

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

RECEIVED

MAY 29 2013

S.C. Supreme Court

Op. No. 4826 (S.C. Ct. App. refiled June 23, 2011)

Case Tracking No. 2011-195907

C-Sculptures, LLC, Respondent,

v.

Gregory A. Brown and Kerry W. Brown, Petitioners.

MOTION FOR COSTS

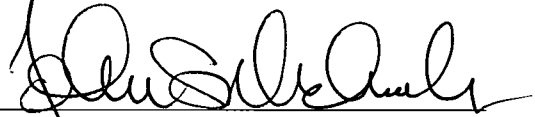
Pursuant to Rule 240 and 242(j), SCACR, Petitioners Gregory A. Brown and Kerry W. Brown requests that the costs of this appeal be taxed against C-Sculptures, LLC.

Rule 242(j) provides that unless the court orders otherwise or the parties agree otherwise, costs shall be taxed against the respondent when this Court's decision has the effect of reversing the judgment of the lower court that was reviewed by the Court of Appeals. This Court's opinion reversed the judgment of the circuit court, and C-Sculptures, LLC was the appellant in the proceedings at the Court of Appeals. Because the Court has not ordered otherwise and the parties have not agreed otherwise, the rule provides the Court should award costs to Petitioners.

In accordance with the instructions of Rule 242(j)(4), an itemized statement of costs is attached to this motion.

May 29, 2013

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John S. Nichols", written over a horizontal line.

John S. Nichols
BLUESTEIN, NICHOLS, THOMPSON &
DELGADO, LLC

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Attorney for Petitioners

THE STATE OF SOUTH CAROLINA
In The Supreme Court

C-Sculptures, LLC,)
)
Respondent,)
)
v.)
)
Gregory A. Brown and)
Kerry W. Brown,)
)
Petitioners.)
_____)

The Appellate Court is requested to tax the following costs against

C-Sculptures, LLC (Respondent)				
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	527	\$.085 per page (plus \$2.45 tax)	\$47.35	
Cost of Printing or Copying Final Reply Brief	153	\$.16 per page (plus \$2.45 tax)	\$27.55	
Cost of Printing or Copying Record on Appeal	2400	\$.13 (plus \$21.77 tax)	\$332.77	
Filing Fee Paid Under Rule 203(d), SCACR		\$100.00	\$100.00	
Cost of Court Reporter's Transcript				
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00	
Other (specify and explain):				

COSTS TAXABLE UNDER RULE 242(j), SCACR				
Cost of Printing or Copying Brief	432	\$.10 per page (plus \$5.19 tax)	\$48.39	
Cost of Printing and Copying Reply Brief	255	\$.213 (plus \$3.88 tax)	\$58.19	
Cost of Printing or Copying Appendix	2,764	\$.145 per page (plus \$25.95 tax)	\$426.73	
Filing fee paid under Rule 242(c), SCACR			\$100.00	
Attorney's fee provided by Rule 242(j)(2), SCACR			\$1,000.00	
Other (specify and explain):				
		TOTAL	\$3,140.98	

I, JOHN S. NICHOLS, do swear or affirm that the forgoing costs are correct and were necessarily incurred in this action. A copy of this statement was (mailed to/served upon) opposing counsel.



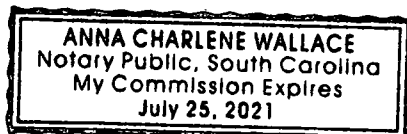
(Signature)

Attorney for Petitioners

Subscribed and sworn before me this 29th day of May, 2013.

Anna Charlene Wallace

Notary Public for Richland County, SC
My Commission Expires: 7/25/21



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394 S.C. 519, 716 S.E.2d 678 (Ct. App. 2011)

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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondent with a copy of the *Motion for Costs* by depositing a copy in the United States Mail, postage prepaid to the following address:

Donald Ryan McCabe, Jr., Esquire
Brian C. Gambrell, Esquire
Stephanie C. Trotter, Esquire
Rogers Townsend & Thomas, PC
P.O. Box 100200
Columbia, SC 29202



Erin Bridges
BLUESTEIN, NICHOLS, THOMPSON
& DELGADO, LLC

May 29, 2013
Columbia, South Carolina