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Sep 28 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

J.Cordell Maddox, Jr, Judge

Case No. 2017-CP-04-02099
Appellate Case No. 2020-000421

John Harbin.....Appellant,

vs.

April Blair, Tracy Dunn, HUB Enterprises, Inc.,
Shawn Conway, Gallivan White & Boyd,
Sam Nikopoulos, and John Doe,..... Respondents,

RESPONDENTS' MOTION TO TAX COSTS

The Respondents Gallivan White & Boyd, PA and Sam Nikopoulos, hereby move to tax costs against the Appellant pursuant to Rule 222 of the *South Carolina of Appellate Court Rules*. The undersigned affirms that the below are the recoverable costs incurred by the Respondents on appeal, and requests that such costs be taxed against the Appellant.

Attorneys' fees allowed by Rule 222	\$2,500.00 ¹
Total	\$2,500.00

¹ Respondents are not seeking printing costs as the briefing was submitted electronically during the COVID-19 Pandemic.

s/Jessica W. Laffitte

A. Johnston Cox (S.C. Bar 9081)

Jessica W. Laffitte (S.C. Bar 100256)

GALLIVAN, WHITE & BOYD, P.A.

Post Office Box 7368

Columbia, SC 29202

(803) 779-1833

September 28, 2022

Attorneys for Respondents

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Sam Nikopoulos, and John Doe, Respondents,

PROOF OF SERVICE

I, the undersigned employee of Gallivan, White & Boyd, P.A., do hereby certify that I have caused the below referenced to be served via email to all parties of record at the address(es) shown below.

Parties of Record

Ms. Jenny Abbott-Kitchings ctappfilings@sccourts.org

Attorneys for Appellant John Harbin

Mr. Donald Smith attorneydonaldsmith@gmail.com

Attorneys for Respondents Shawn Conway and HUB Enterprise, Inc.

Mr. Robert Wilder Hart wharte@richardsonplowden.com
Mr. Steven James Pugh spugh@richardsonplowden.com

Attorney for Respondent April Blair

Mr. James P. Walsh

jwalsh@clarksonwalsh.com

For Defendant Tracy Dunn

A copy of this Motion is served upon Defendant Tracy Dunn, by and through the Office of General Counsel, at his last known address at the South Carolina Department of Corrections, Post Office Box 21787, Columbia, SC 29221-1787, by depositing a copy of it in the United States Mail, postage prepaid, on September 28, 2022.

s/Jessica W. Laffitte

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