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**Oct 05 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas

J. Cordell Maddox, Jr., Circuit Court Judge

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C.A. No.: 2017-CP-04-02099  
Appellate Case No. 2020 - 000421

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John Harbin,

Appellant,

v.

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

Respondents.

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**RESPONDENTS HUB ENTERPRISES, INC. AND SHAWN CONWAY'S  
MOTION TO TAX COSTS**

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NOW COMES the undersigned, for Respondents HUB Enterprises, Inc. and Shawn Conway, who hereby move to tax costs against the Appellant pursuant to Rule 222 of the South Carolina Appellate Court Rules in the above-captioned matter. The undersigned affirms that the below are the recoverable costs incurred by Respondents HUB Enterprises, Inc. and Shawn Conway on appeal, and request that such costs be taxed against the Appellant.

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

RICHARDSON PLOWDEN & ROBINSON, P.A.  
1900 Barnwell Street (29201)  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400

By: *s/ R. Wilder Harte*  
R. Wilder Harte (SC Bar #101228)

ATTORNEYS FOR RESPONDENTS HUB  
ENTERPRISES, INC. AND SHAWN CONWAY

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**CERTIFICATE OF SERVICE**

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I, the undersigned employee of Richardson Plowden & Robinson, P.A., do hereby certify that I have caused Respondents HUB Enterprises, Inc. and Shawn Conway's Motion to Tax Costs to be served via e-mail on all parties of record at the addresses shown below:

**Parties of Record**

Ms. Jenny Abbott-Kitchings

[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**Attorneys for Appellant John Harbin:**

Mr. Donald Smith

[attorneydonaldsmith@gmail.com](mailto:attorneydonaldsmith@gmail.com)

**Attorneys for Respondents Gallivan, White & Boyd, P.A. and Sam Nikopoulos:**

Mr. A. Johnston Cox

[jcox@gwblawfirm.com](mailto:jcox@gwblawfirm.com)

Ms. Jessica W. Laffitte

[jlaffitte@gwblawfirm.com](mailto:jlaffitte@gwblawfirm.com)

**Attorneys for Respondent April Blair:**

James P. Walsh  
P. Christopher Smith, Jr.

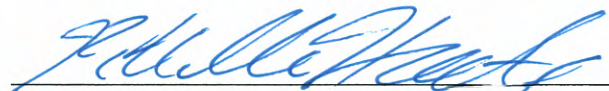
[jwalsh@clarksonwalsh.com](mailto:jwalsh@clarksonwalsh.com)  
[csmith@clarksonwalsh.com](mailto:csmith@clarksonwalsh.com)

**For Respondent Tracy Dunn:**

A copy of this Motion is served upon Respondent 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, South Carolina 29221-1787, by depositing a copy of it in the United States Mail, postage prepaid, on October 5, 2022.

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Post Office Drawer 7788  
Columbia, South Carolina 29202  
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By:



R. Wilder Harte (SC Bar #101228)

ATTORNEYS FOR RESPONDENTS HUB  
ENTERPRISES, INC. AND SHAWN CONWAY

October 5, 2022



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Direct Dial: (803) 253-8716

October 5, 2022

**VIA E-MAIL at [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

Jenny Abbott Kitchings, Clerk  
The South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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RE: *John Harbin v. April Blair; Tracy Dunn; HUB Enterprises, Inc.; Shawn Conway; Gallivan, White & Boyd; Sam Nikopoulos; and John Doe*  
Appellate Case No. 2020-000421  
Our File No. 9178-001

Dear Ms. Kitchings:

Please find attached Respondents HUB Enterprises, Inc. and Shawn Conway's Motion to Tax Costs and Itemized Statement of Costs, along with a Certificate of Service, for filing in the above-referenced matter. By copy of this letter, Respondent Tracy Dunn is being served with same.

Our firm check 106946 in the about of Fifty and No/100 (\$50.00) Dollars in payment of the filing fee is being mailed today via U.S. Mail.

Should you have any questions or comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "R. Wilder Harte".

R. Wilder Harte

RWH:cam  
Attachments