

RECEIVED

Oct 11 2022

SC Court of Appeals

**STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM THE FIRST JUDICIAL CIRCUIT
Honorable Kristi L. Harrington, Presiding

Case No. 2016-CP-18-00838
Appellate Case No. 2018-001262

Dorchester County Taxpayers Association, individually, and on behalf of all others similarly situated; Weatherstone Property Owners Association, individually, and on behalf of all others similarly situated, George Resnick; William A. Harbeson; James Stephen Green, Jr.; Homer P. Gonazales; Gerald E. Ziegler; David Messinger; and South Carolina Public Interest Foundation Appellants,

v.

Dorchester County; Dorchester County Council; David Chinnis, George Bailey, Jay Byars, Willie Davis, Carroll S. Duncan, Larry Hargett and William R. Hearn, Jr., in their official capacities as members of Dorchester County Council; Town of Summerville; Summerville Town Council; William E. McIntosh III, in his official capacity; Dorchester County Sheriff; Luther C. Knight, in his official capacity; Dorchester School District Two; Dorchester School District Two Board of Trustees; Joseph R. Pye, Justin Farnsworth, Gail Hughes, Brian Mitchum, Tanya Robinson, Sam Clark, Barbara Crosby and Lisa Tupper, in their official capacities; Dorchester County School District Four; Dorchester County School District Four Board; Dorchester County Career and Technology Center; and Dorchester County Career and Technology Center Board of Trustees Respondents.

**MOTION FOR COSTS OF RESPONDENTS
DORCHESTER COUNTY SCHOOL
DISTRICT FOUR AND DORCHESTER
COUNTY SCHOOL DISTRICT BOARD**

The Respondents Dorchester County School District Four and Dorchester County School District Board move to be awarded costs against the Appellants in the above-referenced appeal under Rule 222, SCACR. The Respondents' Motion is based on this Court's affirmance of the judgment on appeal by Opinion No. 2021-UP-312 filed September 1, 2021. The Remittitur was issued on September 8, 2022. The Respondents incurred \$2,602.92 in taxable attorney's fees and

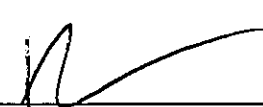
costs in this matter. A sworn, itemized statement of these costs is attached. Accordingly, the County Respondents respectfully request that the Court award them \$2,602.92 in fees and costs pursuant to Rule 222, SCACR.

Kenneth A. Davis

P.O. Box 11844
Columbia, South Carolina 29211
Telephone: 803-254-0707
Facsimile: 803-254-5609

Attorneys for Defendants Dorchester County
School District Four & Dorchester County
School District Four Board

By: _____


Charles J. Boykin, Esq. (SC Bar 65149)
Kenneth A. Davis, Esq. (SC Bar 66416)
Tierney F. Goodwyn, Esq. (SC Bar 102035)

P.O. Box 11844
Columbia, South Carolina 29211
Telephone: 803-254-0707
Facsimile: 803-254-5609

Attorneys for Respondents Dorchester County
School District Four & Dorchester County
School District Four Board

October 11, 2022
Columbia, South Carolina

RECEIVED

Oct 11 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE FIRST JUDICIAL CIRCUIT
Dorchester County Court of Common Pleas
Honorable Kristi L. Harrington, Presiding

Case No. 2016-CP-18-00838
Appellate Case No. 2018-001262

Dorchester County Taxpayers Association, individually, and on behalf of all others similarly situated; Weatherstone Property Owners Association, individually, and on behalf of all others similarly situated, George Resnick; William A. Harbeson; James Stephen Green, Jr.; Homer P. Gonzales; Gerald E. Ziegler; David Messinger; and South Carolina Public Interest Foundation Appellants,

v.

Dorchester County; Dorchester County Council; David Chinnis, George Bailey, Jay Byars, Willie Davis, Carroll S. Duncan, Larry Hargett and William R. Hearn, Jr., in their official capacities as members of Dorchester County Council; Town of Summerville; Summerville Town Council; William E. McIntosh III, in his official capacity; Dorchester County Sheriff; Luther C. Knight, in his official capacity; Dorchester School District Two; Dorchester School District Two Board of Trustees; Joseph R. Pye, Justin Farnsworth, Gail Hughes, Brian Mitchum, Tanya Robinson, Sam Clark, Barbara Crosby and Lisa Tupper, in their official capacities; Dorchester County School District Four; Dorchester County School District Four Board; Dorchester County Career and Technology Center; and Dorchester County Career and Technology Center Board of Trustees..... Respondents.

CERTIFICATE OF SERVICE

The undersigned of Boykin & Davis, LLC., hereby certifies that he has served the following counsel of record with the foregoing **Motion for Costs**, by personally serving the same pursuant to Section (d)(1) of the Supreme Court’s Order dated May 6, 2022, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable) on this 11th day of October 2022.

W. Andrew Gowder, Jr., Esq.
Pratt-Thomas Walker, P.A.
1629 Meeting Street Road
Charleston, SC 29405
andy@austengowder.com

Michael T. Rose, Esq.
Mike Rose Law Firm, PC
406 Central Avenue
Summerville, South Carolina 29483
Mrose5@sc.rr.com

David L. Morrison, Esq.
Morrison Law Firm, LLC
7453 Irmo Drive, Suite B
Columbia, South Carolina 29212
david@dmorrison-law.com

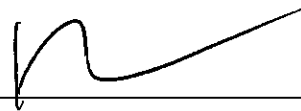
Carmen V. Ganjehsani, Esq.
Drew Hamilton Butler, Esq.
Anthony E. Rebollo, Esq.
Richardson, Plowden, Carpenter &
Robinson, P.A.
P.O. Drawer 7788
Columbia, South Carolina 29202

cganjehsani@RichardsonPlowden.com
dbutler@richardsonplowden.com
trebollo@richardsonplowden.com

Thomas K. Barlow, Esq.
Halligan, Mahoney & Williams
P.O. Box 11367
Columbia, SC 29211-1367
tbarlow@childs-halligan.net

Erik P. Doerring, Esq.
Robert L. Widener, Esq.
Kenneth P Woodington, Esq.
McNair Law firm, P.A.
P.O. Box 11390
Columbia, SC 29211
edoerring@mcnair.net
rwidener@burr.com
kwoodington@dml-law.com

William H. Davidson, Esq.
Davidson & Lindemann PA
P.O. Box 8568
Columbia, SC 29202
wdavidson@dml-law.com



Charles J. Boykin, Esq. (SC Bar 65149)
Kenneth A. Davis, Esq. (SC Bar 66416)
Tierney F. Goodwyn, Esq. (SC Bar 102035)

Attorneys for Dorchester County School
District Four and Dorchester County
School District Board

BOYKIN & DAVIS, LLC

Attorneys and Counselors at Law

220 STONERIDGE DRIVE, SUITE 100
COLUMBIA, SOUTH CAROLINA 29210

TELEPHONE: 803-254-0707
FACSIMILE: 803-254-5609

POST OFFICE BOX 11844
COLUMBIA, SOUTH CAROLINA 29211

Kenneth A. Davis
kavis@boykinlawsc.com

October 11, 2022

RECEIVED

Oct 11 2022

VIA HAND-DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
1220 Senate Street
Columbia, South Carolina 29211

SC Court of Appeals

Re: Dorchester County Taxpayers Association, et al. v. Dorchester County, et al.
Lower Court C.A. No.: 2016-CP-18-00838
Appellate Case No. 2018-001262

Dear Ms. Kitchings:

Enclosed herewith for filing please find the Motion for Costs of Respondents Dorchester County School District Four and Dorchester County School District Board, along with the Certificate of Service and filing fee of \$50.00. We are filing the Motion electronically with the court and serving all parties of record a copy of same.

Thank you for your assistance in this matter.

Sincerely,


Kenneth A. Davis

/hhg/aeg

Enclosures

cc: W. Andrew Gowder, Jr., Esq. (Via Electronic Mail w/encls.)
Michael T. Rose, Esq. (Via Electronic Mail, w/encls.)
David L. Morrison, Esq. (Via Electronic Mail, w/encls.)
Drew Hamilton Butler, Esq. (Via U. S. Mail, w/encls.)
Anthony E. Rebollo, Esq. (Via Electronic Mail, w/encls.)
Carmen V. Ganjehsani, Esq. (Via Electronic Mail, w/encls.)
Erik P. Doerring, Esq. (Via Electronic Mail, w/encls.)
Thomas K. Barlow, Esq. (Via Electronic Mail, w/encls.)
William H. Davidson, Esq. (Via Electronic Mail, w/encls.)
Charles J. Boykin, Esq. (w/o encls.)
Tierney F. Goodwyn, Esq. (w/o encls.)