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THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

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APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

NOV 09 2022

SC Court of Appeals

Michael G. Nettles, Circuit Court Judge

CASE NO. 2018-CP-21-02958
APPEAL NO. 2019-001370

Walter ParkerAppellant

v.

John C. Curl Respondent

v.

Palmetto Flooring Covering Installation, LLC
and Florence Custom Countertops, Inc.....Third-Party Defendants.

MOTION FOR COSTS UNDER RULE 222, SCACR

Jeffrey L. Payne, Esq.
J. René Josey, Esq.
TURNER, PADGET, GRAHAM & LANEY, P.A.
Post Office Box 5478
Florence, SC 29502-5478
843-656-4451 (Telephone)
843-413-5818 (Fax)
JJosey@TurnerPadget.com (Email)

ATTORNEYS FOR RESPONDENT

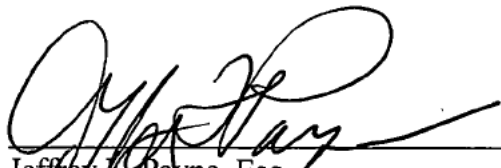
Other Counsel:

Williams Reynolds, Esq.
WILLCOX, BUYCK AND WILLIAMS, P.A.
P.O. Box 1909
Florence, SC 29503
(843) 662-3258

Attorneys for the Appellant

Respondent moves, pursuant to Rule 222, SCACR, for an award of costs and attorney's fees incurred in defending this appeal. Rule 222(a) provides that, unless otherwise ordered or agreed upon by the parties, costs shall be taxed against the Appellant when the appeal is dismissed. Rule 222(b), SCACR, entitles the prevailing party on appeal to recover costs actually incurred in responding to an appeal including an attorney's fee award of Two Thousand Five Hundred and 00/100 (\$2,500.00) Dollars. Accordingly, Respondents ask the Court to award them Two Thousand Six Hundred Fourteen and no/100 (\$2,614.00) Dollars in costs and attorney's fees under Rule 222(b), SCACR. In support of our motion, we have attached an Itemized Statement of Costs, pursuant to Rule 222(b), SCACR.

November 7, 2022



Jeffrey C. Payne, Esq.
J. René Josey, Esq.
TURNER, PADGET, GRAHAM & LANEY, P.A.
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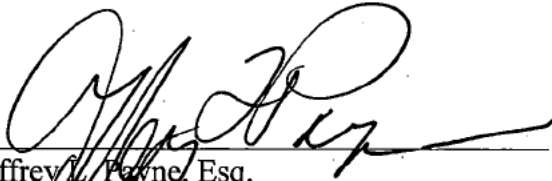
Palmetto Flooring Covering Installation, LLC
and Florence Custom Counterops, Inc.....Third-Party Defendants.

Other Defendants.

PROOF OF SERVICE

I certify that I have served a copy of the Motion for Costs and Itemized Statements of Costs by depositing copies of the same in the United States mail, postage prepaid, on Nov. 7, 2022, to all counsel of record at the following addresses:

Williams Reynolds, Esq.
WILLCOX, BUYCK AND WILLIAMS, P.A.
P.O. Box 1909
Florence, SC 29503


Jeffrey L. Payne, Esq.
J. Rene Josey, Esq.
TURNER, PADGET, GRAHAM & LANEY, P.A.
Post Office Box 5478
Florence, SC 29502-5478
843-656-4451 (Telephone)
JJosey@TurnerPadget.com (Email)

ATTORNEYS FOR RESPONDENT

Turner Padget

REPLY TO:

Jeffrey L. Payne

JPayne@TurnerPadget.com
Writer's Direct Dial: (843) 656-4432
Direct Fax: (843) 413-5825

November 7, 2022

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

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NOV 09 2022

SC Court of Appeals

Re: Walt Parker v. John C. Curl
Appellate Case No.: 2019-001370
Our File No.: 4009.106

Dear Ms. Kitchings:

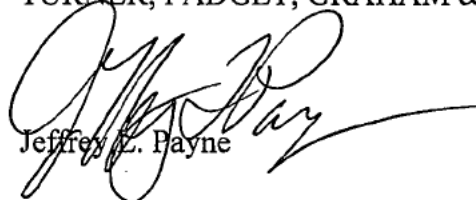
Please find enclosed the original and six (6) copies each of the Motion to Award Costs Under Rule 222, SCACR and Itemized Statement of Costs regarding the above referenced matter. We have also enclosed the original and one copy of the Proof of Service regarding the same.

We would respectfully request that you file the enclosed documents and return a clocked copy of the Motion to Award Costs Under Rule 222, SCACR, Itemized Statement of Costs and Proof of Service to us in the self-addressed stamped envelope, which is enclosed. Also enclosed you will find my firm's check in the amount of \$50.00 to the cover the fee associated with this request.

By copy of this letter with enclosures to counsel for appellant, William Reynolds Williams, Esquire, I am herewith serving him with copies of the same.

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.


Jeffrey L. Payne

JLP/alb
Enclosures
cc: John Curl
Reynolds Williams, Esquire



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P.O. Box 5478, Florence, SC 29502

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The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
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Columbia, SC 29211

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