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**Dec 22 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Honorable William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2022-000498  
Case No. 2015-CP-26-05573

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K.A. Diehl and Associates, Inc.,

Respondent,

v.

James Perkins, Colleen Franke a/k/a Colleen Franke Perkins,  
Mark Dos Santos, Nancy Moore, William Moore, Steven Dame,  
and Errol Dos Santos,

Defendants,

Of whom Mark Dos Santos is the

Petitioner.

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**MOTION FOR COSTS**

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Respondent K.A. Diehl and Associates, Inc. now moves pursuant to Rules 222 and 242(j), SCACR, for assessment of costs against the Petitioner Mark Dos Santos in this matter. A sworn, itemized statement of the recoverable costs incurred in this matter accompanies this motion.

**BURR & FORMAN LLP**



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Myrtle Beach, South Carolina

December 22, 2022

***Attorneys for Respondent K.A. Diehl & Associates,  
Inc.***

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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Honorable William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2018-002009  
Case No. 2015-CP-26-05573

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K.A. Diehl and Associates, Inc.,

Respondent,

v.

James Perkins, Colleen Franke a/k/a Colleen Franke Perkins,  
Mark Dos Santos, William Moore, Steven Dame  
and Errol Dos Santos,

Defendants,

Of whom Mark Dos Santos is the

Appellant.

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**PROOF OF SERVICE**

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*Attorneys for the Respondent*

I, Henrietta U. Golding, of Burr & Forman LLP, attorney for the Respondent, hereby certify that the foregoing **RESPONDENT'S MOTION FOR COSTS AND ITEMIZED STATEMENT OF COSTS** was served on Appellant on December 22, 2022, via email (see attached), to counsel of Record for Appellant:

Russell G. Hines, Esquire  
D. Jay Davis, Jr., Esquire  
Clement Rivers, LLP  
Post Office Box 993  
Charleston, SC 29401  
Email: [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com)  
[jdavis@ycrlaw.com](mailto:jdavis@ycrlaw.com)

Respectfully submitted,

BURR & FORMAN LLP

By:   
Henrietta U. Golding, SC Bar #2173  
James K. Gilliam, SC Bar #76695

*Attorneys for the Respondent*

Myrtle Beach, South Carolina

December 22, 2022

## Evans, Sheila

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**From:** Evans, Sheila  
**Sent:** Thursday, December 22, 2022 1:47 PM  
**To:** 'RHines@ycrlaw.com'  
**Cc:** jdavis@ycrlaw.com; 'pbell@ycrlaw.com'; Voegel, Taylor; Gilliam, James; Golding, Henrietta  
**Subject:** K.A. Diehl v. Perkins; Appellate Case No. 2018-002009/2063741.0000002  
**Attachments:** 221222 Letter to COA encl Motion for Costs & Itemized Statement of Costs.pdf; 221222 Respondent's Motion for Costs & Itemized Statement of Costs.pdf; 221222 Proof of Service (Motion for Costs & Itemized Statement of Costs).pdf

Good Afternoon Mr. Hines,

Attached please find the following documents:

1. Copy of letter to the Court of Appeals of today's date.
2. Respondent's Motion for Costs and Itemized Statement of Costs.
3. Proof of Service.

Sheila

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Dec 22 2022

SC Court of Appeals

BURR & FORMAN LLP  
results matter

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December 22, 2022

**VIA EMAIL: CTAPPFILINGS@SCCOURTS.ORG**

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

Re: **K.A. Diehl and Associates, Inc. v. James Perkins, Colleen Franke a/k/a Colleen Franke Perkins, Mark Dos Santos, Nancy Moore, William Moore, Steven Danne, and Errol Dos Santos, of Whom Mark Dos Santos is the Appellant**  
**Appellate Case No. 2018-002009**  
**Case No. 2015-CP-26-05573**  
**Our Client Matter No. 2063741.0000002**

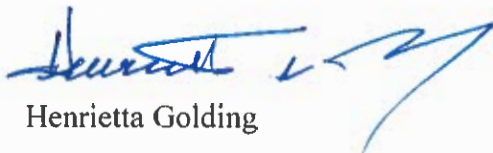
Dear Ms. Kitchings:

Please find attached for filing Respondent's Motion for Costs, Itemized Statement of Costs, and Proof of Service with regard to the above referenced appeal. These documents are being filed via electronic mail and the required filing fee of \$50.00 is being placed in the mail.

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

Very truly yours,

Burr & Forman LLP



Henrietta Golding

HUG/sae  
Enclosure

Jenny Abbott Kitchings, Clerk of Court  
December 22, 2022  
Page 2

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cc: Client (*via email only*)  
Russell G. Hines, Esquire (*via email only*)  
D. Jay Davis, Jr., Esquire (*via email only*)