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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM KERSHAW COUNTY
Court of Common Pleas

JAN 20 2023

SC Court of Appeals

Robert E. Hood, Circuit Court Judge

Opinion 5959 (S.C. Ct. App. filed January 11, 2023)
Appellate Case No.: 2019-000624

Dottie R. Bell.....Petitioner,

v.

John C. Bentley.....Respondent.

PETITIONER’S MOTION FOR AWARD OF ATTORNEY’S FEES AND COSTS

Pursuant to Rule 222, SCACR, the Petitioner moves the Court to tax the costs of this appeal against the Respondent and in support of its motion shows the Court the following:

1. This Court filed an Order dated January 11, 2023 reversing the decision of the Circuit Court that it abused its discretion in denying Bell’s Motion to substitute.
2. Pursuant to Rule 222(a), SCACR, costs shall be taxed against the Respondent when the decision is reversed.
3. As shown in the attached Petitioner’s Itemized Statement of Costs, Petitioner has incurred allowed costs and attorney’s fees in the amount of \$3,120.29.

WHEREFORE, Petitioner hereby requests that the Court grant its Motion for Attorney's fees and Costs in the amount of \$3,120.29 as shown on the attached sworn itemization of costs.

Respectfully submitted,

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr.
2309 Devine Street
Columbia, SC 29205
(803) 251-4517
(803) 251-4527 facsimile
Attorney for Petitioner

Columbia, South Carolina
January 20, 2023

THE STATE OF SOUTH CAROLINA
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APPEAL FROM KERSHAW COUNTY
CIRCUIT COURT

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SC Court of Appeals

Opinion No. 5959 (S.C. Ct. App. filed January 11, 2023)
Appellant Case No.: 2019-000624

Dottie R. Bell.....Petitioner,

v.

John C. Bentley,.....Respondent.

PROOF OF SERVICE

I certify that I have served a copy of the **Petitioner’s Motion for Award of Attorney’s Fees and Costs and Petitioner’s Itemized Statement of Costs** upon Sarah Rand-McDaniel, Esquire and Seth Thomas McDaniel, Esquire, Counsel for the Respondent, at the address below by depositing a copy of same in the United States Mail, postage prepaid, on **January 20, 2023**.

Sarah Rand-McDaniel, Esquire
Seth Thomas McDaniel, Esquire
Walker Allen Grice Ammons & Foy, LLP
P.O. Box 1068
Mt. Pleasant, SC 29465

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr.
2309 Devine Street
Columbia, SC 29205
(803) 251-4517
jgoodwyn@goodwynlaw.com
Attorney for Petitioner

January 20, 2023

T. Jeff Goodwyn, Jr.*†
Charles G. Blackburn**
Jefferson D. Turnipseed**

GOODWYN LAW FIRM, LLC

2309 Devine Street
Columbia, South Carolina 29205

Tel. (803) 251-4517
Fax (803) 251-4527

Email: JGoodwyn@Goodwynlaw.com
Web: www.GoodwynLaw.com

*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

January 20, 2023

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JAN 20 2023

SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: *Dottie R. Bell v. John C. Bentley*
Appellate Case No.: 2019-000624
Opinion No. 5959 (S.C. Ct. App. filed January 11, 2023)
Our File No.: 8000-0260

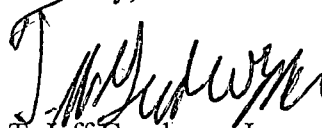
Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of **Petitioners' Motion for Award of Attorney's Fees and Costs and Petitioner's Itemized Statement of Costs** along with a Proof of Service for filing in the above matter. Also, enclosed is a check in the amount of \$50.00 for the filing fee. Please file the Original with the Court and return a clocked copy to me in the self-addressed stamped envelope provided.

By copy of this letter, I am serving a copy of same upon counsel for the Respondent as listed below.

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

Sincerely,


T. Jeff Goodwyn, Jr.

TJG
Enclosures

cc: Dottie Bell
Sarah Rand-McDaniel, Esquire
Seth Thomas McDaniel, Esquire