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Mar 10 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
In the Court of Common Pleas for the Thirteenth Circuit

Alex Kinlaw, Jr., Circuit Court Judge

Appellate Case No.: 2019-001707

George H. Brock, Appellant,

v.

Kris Langville, Individually, and d/b/a Preferred Paralegals, LLC; Donna Carlson;
Jeremy Marsh, Individually, and d/b/a The Techknow Dude, LLC; and
Katherine Jernigan,Defendants,

Of Which

Kris Langville, Individually, and d/b/a Preferred Paralegals, LLC;
Donna Carlson; and Katherine Jernigan are the Respondents.

**RETURN TO RESPONDENTS'
MOTION TO TAX COSTS**

Appellant George H. Brock ("Brock"), by and through undersigned counsel,
hereby submits the following Return to Respondents' Motion to Tax Costs filed
March 3, 2023:

Fees and costs on appeal are governed by Rule 222, SCACR. Respondents
submit an itemized statement of costs, listing no costs necessarily incurred, but
solely requesting attorney's fees.

“Notably, it is within th[e] Court’s discretion whether to award fees and costs under Rule 222.” Austin v. Stokes-Craven Holding Corp., 406 S.C. 187, 199, 750 S.E.2d 78, 84 (2013) (Beatty, J.).

In this matter, Respondents’ counsel filed three (3) motions for extension of time. No other documents were filed, including any brief. Ultimately, the Clerk of Court issued the following correspondence as part of the record in this case:

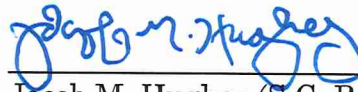
Pursuant to the Court’s order dated November 23, 2020, the time for serving and filing the respondents’ initial brief and designation of matter has expired. Within thirty (30) days of the date of this letter, appellant may proceed with serving the record on appeal and only the appellant’s brief will be considered in this appeal.

The case was submitted during the October 2022 term without oral argument. Respondents’ counsel now requests \$2,500 in attorney’s fees.

In light of these circumstances and the case history, Brock opposes Respondents’ request for attorney’s fees and respectfully asserts that no costs or fees should be awarded in this matter. See Austin, 406 S.C. at 199, 750 S.E.2d at 84 (“It is within th[e] Court’s discretion whether to award fees . . . under Rule 222.”).

Therefore, Brock respectfully requests that the Court deny Respondents’ Motion to Tax Costs.

Respectfully Submitted,



Jacob M. Hughes (S.C. Bar #100646)
HUGHES LAW FIRM, L.L.C.
403 Church Street
Beaufort, South Carolina 29902
(864) 569-2498

March 10, 2023
Beaufort, South Carolina

Attorney for Appellant George H. Brock

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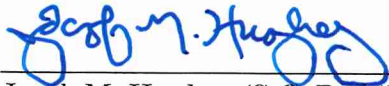
Of Which

Kris Langville, Individually, and d/b/a Preferred Paralegals, LLC;
Donna Carlson; and Katherine Jernigan are the..... Respondents.

CERTIFICATE OF SERVICE

I certify that on March 10, 2023, I served the foregoing Return to Respondents' Motion to Tax Costs upon all other counsel of record, via electronic service using the lawyer's primary e-mail as listed in the Attorney Information System (AIS), pursuant to the South Carolina Supreme Court's May 6, 2022 Amended Order, as follows:

Kenneth E. Norsworthy, Jr., Esquire
218 Trade Street, Suite D
Greer, South Carolina 29651
E: ken@norsworthyfirm.com
Attorney for Respondents



Jacob M. Hughes (S.C. Bar #100646)

March 10, 2023
Beaufort, South Carolina

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SC Court of Appeals

HUGHES LAW FIRM, L.L.C.

March 10, 2023

VIA ELECTRONIC MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211
E: ctappfilings@sccourts.org

RE: *George H. Brock v. Kris Langville, et al.*
Appellate Case No.: 2019-001707

Dear Madame Clerk:

Enclosed herein for filing is Appellant's Return to Respondents' Motion to Tax Costs in this matter.

By copy of this letter, I have served all other counsel of record, as indicated in the Certificate of Service.

With kindest regards, I am

Sincerely,



Jacob M. Hughes

Enclosures

cc (w/ enclosures): Kenneth E. Norsworthy, Jr., Esquire (via electronic mail)