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Mar 22 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Appellate Case No. 2018-001766

Charleston Development Company, LLC, Charleston Housing Company, LLC and NotSo Hostel, LLC, Appellants,

v.

Younesse Alami, Simon M. Adell, Matthew Anderson, Matthew Asher, Daniel Baker, Marie Baker, Matthew and Christina Bare, Andre Bauer, Peter Bierce, Brandon Blount, Barbara Brass, Richard T. Brewer, Sigrid Anne Eilertson, Reginald P. Brown IV, Mary Cahill, Ryan Cockrell, Kevin and Virginia Conlon, Anne Marie Crevar, Christina Cross, Darryl J. Damico, Labar Daniel, Stephen Darwak, Lindsay Davenport, Mary Dickerson, Maxwell Streeter, Kathleen Dougherty, David Dressman, Anna Dressman, Michael Elder, Christopher Scott Farley, Michele Ghastin, Timnah Giller, Virginia Geller, Ryan Gilreath, Sonya Gilreath, Kimberly Glenn, Shaun Halsor, Josephine Rex, Arthur Halvorson, Andrew Halvorson, Linda Hancock, Laura Hyatt, Mike Hartel, Nathan Herring, James Hicks, Jr., Laurie Hicks, Preston G. Hipp, Colin Jones, Matthew F. Jones, Robert C. Jones, Robin Joseph, Molly Keeler, John Kenny, Mandi Walters, Abigail King, Aaron Kless, Laurie Kramer, Robert Kramer, Allison Kreutzer, Benjamin Levitt, Richard Levitt, Jesse Lutz, Nikou Manouchehri, Thomas Naselaris, Zoe Naselaris, Beau O'Steen, Cori O'Steen, Lance Parr, Brandon Perdue, Amanda Lee Raymer, Hadassah Rothenberg, Daniel Ryan, Kimberly Bowlin, Kevin Schnittker, Ginger Scofield, Inderjit Singh, Avtar Singh, Alecia Stevens, Lee Stevens, Justin Swan, Merrick Teichman, John Van Vlack, Jr., William Waterhouse, Jennifer Waterhouse, Anne Wohlfeil, Bryan Young, AJB Trust, Anthony & Jacqueline Bradley, Trustees, Hartshorn Family Trust, Helene Kenny / Bridget Denny Revocable Trust, Wilhelmina M. Wieters Life Estate Childrens Trust, 33 Bogard Street LLC, 249 Cumming, LLC, 253 Coming Street LLC, 259 East Bay LLC, 259 East Bay 10 B LLC, 272 D Coming St. LLC, Café International, Inc., Corner At Old Canton, LLC, Geer Interests LLC, Kit Properties LLC, Lambert-Weiss LLC, The

Naws LLC, New Lease Capital LLC, One Henrietta LLC, Periwinkle Partners, LLC, Porch Properties LLC, Westbury Properties, LLC, and Westendorff Hardware LLC,

Of whom,

Younesse Alami, Simon M. Adell, Matthew Anderson, Matthew Asher, Andre Bauer, Peter Bierce, Brandon Blount, Reginald P. Brown IV, Mary Cahill, Ryan Cockrell, Kevin and Virginia Conlon, Anne Marie Crevar, Darryl J. Damico, Stephen Darwak, Lindsay Davenport, Kathleen Dougherty, David Dressman, Anna Dressman, Michael Elder, Christopher Scott Farley, Michele Ghastin, Ryan Gilreath, Sonya. Gilreath, Shaun Halsor, Josephine Rex, Laura Hyatt, Nathan Herring, James Hicks, Jr., Laurie Hicks, Preston G. Hipp, Colin Jones, Matthew F. Jones, Robert C. Jones, Robin Joseph, Molly Keeler, John Kenny, Abigail King, Aaron Kless, Laurie Kramer, Robert Kramer, Allison Kreutzer, Jesse Lutz, Thomas Naselaris, Zoe Naselaris, Beau O'Steen, Cori O'Steen, Lance Parr, Brandon Perdue, Hadassah Rothenberg, Daniel Ryan, Kimberly Bowlin, Kevin Schnittker, Ginger Scofield, Alecia Stevens, Justin Swan, Merrick Teichman, John Van Vlacic, Jr., William Waterhouse, Jennifer Waterhouse, Anne Wohlfeil, Bryan Young, Helene Kenny / Bridget Denny Revocable Trust, 259 East Bay LLC, 259 East Bay 10 B LLC, Corner At Old Canton, LLC, Kit Properties LLC, The Naws LLC, One Henrietta LLC, Periwinkle Partners, LLC, Porch Properties LLC, Westbury Properties, LLC, and Westendorff Hardware LLC, are

Respondents.

The Appellate Court is requested to tax the following costs against Charleston Development Company, LLC, Charleston Housing Company, LLC and NotSo Hostel, LLC.

Costs Taxable under Rule 222 (b), SCACR	No. of Pages	Rate	Requested	Allowed
Attorney Fees provided by Rule 222 (b), SCACR			\$882.72	

SIGNATURE BLOCK ON FOLLOWING PAGE

s/ Nancy Bloodgood
Nancy Bloodgood, Esquire
Lucy C. Sanders, Esquire
BLOODGOOD & SANDERS, LLC
242 Mathis Ferry Road, Suite 201
Mt. Pleasant, SC 29464
(843) 972-0313

Counsel for Respondents named below

I, Nancy Bloodgood, do swear or affirm that the foregoing fees are correct and were necessarily incurred in this action. A copy of this statement was mailed to opposing counsel.



Nancy Bloodgood

COUNSEL FOR RESPONDENTS SIMON M. ADELL, MATTHEW ANDERSON, PETER BIERCE, BRANDON BLOUNT, RYAN COCKRELL, KEVIN AND VIRGINIA CONLON, KATHLEEN DOUGHERTY, MICHAEL ELDER, PRESTON G. HIPPI, ROBIN JOSEPH, MOLLY KEELER, JOHN KENNY, BRANDON PERDUE, HADASSAH ROTHENBERG, KEVIN SCHNITTKER, GINGER SCOFIELD, BRYAN YOUNG, AND HELENE KENNY AND BRIDGET DENNY REVOCABLE TRUSTS.

Subscribed and sworn before me this 22nd day of March, 2023.



Notary Public for State of South Carolina

My Commission expires: 12/7/2026

Lucy C. Sanders

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Of whom,

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Respondents.

PROOF OF SERVICE OF MOTIONS FOR COSTS PURSUANT TO RULE 222(b)

Nancy Bloodgood, Esquire
Lucy C. Sanders, Esquire
BLOODGOOD & SANDERS, LLC
242 Mathis Ferry Road, Suite 201
Mt. Pleasant, SC 29464
(843) 972-0313

*COUNSEL FOR RESPONDENTS SONYA AND RYAN
GILREATH
AND
FOR RESPONDENTS SIMON M. ADELL, MATTHEW
ANDERSON, PETER BIERCE, BRANDON BLOUNT,
RYAN COCKRELL, KEVIN AND VIRGINIA CONLON,
KATHLEEN DOUGHERTY, MICHAEL ELDER,
PRESTON G. HIPPI, ROBIN JOSEPH, MOLLY
KEELER, JOHN KENNY, BRANDON PERDUE,
HADASSAH ROTHENBERG, KEVIN SCHNITTKER,
GINGER SCOFIELD, BRYAN YOUNG, AND HELENE
KENNY AND BRIDGET DENNY REVOCABLE TRUSTS.*

I hereby certify that on March 22, 2023, I emailed a copy of Motions for Costs
Pursuant to Rule 222 (b) to the following:

Sean K. Trundy, c/o
Mr. Peyre Thomas Lumpkin
Office of Commission Counsel
1220 Senate Street, Suite 106
Columbia, S.C.
plumpkin@sccourts.org

Counsel for Appellants

And

Lucy C. Sanders, Esquire
lsanders@bloodgoodsanders.com

Mary Lee Briggs, Esquire
marylee@maryleebriggslaw.com

Gregory K. Voight, Esquire
greg@voightlaw.xyz

David B. Marvel, Esquire
dave@marvel.lawyer

Christopher L. Murphy, Esquire
cmurphy@rlaattorneys.com

Daniel C. Boles, Esquire
dan@boleslawfirmllc.com

Mallory Lauren Scheer
scheerm@charleston-sc.gov

Michael Ashley Whitsitt
michael@mongelaw.com

Stafford John McQuillan, III, Esquire
mmcquillan@hsblawfirm.com

Counsel for Respondents

And

The Honorable Jenny Abbott Kitchings
Clerk of Court of Appeals
ctappfilings@sccourts.org



Nancy Bloodgood

Charleston, South Carolina

Date: March 22, 2023



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SC Court of Appeals

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

RE: *Charleston Development Co., LLC et al. v Younesse Alami et al.*
Appellate No.: 2018-001766

Dear Ms. Kitchings,

I am electronically filing two Motions for Costs pursuant to Rule 222(b) SCACR, as well as a Proof of Service. One Motion represents the amount one of my clients contributed towards the appeal which they would like reimbursed. The other Motion is only for attorney fees I incurred which remain unpaid. I am also attaching a copy of the filing fee check in the amount of \$100.00 which I am putting in the mail today. Please let me know if anything else is required.

With kindest regards, I am,

Sincerely,

s/Nancy Bloodgood
Nancy Bloodgood

Enclosure

cc: Sean K. Trundy c/o Mr. Peyre Thomas Lumpkin