

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**RECEIVED**

**Apr 21 2023**

**SC Court of Appeals**

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas  
The Honorable Letitia H. Verdin

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Appellate Case No. 2021-000511

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Raymond A. Wedlake, as a Member of Woodington Homeowners' Association, Inc. and on behalf of all other similarly situated members of Woodington Homeowners' Association, Inc.,

Appellant,

v.

Board of Directors of Woodington Homeowners' Association, Inc., comprised of Mona Craigo, Edward Decker, and Sandra LaCroix; McCabe, Trotter, & Beverly, P.C.; and State Farm Fire and Casualty Company,

Respondents,

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**RESPONDENT MCCABE TROTTER & BEVERLY, PC'S PETITION FOR COSTS**

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Pursuant to Rule 222, SCACR, Respondent McCabe Trotter & Beverly, PC (“MTB”) hereby moves for the taxation of costs against Appellant. In support of this Petition, Respondents would show as follows.

On April 27, 2022, the Court of Appeals issued its opinion (Unpublished Opinion No. 2022-UP-184) affirming the order of the trial court. On June 23, 2022, the Court of Appeals denied Appellant’s petition for rehearing. On July 21, 2022 Appellant filed a Petition for Writ of Certiorari to the Supreme Court. On April 18, 2023 the Supreme Court issued an Order denying Appellant’s Petition for Writ of Certiorari. Remittitur was issued by the Court of Appeals on April

19, 2023.

Pursuant to Rule 222(a), SCACR, “Unless otherwise ordered by the appellate court or agreed by the parties, costs shall be taxed against the appellant when the appeal is dismissed or judgment on appeal is affirmed.” The recoverable amounts include an attorney’s fee in an amount set by Order of the Supreme Court.”<sup>1</sup> Rule 222(b), SCACR. Because the judgement of the trial court was affirmed and Appellant’s Petition for Writ of Certiorari was dismissed, costs are taxable against Appellant pursuant to Rule 222, SCACR, and MTB is entitled to an award of costs. A sworn itemized statement of costs is attached as Exhibit A and incorporated herein by reference.

WHEREFORE, MTB prays that costs and attorney’s fees be taxed against Appellant in the amount of \$2,664.81, as set forth in itemized statement of costs accompanying this motion.

April 21, 2023

/s Stephanie Trotter Kellahan  
Stephanie Trotter Kellahan (SC Bar 77680)  
McCabe Trotter & Beverly, PC  
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**ATTORNEY FOR RESPONDENT MCCABE  
TROTTER AND BEVERLY, PC**

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<sup>1</sup> Currently \$2,500.

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Appellants,

**PROOF OF SERVICE**

I certify that I served Respondent McCabe Trotter & Beverly, PC's Motion for Costs and Itemized Statement of Costs on April 21, 2023 as follows:

**VIA EMAIL**

James Walsh, Esq.  
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**Attorney for Respondents Board of Directors**

**VIA EMAIL**

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**Attorney for Respondent State Farm**

**VIA US MAIL**

Raymond A. Wedlake  
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**Appellant**

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**Attorney for Respondent State Farm**

April 21, 2023

/s Stephanie Trotter Kellahan

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Stephanie Trotter Kellahan  
Shareholder

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Licensed in North Carolina

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Directors**

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**Appellant**

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**Attorney for Respondent State Farm**

**RE: Raymond A. Wedlake v. Board of Directors of Woodington  
Homeowners' Association, et al.  
Appellate Case No. 2021-000511  
MTB File: 20073.00047**

Dear Counsel and Mr. Wedlake,

Enclosed herein please find Respondent's Motion for Costs and Proof of Service of the same.

Sincerely,  
Stephanie Trotter Kellahan