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**Apr 24 2023**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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APPEAL FROM SUMTER COUNTY  
Court of Common Pleas

The Honorable R. Ferrell Cothran, Jr.  
Circuit Court Judge

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Civil Action No. 2020-CP-43-00734

Appellate Case No. 2021-001150

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Ronald L. Jones, Appellant,

v.

Gary A. Jones, Sr., Becky J. Jones, Ima Lee Jones, and Shelley Allsbrooks, Respondents.

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**RESPONDENTS'  
MOTION TO TAX COSTS**

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Respondents Gary A. Jones, Sr., Becky J. Jones, and Shelley Allsbrooks (collectively, "Respondents"), by and through the undersigned counsel, pursuant to Rule 222 of the South Carolina Appellate Court Rules, hereby move this Honorable Court for an Order taxing costs against Appellant Ronald L. Jones (hereinafter, "Appellant").

Appellant filed and served his Notice of Appeal to the Court of Appeals on October 8, 2021. On January 13, 2022, Appellant filed his Initial Brief and Designation of Matter. Respondents filed a Motion to Dismiss on February 4, 2022, contending the interlocutory matter was not immediately appealable. Appellant filed his Return to the Motion to Dismiss on February

14, 2022, and Respondents filed their Reply on February 18, 2022. The Court of Appeals granted Respondents' Motion and dismissed the appeal on March 14, 2022. Thereafter, Appellant filed his Petition for Rehearing on March 25, 2022, and the Court of Appeals denied the same by Order dated May 18, 2022.

Appellant subsequently filed a Petition for Writ of Certiorari on June 15, 2022. Respondents filed their Return on July 11, 2022, and Appellant filed his Reply on July 20, 2022. The Supreme Court denied the Petition for Writ of Certiorari on April 18, 2023. The remittitur was sent to the circuit court on April 24, 2023.

Based on the foregoing, Respondents have incurred costs to defend this matter and would respectfully request that Appellant be ordered to pay the attorneys' fee in the amount set by order of the Supreme Court. The sworn, itemized statement of costs provided under Rule 222(d) of the South Carolina Appellate Court Rules is being filed simultaneously herewith.

*(signature page to follow)*

Respectfully submitted,

**SMITH | ROBINSON**

**Smith Robinson Holler DuBose and Morgan, LLC**

*s/Austin T. Reed*

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**PROOF OF SERVICE**

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I, the undersigned attorney of the law offices of Smith Robinson Holler DuBose and Morgan, LLC, do hereby certify that on April 24, 2023, I have served all counsel in this action with a copy of the pleading(s) hereinbelow in accordance with the Supreme Court's Administrative Order by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System.

**Documents Served:** Motion to Tax Costs and Statement of Costs

**Counsel Served:** Via E-Mail Only

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**Attorneys for Appellant Ronald L. Jones**

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**ATTORNEYS FOR RESPONDENTS**

April 24, 2023

Columbia, South Carolina

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**To:** ["Richard@RLWhitt.law"](#); ["Jeff@RLWhitt.law"](#); ["DWhitt2001@aol.com"](#)  
**Cc:** ["chipmcmillan@playermcmillan.com"](#); [Jon Robinson](#); [Shanon Peake](#); [Dot Faulkenberry](#)  
**Subject:** RE: Jones v. Jones (Appellate Case No. 2021-001150)  
**Date:** Monday, April 24, 2023 2:38:00 PM  
**Attachments:** [image001.png](#)  
[2023.04.24 Respondents" Motion to Tax Costs, 1.pdf](#)  
[2023.04.24 Respondents" Statement of Costs, 1.pdf](#)  
[04.24.23 - Proof of Service - Jones v. Jones, 1.pdf](#)

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Good afternoon,

Please find attached the Respondents' Motion to Tax Costs and Statement of Costs in *Jones v. Jones*, Appellate Case No. 2021-001150, which we are electronically filing with the Court of Appeals today, served on you pursuant to this email.

Thank you,

Austin



**Austin Reed**  
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