

**STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**Appeal from Dorchester County
Court of Common Pleas
Hon. Maite Murphy, Circuit Court Judge**

Case No. 2016-CP-18-1001

Tammy C. Richardson, Respondent,

RECEIVED

May 15 2023

SC Court of Appeals

v.

Halcyon Real Estate Services, LLP and McCabe, Trotter & Beverly, P.C.

Of whom McCabe, Trotter & Beverly, P.C. is the Appellant.

Appellate Case No. 2019-000671

**RESPONDENT'S MOTION AND REQUEST FOR COSTS
PURSUANT TO SCACR 222**

WHEREAS Appellant's appeal was dismissed by order of this Court on April 19, 2023;

WHEREAS a remittitur was issued by this Court May 12, 2023;

WHEREAS Respondent expended costs, time and replied to the appeal and prevailed;

Counsel for the Respondent hereby moves this Court to award costs and attorney's fees pursuant to SCACR Rule 222 and attaches an Itemized Statement of Costs. *See* Ex. A – Itemized Statement of Costs.

Respectfully submitted by:



Justin S. Kahn
jskahn@kahnlawfirm.com
Kahn Law Firm, LLP
P. O. Box 31397
Charleston, SC 29417-1397
(843) 577-2128
(843) 577-3538 – Fax

Mary Leigh Arnold
Sammie@maryarnoldlaw.com
Mary Leigh Arnold, P.A.
749 Johnnie Dodds Blvd., Ste. B
Mt. Pleasant, SC 29464
(843) 971-6053
(843) 971-6055 – Fax
Attorneys for Respondent
Tammy C. Richardson

Charleston, SC
May 15, 2023

ITEMIZED STATEMENT OF COSTS

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
May 15 2023
SC Court of Appeals

Tammy C. Richardson, Respondent,)
)
 v.)
)
 Halcyon Real Estate Services, LLP and)
 McCabe, Trotter & Beverly, P.C., Defendants,)
)
 Of which McCabe, Trotter & Beverly, P.C. is the)
 Appellant)
)
 Appellate Case No.: 2019-000675)

The Appellate Court is requested to tax the following costs *against*:
McCabe, Trotter & Beverly, P.C.

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief				
Cost of Printing or Copying Final Reply Brief	629 17 covers 17 bindings	\$.11 \$1.00 \$2.00	\$131.01	
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript				
Attorney's Fee Provided By Rule 222(b), SCACR			\$2,500.00	
Other (specify and explain): 2 blow ups of relevant law and a diagram and copies were used in oral argument to argue	2 Blow ups		\$183.12	

COSTS TAXABLE UNDER RULE 242(j), SCACR				
Cost of Printing or Copying Brief				
Cost of Printing or Copying Reply Brief				
Cost of Printing or Copying Appendix				
Filing fee paid under Rule 242(c), SCACR				
Attorney's fee provided by Rule 242(j)(2), SCACR				
Other (specify and explain):				
		TOTAL	\$2,814.13	

I, Justin S. Kahn, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was (mailed to/served upon) opposing counsel.

JK

(Signature)
Attorney for RESPONDENT

Subscribed and sworn to before me this 15th day of May, 2023

May Milby

Notary Public for South Carolina

My Commission Expires: 4/5/31

(Seal)



Charleston

INVOICE

Date	Invoice #
6/6/2022	CHS158880

Bill To		Job #: CHS29948			
Justin Kahn KAHN LAW FIRM LLC 562 Savannah Highway Charleston, SC 29407		Client Ref. #	Terms	Rep	Ordered By
		Richardson	Net 30	CDavis	Justin Kahn

Description	Qty	Rate	Amount
Trial Boards:30 x 40 Color Mounted on Foam Board	2	\$84.000	\$168.00T

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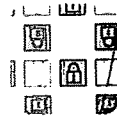
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Charleston, SC 29403



AUTHORIZED SIGNATURE

MEMO Inv# CHS158880 Richardson

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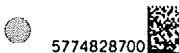
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Date	Invoice #
2/26/2020	CHS154469

Bill To
Justin Kahn KAHN LAW FIRM LLC 562 Savannah Highway Charleston, SC 29407

Job #: CHS25573

Client Ref. #	Terms	Rep	Ordered By
Tammie Richardson	Net 30	CDavis	Pattie Michel

Description	Qty	Rate	Amount
Printing:Legal Brief Prints	629	\$0.110	\$69.19T
Binding:Card Covers	17	\$1.000	\$17.00T
Binding:Spiral Bind 1 in.	17	\$2.000	\$34.00T

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	Tax(0.09):	\$10.82
	Customer Signature:	Date:

Tax ID Number:
57-1051795

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Charleston, SC 29403



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Tammy C. Richardson.....Respondent,

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Halcyon Real Estate Services, LLP and
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Of which McCabe, Trotter, & Beverly, P.C. isAppellant.

PROOF OF SERVICE

Justin S. Kahn
jskahn@kahnlawfirm.com
Kahn Law Firm, LLP
P.O. Box 31397
Charleston, SC 29417-1397
(843) 577-2128
(843) 577-3538 – Fax

Mary Leigh Arnold
Sammie@maryarnoldlaw.com
Mary Leigh Arnold, P.A.
749 Johnnie Dodds Blvd., Ste. B
Mt. Pleasant, SC 29464
(843) 971-6053
(843) 971-6055 – Fax

Attorneys for Respondent
Tammy C. Richardson

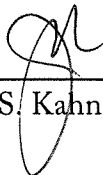
I, Justin S. Kahn, do hereby affirm that on May 15, 2023, I served one copy of the Respondent's Motion and Requests for Costs Pursuant to SCACR 222, on the following below named individuals by email and by placing a copy in the United States Mail, first class, postage prepaid:

Robert P. Wood, Esq.
Rogers Townsend & Thomas, PC
PO Box 100200
Columbia, SC 29202
803.771.7900
Robert.wood@rtt-law.com

Joshua R. Hinson, Esq.
215 Queens Rd., Ste. 200
Charlotte, NC 28204
Jhinson@wolfe-campbell.com

M. Dawes Cooke, Jr., Esq.
Justin P. Novak, Esq.
Joshua R. Hinson, Esq.
Barnwell Whaley Patterson & Helms, LLC
PO Drawer H
Charleston, SC 29402
mdc@barnwell-whaley.com
jnovak@barnwell-whaley.com
jfletcher@barnwell-whaley.com

**Attorneys for Appellant
McCabe Trotter & Beverly, P.C.**


Justin S. Kahn

KAHN LAW FIRM, LLP

**562 SAVANNAH HIGHWAY
CHARLESTON, SC 29407
PHONE 843.577.2128
FAX 843.577.3538
WWW.KAHNLAWFIRM.COM**

**MAILING ADDRESS
PO Box 31397
CHARLESTON, SC 29417-1397
E-MAIL JSKAHN@KAHNLAWFIRM.COM**

ELLIS I. KAHN*^
JUSTIN S. KAHN*^
WES B. ALLISON

May 15, 2023

RECEIVED

May 15 2023

SC Court of Appeals

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

**Re: Tammy C. Richardson v. McCabe, Trotter & Beverly, P.C.
Appellate Case No.: 2019-000671**

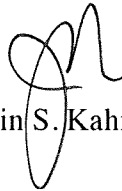
Dear Ms. Kitchings:

Enclosed for filing is an original and 7 copies of the Respondent's Motion and Request for Costs Pursuant to SCACR 222, along with Proof of Service. By copy of this letter I am serving these documents on counsel for Appellant.

Please mark the extra copy of Respondent's motion filed and return it to us in the enclosed, postage-prepaid envelope.

With best regards, I am

Yours sincerely,



Justin S. Kahn

JSK/pm
Encl.

cc: M. Dawes Cooke, Jr., Esq.
John P. Novak, Esq.
John W. Fletcher, Esq.
Robert P. Woods, Esq.
Joshua R. Hinson, Esq.

* SOUTH CAROLINA AND DISTRICT OF COLUMBIA

^ BOARD CERTIFIED BY THE NATIONAL BOARD OF TRIAL ADVOCACY IN CIVIL TRIAL ADVOCACY AND
THE AMERICAN BOARD OF PROFESSIONAL LIABILITY ATTORNEYS IN MEDICAL MALPRACTICE