

RECEIVED

Jun 15 2023

SC Court of Appeals

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

APPEAL FROM YORK COUNTY
COURT OF COMMON PLEAS
THE HONORABLE DANIEL D. HALL
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2021-000986
CIVIL ACTION NO. 2021-CP-46-01651

Tony's Garage, LLC,

APPELLANT,

versus

UniFirst Corporation,

RESPONDENT.

**MOTION FOR COSTS OF RESPONDENT
UNIFIRST CORPORATION**

The Respondent UniFirst Corporation moves to be awarded costs against the Appellant Tony's Garage, LLC in the above-referenced appeal under Rule 222, SCACR. The Respondent's Motion is based on this Court's affirmance of the judgment on appeal by Opinion No. 2023-UP-173 filed May 3, 2023. The Remittitur was issued on May 31, 2023.

The Respondent incurred \$2,555.09 in taxable attorney's fees and costs in this matter. A sworn, itemized statement of these costs is attached. Accordingly, the Respondent respectfully requests that the Court award it \$2,555.09 in fees and costs pursuant to Rule 222, SCACR.

Respectfully submitted,

s/ Carmen V. Ganjehsani

Caleb M. Riser (S.C. Bar No. 76738)

Carmen V. Ganjehsani (S.C. Bar No. 73515)

RICHARDSON, PLOWDEN & ROBINSON, PA

Post Office Drawer 7788

Columbia, South Carolina 29202

(803) 771-4400

criser@richardsonplowden.com

cganjehsani@richardsonplowden.com

ATTORNEYS FOR RESPONDENT

UNIFIRST CORPORATION

June 15, 2023.

RECEIVED

Jun 15 2023

SC Court of Appeals

CERTIFICATE OF SERVICE

I, the undersigned, attorney for the Respondent UniFirst Corporation, do hereby certify that I have this date served the foregoing Motion for Costs, dated June 15, 2023, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Order dated May 6, 2022, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

Stephen D. Schusterman
SCHUSTERMAN LAW FIRM, PA
Post Office Box 4211
Rock Hill, South Carolina 29732
sdslaw@comporium.net
ATTORNEY FOR APPELLANT

A copy of the sent email is enclosed with this Certificate of Service.


s/ Carmen V. Ganjehsani
Carmen V. Ganjehsani (S.C. Bar No. 73515)
RICHARDSON, PLOWDEN & ROBINSON, PA
Post Office Drawer 7788
Columbia, South Carolina 29202
Attorneys for the Respondent
UniFirst Corporation

Dated: June 15, 2023.

From: [Carmen Ganjehsani](#)
To: "sdslaw@comporium.net"
Cc: [Caleb Riser](#); [Nelson Weston](#)
Subject: 2021-000986 Tony's Garage v. UniFirst Corp
Date: Thursday, June 15, 2023 11:37:00 AM
Attachments: [2021-000986 Tony's Garage v. UniFirst \(Mtn for Costs\).pdf](#)

Pursuant to the Supreme Court's Order dated August May 6, 2022, please find served upon you the Motion for Costs on behalf of Respondent UniFirst Corporation.

Thank you,
Carmen Ganjehsani

HOME	VCARD	LOCATION
		Carmen V. Ganjehsani Shareholder Cganjehsani@RichardsonPlowden.com Richardson Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 www.RichardsonPlowden.com

The information contained in this e-mail message may be attorney-client privileged, attorney work product, or strictly confidential information. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of the communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone at (803) 771-4400 and permanently delete this e-mail.



COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202
1900 Barnwell St., Columbia, SC 29201 P 803-771-4400 F 803-779-0016

MYRTLE BEACH P.O. Box 3646 • Myrtle Beach, SC 29578
2103 Farlow St., Suite B, Myrtle Beach, SC 29577 P 843-448-1008 F 843-448-1533

CHARLESTON P.O. Box 21203 • Charleston, SC 29413
235 Magrath Darby Blvd., Mount Pleasant, SC 29464 P 843-805-6550 F 843-805-6599

www.RichardsonPlowden.com

REPLY TO: Columbia
E-Mail: cganjehsani@richardsonplowden.com
Direct Dial: (803) 253-8692

June 15, 2023

Via hand delivery and e-mail (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
Jun 15 2023
SC Court of Appeals

Re: Tony's Garage, LLC v. UniFirst Corporation
Appellate Case No. 2021-000986
RPR File No.: 9722-005

Dear Ms. Kitchings:

Enclosed for filing is the Motion for Costs on behalf of the Respondent UniFirst Corporation in the above-referenced case, along with our Certificate of Service. We are also filing this Motion electronically with the Court of Appeals via e-mail at ctappfilings@sccourts.org pursuant to Section (b)(2) of the Supreme Court's May 6, 2022 Order.

Also enclosed is our firm's check in the amount of \$50.00 for the filing fee in this matter.

We have served this Motion for Costs on counsel for the Appellant upon their primary email address listed in the Attorney Information System.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely,

/s Carmen V. Ganjehsani

Carmen V. Ganjehsani

Encs.

cc: Stephen D. Schusterman (via e-mail)
Caleb Martin Riser (FYI)
S. Nelson Weston, Jr. (FYI)