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Jun 23 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Justice Jean Toal, Circuit Court Judge

Case No. 2023-000232

Rhonda Meisner, Appellant,

vs.

Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson;
Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.;
Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA;
Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC;
Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA; and
John Doe, (1-10), Respondents.

MOTION FOR ATTORNEY’S FEES

The Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore, Taylor & Thomas, P.A., Moore Taylor Law Firm, P.A., and Moore Bradley Myers Law Firm, P.A. respectfully move this Court for an award of attorney’s fees to be assessed against the Appellant Rhonda Meisner in accordance with the provisions of Rule 222(b) of the South Carolina Appellate Court Rules, and in support of this motion state as follows:

1. Appellant Rhonda Meisner sued Defendants on March 18, 2022, in Richland County, South Carolina, alleging that several parties damaged her reputation, and deprived her of her livelihood, privacy and parental rights for their own pecuniary gains and objectives. Respondents Grant Meisner, and Grant Meisner, MD, LLC, answered the

complaint and counterclaimed, and filed a motion for dismissal on April 6, 2022. Respondents Grant Meisner and Grant Meisner, MD, LLC filed an amended answer and counterclaim on April 12, 2022. Respondents Sheila Robinson, Moore, Taylor & Thomas, P.A., Moore Taylor Law Firm, P.A., and Moore Bradley Myers Law Firm, P.A. filed their answer and counterclaims, as well as their motion to dismiss on April 12, 2022.

2. Appellant Rhonda Meisner amended her complaint on May 6, 2022. Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore, Taylor & Thomas, P.A., Moore Taylor Law Firm, P.A., and Moore Bradley Myers Law Firm, P.A. answered and counterclaimed on May 18, 2022.

2. Justice Jean H. Toal heard multiple motions from the parties on December 2, 2022, in Richland County. She issued a Form 4 on December 15, 2022. The Motions to Dismiss Sheila Robinson, Grant Meisner, MD and Grant Meisner, MD, LLC were granted. A second Form 4 was issued by Justice Toal on December 20, 2022, to state that the Moore Bradley Myers Law Firm, P.A, a/k/a Moore, Taylor & Thomas P,A, a/k/a Moore Taylor Law Firm P.A. were also dismissed from the case.

3. Appellant Meisner filed a motion to alter and amend pursuant to SCRCF Rule 52 and Rule 59(e) the Court's December 15, 2022, and December 20, 2022, Form 4 Orders on December 29, 2022. Justice Toal issued an order denying Appellant's motion to alter and amend on January 10, 2023.

4. Appellant Meisner appealed this judgment to the Court of Appeals on February 15, 2023. The court issued its order dismissing the appeal as untimely on June 6, 2022.

7. Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore, Taylor & Thomas, P.A., Moore Taylor Law Firm, P.A., and Moore Bradley Myers Law Firm, P.A. seek an award of attorney's fees in accordance with Rule 222(b) in the amount of \$2500.

Wherefore, Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore, Taylor & Thomas, P.A., Moore Taylor Law Firm, P.A., and Moore Bradley Myers Law Firm, P.A. respectfully ask the Court to enter an order assessing attorney's fees against Appellant Rhonda Meisner in the amount of \$2500.

Respectfully submitted,

s/James Edward Bradley _____

James Edward Bradley, SC Bar # 66130

Moore Bradley Myers Law Firm, P.A.

1700 Sunset Boulevard

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West Columbia, SC 29171

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Attorney for Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson; Moore, Taylor & Thomas, P.A., Moore Taylor Law Firm, P.A., and Moore Bradley Myers Law Firm, P.A.

West Columbia, South Carolina

June 23, 2023

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Rhonda Meisner,Appellant,

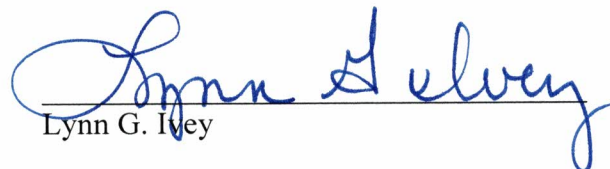
vs.

Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson;
Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.;
Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA;
Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC;
Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA; and
John Doe, (1-10), Respondents.

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of the Moore Bradley Myers Law Firm, P.A., certify that I have served the Motion for Attorney’s Fees by depositing copies of same in the United States Mail, postage prepaid, on June 23, 2023, addressed to *Pro Se* Appellant as follows:

Rhonda Meisner
PO Box 689
Blythewood, SC 29016


Lynn G. Ivey



S. Jahue Moore†
 James Edward Bradley†
 Sheila McNair Robinson
 Christian G. Spradley
 William H. Edwards
 Stanley L. Myers
 Jane H. Downey♦
 S. Jahue Moore, Jr.
 William B. Fortino
 Ralph Nichols Riley, Jr.
 John C. Bradley, Jr.
 Lester McGill Bell, Jr.

June 23, 2023

Melissa K. Moore
 Bryan C. Letteer
 Sierra D. Carini
 Lawrence D. Turner
 Emily E. Collins

Retired
 J. Mark Taylor**
 Robert D. Hazel†
 C. David Sawyer, Jr.†
 Billy C. Coleman (1916-2019)

The Honorable Jenny Abbott Kitchings
 Clerk, South Carolina Court of Appeals
 P.O. Box 11629
 Columbia, SC 29211
 VIA Email and US Mail

RECEIVED
Jun 23 2023
SC Court of Appeals

Re: Rhonda Meisner vs. Grant Meisner, et al.
 Case No.: 2022-CP-40-01415
 Appellate Case No. 2021-000232

Dear Ms. Kitchings:

Enclosed please find our firm check for \$50.00 for the filing fee for Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore Taylor & Thomas, PA, Moore Taylor Law Firm, PA, and Moore Bradley Myers Law Firm, PA's Motion for Attorney's Fees filed by email today. A copy of this motion and the proof of service are also enclosed for your reference.

Thank you for your time and consideration.

Sincerely,

Lynn G. Ivey
 Assistant to James Edward Bradley

Enclosures

cc: Rhonda Meisner
 Stephanie H. Burton, Esq. (via email)
 James E. Parham, Jr., Esq. (via email)
 Michael C. Tanner, Esq. (via email)