

**RECEIVED**

**Jul 03 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
CIRCUIT COURT  
Justice Jean Toal, retired, Circuit Court Judge

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Appellate Case # 2023-000232

Rhonda Meisner,

Appellant

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;  
John Doe, (1-10) a fictional name assigned to identify parties  
that are not yet known or not yet determined.

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Respondent(s)

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RETURN TO MOTION FOR ATTORNEY’S FEES BY Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson; Moore, Taylor, & Thomas, P.A; Moore Taylor Law Firm, P.A; Moore Bradley Myers Law Firm, PA

The Appellant respectfully requests this Honorable Court to deny the attorney’s fees sought for failure to attach an itemized sworn statement in their request for fees. For this reason and the reasons outlined below, the Appellant respectfully requests the attorneys fees be denied or greatly reduced because no appellate briefs were filed.

The Appellant avers only the Grant Meisner and Grant Meisner, MD, LLC respondents are entitled to make a request for fees. Additionally, it appears that, upon information and belief, the only respondents that paid attorneys fees is Grant Meisner. As the Appellant is forced to continue to deal with the “bad acts” perpetrated by the Respondents despite the appeal, the appellant requests this Honorable Court to deny relief in the form of attorneys fees and costs.

Additionally, the appellant notes the attorneys fee affidavit failed to provide an itemization of fees billed.

For the above reasons, the appellant requests this Honorable Court to deny all such requests for costs including attorney's fees or provide minimal relief.

Respectfully,

*s/Rhonda Meisner*

July 3, 2023

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PROOF OF SERVICE-RETURN TO MOTION FOR ATTORNEYS FEES The appellant certifies that she has served a copy of her return to Motion for Attorney's fees of Moore Bradley Myers Law Firm, P.A., Moore Taylor & Thomas, P.A. Sheila Robinson, Grant Meisner, and Grant Meisner, MD, LLC, by placing a copy of the following in the United States Postal service with adequate postage attached to James Edward Bradley of MOORE BRADLEY MYERS LAW FIRM, P. A Post Office Box 5709 West Columbia, South Carolina 29171, James E. Parham, Jr 220 Ministry Drive Irmo, South Carolina 29063; Stephanie Burton 308 E. Saint John Street Spartanburg, SC 29302. Michael C. Tanner PO Box 1061 Bamberg, SC 29003. Finally, all parties will be notified by the electronic filing system maintained by the Court of Appeals associated with this appeal.

July 3, 2023

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