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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. 2020-001068
CIVIL ACTION NO. 2020-CP-46-01641

Evolve Softworks, LLC,

APPELLANT,

versus

Anthony Burkett,

RESPONDENT.

**MOTION FOR COSTS OF APPELLANT
EVOLVE SOFTWARES, LLC**

The Appellant, Evolve Softworks, LLC, moves to be awarded costs against Respondent Anthony Burkett in the above-referenced appeal under Rule 222, SCACR. Appellant's Motion is based on this Court's reversal of the decision on appeal by Opinion No. 2023-UP-251 filed June 21, 2023. The Remittitur was issued on July 7, 2023.

Appellant incurred \$3,095.69 in taxable attorney's fees and costs in this matter. A sworn, itemized statement of these costs is attached. Accordingly, Appellant respectfully requests that the Court award it \$3,095.69 in fees and costs pursuant to Rule 222, SCACR.

Respectfully submitted,

s/ Carmen V. Ganjehsani

Carmen V. Ganjehsani

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ATTORNEYS FOR APPELLANT

EVOLVE SOFTWARES, LLC

July 13, 2023.

CERTIFICATE OF SERVICE

I, the undersigned, attorney for the Appellant, Evolve Softworks, LLC, do hereby certify that I have this date served the foregoing Motion for Costs, dated July 13, 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):

Kenneth R. Raynor
RAYNOR LAW FIRM, PLLC
1822 Cleveland Avenue
Charlotte, North Carolina 28203
ken@raynorlawfirm.com
ATTORNEYS FOR RESPONDENT
ANTHONY BURKETT

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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 Appellant
Evolve Softworks, LLC

Dated: July 13, 2023.

From: [Carmen Ganjehsani](#)
To: [Kenneth Raynor](#)
Cc: [Francesca Macchiaverna](#); [Justin Kaplan](#); [William Freeman](#)
Subject: 2020-001068 Evolve Softworks v. Burkett
Date: Thursday, July 13, 2023 10:46:00 AM
Attachments: [2020-001068 Evolve Softworks v. Burkett \(Mtn for Costs\) \(2978095\).pdf](#)

Pursuant to the Supreme Court's Order dated May 6, 2022, please find served upon you the Motion for Costs on behalf of Appellant Evolve Softworks, LLC.

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

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July 13, 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
Jul 13 2023
SC Court of Appeals

Re: Evolve Softworks, LLC v. Anthony Burkett
Appellate Case No. 2020-001068
RPR File No.: 9735-001

Dear Ms. Kitchings:

Enclosed for filing is the Motion for Costs on behalf of the Appellant Evolve Softworks, LLC 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 Respondent upon his 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: Kenneth R. Raynor
Francesca Macchiaverna
William S.F. Freeman