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Jul 21 2023
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

Steven C. Kirven, Master in Equity
Case No: 2020-CP-04-00443

Appellate Case No. 2020-000890

Vicki Littlefield.....Respondent,

v.

Paul W. Cromer, Jr., individually and d/b/a Paul Cromer, Inc.....Appellant.

RESPONDENT’S MOTION FOR COSTS

Respondent Vicki Littlefield having prevailed on Appellant’s appeal in the above-captioned action, moves for taxation of costs, pursuant to Rule 222 of the South Carolina Appellate Court Rules, against Appellant. Included in support of this motion is an itemized statement of costs in this action allowable under the Rules and sworn to by Meliah Bowers Jefferson, attorney for Respondent. Respondent makes this motion without prejudice to her right to seek an additional appellate and post-appellate attorneys’ fees and costs not covered by Rule 222, to which she is entitled under the promissory note underlying this appeal, from the trial court. *See Muller v. Myrtle Beach Golf & Yacht Club*, 313 S.C. 412, 415, 438 S.E.2d 248, 250 (1993) (“Rule 222 does not preempt an award of attorney's fees to which one is otherwise entitled.”); *McDowell v. S.C.D.S.S.*, 304 S.C. 539, 543, 405 S.E.2d 830 (1991).

Respectfully Submitted,

s/ Meliah Bowers Jefferson

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Attorneys for Respondent Vicki Littlefield

Dated: July 21, 2023

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CERTIFICATE OF SERVICE

The undersigned certifies that she has served a copy of Motion for Costs and Itemized Statement of Costs on counsel of record below this 21st day of July, 2023, by electronic mail to the address listed with AIS as follows:

Joshua B. Raffini, Esq.
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s/Meliah Bowers Jefferson
Meliah Bowers Jefferson