

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

---

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Roger L. Couch, Circuit County Judge

---

Lower Court Case Number: 2008-CP-42-0835  
Appellate Case Number: 2011-194466

---

**RECEIVED**

JUL - 9 2013

**S.C. Supreme Court**

Shannon Hutchinson, Personal Representative of the  
Estate of Stephen F. Ney, a/k/a Steve F. Ney,.....Petitioner,

v.

Liberty Life Insurance Company,.....Respondent.

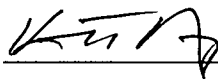
---

**MOTION FOR COSTS AND FEES**

---

Kenneth C. Anthony, Jr.  
**THE ANTHONY LAW FIRM, P.A.**  
250 Magnolia Street (29306)  
Post Office Box 3565  
Spartanburg, SC 29304  
(864) 582-2355  
Facsimile: (864) 583-9772  
[kanthony@anthonylaw.com](mailto:kanthony@anthonylaw.com)  
Attorney for Petitioner

Petitioner Shannon Hutchinson was the prevailing party in the matter of Hutchinson v. Liberty Life Insurance Company and hereby requests that she be awarded her costs on appeal. Petitioner was granted summary judgment at the circuit court. Respondent filed an appeal to the Court of Appeals, which found for Respondent, and Petitioner then filed a Petition for Certiorari, which was granted by this Court. This Court unanimously reversed the decision of the Court of Appeals, thereby upholding the original decision of the trial court. Therefore, pursuant to Rules 242 and 222, SCACR, Petitioner is entitled to her costs on appeal, as more fully stated in the attached Form 17.



---

Kenneth C. Anthony, Jr.

**THE ANTHONY LAW FIRM, P.A.**

250 Magnolia Street (29306)

Post Office Box 3565

Spartanburg, SC 29304

(864) 582-2355

Facsimile: (864) 583-9772

[kanthony@anthonylaw.com](mailto:kanthony@anthonylaw.com)

Attorney for Petitioner

**FORM 17**  
**ITEMIZED STATEMENT OF COSTS**

THE STATE OF SOUTH CAROLINA  
In The Supreme Court  
Lower Court Case Number: 2008-CP-42-0835  
Appellate Case Number: 2011-194466

Shannon Hutchinson, Personal Representative )  
of the Estate of Stephen F. Ney, a/k/a Steve F. Ney, )  
 )  
v. )  
 )  
Liberty Life Insurance Company, )  
 )

The Appellate Court is requested to tax the following costs against Liberty Life Insurance Company

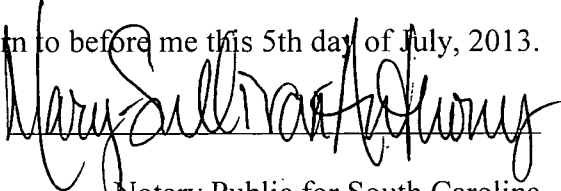
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	30 pages 15 pages	\$0.11 \$2.99	\$114.45	
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript				
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00	
Other (specify and explain):				

COSTS TAXABLE UNDER RULE 242(j), SCACR				
Cost of Printing or Copying Brief	2,044 pgs 31 pages	\$0.11 \$2.99	\$317.53	
Cost of Printing or Copying Reply Brief	135 pgs 30 pages	\$0.11 \$2.99	\$104.55	
Cost of Printing or Copying Appendix				
Filing fee paid under Rule 242(c), SCACR			\$100.00	
Attorney's fee provided by Rule 242(j)(2), SCACR			\$1,000.00	
Other (specify and explain): Printing or Copying Petition for Writ Cert. and Memo in Support	120 pgs 60 pages	\$0.11 \$2.99	\$192.60	
		TOTAL	\$2,829.13	

I, Kenneth C. Anthony, Jr., do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was (mailed to/served upon) opposing counsel.

  
 \_\_\_\_\_  
 (Signature)  
 Attorney for Shannon Hutchinson

Subscribed and sworn to before me this 5th day of July, 2013.

  
 \_\_\_\_\_  
 Notary Public for South Carolina

My Commission Expires: 6/16/2018  
 (Seal)

**FORM 7**  
**PROOF OF SERVICE OF FORM 17-ITEMIZED STATEMENT OF COSTS AND**  
**MOTION FOR COSTS AND FEES**

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

---

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Roger L. Couch, Circuit Court Judge

---

Lower Court Case No.: 2008-CP-42-0835  
Appellate Case No.: 2011-194466

---

Shannon Hutchinson, Personal Representative of the Estate of Steven F. Ney,  
a/k/a Steve F. Ney, Petitioner,

v.

Liberty Life Insurance Company, Respondent.

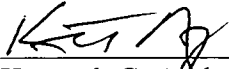
---

**PROOF OF SERVICE**

---

I certify that I have served the Form 17-Itemized Statement of Costs and a Motion for Costs and Fees on Liberty Life Insurance Company by depositing a copy in the United States Mail, postage prepaid, on July 5, 2013, addressed to its attorneys of record, Kevin K. Bell and Rebecca Roser, Post Office Box 944, Columbia, SC 29202.

July 5, 2013

  
\_\_\_\_\_  
Kenneth C. Anthony, Jr.  
**THE ANTHONY LAW FIRM, P.A.**  
Post Office Box 3565  
Spartanburg, SC 29304  
(864) 582-2355  
Facsimile: (864) 583-9772  
[kanthony@anthonylaw.com](mailto:kanthony@anthonylaw.com)  
Attorney for Petitioner