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Aug 28 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

James E. Chellis, Master in Equity

Case No. 2020-001168

NCP PILGRIM, LLC

Respondent,

v.

MARY LOU CERCOPELY, DAVID S. CLANCY, SOUTH CAROLINA FEDERAL
CREDIT UNION, SOUTHCOAST COMMUNITY BANK, JOAN GEANURACOS and
DAVID SEAN CLANCY,

Of whom MARY LOU CERCOPELY, DAVID S. CLANCY,
And DAVID SEAN CLANCY are the

Appellants.

RESPONDENT NCP PILGRIM, LLC'S MOTION FOR COSTS UNDER RULE 222(d)
SCACR

Russell P. Patterson, Esquire
Lauren P. Williams, Esquire
Russell P. Patterson, P.A.
P.O. Box 8047
Hilton Head, South Carolina 29938
(843) 341-9300
Attorneys for the Respondent
NCP Pilgrim, LLC

Pursuant to Rule 222(d), SCACR, Respondent NCP Pilgrim, LLC (“Respondent”) respectfully files this Motion for Costs.

Accordingly, Respondent requests the Appellate Court tax the following costs against Appellants Mary Lou Cercopely, David S. Clancy, and David Sean Clancy:

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing Final Brief	26	6 copies @ \$8.88 per copy	\$53.29	
Attorney’s Fee Provided by Rule 222(b), SCACR			\$2,500.00	
		TOTAL	\$2,553.29	

I, Lauren P. Williams, 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 opposing counsel.

Respectfully submitted,

Lauren P. Williams / 8/28/23
Date

Lauren P. Williams
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Attorneys for the Respondent,
NCP Pilgrim, LLC

SWORN to before me this
28th Day of August, 2023.

Deborah J. Taylor
Notary Public for South Carolina

DEBORAH J. TAYLOR
Notary Public, State of South Carolina
Printed Name: _____
My Commission Expires 10/24/2027

My Commission Expires: _____

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Of whom MARY LOU CERCOPELY, DAVID S. CLANCY,
And DAVID SEAN CLANCY are the

Appellants.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date indicated below, counsel for Appellants was served with a copy of the Respondent NCP Pilgrim, LLC's Motion for Costs by mailing a copy of the same via E-mail and First Class, U.S. Mail, postage-paid on the date set forth below. A copy of the email is attached hereto as Exhibit 1.

Robert Bratton Varnado, Esquire
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*Attorney for Appellants,
Mary Lou Cercopely, David Clancy,
and David Sean Clancy*

Respectfully submitted,

/s/ Lauren P. Williams

Lauren P. Williams

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Attorneys for the Respondent,

NCP Pilgrim, LLC

Hilton Head Island, South Carolina
August 28, 2023

EXHIBIT 1

Lauren Williams

From: Lauren Williams
Sent: Monday, August 28, 2023 4:30 PM
To: Rob Varnado
Subject: NCP Pilgrim, LLC v. Cercopely, et al. (Case No. 2020-1168)
Attachments: Motion for Costs 8-28-23.pdf

Rob,

I hope you are doing well. Please find attached a copy of the Motion for Costs that was filed in the above referenced matter this afternoon. A hard copy was also mailed to your attention.

Thank you,

Lauren P. Williams
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