

RECEIVED

Oct 12 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM CHARLESTON COUNTY
Court Of Common Pleas

The Honorable J. C. Nicholson, Jr., Circuit Court Judge
Trial Court Case No.: 2015-CP-16-00815

Civil Action No. 2017-CP-10-02148
Court of Appeals Case No. 2018-000171
Supreme Court Case No. 2021-000137

Cleo SandersRespondent

v.

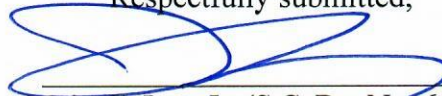
Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram, Santander Consumer USA Holdings, Inc., Isiah S. White, Danny Anderson and Patrick Bachrodt, Jr. Defendants

Of whom, Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and Isiah S. White are the. Petitioners/Appellants

MOTION FOR COSTS ON APPEAL

The Petitioners/Appellants Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and Isiah S. White, by and through its undersigned counsel hereby move to recover costs on appeal pursuant to Rule 222, SCACR. An itemized statement of costs is attached to this motion as Exhibit A and incorporated herein by this reference.

Respectfully submitted,



John T. Lay, Jr. (S.C. Bar No. 64526)
Jessica W. Laffitte (S.C. Bar No. 100256)
GALLIVAN, WHITE & BOYD, P.A.
Post Office Box 7368
Columbia, South Carolina 29202
Telephone: 803.779.1833
Facsimile: 803.779.1767

ATTORNEYS FOR
PETITIONERS/APPELLANTS SAVANNAH
HIGHWAY AUTOMOTIVE COMPANY, A
GENERAL PARTNERSHIP D/B/A RICK
HENDRICK DODGE CHRYSLER JEEP RAM
AND ISIAH S. WHITE

RECEIVED

Oct 12 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM CHARLESTON COUNTY
Court Of Common Pleas

The Honorable J. C. Nicholson, Jr., Circuit Court Judge
Trial Court Case No.: 2015-CP-16-00815

Civil Action No. 2017-CP-10-02148
Court of Appeals Case No. 2018-000171
Supreme Court Case No. 2021-000137

Cleo SandersRespondent

v.

Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge
Chrysler Jeep Ram, Santander Consumer USA Holdings, Inc., Isiah S. White, Danny Anderson
and Patrick Bachrodt, Jr. Defendants

Of whom, Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick
Dodge Chrysler Jeep Ram and Isiah S. White are the. Petitioners/Appellants

PROOF OF SERVICE

I certify that I have served the Motion for Costs on Appeal by electronic mail – in
accordance with § (d)(1) of the Supreme Court’s August 25, 2021, Order re: Methods of Electronic
Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, Appellate Case
No. 2020-000447 on counsel for the Respondent, C. Steven Moskos, Esquire, C. Steven Moskos,
PA, sent to their AIS-registered email address, as follows: steve@moskoslawfirm.com.

Respectfully submitted,



John T. Lay, Jr. (S.C. Bar No. 64526)
Jessica W. Laffitte (S.C. Bar No. 100256)
GALLIVAN, WHITE & BOYD, P.A.
Post Office Box 7368
Columbia, South Carolina 29202
Telephone: 803.779.1833
Facsimile: 803.779.1767

ATTORNEYS FOR
PETITIONERS/APPELLANTS SAVANNAH
HIGHWAY AUTOMOTIVE COMPANY, A
GENERAL PARTNERSHIP D/B/A RICK
HENDRICK DODGE CHRYSLER JEEP RAM
AND ISIAH S. WHITE