

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

69187

APPEAL FROM YORK COUNTY
Court of Common Pleas
S. Jackson Kimball, Special Court Judge

Appellate Case No.: 2011-192486

RECEIVED

JUL 23 2013

Pamela Dill as the Attorney-in-Fact
and Natural Mother of Britten Teno.....Appellant,

SC Court of Appeals

v.

Colony Insurance Company,
Gill-Young Insurance (now known as
"Gill Insurance, LLC" or ("The Gill Agency")
and Hull & Company, Inc.Respondents.

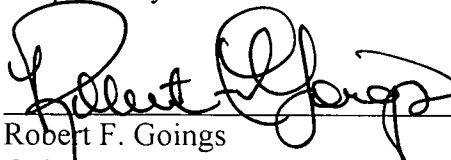
**RESPONDENT GILL-YOUNG INSURANCE'S MOTION
TO ASSESS COSTS AND ITEMIZATION OF COSTS**

Pursuant to Rule 222, SCARC, Respondent Gill-Young Insurance, the prevailing party on appeal, hereby requests this court to tax the following costs against Appellant Pamela Dill as Attorney-in-Fact and Natural Mother of Britten Teno:

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	558 pages	Invoice from Print House (see attached)	\$86.62	
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00	
		TOTAL	\$1,086.62	

I, Robert F. Goings, 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.

Respectfully Submitted:




Robert F. Goings
Goings Law Firm, LLC
914 Richland Street, Suite A-101
Post Office Box 436 (29202)
Columbia, South Carolina 29201
(803) 350-9230 (ph)
(877) 789-6340 (fax)
Attorney for Respondent Gill-Young Insurance

July 22, 2013

Columbia, South Carolina

SWORN to and SUBSCRIBED before me
This 22nd day of July, 2013

 (L.S.)
NOTARY PUBLIC FOR NORTH CAROLINA
My Commission Expires: 9/15/2012

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 914 RICHLAND ST., STE. A-101
 COLUMBIA SC 29201

QUANTITY	DESCRIPTION	AMOUNT								
25	LEGAL BRIEF FOR THE COURT <i>Dill v. Gill</i> <i>- Brief of Respondent</i> <i>Paid 2/11/13</i>	80.95								
TERMS & CONDITIONS Upon failure to pay, I (the customer) agree to pay ALL cost of collection that is accrued by PRINT HOUSE PLUS, INC., or by any firm hired by PRINT HOUSE PLUS, INC. to collect any outstanding invoices owed - including ALL attorney fees and court costs accumulated during the collection. All accounts over 30 days shall be subject to a late charge of 2% per month, 24% per annum or the highest rate permitted by law. X _____ Customer Signature		<table border="1"> <tr> <td data-bbox="1122 1774 1338 1849">SUB</td> <td data-bbox="1338 1774 1552 1849">80.95</td> </tr> <tr> <td data-bbox="1122 1849 1338 1923">TAX</td> <td data-bbox="1338 1849 1552 1923">5.67</td> </tr> <tr> <td data-bbox="1122 1923 1338 1998">SHIPPING</td> <td data-bbox="1338 1923 1552 1998"></td> </tr> <tr> <td data-bbox="1122 1998 1338 2051">TOTAL</td> <td data-bbox="1338 1998 1552 2051">86.62</td> </tr> </table>	SUB	80.95	TAX	5.67	SHIPPING		TOTAL	86.62
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Pamela Dill as the Attorney-in-Fact
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v.

Colony Insurance Company,
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“Gill Insurance, LLC” or (“The Gill Agency”)
and Hull & Company, Inc.Respondents.

PROOF OF SERVICE

I certify that I have served Respondent Gill-Young Insurance’s Motion to Assess Costs and Itemization of Costs on all parties by mailing a copy of same in the United States Mail to the following:

John S. Nichols
Bluestein, Nichols, Thompson & Delgado, LLC
Post Office Box 7965
Columbia, SC 29202
Attorneys for Appellant


L. Kristin King
Elizabeth A. Martineau
Gray King Chamberlin Martineau, LLC
200 South College Street
Charlotte, NC 28202
Attorneys for Respondent Colony Insurance Company

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Jennifer D. Eubanks
Phillip E. Reeves
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Attorneys for Respondent Hull & Company, Inc.

By: 
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Columbia, South Carolina



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July 23, 2013

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

Re: Pamela Dill as the Attorney-in-Fact and Natural Mother of Britten Teno v.
Colony Insurance Company, Gill-Young Insurance (now known as "Gill
Insurance, LLC" or ("The Gill Agency") and Hull & Company, Inc.
Case Tracking Number: 2011192486

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of Respondent Gill-Young Insurance's Motion to Assess Costs and Itemization of Costs in the above-referenced matter. Also enclosed is a check for \$25.00 representing payment for the applicable filing fee. Please file the original and return the clocked copies to me via my courier.

Thank you for your assistance. Please feel free to contact me if you have any questions.

With kind regards,

Sincerely,

A handwritten signature in black ink, appearing to read "Robert F. Goings", written over a horizontal line.

Robert F. Goings

cc: John S. Nichols, Esq.
Robert V. Phillips, Esq.
L. Kristin King, Esq.
Phillip E. Reeves, Esq.
Joel W. Collins, Esq.
Dylan E. Gist (via email)
Mr. James Gill

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