

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CLARENDON COUNTY
Court of Common Pleas

R. Ferrell Cothran, Circuit Court Judge

Case Number: 2022-000626

RECEIVED
APR 01 2024
SC Court of Appeals

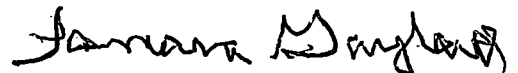
Tamara GaylordAppellant,

Ronnie GaineyRespondent.

APPELLANT'S RETURN TO MOTION FOR COSTS

Respondent's motion for costs is untimely and should therefore be denied. Pursuant to Rule 4(d)(8), proof of service via the postal service must be certified or registered. Specifically, the rule states: "Service is effective upon the date of delivery as shown on the return receipt."

The proof of service filed by respondent claims it was sent March 13, 2024 with pre-paid postage. The pre-paid postage on the mailed envelope is dated March 19, 2024. It was not received until March 25, 2024 with no return receipt. As stated in Rule 222(d), the motion for costs must be filed within 15 days. The Respondent's motion was not properly served and outside of the required deadline.



Tamara Gaylord
2330 Addison St
Sumter, SC 29153

April 1, 2024

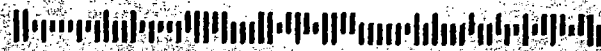
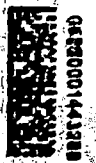
Land Parker Welch LLC
Post Office Box 138
29 South Mill Street
Manning, South Carolina 29102

COLUMBIA SC 290

19 MAR 2024PM 2



\$0.88⁰
US POSTAGE
FIRST-CLASS
FROM 29102
03/19/2024
Storage
article



TAMARA GAYLORD
c/o Brent Lyons
2330 ADDISON ST
SUMTER SC 29153-8630

Express
attempt
request
is
by the
postage
respective M.



CPU PIGGLY WIGGLY #90
1011 BROAD ST
SUMTER, SC 29150-9994
(800)275-8777

04/01/2024

12:20 PM

Product	Qty	Unit Price	Price
PM Express 1-Day Flat Rate Env Manning, SC 29102 Flat Rate Signature Waiver Scheduled Delivery Date Tue 04/02/2024 06:00 PM Money Back Guarantee Tracking #: EI667573165US Insurance Up to \$100.00 included	1		\$30.45
Total			\$30.45
Grand Total:			\$30.45
Credit Card Remit			\$30.45

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1-800-222-1811

Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm> or call 1-800-222-1811

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Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

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All sales final on stamps and postage
Thank you for your business.

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Receipt #: 840-22900467-1-7663164-2
Clerk: 00

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Tamara Gaylord Appellant,

Ronnie Gainey Respondent.

PROOF OF SERVICE

I certify that I have served the Return to Motion For Costs on Respondent by certified mail via the United States Mail on April 1, 2024, addressed to the attorney for Respondent, Ceth Land at P.O Box 138, 29 South Mill St, Manning SC 29102.


Tamara Gaylord
2330 Addison St,
Sumter, SC 29153