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Apr 08 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM DARLINGTON COUNTY  
Court of Common Pleas/Magistrate  
Craig L. LaCross, Magistrate Judge

Appellate Case No. 2023-000546

Stephanie McAnuff, .....Appellant,

v.

ASIP Town Park, LLC, .....Respondent.

**MOTION FOR COSTS**

The Respondent, by and through the undersigned, respectfully moves, pursuant to Rule 222 of the South Carolina Appellate Court Rules, this Honorable Court for an order awarding costs in the amount of One-Hundred Fifty and 00/100 (\$150.00) Dollars. Pursuant to Rule 222 and S.C. Supreme Court Order 2018-01-17-02, the Respondent also seeks attorney’s fees in the amount of Two-thousand Five Hundred and 00/100 (\$2,500) Dollars. In support of its motion, Respondent attaches hereto an Affidavit of Edward A. Love.

**WHEREFORE**, the Respondent respectfully prays that this Honorable Court grant its Motion for Costs and grant any further relief the court deems just and equitable.

April 8, 2024

\_\_\_\_\_  
s/ Edward A. Love  
EDWARD A. LOVE  
Post Office Box 1764  
135 South Dargan Street, Suite 201  
Florence, SC 29503  
(843) 407-5525 – Tel  
Attorney for Respondent

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SC Court of Appeals

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF FLORENCE )

IN THE COURT OF COMMON PLEAS

Appellate Case No. 2023-000546

**AFFIDAVIT OF FEES AND COSTS ON APPEAL**

Personally appeared before me, Edward A. Love, who first being duly sworn, deposes and says as follows:

1. I am over the age of eighteen years, and am personally familiar with the facts stated herein.

2. I am a Partner with the law firm of King, Love, & Hupfer, LLC in Florence, South Carolina. I have been licensed to practice law in the state of South Carolina since 2006, and am a member in good standing with the South Carolina Bar association. I am licensed to practice law not only before the state courts of South Carolina and Georgia, but also before the Federal District Courts of South Carolina and Georgia as well as the Fourth and Eleventh Circuit Court of Appeals. I am an active member of numerous professional organizations, including both the South Carolina Bar Association and the Florence County Bar Association.

3. A substantial portion of my law practice involves representing businesses in collection actions; including eviction/ejectment processes and proceedings. During my legal career, I have been involved in hundreds of civil matters before state and federal courts.

4. My standard hourly rate and the rate of my staff are reasonable for an attorney and office of my age and experience.

5. The Respondent retained my law firm and me to represent them in the above-captioned lawsuit.

6. The Respondent incurred attorney/paralegal fees in the amount of at least Eleven Thousand Seven Hundred Seventy-one and 50/100 (\$11,771.50) Dollars and costs in the amount

of One-Hundred Fifty and 00/100 (\$150.00) Dollars for a total of Eleven Thousand Nine Hundred Twenty-one and 50/100 (\$11,921.50) Dollars.

7. The tasks and hours were reasonable and necessary to properly and adequately represent the Respondent in this matter. The tasks and time expended include only those things directly related to the litigation of this action, such as researching, preparing and filing motions, pleadings, responses, and the like.

8. In my experience, the hours expended were necessary, customary, reasonable, and appropriate.

9. This action did not involve any unusual questions of fact or law, any lost opportunities, or the like which would warrant an upward departure from the standard hourly rate or a strict application of the lodestar method.

10. The total amount now sought for attorneys' fees and related costs from my firm in representing the Respondent is at least Eleven Thousand Nine Hundred Twenty-one and 50/100 (\$11,921.50) Dollars. This amount is reasonable and customary, and was necessarily incurred in this action.

FURTHER YOUR AFFIANT SAITH NOT.



EDWARD A. LOVE

SWORN to before me this

8<sup>th</sup> day of April, 2024.

Wendy A. Lee  
Notary Public for South Carolina  
My Commission Expires: 10/25/2028

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v.

ASIP Town Park, LLC, .....Respondent.

**PROOF OF DELIVERY**

The undersigned hereby certifies that on April 8, 2024, Respondent’s Motion for Costs and Affidavit attached thereto were served on Appellant by mailing a copy of same by United States Mail, postage prepaid, to the following address:

STEPHANIE MCANUFF  
PO BOX 691228  
MINT HILL, NC 28227

April 8, 2024

/s/ Edward A. Love  
EDWARD A. LOVE  
Post Office Box 1764  
135 South Dargan Street, Suite 201  
Florence, SC 29503  
(843) 407-5525 – Tel  
Attorney for Respondent