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**Apr 09 2024**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM PICKENS COUNTY COURT OF COMMON PLEAS

CHARLES B. SIMMONS, MASTER IN EQUITY

C. A. NO. 2018-CP-39-00585

APPELLATE CASE NO. 2020-000396

Terence “Terry” Carroll.....Appellant

vs.

Debra Mowery, TD Realty, Upstate RE Group, Hawk Shadow Business Services, LLC, and Debra Mower Realtor .....Respondents

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**MOTION FOR COSTS**

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The Appellant filed an appeal of the special referee’s order dismissing Appellant’s causes of actions for unjust enrichment, interest in and for real estate, breach of contract, restitution, constructive fraud, breach of trust, and quantum meruit. By Order of this Court dated July 26, 2023, this Court affirmed all of the lower court’s rulings. On March 26, 2024, The Supreme Court of South Carolina denied Petitioner Carroll’s writ of certiorari. As such, this matter has been remitted to the lower court or tribunal. Respondents as the prevailing parties in this appeal, hereby move this Court, by and through their undersigned counsel, for an Order taking costs in their favor in accordance with the attached Itemized Statement of Costs, incorporated herein by reference.

*[signature page to follow]*

Respectfully submitted,



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Bruce W. Bannister (SC Bar No. 15679)

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Phone: (864) 298-0084

E-mails: [bbannister@bannisterwyatt.com](mailto:bbannister@bannisterwyatt.com)

*Attorney for the Respondents*

April 9, 2024  
Greenville, SC

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STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

Charles B. Simmons, Master in Equity

C. A. NO. 2018-CP-39-00585  
Appellate Case No. 2020-000396

Terrance "Terry" Carrol, .....Appellant,

vs.

Debra Mowery, TD Realty, Upstate RE Group,  
Hawk Shadow Business Service, LLC, and Debra Mower Realtor, .....Respondents.

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**PROOF OF SERVICE**

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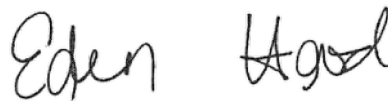
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The undersigned certifies that a true copy of the foregoing:

**MOTION FOR COSTS**

was this 9th day of April, e-mailed to counsel of records via the AIS e-mail on file:

J. Falkner Wilkes, Esquire  
E-mail: jfalknerwilkes@gmail.com  
*Attorney for Appellant*



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SC Court of Appeals

Jenny Abbott Kitchings, Clerk  
Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211


**Re: Terrence "Terry" Carrol v. Debra Mowery**  
**Appellate Case Number: 2020-000396**

Dear Ms. Kitchings:

Enclosed please find a check for the filing fee for Respondents' **Motion for Costs** filed electronically in the above matter on April 9, 2024.

Should have any questions, please do not hesitate to contact me.

Yours truly,  
BANNISTER, WYATT & STALVEY, LLC

  
Eden Hood  
Paralegal

/eh  
Enc. (As Stated)