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**Apr 30 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA  
Workers' Compensation Commission

WCC File No. 1506114  
Appellate Case No.: 2019-001254

Doretta Butler-Long, Claimant, ..... Appellant,

v.

Illinois Tool Works, Employer,  
and American Zurich Insurance Company, Carrier, ..... Respondent.

**ITEMIZED STATEMENT OF COSTS**

The Appellate Court is requested to tax the following costs against Illinois Tool Works and American Zurich Insurance Company, Respondents.

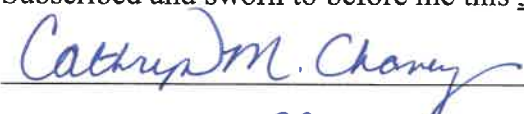
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief			193.34	
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR		\$100.00	\$100.00	

Cost of Court Reporter's Transcript		\$290.25	\$290.25	
Attorney's Fee Provided By Rule 222(b), SCACR		\$2,500.00	\$2,500.00	
Other (specify and explain):				
COSTS TAXABLE UNDER RULE 242(j), SCACR				
Cost of Printing or Copying Brief				
Cost of Printing or Copying Reply Brief				
Cost of Printing or Copying Appendix				
Filing fee paid under Rule 242(c), SCACR				
Attorney's fee provided by Rule 242(j)(2), SCACR				
Other (specify and explain):				
		TOTAL	\$3,083.59	

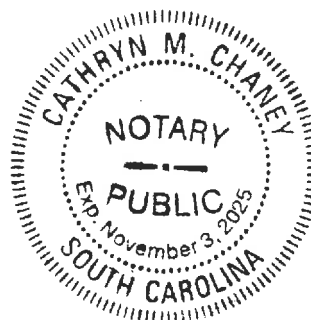
I, Stephen B. Samuels, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed to opposing counsel.

  
 \_\_\_\_\_  
 Attorney for Respondent

Subscribed and sworn to before me this 30th day of April, 2024

  
 \_\_\_\_\_  
 Notary Public for SC

My Commission Expires: 11/3/25



Samuels Reynolds Law Firm, LLC

1320 Richland Street  
Columbia, SC 29201

# Statement

Date
4/30/2024

To:
Doretta Butler 113 Brook Pines Drive, Apt. 2201 Columbia, SC 29210

Amount Due	Amount Enc.
\$1,388.78	

Date	Transaction	Amount	Balance
08/04/2017	WC Claim- Records-Dr. Sweet	19.55	19.55
08/04/2017	Records-University Ortho	34.20	53.75
08/04/2017	Records-Family Practice Center	37.00	90.75
08/04/2017	Records-Palmetto Richland	29.78	120.53
08/04/2017	Records-Providence Hospital	27.67	148.20
08/04/2017	Records-Providence Hospital	27.67	175.87
08/04/2017	Records-University Ortho	32.21	208.08
08/04/2017	Records-University Ortho	36.23	244.31
08/04/2017	Medical Conference-Dr. Mazoue	200.00	444.31
08/04/2017	Deposition-Dr. Butler	126.00	570.31
08/04/2017	records-University Ortho	39.97	610.28
08/04/2017	Records from Drayer Physical Therapy	73.50	683.78
08/04/2017	Filing Fee - Form 50 Hearing Request	25.00	708.78
08/04/2017	Deposition - Doretta Butler	50.00	758.78
08/04/2017	D. Butler - Depo of Dr. Mazoue	200.00	958.78
08/04/2017	D. Butler - Transcripts	180.00	1,138.78
08/04/2017	WCC 1221499 Form 30 Appeal Filing Fee D. Butler	150.00	1,288.78
08/04/2017	Doretta Butler - Notice of Appeal Filing Fee	100.00	1,388.78

CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
0.00	1,388.78	0.00	0.00	0.00	\$1,388.78

**Samuels Reynolds Law Firm, LLC**  
**Unbilled Costs by Job**

Accrual Basis

All Transactions

Type	Date	Source Name	Memo	Account	Billing Status	Amount
Butler/Doretta WC Claim	08/16/2017	Creel Court Reporting, Inc.	Transcript of F.C. Hearing, D. Butler	Court Reporter Fees	Unbilled	110.25
Bill	09/05/2017	South Carolina Court of Appeals	Motion for Extension, D. Butler	Filing Fees	Unbilled	25.00
Bill	11/13/2017	South Carolina Court of Appeals	Motion for Extension, D. Butler-Long	Filing Fees	Unbilled	25.00
Bill	12/11/2017	South Carolina Court of Appeals	Motion for Extension, Doretta Butler	Filing Fees	Unbilled	25.00
Bill	02/06/2018	Columbia Printing & Graphics	INV NO. 53871, D. Butler-Long	Copy and printing expense	Unbilled	193.34
Credit Card Charge	08/26/2023	Ciox Health	Medical Records, MUSC Columbia, Inv #0428086314, 08/26/2023	Medical Records	Unbilled	63.52
Credit Card Charge	08/26/2023	Ciox Health	Medical Records, Palmetto Imaging, Inv #0427847198, 08/26/2023	Medical Records	Unbilled	29.82
Bill	09/05/2023	Waverly Family Practice-Cooperative Health	Medical Records, Waverly Family Practice, 09/05/2023	Medical Records	Unbilled	25.00
Bill	11/20/2023	South Carolina Supreme Court	Filing Fee, Motion for Extension, 11/20/2023	Medical Records	Unbilled	50.00
Total WC Claim						546.93
Total Butler/Doretta						546.93
<b>TOTAL</b>						<b>546.93</b>

1935.71

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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

Appellate Case No.: 2023-001632

Doretta Butler-Long, Employee, Claimant, ..... Respondent,

v.

ITW Labels, Employer and American Zurich Insurance  
Company/Zurich North America c/o Broadspire, Carrier, ..... Petitioners.

**PROOF OF SERVICE**

I certify that I, Wanda Powell, Paralegal for the Samuels Reynolds Law Firm, LLC, have served the **Motion for Costs and Attorneys Fees** upon counsel for the Petitioners as indicated below:

The Honorable Jenny Abbot Kitchings  
Clerk of the South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
***Via Hand Delivery***

Jason W. Lockhart, Esquire  
McAngus Goudelock & Courie, LLC  
1320 Main Street, 10<sup>th</sup> floor  
Columbia, SC 29201  
***Via Email: jlockhart@mgclaw.com***

April 30, 2024



Wanda Powell  
SAMUELS REYNOLDS LAW FIRM, LLC  
1320 Richland Street  
Columbia, SC 29201  
(803) 779-4000



STEPHEN B. SAMUELS  
P. JASON REYNOLDS  
C. DAVID BEALE, JR.  
MICHAEL R. PARKS  
ATTORNEYS AT LAW

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The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RE: Doretta Butler v. Illinois Tool Works  
Appellate Case No.: 2023-001632

Dear Ms. Kitchings:

Enclosed for filing please find our **Motion for Costs and Attorneys Fees** in the above-referenced appeal. I have also enclosed our firm's check in the amount of Fifty (\$50.00) Dollars as payment of the required filing fee. Please have your staff date stamp an extra copy of the Motion, and return a clocked copy to our courier.

By copy of this letter and enclosure to Jason Lockhart, counsel of record for the Petitioners, we are serving him with a copy of our **Motion for Costs and Attorneys Fees** as indicated by the attached Proof of Service.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your consideration.

With kindest regards, I am

Respectfully,

A handwritten signature in blue ink, appearing to read 'Wanda Powell', is written over the typed name.

Wanda Powell

Paralegal to Stephen B. Samuels

/wp  
Enclosure(s) as stated

cc: Jason Lockhart, Esquire