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**Jun 21 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

James E. Chellis, Master in Equity

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Case No. 2020-001168

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NCP PILGRIM, LLC

Respondent,

v.

MARY LOU CERCOPELY, DAVID S. CLANCY, SOUTH CAROLINA FEDERAL  
CREDIT UNION, SOUTHCOAST COMMUNITY BANK, JOAN GEANURACOS and  
DAVID SEAN CLANCY,

Of whom MARY LOU CERCOPELY, DAVID S. CLANCY,  
And DAVID SEAN CLANCY are the

Appellants.

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RESPONDENT NCP PILGRIM, LLC'S MOTION FOR COSTS UNDER RULE 222(d)  
SCACR

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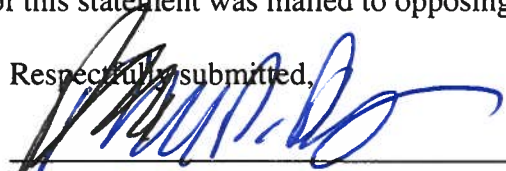
Russell P. Patterson, Esquire  
Lauren P. Williams, Esquire  
Russell P. Patterson, P.A.  
P.O. Box 8047  
Hilton Head, South Carolina 29938  
(843) 341-9300  
Attorneys for the Respondent  
NCP Pilgrim, LLC

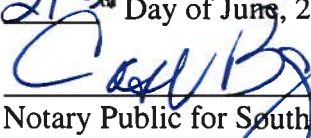
Pursuant to Rule 222(d), SCACR, Respondent NCP Pilgrim, LLC (“Respondent”) respectfully files this Motion for Costs.

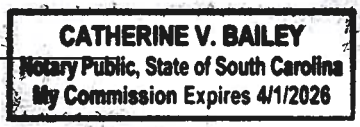
Accordingly, Respondent requests the Appellate Court tax the following costs against Appellants Mary Lou Cercopely, David S. Clancy, and David Sean Clancy:

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing Final Brief	26	6 copies @ \$8.88 per copy	\$53.29	
Attorney’s Fee Provided by Rule 222(b), SCACR			\$2,500.00	
		<b>TOTAL</b>	<b>\$2,553.29</b>	

I, Russell P. Patterson, 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.

Respectfully submitted,  
  
 \_\_\_\_\_ / Date 6/21/24  
 Russell P. Patterson  
 Russell P. Patterson, P.A.  
 P.O. Box 8047  
 Hilton Head Island, SC 29938  
 (843) 341-9300  
[lauren@russellpattersonlaw.com](mailto:lauren@russellpattersonlaw.com)  
 Attorneys for the Respondent,  
 NCP Pilgrim, LLC

SWORN to before me this  
21<sup>st</sup> Day of June, 2024.  
  
 \_\_\_\_\_  
 Notary Public for South Carolina

Printed Name: \_\_\_\_\_  
 My Commission Expires: \_\_\_\_\_  


THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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DAVID SEAN CLANCY,

Of whom MARY LOU CERCOPELY, DAVID S. CLANCY,  
And DAVID SEAN CLANCY are the

Appellants.

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CERTIFICATE OF SERVICE

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The undersigned hereby certifies that on the date indicated below, counsel for Appellants was served with a copy of the Respondent NCP Pilgrim, LLC's Motion for Costs by mailing a copy of the same via E-mail and First Class, U.S. Mail, postage-paid on the date set forth below. A copy of the email is attached hereto as Exhibit 1.

Robert Bratton Varnado, Esquire  
Brown & Varnado, LLC  
P.O. Box 1127  
Mt. Pleasant, SC 29465  
[rvarnado@varnado-law.com](mailto:rvarnado@varnado-law.com)  
*Attorney for Appellants,  
Mary Lou Cercopely, David Clancy,  
and David Sean Clancy*

Respectfully submitted,

/s/ Russell P. Patterson

Russell P. Patterson

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Hilton Head Island, SC 29938

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[lauren@russellpattersonlaw.com](mailto:lauren@russellpattersonlaw.com)

*Attorneys for the Respondent,*

*NCP Pilgrim, LLC*

Hilton Head Island, South Carolina  
June 21, 2024

**Russell P. Patterson, P.A.**

Serving the Lowcountry for over 35 years



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**SC Court of Appeals**

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June 21, 2024

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

E-mail

**Re: NCP Pilgrim, LLC v. Mary Lou Cercopely, et al  
Appellate Case No. 2020-001168**

Dear Ms. Kitchings:

Please find enclosed Respondent Pilgrim LLC's Motion for Costs under Rule 222(d) SCACR, a Certificate of Service for filing in the above referenced matter, along with the filing for of \$50.00 By copy of this letter, I am serving opposing counsel with these documents.

Please let me know if you have any questions or need any additional information.

Sincerely,  
RUSSELL P. PATTERSON, P.A.

A handwritten signature in blue ink, appearing to be 'R. Patterson', written over a horizontal line.

Russell P. Patterson

**Enclosures**

cc: Robert B. Varnado, Esquire (w/o encl.) - via email  
NCP Pilgrim, LLC (w/o encl.) - via email