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Jan 28 2025

S.C. SUPREME COURT

*Taylor v. McIver, et al*

*Appellate Case No.: 2024-001889*

# Exhibit A

*To Respondent Carla Taylor's Motion for Costs and Sanctions*

Affidavit of Attorney's Fees and Costs

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Jan 28 2025

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM HORRY COUNTY  
In the Court of Common Pleas

William H. Seals, Jr. Circuit Judge

Appellate Case No. 2024-001889

Lower Court Case No. 2024-CP-26-07182

Carla Taylor, .....Respondent,

v.

Kenneth McIver, Caroline Gore, and Derrick Stevens in their official capacities as members of the Town of Atlantic Beach Municipal Election Commission ..... Appellants.

**AFFIDAVIT OF ATTORNEY'S FEES**

PERSONALLY appeared before me, Robert E. Tyson, Jr., who being duly sworn depose and say as follows:

1. My name is Robert E. Tyson, Jr., Esquire. I am over eighteen (18) years of age, of sound mind, and fully competent to make this Affidavit. I have personal knowledge of the facts stated in this Affidavit, and they are all true and correct.

2. I represent Plaintiff, Carla Taylor in the above-styled and numbered matter. I am familiar, therefore, with the facts, filings, and all other aspects of this appeal. I am a member of the law firm of Robinson Gray Stepp & Laffitte, LLC, located at 2151 Pickens Street, Suite 500, Columbia, South Carolina 29201. I am licensed to practice in South Carolina. I have been licensed

to practice law in the State of South Carolina since 1995 and have continuously been a member in good standing of the South Carolina Bar Association. I am also admitted to practice in the United States District Court for the District of South Carolina, the United States Court of Appeals for the Fourth Circuit, and the United States Supreme Court. My practice involves litigation matters in the state court and federal court.

3. My customary billing rate for this matter is \$350.00 per hour, which is consistent with the prevailing community rate for similar services offered by attorneys in South Carolina. When I have been able, I have also delegated certain research and writing tasks associated with this file to other members of our firm, to include: La'Jessica M. Stringfellow, Esquire, at a rate of \$225.00 per hour; Sarah C. Frierson, Esquire, at a rate of \$225.00 per hour; and paralegal, Cyndi Nygord, at a rate of \$125.00 per hour.

4. It is my opinion that the fees and expenses incurred are reasonable and necessary in this case based upon:

- a. The novelty and difficulty of the questions involved;
- b. The skill and amount of time required to perform the services properly;
- c. The experience, reputation and ability of those performing the services;
- d. The likelihood that the engagement will preclude other employment;
- e. The time limitations imposed by you or the circumstances;
- f. The amount involved and the results obtained; and
- g. Any other factors that may be relevant under applicable rules of professional conduct.

5. The fees charged in participating in this appeal are those customarily charged for the same or similar services by attorneys with my experience, reputation, and ability, considering

the nature of the controversy, the time limitations imposed, and the results obtained compared with results in similar cases. My hourly rate of \$350 is reasonable and necessary for the legal services which I have provided in this case. Similarly, attorney and Robinson Gray Partner, La'Jessica M. Stringfellow's hourly rate of \$225 per hour, Sarah C. Frierson's hourly rate of \$225, and paralegal, Cyndi Nygord's hourly rate of \$125 are reasonable and necessary for the legal services which they have provided in this case.

6. From November 5, 2024, (when Appellants filed their Notice of Appeal), Robinson Gray attorneys and staff have billed **\$11,160.00** for **42.10** hours of work. The total fees were computed by multiplying each attorney's hourly rate by the amount of hours the attorney worked.


7. I spent 15.9 hours in this appeal, La'Jessica Stringfellow spent 22.90 hours in this appeal, Sarah Frierson spent .3 hours in this appeal, and Cyndi Nygord spent 3 hours in this appeal, which are reasonable and necessary times for services such as those rendered in this case for someone of our experience.

8. In addition to attorneys' fees, Robinson Gary expended **\$50.00** in costs for filing fees, service of process fees and other related expenses.

9. All of the activities and work undertaken by the attorneys and staff on this matter were and will be necessary to represent Respondent Carla Taylor in this matter, and the fees charged and to be charged therefore were reasonable and necessary.

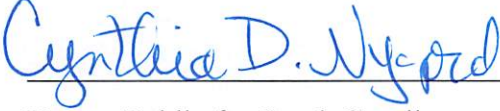
Further, Affiant sayeth not.

January 27, 2025

  
\_\_\_\_\_  
Robert E. Tyson, Jr., Esquire

Sworn to before me

This 28<sup>th</sup> day of January 2025

  
\_\_\_\_\_  
Notary Public for South Carolina

My Commission expires: 11/21/29