

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
L. Casey Manning, Circuit Court Judge

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Appellate Case No. 2022-001470  
Case No. 2019-CP-40-05221

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Alicia Pearson, ..... Respondent,

v.

Richland County, ..... Appellant.

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**MOTION FOR COSTS ON APPEAL**

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The Appellant Richland County moves this Court, pursuant to Rule 222(d), SCACR, to tax costs on appeal in the amount of \$3,028.83 against the Respondent Alicia Pearson.

This motion is based on the grounds as set forth in the supporting memorandum filed herewith.

The requested costs on appeal are set forth in the Statement of Costs on Appeal which is filed herewith.

LINDEMANN LAW FIRM, P.A.

BY: *s/ Andrew F. Lindemann*

ANDREW F. LINDEMANN #13030  
5 Calendar Court, Suite 202  
Post Office Box 6923  
Columbia, South Carolina 29260  
(803) 881-8920

*Counsel for Appellant Richland County*

February 27, 2025

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**MEMORANDUM IN SUPPORT OF  
MOTION FOR COSTS ON APPEAL**

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By its published opinion filed January 29, 2025, the South Carolina Court of Appeals reversed the lower court’s order granting Respondent Alicia Pearson a jury trial on her breach of contract claim.

Rule 222(a), SCACR, provides that when a “judgment is reversed, costs shall be taxed against the respondent.” *See*, Rule 222(a), SCACR. Because the trial court was reversed, the Appellant Richland County qualifies as the prevailing party in this appeal. Therefore, as the prevailing party on appeal, the Appellant is

entitled to an award of costs on appeal in accordance with Rule 222(b), SCACR, which includes the \$250.00 filing fee for the Notice of Appeal, the transcript for the August 4, 2022 motion hearing, as well as the costs associated with printing its Final Brief and the Record on Appeal. The Appellant is also entitled to attorney's fees in the amount of \$2,500.00, which is an amount set by order of the Supreme Court.

The filing of this motion is timely. The Remittitur was filed on February 18, 2025. This motion is filed within fifteen days of the issuance of the Remittitur, as required by Rule 222(d), SCACR.

As a result, the Appellant Richland County moves this Court, pursuant to Rule 222(d), SCACR, for costs on appeal in the amount of \$3,028.83 to be taxed against the Respondent Alicia Pearson. The requested costs on appeal are set forth in the Statement of Costs on Appeal, which is also filed herewith.

Respectfully submitted,

LINDEMANN LAW FIRM, P.A.

BY: s/ Andrew F. Lindemann  
ANDREW F. LINDEMANN #13030  
5 Calendar Court, Suite 202  
Post Office Box 6923  
Columbia, South Carolina 29260  
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*Counsel for Appellant Richland County*

February 27, 2025

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**CERTIFICATE OF SERVICE**

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Pursuant to Section (d)(1) of the Supreme Court’s Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), the undersigned employee of Lindemann Law Firm, P.A., counsel for the Appellant Richland County, does hereby certify that service of the **Motion for Costs on Appeal, Memorandum in Support of Motion for Costs on Appeal**, and the **Statement of Costs on Appeal** was made upon all counsel of record by email only this the 27th day of February 2025, as follows:

Donald Gist, Esquire  
Gist Law Firm, P.A.  
Email: [dtommygist@yahoo.com](mailto:dtommygist@yahoo.com)

*s/ Andrew F. Lindemann*

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5 Calendar Court, Suite 202 (29206)  
Post Office Box 6923  
Columbia, South Carolina 29260

February 27, 2025

**ANDREW F. LINDEMANN\***  
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Email: [andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)

*\*Also Admitted in North Carolina*

**RECEIVED**  
**Feb 27 2025**  
**SC Court of Appeals**

**Via Email Only**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: Alicia Pearson v. Richland County, South Carolina  
Appellate Case Number: 2022-001470  
Civil Action Number: 2019-CP-40-5221  
Claim Number: 2020G00141  
Our File Number: 314.20233

Dear Ms. Kitchings:

Pursuant to Section (b)(2) the Supreme Court's Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (as amended April 24, 2024), please find enclosed for filing the **Motion for Costs on Appeal, Memorandum in Support of Motion for Costs on Appeal**, and the **Statement of Costs on Appeal** with regard to the above referenced appeal. By copy of this letter, I am serving copies on all counsel of record by email only pursuant to Section (d)(1) of the same Supreme Court Order.

My firm's check for the \$50.00 filing fee will be mailed to the Court via U.S. Mail. Thank you for your assistance.

Sincerely,

LINDEMANN LAW FIRM, P.A.

Andrew F. Lindemann

AFL/jac  
Enclosures

cc: Donald Gist, Esquire (w/ Enclosures, Via Email Only)