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Apr 28 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from County Family Court
Honorable G.D. Morgan, Jr.

Appeal from Greenville County
Court of Common Pleas

Anthony Beasley, Individually and on behalf of the minor child, LB born 2014,
Appellant, Respondents,

v.

South Carolina Department of Social Services, South Carolina Department of
Children Advocacy, Children's Advocacy Center of Spartanburg, Cherokee and Union Counties,
Inc., Defendants,, et al. Defendants,

Of whom Anthony Beasley is the Appellant.

Appellate Case No: 2024-000200

REPLY TO MOTION FOR COSTS AND FEES

I, Melinda Butler, hereby motion the Court to deny the State's motion for costs and fees. In support of the denial, Appellant submits that he has been in litigation in the family court with the State of South Carolina since 2020 and is now in this litigation. The party seeking fees is the State of South Carolina. Had Mr. Beasley prevailed, the State would be denying responsibility for fees and costs on appeal, alleging they are a State agency and taxpayer funded. The reverse is true as well. They are a State agency whom should not be awarded costs and fees after a favorable verdict on appeal. (See generally SCRCP, Rule 4, treating service of process differently when it is upon a State agency). Furthermore, Appellant submits the remittitur was filed the same day as the motion for costs and the motion is therefore, untimely.

Respectfully submitted,

s/ *Melinda Butler*

Melinda Butler
Counsel for Appellant
S.C. Bar No. 78040
BUTLER LAW FIRM, LLC
211 E. Main Street
Union, South Carolina 29379

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PROOF OF SERVICE

I, Melinda Butler, hereby certify that I have served a copy of the **Reply to Motion for
Costs and Fees** on the below stated parties at the stated email AND/OR postal address as
indicated below, by attaching a copy of same, on April 28, 2025, addressed as follows:

Stephanie Burton, Esq., sburton@gibbesburton.com
McElhaney White, Esq. mwhite@holcombebomar.com

Respectfully submitted,

_____ s/ *Melinda Butler*
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