

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM YORK COUNTY
Court of Common Pleas

Lee S. Alford, Circuit Court Judge

Case No. 02-CP-46-2369

Auto-Owners Insurance Company,Petitioner,

v.

Samuel W. Rhodes, Piedmont Promotions,
Inc. and Marion L. Eadon d/b/a C & B
Fabrications, C & B Fabrications, Inc. and
Low Country Signs, Inc.,Respondents.

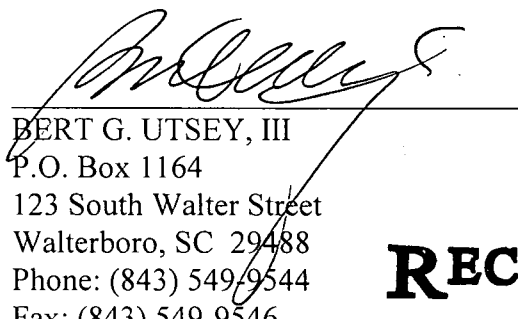
MOTION FOR COSTS

Pursuant to Rules 222 and 242(j), SCACR, Respondents Samuel W. Rhodes and
Piedmont Promotions, Inc. move this Honorable Court for an Order awarding them costs
against Petitioner as set forth in the attached Itemized Statement of Costs.

Respectfully submitted,

PETERS, MURDAUGH, PARKER,
ELTZROTH AND DETRICK, P.A.

BY:


BERT G. UTSEY, III
P.O. Box 1164
123 South Walter Street
Walterboro, SC 29488
Phone: (843) 549-9544
Fax: (843) 549-9546

RECEIVED

OCT 23 2013

S.C. SUPREME COURT

MATTHEW V. CREECH
P.O. Box 2500
110 West Wilson Street
Ridgeland, SC 29936
Phone: (843) 726-6131
Fax: (843) 726-6057

and

CREIGHTON B. COLEMAN
P.O. Box 1006
120 Washington Street
Winnsboro, SC 29180
Phone: (803) 635-6884

October 2, 2012
Walterboro, South Carolina

Attorneys for Respondents Samuel W.
Rhodes, Jr. and Piedmont Promotions, Inc.

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

OCT 23 2013

APPEAL FROM YORK COUNTY
Court of Common Pleas

S.C. Supreme Court

Lee S. Alford, Circuit Court Judge

Case No. 02-CP-46-2369

Auto-Owners Insurance Company,Petitioner,

v.

Samuel W. Rhodes, Piedmont Promotions,
Inc. and Marion L. Eadon d/b/a C & B
Fabrications, C & B Fabrications, Inc. and
Low Country Signs, Inc.,Respondents.

ITEMIZED STATEMENT OF COSTS

The Court is requested to tax the following costs against Petitioner:


COSTS TAXABLE UNDER RULE 222(b), SCACR	NO. OF PAGES (pages x copies)	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing Respondents' Final Brief (Rule 222(b)(5), SCACR)	52 x 21	0.15 ¹	\$163.80	
Cost of Court Reporter's Transcript (copy) (Rule 222(b)(2), SCACR)	47 pages	0.75 ²	\$35.25	
Attorney's Fee (Rule 222(b), SCACR)			\$1,000.00	

¹ Respondents' counsel uses the rate of \$.15 per page based upon his knowledge of the rate per page approved by this Court in other appeals.

² Respondent's counsel uses the rate of \$.75 per page based upon Rule 607, SCACR.


COSTS TAXABLE UNDER RULE 242(j), SCACR	NO. OF PAGES (pages x copies)	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing Respondents' Brief (Rule 242(i), SCACR)	40 x 21	0.15	\$126.00	
Attorney's Fee (Rule 242(j)(2), SCACR)			\$1,000.00	
		TOTAL	\$2,325.05	

I, Bert G. Utsey, III, do swear and affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed to opposing counsel.


 BERT G. UTSEY, III
 Attorney for Respondents Samuel W.
 Rhodes, Jr. and Piedmont Promotions, Inc.

October 21, 2013
 Walterboro, South Carolina

Subscribed and sworn to me this 21st day of October, 2013.


 Notary Public for South Carolina
 My Commission Expires: 2/15/2022
 (Seal)

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM YORK COUNTY
Court of Common Pleas

Lee S. Alford, Circuit Court Judge

Case No. 02-CP-46-2369

RECEIVED

OCT 23 2013

S.C. Supreme Court

Auto-Owners Insurance Company,

Petitioner

v.

Samuel W. Rhodes, Piedmont Promotions,
Inc. and Marion L. Eadon d/b/a C & B
Fabrications, C & B Fabrications, Inc. and
Low Country Signs, Inc.,

Respondents.

PROOF OF SERVICE

I certify that I have served a copy of MOTION FOR COSTS and ITEMIZED STATEMENT OF COSTS upon all parties by mailing same via U.S. First Class Mail, postage prepaid, on October 18, 2013, addressed to their attorneys of record

John L. McCants
ROGERS LEWIS JACKSON MANN & QUINN, LLC
1330 Lady Street, Ste. 400
Columbia, SC 29201


A. Johnston Cox, Esquire
GALLIVAN, WHITE & BOYD, PA
P.O. Box 7368
Columbia, SC 29202

Attorneys for Petitioner Auto Owners

and

William O. Sweeney, Esquire
SWEENEY, WINGATE & BARROW, PA
Post Office Box 12129
Columbia, SC 29211

Attorneys for Respondent Marion L.
Eadon d/b/a C&B Fabrication, C&B
Fabrications, Inc. and Low Country
Signs, Inc.



Bert G. Utsey, III
PETERS, MURDAUGH, PARKER,
ELTZROTH & DETRICK, P.A.
Post Office Box 1164
Walterboro, South Carolina 29488
(843)549-9544
Attorney for Respondent
Samuel W. Rhodes

October 21, 2013
Walterboro, South Carolina