

RECEIVED

Jul 30 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Bentley D. Price
Circuit Court Judge

Appellate Case No. 2023-001852

Athena Irland, Appellant,

v.

Brandy S. Culp, Respondent.

ITEMIZED STATEMENT OF COSTS

The Appellate Court is requested to tax the following costs against

Appellant Athena Irland

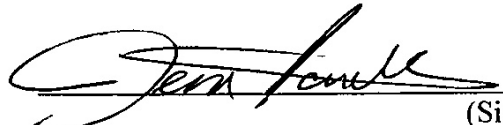
(Name of Party)

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief				
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				

Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript				
Attorney's Fee Provided By Rule 222(b), SCACR			\$2,500.00	
Other (specify and explain): Motion Attached – Additional Costs pursuant to Rule 222(b), SCACR <u>and</u> Sanctions for Frivolous Appeal pursuant to Rule 269, SCACR.			\$40,634.56	
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COSTS TAXABLE UNDER RULE 242(j), SCACR				
Cost of Printing or Copying Brief				
Cost of Printing or Copying Reply Brief				
Cost of Printing or Copying Appendix				
Filing fee paid under Rule 242(c), SCACR				
Attorney's fee provided by Rule 242(j)(2), SCACR				
Other (specify and explain):				
		TOTAL	\$43,134.56	

[Signature on following page]

I, Jesse Sanchez, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed via certified mail to Appellant .



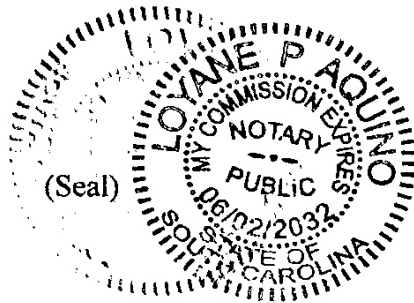
(Signature)
Attorney for Respondent Brandy S. Culp

Subscribed and sworn to before me this 30 day of July, 2025.



Notary Public for SC

My Commission Expires: 06/02/2032



**Culp v. Irland Appeal - Costs Incurred by Respondent Brandy S. Culp
Appellate Case No. 2023-001852**

Invoice	Amount
1217	2500
1249	5000
1255	2775.93
1268	9547.02
1272	7673.84
1283	10279.29
1302	2858.48
TOTAL	\$40,634.56



751 Johnnie Dodds Blvd., Suite 200
Mount Pleasant, SC 29464
Phone: 843-814-8181

Invoice # 1217
Date: 08/11/2022
Due Upon Receipt

Brandy Culp

**Appeal - IN THE MATTER OF: Dolly L. Coleman (Decedent), Athena L. Irland vs. Isadore John Psaras, Christina D. Culp, Brandy S. Culp.
Case No. 2022-CP-10-3304.**

Type	Date	Notes	Quantity	Rate	Total
Expense	08/11/2022	Flat Fee - Motion to Dismiss	1.00	\$2,500.00	\$2,500.00
				Total	\$2,500.00
				Payment (08/24/2022)	-\$2,500.00
				Balance Owing	\$0.00

Please make all amounts payable to: The Law Office of Jesse Sanchez, LLC



751 Johnnie Dodds Blvd., Suite 200
Mount Pleasant, SC 29464
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Invoice # 1249
Date: 07/17/2023
Due Upon Receipt

Brandy Culp

**Appeal - IN THE MATTER OF: Dolly L. Coleman (Decedent), Athena L. Irland vs. Isadore John Psaras, Christina D. Culp, Brandy S. Culp.
Case No. 2022-CP-10-3304.**

Type	Date	Notes	Quantity	Rate	Total
Expense	07/17/2023	Drafting Documents: Preparation of Petition for Writ of Mandamus, Exhibits, Proof of Service, Cover Letter, and follow up correspondence with the Circuit Court and Court of Appeals.	1.00	\$5,000.00	\$5,000.00
				Total	\$5,000.00
				Payment (08/10/2023)	-\$5,000.00
				Balance Owing	\$0.00

Please make all amounts payable to: The Law Office of Jesse Sanchez, LLC



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Invoice # 1255
 Date: 10/09/2023
 Due Upon Receipt

Brandy Culp

Appeal - IN THE MATTER OF: Dolly L. Coleman (Decedent), Athena L. Irland vs. Isadore John Psaras, Christina D. Culp, Brandy S. Culp. Case No. 2022-CP-10-3304.

Type	Date	Notes	Quantity	Rate	Total
Expense	07/17/2023	Reimbursable expenses: Postage - Certified RR	1.00	\$26.40	\$26.40
Expense	07/20/2023	Reimbursable expenses: Postage	1.00	\$26.16	\$26.16
Service	07/20/2023	Drafting Documents: Drafted, served, and filed Supplement to Notice of Appeal with Court of Appeals, and Proof of Service.	0.30	\$300.00	\$90.00
Service	09/26/2023	Hearing: Hearing Prep. Discussions with D. Slotchiver and S. Slotchiver. Call with Judge Price's office re: scheduling (.1).	2.10	\$300.00	\$630.00
Service	09/27/2023	Hearing: Hearing Prep and Hearing on Appeal.	3.00	\$300.00	\$900.00
Service	09/28/2023	Drafted proposed order and proof of service. Discussion with D. Slotchiver and S. Slotchiver re: same. Filed and served proposed order and proof of service with the Court and all parties to the appeal.	3.50	\$300.00	\$1,050.00
Expense	09/28/2023	Reimbursable expenses: Proposed Order Filing Fee	1.00	\$31.74	\$31.74
Expense	09/28/2023	Reimbursable expenses: Certified Mail - Postage	1.00	\$21.63	\$21.63

Total	\$2,775.93
Payment (11/22/2023)	-\$1,000.00
Payment (12/19/2023)	-\$1,775.93

Balance Owing **\$0.00**

Please make all amounts payable to: The Law Office of Jesse Sanchez, LLC



751 Johnnie Dodds Blvd., Suite 200
 Mount Pleasant, SC 29464
 Phone: 843-814-8181

Invoice # 1268
 Date: 04/25/2024
 Due Upon Receipt

Brandy Culp

Appeal - IN THE MATTER OF: Dolly L. Coleman (Decedent), Athena L. Irland vs. Isadore John Psaras, Christina D. Culp, Brandy S. Culp. Case No. 2022-CP-10-3304.

Type	Date	Notes	Quantity	Rate	Total
Service	04/22/2024	Drafting Documents: Reviewed appellate file, including all filings by A. Irland. Conducted Legal Research on Probate Code Statutory Requirements for Appeals, Jurisdictional Requirements, and Two-issue Rule. Outlined Motion to Dismiss - Statement of the Case and Arguments 1-5.	12.00	\$350.00	\$4,200.00
Service	04/23/2024	Drafting Documents: Drafted Motion to Dismiss.	12.00	\$350.00	\$4,200.00
Service	04/24/2024	Drafting Documents: Forwarded Draft Motion to Dismiss to Co-counsel. Revised and Finalized Draft. Organized Exhibits and Drafted Exhibits Index. Drafted Cover Letter to Kitchings and Proof of Service. Electronically and physically filed and served Motion with all corresponding documents. Forwarded clocked copies to Client.	6.00	\$350.00	\$2,100.00
Expense	04/24/2024	Postage: Postage for filing and serving Motion to Dismiss via Certified and Priority Mail.	1.00	\$57.80	\$57.80
Expense	04/24/2024	Filing Fee: Filing fee for motion to dismiss.	1.00	\$50.00	\$50.00

Subtotal	\$10,607.80
Invoice Discount	10.0%
Total	\$9,547.02
Payment (08/08/2024)	-\$3,000.00

Payment (09/13/2024)	-\$4,000.00
Payment (11/12/2024)	-\$2,000.00
Payment (12/27/2024)	-\$547.02
Balance Owing	\$0.00

Please make all amounts payable to: The Law Office of Jesse Sanchez, LLC



751 Johnnie Dodds Blvd., Suite 200
 Mount Pleasant, SC 29464
 Phone: 843-814-8181

Invoice # 1272
 Date: 09/10/2024
 Due Upon Receipt

Brandy Culp

**Appeal - IN THE MATTER OF: Dolly L. Coleman (Decedent), Athena L. Irland vs. Isadore John Psaras, Christina D. Culp, Brandy S. Culp.
 Case No. 2022-CP-10-3304.**

Type	Date	Notes	Quantity	Rate	Total
Service	05/10/2024	Drafting Documents: Drafted Reply to Return to Motion to Dismiss, Cover Letter, and Proof of Service. Forwarded to trial counsel for review. Incorporated trial counsel notes. Filed and served the same via Certified Mail. Forwarded copy to client.	5.50	\$350.00	\$1,925.00
Service	05/10/2024	Drafting Documents: Reviewed Irland Return to Motion to Dismiss. Outlined Reply. Began drafting Reply to Return.	5.00	\$350.00	\$1,750.00
Expense	05/10/2024	Postage: Certified Mail Service to Parties and Filing with Court.	1.00	\$53.05	\$53.05
Service	08/12/2024	Drafting Documents: Began drafting Initial Brief of Respondent.	2.00	\$350.00	\$700.00
Service	08/13/2024	Drafting Documents: Drafted Initial Brief of Respondent, forwarded draft to co-counsel for comment.	8.00	\$350.00	\$2,800.00
Service	08/14/2024	Drafting Documents: Finalized Respondent's Initial Brief, Drafted Designation of Matter to Include in the Record on Appeal, Drafted Motion to Strike Appellant's Brief, Proof of Service, and Cover Letter. Filed and served the same.	5.00	\$350.00	\$1,750.00
Expense	08/14/2024	Filing Fee: Motion to Strike	1.00	\$50.00	\$50.00
				Subtotal	\$9,028.05

Invoice Discount	15.0%
Total	\$7,673.84
Payment (12/27/2024)	-\$2,452.98
Balance Owing	\$5,220.86

Please make all amounts payable to: The Law Office of Jesse Sanchez, LLC

Brandy Culp

**Appeal - IN THE MATTER OF: Dolly L. Coleman (Decedent), Athena L. Irland vs. Isadore John Psaras, Christina D. Culp, Brandy S. Culp.
Case No. 2022-CP-10-3304.**

Type	Date	Notes	Quantity	Rate
Service	11/20/2024	Drafting Documents: Drafted Renewed Motion to Dismiss.	6.00	\$350.00
Service	11/21/2024	Drafting Documents: Drafted Renewed Motion to Dismiss. Forwarded draft to Steve and Dan Slotchiver for review.	10.00	\$350.00
Service	11/22/2024	Drafting Documents: Finalized Renewed Motion to Dismiss, Prepared Exhibits, Drafted Cover Letter and Proof of Service, filed and served the same.	2.00	\$350.00
Expense	11/22/2024	Reimbursable expenses: Filing fee	1.00	\$50.00
Expense	11/22/2024	Postage: Postage	1.00	\$18.95
Service	12/05/2024	Drafting Documents: Reviewed Appellant's Record on Appeal. Call with Steve Slotchiver. Drafted Addendum to Motion to Dismiss, organized corresponding exhibits, drafted Proof of Service and Cover Letter to the Court of Appeals. Prepared documents for service and filing.	10.00	\$350.00
Expense	12/06/2024	Reimbursable expenses: Filing fee	1.00	\$50.00
Expense	12/06/2024	Reimbursable expenses: Postage	1.00	\$10.34
Service	03/04/2025	Letter Writing: Drafted letter to the the Court of Appeals re: Appellant's most recent Request for Extension and concerns regarding Appellant's dilatory tactics.	1.00	\$350.00
			Total	\$10,279.29

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1272	09/10/2024	\$7,673.84	\$2,452.98	\$5,220.86
1302	07/30/2025	\$2,858.48	\$0.00	\$2,858.48

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1283	03/07/2025	\$10,279.29	\$0.00	\$10,279.29
Outstanding Balance				\$18,358.63
Total Amount Outstanding				\$18,358.63

Please make all amounts payable to: The Law Office of Jesse Sanchez, LLC

Payment is due upon receipt.



751 Johnnie Dodds Blvd., Suite 200
Mount Pleasant, SC 29464
Phone: 843-814-8181

Invoice # 1302
Date: 07/30/2025
Due Upon Receipt

Brandy Culp

**Appeal - IN THE MATTER OF: Dolly L. Coleman (Decedent), Athena L. Irland vs. Isadore John Psaras, Christina D. Culp, Brandy S. Culp.
Case No. 2022-CP-10-3304.**

Type	Date	Notes	Quantity	Rate	Total
Service	03/25/2025	Drafting Documents: Drafted Return to Motion to Reinstate Appeal, Cover Letter, and Proof of Service. Forwarded to co-counsel for review. Filed and served the same.	3.00	\$350.00	\$1,050.00
Expense	03/25/2025	Postage: Postage	1.00	\$8.48	\$8.48
Service	07/30/2025	Drafted Motion for Taxation of Costs and Motion for Sanctions, Proof of Service, and Cover Letter.	5.00	\$350.00	\$1,750.00
Expense	07/30/2025	Reimbursable expenses: Filing Fee - Motion	1.00	\$50.00	\$50.00
				Total	\$2,858.48

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