

RECEIVED

Sep 03 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY

Court of Common Pleas

Shannon M. Phillips, Master in Equity

Appellate Case No. 2023-001897

Erin Burns Anderson,)
)
Respondent,)
)
v.)
)
Rudy Lamar Pearson,)
)
Appellant,)
_____)

MOTION FOR COSTS

COMES NOW the Appellant, Rudy Lamar Pearson, by and through his undersigned counsel, pursuant to **Rule 222, South Carolina Appellate Court Rules (SCACR)**, and respectfully moves this Honorable Court for an award of costs incurred in connection with this appeal.

In support of this Motion, Appellant states the following:

1. The Court of Appeals issued its opinion on March 5, 2025, reversing the decision of the lower court in favor of the Appellant.
2. As the prevailing party in this appeal, Appellant is entitled to recover costs pursuant to Rule 222, SCACR, unless the Court orders otherwise.
3. Rule 222, SCACR provides that "[w]hen a judgment is reversed, costs shall be taxed against the respondent unless the court orders otherwise."
4. The taxable costs in this appeal total \$3,928.97, and consist of the following:

- Cost of Printing or Copying Final Brief: \$23.32
- Cost of Printing or Copying Final Reply Brief: \$11.66
- Cost of Printing or Copying Record on Appeal: \$401.99
- Filing Fee Paid under Rule 203(d), SCACR: \$250.00
- Cost of Court Reporter's Transcript: \$742.00
- Attorney's Fee Provided by Rule 222(b), SCACR: \$2,500.00

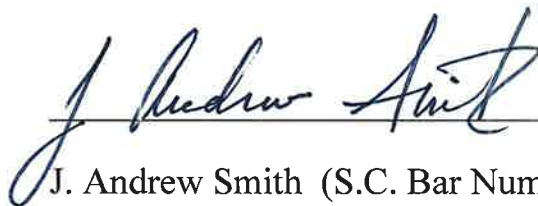
5. A Sworn Itemized Statement of Costs is attached to this Motion pursuant to Rule 222 (d), SCACR.

WHEREFORE, Appellant respectfully requests that this honorable Court enter an order awarding costs in the amount of \$3,928.97 against Respondent.

Very respectfully submitted this 3rd day of September, 2025.

Very Respectfully,

THE LAW OFFICE OF CLIFFORD BUSH III, LLC



J. Andrew Smith (S.C. Bar Number 14086)

Phone (843) 379-9500

Fax (843) 379-9550

Email drew@lawofficeofcbushiii.com

Attorney for Appellant

Beaufort County, SC

September 3, 2025

RECEIVED

Sep 03 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBUG COUNTY
Court of Common Pleas

Shannon M. Phillips, Master in Equity

Appellate Case No. 2023-001897

Case No. 2018-CP-42-01222

Erin Burns Anderson

Respondent,

v.

Rudy Lamar Pearson,

Appellant.

PROOF OF SERVICE

I certify that I have served the attached Motion for Costs and Sworn Itemized Statement of Costs on Respondent, Erin Burns Anderson, by depositing a copy of it in the United States Mail, postage prepaid, on September 3, 2025, addressed to her attorneys of record, Bernie W. Ellis, Burr & Forman, LLP, P. O. Box 447, Greenville, SC 29602 and William B. Darwin, Jr., Holcombe Bomar, PA, P.O. Box 1897, Spartanburg, SC 29304, and by sending an electronic copy to their respective email addresses as listed on Attorney Information System (AIS), bellis@burr.com and kdarwin@holcombebomar.com.

September 3, 2025

s/ J. Andrew Smith

J. Andrew Smith

28 Old Jericho Road

Beaufort, South Carolina 29906

(843) 379-9500

Attorney for Appellant

drew@lawofficeofcbushiii.com

CBIII

Serving Throughout South Carolina

Law Office of Clifford Bush III, LLC

J. ANDREW SMITH

Attorney at Law

drew@lawofficeofcbushiii.com

www.lawofficeofcbushiii.com

September 3, 2025

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

Sep 03 2025

SC Court of Appeals

RE: Erin Burns Anderson v. Rudy Lamar Pearson, Appellate Case No. 2023-001897

Dear Ms. Kitchings:

Enclosed is Appellant's Motion for Costs, Sworn Itemized Statement of Costs, a check for Fifty and 00/100 (\$50.00) Dollars for the filing fee, and a Certificate of Service.

Sincerely,

s/ J. Andrew Smith

J. Andrew Smith

28 Old Jericho Road

Beaufort, SC 29906

(843) 379-9500

Attorney for Appellant

cc: Clifford Bush, III
Attorney for Appellant

Bernie W. Ellis
Attorney for Respondent

William B. Darwin, Jr.
Attorney for Respondent

Duane Alan Lazenby
Attorney for Appellant

Steven Edward Buckingham
Attorney for Appellant

Social Security Disability • Veterans' Disability • Automobile Accidents

Wrongful Death • Medical Malpractice • Personal Injury • Workers' Compensation • Discrimination • Contract Law

28 Old Jericho Road, Beaufort, SC 29906 • P.O. Box 6194, Beaufort, SC 29903 • Ph (843) 379-9500 • Fax (843) 379-9550