

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

106592

In Re: Estate of M.K. Jennings 2010ES2800169

Beverly Hennager, Appellant,

v.

Mary E. Deardon, as Personal Representative of the
Estate of M.K. Jennings, Respondent

RECEIVED

DEC 02 2025

SC Court of Appeals

Appellate Case No. 2024-001152


Appeal From Kershaw County
Daniel Coble, Circuit Court Judge

MOTION TO RECOVER COSTS AND ATTORNEY'S FEES

The Respondent, Mary E. Deardon, as Personal Representative of the Estate of M.K. Jennings, respectfully moves pursuant to Rule 222, SCACR, for an Order allowing the Respondents to recover costs and attorney's fees. The motion is based upon the following:

- 1) Appellant's writ of certiorari was denied, as required by Rule 222(e).
- 2) This motion is timely, as the remittitur was issued November 19, 2025, within the fifteen (15) days required by Rule 222(d).
- 3) Rule 222(a) and (b), SCACR, allows for Respondent's recovery of attorney fees in the amount of Two Thousand Five Hundred and no/100 (\$2,500.00) Dollars.

WE SO MOVE:


Moultrie B. Burns, Jr. / SC Bar#1042
Savage, Royall & Sheheen, LLP
Post Office Drawer 10, Camden, SC 29021
803-432-4391 / mburns@thesavagefirm.com
Attorney for the Respondent

December 2, 2025.

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AFFIDAVIT OF COSTS AND ATTORNEY'S FEES

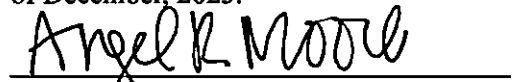
Personally appeared before me, Moultrie B. Burns, Jr., attorney for the Respondent, who first being sworn, deposes and says the following:

- 1) Rule 222 allows for an attorney's fee of Two Thousand Five Hundred and no/100 (\$2,500.00) Dollars when the appeal is affirmed and a writ of certiorari is denied, as in this case.

AFFIANT FURTHER SAYETH NOT.


Moultrie B. Burns, Jr. / SC Bar#1042
Savage, Royall & Sheheen, LLP
Post Office Drawer 10, Camden, SC 29021
803-432-4391 / mburns@thesavagefirm.com
Attorney for the Respondent

SWORN to be me this 2nd day
of December, 2025.


Notary Public for South Carolina
My Commission Expires: 01/09/2035

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CERTIFICATE OF SERVICE

I, the undersigned, an employee of Savage, Royall & Sheheen, LLP do hereby certify that I have served the Respondent's Motion to Recover Costs and Attorney Fees and Affidavit of Costs by depositing a copy of same in a United States Postal Mailbox, first class mail, postage prepaid, addressed to the individual below on the 2nd day of December, 2025.

Beverly Hennager
315 Wood Lane
Corvallis, Montana 59828

Angel R. Moore

Angel R. Moore
Savage, Royall & Sheheen, LLP
Post Office Drawer 10, Camden, SC 29021
803-432-4391

SWORN to be me this 2nd day
of December, 2025.

Amy Woods
Notary Public for South Carolina
My Commission Expires: 9/1/33