

original

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY OF COMMON PLEAS

The Hon. R. Markley Dennis, Circuit Court Judge

Case No.: 2022-CP-10-03684

Appellate Case No.: 2022-000622

106784

Russell Crawford, )  
 )  
 Appellant, )  
 )  
 v. )  
 )  
 Raymond Babich, )  
 )  
 Respondent. )

**RECEIVED**  
DEC 23 2025  
SC Court of Appeals

**NOTICE OF MOTION AND MOTION TO TAX COSTS, INCLUDING AN ATTORNEY'S FEE, AGAINST APPELLANT PURSUANT TO RULE 222 OF THE SOUTH CAROLINA RULES OF APPELLATE PROCEDURE**

**PLEASE TAKE NOTICE** that Respondent Raymond Babich ("Respondent") will move this Court upon the Affidavit of his counsel, William B. Jung, Esq., sworn to July 10, 2025, pursuant to Rules 222 and 226 of the South Carolina Rule of Appellate Procedure, to assess and tax costs totaling \$2,702.19, representing an attorney's fee of \$2,500.00 and costs of \$252.19 for printing Respondent's Final Brief and paid Motion Fees, against Appellant Rusell Crawford based upon this Court's affirmance of the judgment of the trial court by Order dated July 9, 2025.

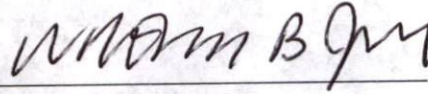
**WHEREFORE**, counsel prays for an Order awarding \$2,752.19 in costs against

the Appellant and in favor of the Respondent.

Respectfully submitted,

Dated: Mount Pleasant, S.C.  
December 18, 2025

WILLIAM B. JUNG, ESQ.

A handwritten signature in black ink that reads "William B. Jung". The signature is written in a cursive style and is positioned above a horizontal line.

William B. Jung, Esq.  
(S.C. Bar No. 0068788)  
1156 Bowman Road, Ste. 200  
Mount Pleasant, S.C. 29464  
(843) 576-4200  
[bradjung@msn.com](mailto:bradjung@msn.com)

Attorney for the Respondents

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY OF COMMON PLEAS

The Hon. R. Markley Dennis, Circuit Court Judge

Case No.: 2022-CP-10-03684

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Russell Crawford, )  
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**AFFIDAVIT IN SUPPORT OF MOTION  
TO TAX COSTS AND AN ATTORNEY'S  
FEE**

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STATE OF SOUTH CAROLINA )  
 ) ss.:  
COUNTY OF CHARLESTON )

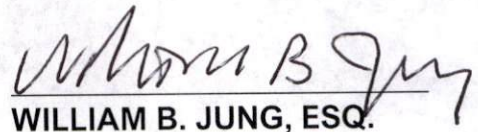
**WILLIAM B. JUNG, ESQ.**, being duly sworn, deposes and says:

1. I am an attorney admitted to practice before this Court and am counsel to Respondent Raymond Babich. I have personal knowledge of the following averments, which I represent are true and correct statements of fact. I submit this Affidavit in support of Respondent's motion to tax costs and attorney's fees against the Appellant, Russell Crawford, pursuant to Rule 222 of the South Carolina Rules of Appellate Procedure.

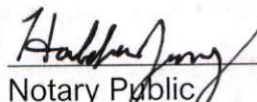
2. The Respondent, Raymond Babich, was the prevailing party on this appeal under and by this Court's Order dated July 9, 2025, which affirmed the Judgment and Order of the trial court.

3. Respondent seeks an attorney's fee of \$2,500.00 as the prevailing party in this Court's affirmance of the judgment of the trial court. Rule 222(a) and (b). In addition to the \$2,500.00 attorney's fee provided by Rules 222(b), Respondent incurred the following costs: (1) \$102.19 in printing Respondents' Final Brief; (2) a \$50.00 Motion Fee on Motion to Compel Appellant's Filing of a Supplemental Record on Appeal; (3) a \$50.00 Motion Fee on Respondent's Motion to Dismiss Appeal for Appellant's failure to comply with this Court's Order and (4) the \$50.00 Motion Fee for the instant Motion. A copy of documents related to these costs is attached as Exh. "1."

**WHEREFORE**, Respondent prays for an Order awarding \$2,752.19 in costs against appellant and in favor of the respondents as provided in Rule 222 of the South Carolina Rules of Appellate Procedure.

  
WILLIAM B. JUNG, ESQ.

Sworn to before me this 18th  
Day of December, 2025.

  
Notary Public  
My Commission Expires: 10/21/2035

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY OF COMMON PLEAS

The Hon. R. Markley Dennis, Circuit Court Judge

Case No.: 22-CP-08-0546

Appellate Case No.: 2022-000622

Russell Crawford, )  
 )  
 Appellant, )  
 )  
 v. )  
 )  
 Raymond Babich, )  
 )  
 Respondent. )

**MEMORANDUM OF LAW IN SUPPORT OF RESPONDENT'S MOTION  
TO RECOVER AN AWARD OF COSTS AGAINST APPELLANT**

Respondents Raymond Babich ("Respondent"), by his attorney, William B. Jung, Esq., submit this Memorandum in support of their motion pursuant to Rules 222(a) and Rule 226(b) of the South Carolina Rules of Appellate Procedure to recover an award of costs, including attorney's fees, following this Court's affirmance of the judgment of the trial court.

Appellate Court Rule 222(a) of the South Carolina Rules of Appellate Procedure provides that a respondent is entitled to recover costs when the Court of Appeals issues an Order affirming the judgment of the trial court. *Id.* By Order dated July 9, 2025, this Court denied Appellant's appeal by affirming the judgment of the trial court.

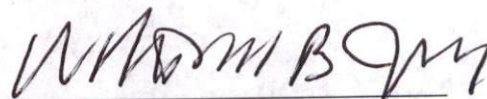
Appellate Court Rule 222(a) provides that “costs shall be taxed against the appellant when the appeal is dismissed or judgment on appeal is affirmed.” *Id.* As set forth in the attached affidavit of William B. Jung, Esq, Respondent incurred the following costs: (1) \$102.19 in printing the Respondents’ Final Brief and (2) three \$50.00 Motion Fee for a total of \$150.00 related to motions to compel Appellant’s compliance with this Court’s Appellate Rules and Orders and the cost of the instant Motion. In addition, the Respondent seeks recovery of an attorney’s fees of \$2,500.00. These are all authorized costs under Rules 222 and 226 of the South Carolina Rules of Appellate Procedure, and Respondent respectfully submits that the gross sum of \$2,702.19 in costs is appropriate to be taxed against the Appellant and in favor of the Respondent.

**Conclusion**

For the foregoing reasons, Respondent respectfully requests that \$2,752.19 in costs be assessed against Appellant and in favor of Respondent as provided in Rules 222 and 226 of the South Carolina Rules of Appellate Procedure.

Dated: Mount Pleasant, S.C.  
December 18, 2025

**WILLIAM B. JUNG, ESQ.**



**William B. Jung, Esq. (#0068788)**

1156 Bowman Road, Ste. 200

Mount Pleasant, S.C. 29464

(843) 576-4200

[bradjung@msn.com](mailto:bradjung@msn.com)

Attorney for the Respondents

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY OF COMMON PLEAS

The Hon. R. Markley Dennis, Circuit Court Judge

Case No.: 22-CP-08-0546

Appellate Case No.: 2022-000622

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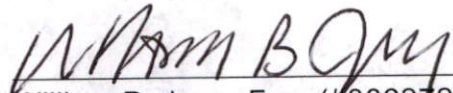
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**PROOF OF SERVICE OF MOTION TO TAX COSTS AND ATTORNEY'S FEE**

I, William B. Jung, Esq., counsel for Respondent, certify under penalty of perjury that on December 18, 2025, I served a copy of Respondent's Motion to tax costs and an attorney's fee against Appellant Russell Crawford by mailing a true copy thereof to the Appellant in an envelope, first class postage paid, addressed to Appellant:

Mr. Russell Crawford  
4683 W. Montague Avenue, Lot 3  
North Charleston, S.C. 29418

Dated: December 18, 2025

  
William B. Jung, Esq. (#0068788)  
1156 Bowman Road, Ste. 200  
Mount Pleasant, S.C. 29464  
(843) 576-4200  
[bradjung@msn.com](mailto:bradjung@msn.com)

Attorney for Respondents

ADMITTED  
SOUTH CAROLINA  
NEW YORK

**WILLIAM B. JUNG, ESQ.**

BOWMAN CENTER  
1156 BOWMAN ROAD, STE. 200  
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WEBSITE: [bradjungattorney.com](http://bradjungattorney.com)

December 18, 2025

The Hon. Jenny Abbott Kitchings  
Clerk of Court  
S.C. Court of Appeals  
1220 Senate Street  
P.O. Box 11629  
Columbia, S.C. 29211

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Re: Russell Crawford v. Raymond Babich  
Appellate Case No.: 2025-000622


Dear Madame Clerk:

I represent the Respondent Raymond Babich who was the prevailing party on the above appeal on which a Remittitur issued today.

I am writing to forward the Respondent's Motion for an Award of Fees and Costs (one original and six copies) and payment of the \$50.00 Motion filing fee,

Kindly please file the same. Thank you for your courtesy.

Sincerely yours,



William B. Jung

WBJ:wbj  
Encl.  
cc. Russell Crawford



WILLIAM B. JUNG, ESQ.  
BOWMAN CENTER  
1156 BOWMAN ROAD, STE. 200  
MOUNT PLEASANT, SC 29464

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