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Dec 29 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of
Appeals

Appeal from Richland County Circuit Court
The Honorable Jean Toal, retired Chief Justice
Case No. 2024-001626

Rhonda Meisner,

Appellant,

v.

Grant Meisner, Grant Meisner,
MD, LLC; Sheila Robinson; Erwin
Mangubat, MD; Moore, Taylor, &
Thomas, P.A.; Moore Taylor
Lawfirm; Moore Bradley Myers Law
Firm, LLC; Tricia L. Flowers;
Flowers Consulting, LLC; Richard
G. Whiting, Esquire; Law Offices of
Richard Whiting, P.A.; John Doe
(1-10) a fictional name assigned to
identify parties that are not yet
known or not yet determined.

Respondent
s.

RETURN TO RESPONDENTS GRANT
MEISNER; GRANT MEISNER, MD,
LLC; Moore, Taylor, & Thomas, P.A.;
Moore Taylor Law firm, P.A.; Moore
Bradley Myers Law Firm, P.A. and
SHEILA ROBINSON MOTION FOR
COSTS AND ATTORNEY'S FEES

The Appellant, Rhonda Meisner timely files her response for attorney's fees and costs considering December 24, 25, and 26, 2025 were holidays and December 29, 2025 is the next business day.

The Motion for attorney's fees and costs is untimely and should be denied or significantly reduced for several reasons.

The appellant respectfully requests this Honorable Court deny the *untimely* motion for costs (the request was filed before final disposition and as such, should be denied as untimely) along with the requested attorney's fees.¹ The motion for costs and attorney's fees is required to be submitted within 30 days of final disposition, *not before* final disposition of the appeal.²

For additional reasons as outlined below, the untimely request should be denied in *Toto or significantly reduced*.

Neither the attorney nor the firm submitting the request for reimbursement is licensed to operate commercially in Richland County and does not have the required City of Columbia business license- for law firms or attorneys- which preclude relief based on equitable tenets.³

The appellant attached a declaration pursuant to 28 U.S.C. §1764 regarding the attorney,(Ward Bradley) and his firm's (Moore Bradley Myers, P.A.) failure to obtain necessary licenses to do business in Richland County. Specifically, neither attorney Bradley or his company acquired the required City of Columbia business license to operate. The declaration is supported with an email confirmation from the City of Columbia. The appellant urges this Court to deny any attempts to retroactively request fees after either entity acquires the appropriate business license, to gain commercially from their trade, retroactively.

¹ There is a pending Petition for Rehearing and Rehearing *en banc*, that is currently pending before this Honorable Court of Appeals

² To the extent the Respondent believes the final disposition will be rendered within 30 days, the rules still require the submission to be within 30 days.

³ Declaration of Rhonda Meisner

The attached Attorney Fee Affidavit does not support an award of attorney's fees and costs because it is not supported with admissible evidence of the expenses or receipt of the payment of the attorney's fees.

As an initial matter, the costs associated with the motion have previously been submitted; however, the appellant avers the affidavit submitted to this Honorable Court of Appeals in support of the requests for attorney's fees does *not evidence* that Respondents as named above are entitled to attorney's fees and costs pursuant to SCACR Rule 222(b) because the affidavit does not state or affirm "the Respondents *actually paid* the attorney's fees requested." Clearly, the law firm Respondents did not pay any fees to themselves, or if they did, they would not be eligible for reimbursement.

SCACR Rule 222(b) entitles parties to be reimbursed costs and attorney's fees actually "incurred." The appellant avers in the context of contingency representation, those fees are not "incurred." Also, the appellant avers the fees must be already "paid." The failure to affirm or even state that the attorney's fees were "actually paid" instead of "necessarily incurred" from the Respondents' attorney does not evidence reimbursement of fees not yet paid. SCACR 222(b) is not a fee shifting Rule, but that appellant argues, it is rather a reimbursement for appellate attorney's fees incurred. As such, the appellant avers there must be underlying proof the attorneys fees were actually paid, before SCACR Rule 222 (b) is invoked. The appellant avers the attorneys' affidavit attached to the motion, must be supported by the actual ledger of payments made, by the Respondent or an

affirmative/statement by the submitting attorney that the fees were previously paid.

As an additional sustaining fact, the respondents' requests for attorney's fees should be denied or significantly reduced because no briefs have been submitted by these Respondents.

The appellant avers the submission of requests for reimbursements must be made by an entity legally allowed to operate and not an entity that is not permitted under law to participate in commercial activities in Richland County. Upon information and belief, the Moore Bradley Myers Law Firm, P.A. and Ward Bradley does not have a business license to operate commercially in Richland County or the City of Columbia. As such, because the entity requesting payment is unlicensed to do business, the payment should be denied based on equitable tenets. Should the Respondent's acquire the business license in the future, the appellant avers the requests should still be denied because the work done was presumably done without a business license because the license was not in place the day of the hearing or when the attorney submitted the request for reimbursement.

For the above reasons, the appellant respectfully requests this Honorable Court deny attorney's fees and costs .Respectfully Submitted,

December 29, 2025

/s/ Rhonda Meisner

Rhonda Meisner
PO Box 689
Blythewood, SC 29016
Scorequipment@gmail.com
(803)206-3402

THE STATE OF SOUTH CAROLINA
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*Exhibit
#1*

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Respondent
s.

RHONDA MEISNER'S DECLARATION
SUBMITTED UNDER PENALTY OF
PERJURY PURSUANT TO 28 U.S.C. §
1746 IN SUPPORT OF RETURN TO
RESPONDENT MEISNER'S,
ROBINSONS'S AND LAW FIRM'S
MOTION FOR COSTS AND
ATTORNEY'S FEES

My name is Rhonda Meisner and I am over 18 years of age and competent to make this declaration under penalty of perjury for the truth of the matters asserted herein. I submit the below facts as true except those facts submitted upon information and belief, and I believe those facts to be true as well.

1. I attended the hearing before the Honorable Jean Toal and observed Sheila Robinson and Ward Bradley, at the hearing. I was unaware at that hearing, that Sheila Robinson, Ward Bradley, or Moore Bradley Myers Law Firm, P.A. did not have a business license to operate in Richland County or the City of Columbia which is where Ward Bradley appeared on behalf of the Meisner Respondents, Sheila Robinson, and the law firm Respondents for the hearing.
2. At all times when paperwork was submitted in this case on behalf of the above named Respondents, Ward Bradley, of Moore Bradley Myers Law Firm, P.A. signed with the Moore Bradley Myers, P.A. signature block including the request for attorneys fees and costs.
3. I requested information on the business licenses from the city of Columbia for attorneys operating in Richland County and the City of Columbia.
4. I was informed that Moore Bradley Myers Law Firm, P.A. did not have a business license for the City of Columbia and upon information and belief, he is not entitled to relief.

I submit the above as true and subject to penalty of perjury. For those facts submitted upon information and belief, I believe those are true as well.

12/29/2005



Rhonda Meisner

SCDL ending in 1138

Outlook

Exhibit #1

Re: [EXTERNAL] Business license for the following entities

From: Brown, Catelyn A <Catelyn.Brown@columbiasc.gov>
Date: Wed 12/17/2025 11:35 AM
To: Rhonda Meisner <scorequipment@gmail.com>

Good morning I had a chance to thoroughly look at the names provided to see whether they hold a business license within the city of Columbia. The only current name that holds a license within the city is Richard G. Whiting.

All other businesses do not show in our system which generally means they don't have a City of Columbia license. If you reside in the county of Richland and or the municipality of Lexington you need a business license from their license facility. Should you have a license from them and your business is located in either or, assuming you wish to come within the city limits to generate revenue for your business you must have a City of Columbia business license.

In case you have any questions or concerns regarding anything at all please email me at catelyn.brown@columbiasc.gov or call me directly from the highlighted number below.

The Best,

Catelyn 🌸

Catelyn Brown
Revenue Technician
Business License Division
Office: (803)545-3347
Desk: (803) 545-3341
Fax: (803) 988-8025
www.ColumbiaSC.net



From: Rhonda Meisner <scorequipment@gmail.com>
Sent: Tuesday, December 16, 2025 4:55 PM
To: Brown, Catelyn A <Catelyn.Brown@columbiasc.gov>
Subject: [EXTERNAL] Business license for the following entities

CAUTION: This email originated outside of the organization. Do not click links or open attachments from unknown senders or suspicious emails. Never enter a username or password on a site that you did not knowingly access. For suspicious emails, please report using the "Phish Alert Report" button.

You don't often get email from scorequipment@gmail.com. [Learn why this is important](#)

Good Afternoon,

Can you please confirm whether the following law firms have business licenses to conduct business in Richland County, specifically in the City of Columbia?

Gibbes Burton, LLC or attorney Stephanie Burton

Moore Bradley Myers Law Firm, P.A. Or attorney Sheila Robinson or attorney James E. Ward Bradley

Moore, Taylor & Thomas, P.A.

Moore Taylor Law Firm, P.A.

Flowers Consulting, LLC; or Tricia Flowers

Law Offices of Richard G. Whiting, P.A. Or attorney Richard G. Whiting

Please respond to this email with whether they have license and if so for which of the last 5 years.

Respectfully,

Can

Rhonda Lewis Meisner, Principal

303)206-3402

Email disclosure: The Contents of this email and any attachments are private and privileged and intended only for the email addresses listed as recipients. Disclosure to others is strictly prohibited. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this email in error and/or the attachments in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited and any dissemination, distribution, or copying may violate federal law. The information contained herein may constitute opinions of the sender which are

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Protected under the 1st Amendment of the United States Constitution. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

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**PROOF OF SERVICE-RETURN TO MOTION FOR COSTS
MEISNER, ROBINSON, AND LAW FIRM DEFENDANTS**

Rhonda Meisner has electronically filed her RETURN TO MOTION FOR COSTS
REPLY and proof of service and copied the following attorneys emailing
michaelctannerllc@bellsouth.net; sburton@gibbesburton.com; ward@mbmlawsc.com
;jparham@jparhamlaw.com; scorequipment@gmail.com; murrell@smithrobinsonlaw
.com; ward@mbmlawsc.com; shanon.peake@smithrobinsonlaw.com; Additionally, I
mailed a copy postage prepaid by U.S. mail to : James Edward Bradley Post Office
Box 5709 W.Columbia, SC 29171 Stephanie Burton 308 E. Saint John Street
Spartanburg, SC 29302; Michael C. Tanner PO Box 1061 Bamberg, SC 29003 and
Shannon Peake 2530 Devine Street Columbia SC 29205.

DEC 29, 2025

/S/ Rhonda Meisner

Rhonda Meisner
PO Box 689
Blythewood, SC 29016
scorequipment@gmail.com
(803)206-3402