

RECEIVED

Jan 09 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas
H. Steven DeBerry, IV, Circuit Court Judge

Appellate Case No.: 2024-000444
Case No.: 2023-CP-33-00472

Angela D. Young, as Personal Representative for the Estate of Chellie Nixon.....Appellant,

v.

Carolyn Johnson, as Personal Representative for the Estate of Samuel L. Davis.....Respondent.

FORM 17
ITEMIZED STATEMENT OF COSTS

The Court of Appeals is requested to tax the following costs against the Appellants:

(See Below)

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Printing/Copying Brief	171	\$0.25/page	\$42.75	
Cost of Filing Fees:				
Motion for Costs			\$50.00	
Attorneys' fee under under Rule 222(b), SCACR			\$2,500.00	
TOTAL			\$2,592.75	

I, J. Rene Josey, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed to and served upon opposing counsel.

Respectfully submitted:

Florence, South Carolina

January 9th, 2026


TURNER, PADGET, GRAHAM & LANEY, P.A.

By: 

J. René Josey (S.C. Bar # 3230)
 Jeffrey L. Payne (S.C. Bar # 15136)
 Post Office Box 5478
 Florence, SC 29502-5478
 Telephone: (843) 656-4451
 Email: RJosey@TurnerPadget.com
 JPayne@TurnerPadget.com

ATTORNEYS FOR RESPONDENTS

SWORN to before me this 9 day of January, 2026


 Notary Public for South Carolina
 My Commission Expires: 11/28/2026

RECEIVED

Jan 09 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas
H. Steven DeBerry, IV, Circuit Court Judge

Appellate Case No.: 2024-000444
Case No.: 2023-CP-33-00472

Angela D. Young, as Personal Representative for the Estate of Chellie Nixon.....Appellant,

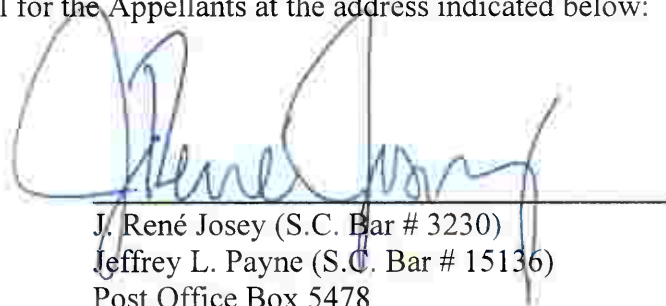
v.

Carolyn Johnson, as Personal Representative for the Estate of Samuel L. Davis.....Respondent.

PROOF OF SERVICE

I certify that I have served a copy of the Motion for Costs and Itemized Statements of Costs by depositing copies of the same in the United States mail, postage prepaid, on January 9, 2026, 2026, to counsel for the Appellants at the address indicated below:

Danny V. Butler, Esq.
4420 Oleander Drive, Ste 203
Myrtle Beach, SC 29577



J. René Josey (S.C. Bar # 3230)
Jeffrey L. Payne (S.C. Bar # 15136)
Post Office Box 5478
Florence, SC 29502-5478
Telephone: (843) 656-4451
Email: RJosey@TurnerPadget.com
JPayne@TurnerPadget.com

ATTORNEYS FOR RESPONDENTS

RECEIVED

Jan 09 2026

SC Court of Appeals

Turner Padget

REPLY TO:

J. René Josey

E-Mail: JJosey@TurnerPadget.com
Writer's Direct Dial: (843) 656-4451
Writer's Direct Fax: (843) 413-5818

January 9, 2026

VIA US MAIL AND EMAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: In Re: Chellie Nixon
Angela D. Young, as Personal Representative for the Estate of Chellie Nixon v. Estate of
Samuel L. Davis
Appellate Case No.: 2024-000444
TPGL File No.: 18331.101

Dear Ms. Kitchings:

Please find attached a Motion to Award Costs Under Rule 222 SCACR and Itemized Statement of Costs regarding the above-referenced matter. We have also attached the Proof of Service regarding the same.

We would respectfully request that you file the attached documents and return a clocked copy of the Motion to Award Costs Under Rule 222 SCACR, Itemized Statement of Costs and Proof of Service to me via electronic mail. Please be advised that my firm has, by hard-copy of this letter, placed a check in today's outgoing mail to cover the requisite filing fee.

By copy of this letter with enclosures to counsel for the Appellant, Danny Butler, Esquire, I am herewith serving him with copies of the same.

Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.

J. René Josey

cc: Danny Butler, Esq. (via E-mail)