

**RECEIVED**

**Jan 23 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas  
Roger M. Young, Sr., Circuit Court Judge

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Appellate Case No. 2023-001124  
Case No. 2020-CP-08-02455

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Rita R. Greenawalt, and  
James M. Greenawalt,

Appellants,

v.

Nissan North America, Inc.,

Respondent.

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**ITEMIZED STATEMENT OF COSTS**

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

<b>Costs And Fees Taxable Under Rule 222(B), SCACR</b>	<b>No. of Pages</b>	<b>Rate</b>	<b>Requested</b>	<b>Allowed (For Court Use Only)</b>
Cost of Printing or Copying Final Brief of Respondent – 7 copies	33 (231 pages total)	.10	\$23.10	
Cost of Court Reporter’s Transcript – Invoice Attached as Exhibit A			\$40.00	

Attorney's Fee Provided by Rule 222(b), SCACR			\$2,500.00	
Other (specify and explain)			\$0.00	
TOTAL			<b><u>\$2,563.10</u></b>	

I, Blake T. Williams, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: Blake T. Williams

Blake T. Williams  
S.C. Bar No. 100794  
E-Mail: blake.williams@nelsonmullins.com  
Christopher C. Genovese  
S.C. Bar No. 72630  
E-Mail: chris.genovese@nelsonmullins.com  
Patrick D. Quinn  
S.C. Bar No. 100215  
E-Mail: patrick.quinn@nelsonmullins.com  
1320 Main Street / 17th Floor  
Post Office Box 11070 (29211-1070)  
Columbia, SC 29201  
(803) 799-2000

*Attorneys for Respondent Nissan North America, Inc.*

SWORN to and subscribed before me  
this \_\_\_ day of January, 2026.

Jessica Troutman (L.S.)  
Notary Public for South Carolina  
My Commission Expires: 6/1/2028

# **Exhibit A**

(Cost of Court Reporter's Transcript – Invoice)



NELSON MULLINS RILEY & SCARBOROUGH LLP  
ATTORNEYS AND COUNSELORS AT LAW

Sarah T. Eibling  
T: 803.255.9756  
sarah.eibling@nelsonmullins.com

1320 Main Street, 17th Floor  
Columbia, SC 29201  
T: 803.799.2000 F: 803.256.7500  
nelsonmullins.com

August 3, 2023

Via FedEx

Ms. Yvestre Torres  
261 Brookshire Road  
Goose Creek, SC 29445

RE: Rita Greenawalt, et al. v. Nissan North America, Inc.  
C.A. #2020-CP-08-02455

Dear Ms. Torres:

Enclosed please find our firm's check in the amount of \$40.00, which represents the balance owed for our expedited transcript of the April 5, 2023 hearing before Judge Roger M. Young. Thank you,

Sincerely,

A handwritten signature in blue ink that reads "Kelli D. Martin".

Kelli D. Martin  
Sr. Administrative Assistant  
to Sarah T. Eibling

/em  
Enclosure

NELSON MULLINS RILEY & SCARBOROUGH LLP

SYNOVUS BANK  
COLUMBIA, SC

1039292

ATTORNEYS AND COUNSELORS AT LAW

PO BOX 11070  
COLUMBIA, SC 29211-1070

67-119  
539

Date: August 3, 2023

Pay: Forty and 00/100\*\*\*\*\* \$ \*\*\*40.00\*\*\*

PAY TO THE ORDER OF: Yvestre Torres  
7983 Shadow Oak Drive  
North Charleston, SC 29406

NELSON MULLINS RILEY & SCARBOROUGH LLP  
ORIGINAL SIGNATURE REQUIRED IF OVER \$500  
VOID AFTER 180 DAYS

Memo:

⑈0 1039292⑈ ⑆06 1 100606⑆ 10027206 1 1⑈

Payee: Yvestre Torres

Check #: 1039292

Vendor ID: 73633

Vendor Assigned Customer #:

Check Date: Aug 03/23

Inv #	Inv Date	G/L Acct	Client	Matter	Narrative	Amount	Inv Total
080223-000531-0927)2/23			000531	01930		\$40.00	\$40.00
Vendor: Yvestre Torres Invoice#: 080223-000531-0927 Date: 8/2/2023 - CRINV - - 08/02/23 - Balance due court reporter for hearing transcript							
Invoice Totals:						\$40.00	\$40.00

Kelli

## Kelli Martin

---

**From:** Torres, Yvestre <ytorres@sccourts.org>  
**Sent:** Tuesday, August 1, 2023 6:39 PM  
**To:** Kelli Martin  
**Subject:** Re: Rita Greenawalt, et al. v. Nissan North America, Inc. - C. A. #2020-CP-08-02455 - Court Reporter

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

### External Source/Sender notice

Use caution responding or clicking links/attachments.

Good evening, Ms. Martin,

I wanted to inform you that the expedited transcript you have requested has been completed. However, I did underestimate the number of pages by eight pages. Therefore, there is a balance due of \$40. Once the balance payment has been received, the transcript will be released to you. Also, I did note that the address on the initial deposit check was the Shadow Oak Drive, North Charleston address. You can remove that from your database as I am no longer at that address. The current address where the payment was mailed to on the FedEx envelope, the Brookshire Road, Goose Creek address, is the correct one. Thank you and have a wonderful evening.

Yvestre Torres

---

**From:** Kelli Martin <kelli.martin@nelsonmullins.com>  
**Sent:** Friday, July 28, 2023 2:42 PM  
**To:** Torres, Yvestre <ytorres@sccourts.org>  
**Subject:** RE: Rita Greenawalt, et al. v. Nissan North America, Inc. - C. A. #2020-CP-08-02455 - Court Reporter

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Great! Thank you. Have a nice weekend.

Kelli

**From:** Torres, Yvestre <ytorres@sccourts.org>  
**Sent:** Friday, July 28, 2023 2:36 PM  
**To:** Kelli Martin <kelli.martin@nelsonmullins.com>  
**Subject:** Re: Rita Greenawalt, et al. v. Nissan North America, Inc. - C. A. #2020-CP-08-02455 - Court Reporter

Good afternoon, Ms. Martin

I received the check today regarding the production of the expedited transcript. Therefore, your seven-day expedited delivery timeframe starts on today's date. Thank you and have a wonderful weekend.

Yvestre Torres

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**From:** Torres, Yvestre <[ytorres@sccourts.org](mailto:ytorres@sccourts.org)>  
**Sent:** Wednesday, July 26, 2023 3:52 PM  
**To:** Kelli Martin <[kelli.martin@nelsonmullins.com](mailto:kelli.martin@nelsonmullins.com)>  
**Subject:** Re: Rita Greenawalt, et al. v. Nissan North America, Inc. - C. A. #2020-CP-08-02455 - Court Reporter

Yes, same address, please. I may not be able to sign for it if I'm in court when it arrives, however.

Yvestre Torres

---

**From:** Kelli Martin <[kelli.martin@nelsonmullins.com](mailto:kelli.martin@nelsonmullins.com)>  
**Sent:** Wednesday, July 26, 2023 3:18 PM  
**To:** Torres, Yvestre <[ytorres@sccourts.org](mailto:ytorres@sccourts.org)>  
**Subject:** RE: Rita Greenawalt, et al. v. Nissan North America, Inc. - C. A. #2020-CP-08-02455 - Court Reporter

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Should we send our check via Federal Express to the address below? If not, where? Thank you,

Kelli

**From:** Torres, Yvestre <[ytorres@sccourts.org](mailto:ytorres@sccourts.org)>  
**Sent:** Monday, July 24, 2023 6:07 PM  
**To:** Kelli Martin <[kelli.martin@nelsonmullins.com](mailto:kelli.martin@nelsonmullins.com)>  
**Subject:** Re: Rita Greenawalt, et al. v. Nissan North America, Inc. - C. A. #2020-CP-08-02455 - Court Reporter

Good evening. The deposit letter is below:

YVESTRE TORRES  
261 Brookshire Road  
Goose Creek, SC 29445  
[ytorres@sccourts.org](mailto:ytorres@sccourts.org)

July 24, 2023

IN RE: Rita Greenawalt, et al, v. Nissan North America, Inc.

Case No. 2020-CP-08-02455

Dear Ms. Martin:

I hereby acknowledge receipt of your request for an expedited transcript dated July 24, 2023, in the above-captioned case held in front of Judge Young on April 5, 2023. I have reviewed my records and estimate that your transcript will be 38 pages. Based on the current expedited rate of \$5.00 per page, the cost will be \$190.00. Under our rules, I have seven days in which to complete the transcript.

Upon receipt of a certified check or money order (no personal checks, please, but a law firm check is acceptable) for \$190.00, the seven days will begin. If I have underestimated the number of pages, you will be notified prior to delivery of the transcript of the balance due. If I have overestimated the number of pages, you will be refunded the overpayment.

Sincerely,

Yvestre Torres

---

**From:** Kelli Martin <[kelli.martin@nelsonmullins.com](mailto:kelli.martin@nelsonmullins.com)>  
**Sent:** Monday, July 24, 2023 9:10 AM  
**To:** Torres, Yvestre <[ytorres@sccourts.org](mailto:ytorres@sccourts.org)>  
**Cc:** Transcripts <[transcripts@sccourts.org](mailto:transcripts@sccourts.org)>  
**Subject:** RE: Rita Greenawalt, et al. v. Nissan North America, Inc. - C. A. #2020-CP-08-02455 - Court Reporter

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Good morning Ms. Torres. Please see our Transcript Request attached. Thank you,

Kelli

**From:** Torres, Yvestre <[ytorres@sccourts.org](mailto:ytorres@sccourts.org)>  
**Sent:** Saturday, July 22, 2023 2:32 PM  
**To:** Kelli Martin <[kelli.martin@nelsonmullins.com](mailto:kelli.martin@nelsonmullins.com)>  
**Subject:** Re: Rita Greenawalt, et al. v. Nissan North America, Inc. - C. A. #2020-CP-08-02455 - Court Reporter

Good afternoon, Ms. Martin,

I am the court reporter for the above-mentioned hearing. Please forward the transcript request form to me. Thank you and have a wonderful weekend.

Yvestre Torres

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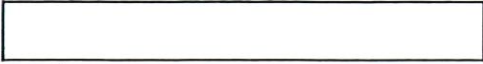
**From:** Kelli Martin <[kelli.martin@nelsonmullins.com](mailto:kelli.martin@nelsonmullins.com)>  
**Sent:** Friday, July 21, 2023 2:09 PM  
**To:** Torres, Yvestre <[ytorres@sccourts.org](mailto:ytorres@sccourts.org)>  
**Cc:** Kevin Werner <[kevin.werner@nelsonmullins.com](mailto:kevin.werner@nelsonmullins.com)>  
**Subject:** Rita Greenawalt, et al. v. Nissan North America, Inc. - C. A. #2020-CP-08-02455 - Court Reporter

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Good afternoon Ms. Torres. I work for Sarah Eibling and we are in need of finding the Court Reporter for a hearing on April 5, 2023 before Judge Roger Young in the above referenced matter. Your name was listed as the Court Reporter on Monday, April 3, 2023

so I thought I would begin with you. If you happen to be the Court Reporter for this hearing, please let me know and I will forward the Transcript Request Form to you. Thank you,

Kelli Martin



**KELLI MARTIN SENIOR ADMINISTRATIVE ASSISTANT TO SARAH T. EIBLING**

kelli.martin@nelsonmullins.com

MERIDIAN | 17TH FLOOR

1320 MAIN STREET | COLUMBIA, SC 29201

T 803.255.9248 F 803.255.5168

NELSONMULLINS.COM

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~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.



*package id*  
0509306  
*ship date*  
Thu, Aug 03 2023  
*to*  
Yvestre Torres  
261 BROOKSHIRE RD  
GOOSE CREEK, SC  
29445-7611  
United States  
1.803.799.2000  
ytorres@sccourts.org  
*residential address*  
No  
*return label*  
No  
*notification type*  
Delivery  
*notification recipients*  
kelli.martin@nelsonm...

*from*  
Sarah Eibling (STE)  
Nelson Mullins  
Meridian / 17th Floor  
1320 Main Street  
Columbia, SC 29201  
US  
(803) 255-9756  
*billing*  
Nissan North America,  
Inc.Greenawalt, Rita and  
James  
(000531.01930)  
*operator*  
Kelli Martin  
803.255.9248  
kelli.martin@nelsonmullins.cc  
*create time*  
08/03/23, 3:08PM

*vendor*  
FedEx  
*tracking number*  
782024811451  
*service*  
FedEx Standard  
Overnight@  
*packaging*  
FedEx® Envelope  
*signature*  
Deliver Without Signature  
*courtesy quote*  
19.60

*Quote may not reflect all  
accessorial charges*

**RECEIVED**

**Jan 23 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas  
Roger M. Young, Sr., Circuit Court Judge

---

Appellate Case No. 2023-001124  
Case No. 2020-CP-08-02455

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Rita R. Greenawalt, and  
James M. Greenawalt,

Appellants,

v.

Nissan North America, Inc.,

Respondent.

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**PROOF OF SERVICE**

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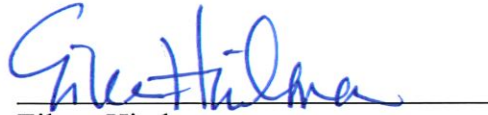
I, the undersigned Administrative Assistant, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Nissan North America, Inc., do certify that I have served all counsel of record in this action with a copy of the document(s) set forth below under Supreme Court Order dated April 24, 2024.

Pleading(s): Motion for Fees and Costs with Itemized Statement of Costs

Served: C. Steven Moskos  
C. Steven Moskos, PA  
6650 Rivers Ave  
Suite 210  
North Charleston, SC 29406  
[steve@moskoslawfirm.com](mailto:steve@moskoslawfirm.com)

Brooks Roberts Fudenberg  
Law Office of Brooks R. Fudenberg, LLC  
14 Ashe St  
Charleston, SC 29403  
[brooks.r.fudenberg@fudenberglaw.com](mailto:brooks.r.fudenberg@fudenberglaw.com)

*Counsel for Petitioners*



Eileen Hindman  
Sr. Legal Administrative Assistant

January 23, 2026