

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

FEB 03 2026

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SC Court of Appeals

Mikell R. Scarborough
Master-in-Equity

107126

Appellate Case No. 2023-001428
Charleston County Case No. 2017-CP-10-05358

MOTION FOR COSTS

Edward Mikell, Individually and as Personal Representative for
the Estate of Estelle White, deceased,.....Respondent,

v.

Mary Ann Green, Elnora Capers, William Mikell, Eloise Chestnut, Ralph Brown, Roges Brown, Raymond Mack, Henrietta J. Mack-Barnette, Jeanette Mack Green, James Mack, Jo Nathan Mack a/k/a Nathan Mack, Ida M. Blake, Glenn Mack, Rose Mack, Elizabeth Lee a/k/a Dorothy Marie Mack Lee, Michael Mack, Harvey Mack, Carolyn McClair, Magaline E. Brown, Delores G. Mack, Charles Mack III, Alton Kirk Mack a/k/a Kirk Mack, Kendall Gibbs, Harold Mack, Walter Brown (son of Cumsey Brown), Albertha Cohen, Jessie M. Washington, Manny Dunmeyer Jr., Ruthie Brown Roper, Sylvia Dunmeyer, Francis Dunmeyer, Tammy Dunmeyer, Brandy Dunmeyer, Timothy Brown, Barbara Ann Gathers aka Barbara Ann Geathers, Clarence Smith, Jr., Lillian Middleton, Pauline Walker a/k/a Pearline Washington, Robert Smith, Arthur Smith, Margaret Brown, Georgiana Smith, Louise Hamilton, Benjamin Smith, John Smith, Leola Smith, Michael Smith, Janet Heyward Nelson, Eric Heyward, Keith Heyward, Darrell Heyward, William Heyward, Charlene Gadsden, Richard Brown, Sr., Sharon Y. Brown, Merele J. Mack, Adrienne F. Mack a/k/a Frankie Mack, Michael Brown, Louis Mikell, Janie Mikell, Altamese Brown, LaTricia Brown-Mayfield, and Edward Littleton Brown, Melissa

Mikell (daughter of Nicolas Mikell), Tamisha Mikell, Thomas Elliott Mikell, Meliss Mikell (daughter of Thomas Mikell), Les Brown, Patricia Campbell, Curtrina Ladson, if they be alive, and JOHN DOE AND JANE DOE, whose true names are unknown and fictitious names designating the unknown heirs, devisees, distributees, issue, executors, administrators, successors, or assigns of the above-named Defendants and if any of them be dead and of Estelle White, Lizzie Mikell Green, Edward Mikell, Emily Mikell Brown, Zeebree Mikell, Marion Green a/k/a Marian Green, Walter Brown, Florence Gadsden, Ida Mack, Charles Mack Jr., Geneva Mack, Franklin Mack Cumsey Brown, Nancy Brown, James Brown, Emily Heyward, Ida Mae Smith Dunmeyer, Pamela Dunmeyer Brown, Elizabeth Dunmeyer, Charles Brown, Jr., Rena Smith, Johnny Brown, Adell Mikell, Nicolas Mikell, Jesse Mikell, Thomas Mikell, and Mary Frances Brown, all deceased; and MARY ROE AND RICHARD ROE, whose true names are unknown and fictitious names designating infants, persons under disability, incompetents, imprisoned, or those person in the military, if any; and all other persons, known or whose true names are unknown, claiming any right, title, interest in, or lien upon the real estate described in the Complaint herein..... **Defendants,**

Of whom Richard Brown, Sr. and Sharon Y. Brown are the.....**Appellants**

Respondent, pursuant to Rule 222(d), SCACR, moves for entry of an order taxing the costs of this appeal against Appellants Richard Brown, Sr. and Sharon Y. Brown. Respondent would show the following in support of his motion:

1. This Court issued its remittitur in this case on January 23, 2026.
2. Rule 222(d), SCACR, allows the prevailing party in an appeal to tax costs and attorney's fees.
3. A Bill of Costs is attached to this motion setting forth the requested costs and fees.

Wherefore, Respondent requests this Court grant his motion for costs and issue such other and further relief as it deems just and proper.

Dated: 01/30/2026



Jason Scott Luck
P.O. Box 47
Bennettsville, SC 29512
843.479.6863 (o)
843.479.7222 (f)
jason@luck.law
Attorney for Respondent

RECEIVED
FEB 03 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough
Master-in-Equity

Appellate Case No. 2023-001428

CERTIFICATE OF SERVICE

Edward Mikell, Individually and as Personal
Representative for the Estate of Estelle White, deceased,..... Respondent,


v.

Mary Ann Green, et al. Defendants,

Of whom Richard Brown, Sr. and Sharon Y. Brown
are the..... Appellants

The undersigned certifies that, on the date set forth below, he mailed, first class postage prepaid, copies of Respondent's Motion for Costs to: Michael W. Sautter, Esq. & Mark V. Evans, Esq., 147 Wappoo Creek Dr., Ste. 202, Charleston, SC 29412.

Dated: 01/30/2026



Jason Scott Luck
P.O. Box 47
Bennettsville, SC 29512
843.479.6863 (o)
843.479.7222 (f)
jason@luck.law
Attorney for Respondent

JASON SCOTT LUCK
ATTORNEY AT LAW
P.O. Box 47
Bennettsville, SC 29512

COLUMBIA SC 290

31 JAN 2026 PM 4 L



South Carolina Court of Appeals
ATTN: Clerk/Motions
PO Box 11629
Columbia, SC 29211

RECEIVED

FEB 03 2026

SC Court of Appeals

2921131629 B012

