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Mar 17 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

Case No. 2018-CP-10-4083
Appellate Case No.: 2022-001114

Charleston CW, LLC, Appellant,

v.

Charleston Animal Society, Ellen Harley, and
Charleston Carriage Horse Advocates, LLC. Respondents.

**RESPONDENT CHARLESTON ANIMAL SOCIETY'S
MOTION FOR COSTS PURSUANT TO RULE 222**

Elizabeth J. Palmer (SC Bar #73680)
Saxton & Stump, LLC
151 Meeting St., Suite 400
Charleston, SC 29401
(843) 414-5080
ep@saxtonstump.com

Attorneys for Respondent
Charleston Animal Society

Pursuant to Rules 222 and 240 SCACR, Respondent Charleston Animal Society (“Respondent”) requests the costs of the appeal be taxed against Appellant Charleston CW, LLC. Respondent is entitled to seek and recover costs pursuant to Rule 222(a). Appellant is to be taxed costs when the appeal is affirmed. The appeal was affirmed by Unpublished Opinion No. 2025-UP-153 filed on April 30, 2025, by the S.C. Court of Appeals. Following the S.C. Supreme Court’s denial of Appellant’s Petition for Certiorari, this matter was remitted to the lower court by letter dated March 12, 2026, from the Court of Appeals. Pursuant to Rule 222(b), the costs allowed Respondent include the costs of printing the party’s final brief(s) under Rule 210. In addition, and also pursuant to Rule 222(b), Respondent is entitled to recover an attorney’s fee in an amount set by order of the Supreme Court. By order dated January 17, 2018, the amount set for the attorney’s fee is \$2,500.

The Court is requested to tax the following costs and fees against Appellant Charleston CW, LLC:

Costs Taxable Under Rule 222, SCACR	No. of Pages	Rate	Requested	Allowed
Cost of Printing or Copying of Final Brief	69	Color Prints: \$5.00 Brief Prints: \$9.75	\$14.75	
Attorney’s Fee Provided by Rule 222(b), SCACR			\$2,500.00	
		TOTAL:	\$2,514.75	

WHEREAS, this appeal has been affirmed by Unpublished Opinion No. 2025-UP-153 and the remittitur was sent to the lower court on March 12, 2026. Counsel for Respondent hereby moves for attorney’s fees and costs to be taxed in this matter pursuant to Rule 222 and provides herein an itemized, sworn statement of costs set forth herein.

I, Elizabeth J. Palmer, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was served upon opposing counsel on March 17, 2026, by providing a copy of this Motion for Costs.



Elizabeth J. Palmer (SC Bar #73680)
Saxton & Stump, LLC
151 Meeting St., Suite 400
Charleston, SC 29401
(843) 414-5080
ep@saxtonstump.com

Attorney for Respondent
Charleston Animal Society

SWORN to before me this

17 day of March, 2026



Notary Public for South Carolina

My commission expires: 3/20/35



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Charleston Carriage Works, LLC, Appellant,

v.

Charleston Animal Society, Ellen Harley, and
Charleston Carriage Horse Advocates, LLC. Respondents.

PROOF OF SERVICE

I do hereby certify that on March 17, 2026, I have served all counsel in this action with a copy of **Respondent Charleston Animal Society's Motion for Costs Pursuant to Rule 222** via email to the following email addresses:

Thomas R. Goldstein, Esquire
Belk, Cobb, Infinger & Goldstein, P.A.
P.O. Box 71121
Charleston, SC 29415
tgoldstein@cobblaw.net

ATTORNEY FOR APPELLANT

Jenkins M. Mann, Esquire
Shaun C. Blake, Esquire
MANN BLAKE and JACKSON
1619 Sumter Street
Columbia, SC 29201
jmann@mannblake.com
sblake@mannblake.com

ATTORNEYS FOR RESPONDENTS ELLEN HARLEY AND CHARLESTON CARRIAGE
HORSE ADVOCATES

s/ Taylor Davis

Taylor Davis, Paralegal
Saxton & Stump, LLC
151 Meeting Street, Suite 400
Charleston, SC 29401
(843) 414-5080

SAXTON & STUMP
LAWYERS AND CONSULTANTS

151 Meeting Street, Suite 400 • Charleston, SC 29401
P: (843) 414-5080 • F: (843) 580-8303

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SC Court of Appeals

Direct Dial: (843) 278-0114
Email: tdavis@saxtonstump.com

March 17, 2026

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29201

Re: Charleston Carriage Works v. Charleston Animal Society, et al.
Appellate Case No.: 2022-001114

Dear Ms. Kitchings:

Please find enclosed a check in the amount of \$50.00, to cover the filing fee for Respondent Charleston Animal Society's Motion for Costs Pursuant to Rule 222, in connection with the above referenced matter. Also enclosed is a copy of the motion, which has been e-filed.

Should you have any questions or concerns, please do not hesitate to contact us. Thank you for your assistance with this matter.

Sincerely,

s/ Taylor Davis

Taylor Davis
Paralegal

/tnd

Enclosures

cc: Thomas R. Goldstein, Esquire
Jenkins M. Mann, Esquire
Shaun C. Blake, Esquire