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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.

**RESPONDENTS ELLEN HARLEY AND CHARLESTON CARRIAGE HORSE
ADVOCATES, LLC'S
MOTION FOR COSTS PURSUANT TO RULE 222**

Jenkins M. Mann (SC Bar #74894)
Mann Blake and Jackson
Mailing: PO Box 11803, Columbia, SC 29211
Physical: 1619 Sumter Street, Columbia, SC 29201
Tel: (803) 256-1268
Email: jmann@mannblake.com

Attorney for Respondents
Ellen Harley
Charleston Carriage Horse Advocates, LLC

Pursuant to Rules 222 and 240 SCACR, Respondents Ellen Harley and Charleston Carriage Horse Advocates, LLC (“Respondents”) request the costs of the appeal be taxed against Appellant Charleston CW, LLC. Respondents are 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 The appeal was affirmed by Unpublished Opinion No. 2025-UP-153 filed on April 30, 2025, by the S.C. Court of Appeals.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 Respondents include the costs of printing the party’s final brief(s) under Rule 210. In addition, and also pursuant to Rule 222(b), Respondents are 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.

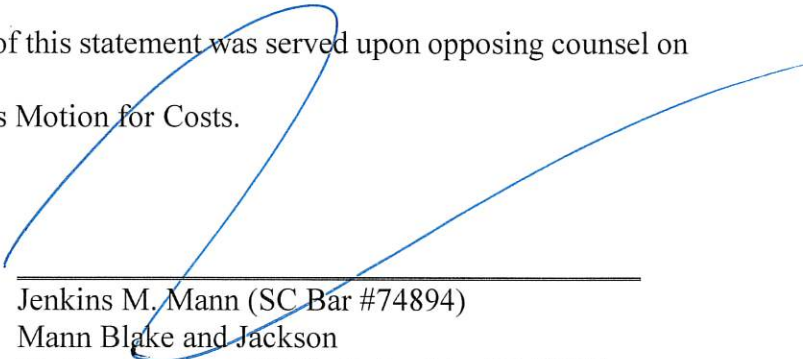
The Court is requested to tax the following costs and fees against Appellant Charleston CW, LLC:

Party Name	Costs Taxable Under Rule 222, SCACR	No. of Pages	Rate	Requested	Allowed
Ellen Harley	Attorney’s Fee Provided by Rule 222(b), SCACR			\$2,500.00	
Charleston Carriage Horse Advocates, LLC	Attorney’s Fee Provided by Rule 222(b), SCACR			\$2,500.00	
			TOTAL:	\$5,000.00	

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 Respondents hereby

move 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.

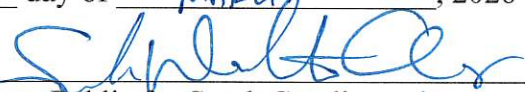
I, Jenkins M. Mann, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was served upon opposing counsel on March 17, 2026, by providing a copy of this Motion for Costs.

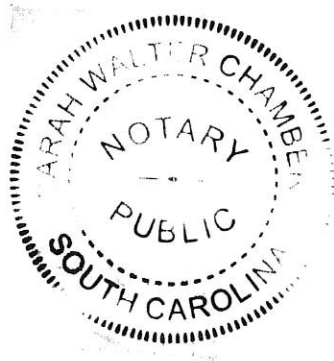


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Mann Blake and Jackson
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Physical: 1619 Sumter Street, Columbia, SC 29201
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Email: jmann@mannblake.com

Attorney for Respondents
Ellen Harley
Charleston Carriage Horse Advocates, LLC

SWORN to before me this

17th day of March, 2026

Notary Public for South Carolina
My commission expires: 10/4/33



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PROOF OF SERVICE

I do hereby certify that on March 17, 2026, I have served all counsel in this action with a copy of **Respondents Ellen Harley and Charleston Carriage Horse Advocates, LLC'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

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

ATTORNEY FOR RESPONDENT CHARLESTON ANIMAL SOCIETY

s/ Sarah Chambers

Sarah Chambers, Paralegal
Mann Blake and Jackson
1619 Sumter Street
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s/ Sarah Chambers

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Direct: (803) 978-1972
Email: schambers@mannblake.com

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SC Court of Appeals

March 17, 2026

VIA U.S. MAIL

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

Re: Charleston Carriage Works v. Ellen Harley, 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 Respondents Ellen Harley and Charleston Carriage Horse Advocates, LLC'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.

Thank you for your time and attention to this matter.

Sincerely,
s/ Sarah Chambers
Sarah Chambers, Paralegal

/swc
Enclosures