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**Apr 03 2026**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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**APPEAL FROM CHARLESTON COUNTY  
COURT OF COMMON PLEAS**

**DEADRA L. JEFFERSON, CIRCUIT COURT JUDGE**

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**APPELLATE CASE No. 2025-001314**

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**M. EDWARD WILSON, JR., M.D.,**

**PLAINTIFF/RESPONDENT,**

**v.**

**MARQUEE LIMO CO., LLC AND PAUL BROWN, DEFENDANTS,**

**OF WHICH MARQUEE LIMO CO., LLC, IS THE APPELLANT.**

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**RESPONDENT'S MOTION AND REQUEST FOR  
COSTS PURSUANT TO RULE 222, SCACR**

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**WHEREAS** Appellant's notice of appeal was filed July 1, 2025 and after filing a motion to dismiss, this appeal was dismissed by order of this Court on March 19, 2026 in favor of Respondent;

**WHEREAS** Respondent expended costs, time and replied to the appeal and prevailed;

Counsel for the Respondent hereby moves this Court to award costs and attorney's fees pursuant to SCACR Rule 222 and attaches an Itemized Statement of Costs. *See* Ex. A – Itemized Statement of Costs.

Respectfully submitted,  
**KAHN LAW FIRM, LLP**  
s/ **Justin S. Kahn**   
Wes B. Allison  
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**ATTORNEYS FOR RESPONDENT**

**EXHIBIT A**

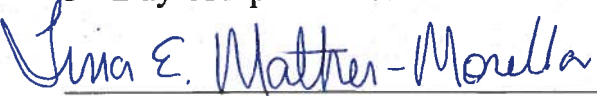
The Appellate Court is requested to tax the following costs against:  
**Marquee Limo Co., LLC** via Progressive Northern Insurance Company

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief				
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript			379.00	
Attorney's Fee Provided By Rule 222(b), SCACR			2,500.00	
Other (specify and explain): Fee Motion to Dismiss Fee Motion for Costs			50.00 50.00	
<b>TOTAL</b>			<b>\$ 2,979.00</b>	

I, Justin S. Kahn, 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/served upon) opposing counsel.

  
 \_\_\_\_\_  
 Attorney for Respondent

Subscribed and sworn to before me this  
 3<sup>rd</sup> Day of April 2026.

  
 \_\_\_\_\_  
 Notary Public for South Carolina  
 My Commission Expires: 10/19/33 (Seal)



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**APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas**

**Deadra L. Jefferson, Circuit Court Judge**

---

**Appellate Case No. 2025-001314**

---

**M. Edward Wilson, Jr., M.D.,**

**Plaintiff/Respondent,**

**v.**

**Marquee Limo Co., LLC and Paul Brown,**

**Defendants,**

**of which Marquee Limo Co., LLC, is the Appellant.**

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**PROOF OF SERVICE**

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The undersigned attorneys hereby certify that a copy of Respondent's Motion and Request for Costs Pursuant to Rule 222, SCACR in the above-referenced case has been served on counsel of record by electronic delivery, as set forth below:

**Michelle N. Endemann** (SC Bar # 79894)

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**Jeffrey M. Crudup** (SC Bar #100281)

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**RESPECTFULLY SUBMITTED**  
**S/ JUSTIN S. KAHN**  
WES B. ALLISON SC BAR No. 100533  
ELLIS I. KAHN SC BAR No. 3257  
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**ATTORNEYS FOR RESPONDENT**

**APRIL 3, 2026**

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April 3, 2026

Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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**Apr 03 2026**

**SC Court of Appeals**

Re: *M. Edward Wilson, Jr. v. Marquee Limo Co., LLC*  
Appellate Case No. 2025-001314

Dear Ms. Kitchings,

Today, we submitted electronically to the Court our Motion for Costs.

Enclosed is the filing fee of \$50.00 for the above matter.

Thank you very much.

Respectfully,

/s Justin S. Kahn

Encl.

cc: Michelle N. Endemann (SC Bar # 79894)  
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Jeffrey M. Crudup (SC Bar #100281)  
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