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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Maite Murphy

Appellate Court Case No.: 2023-001278

Carol Jenkins Jackson and Judy Sharon Jenkins Watson, Appellants.

v.

Michael F. Rivers, R.M. Lapp, Trustee for St. Helena Asset Trust, Heirs of Harrison Rivers, Heirs of Ophelia Rivers, Heirs of Harold W. Rivers, Heirs of Rachel Chisholm, Heirs of Florence C. Parker, Heirs at Law of Rueben M. Chisholm, and also Vernell I. Smashum, Barbara McClarking, Beverly J. Scott, Amos Williams, Clifford Huff, Sandra Mack-Huff, a Trustee for the Margaret Loyd Sumpter Trust dated August 30, 2002, Joseph A. Moore all of whom are believed to be adjacent landowners and are made Defendants in this action, and also all other persons unknown having or claiming to have any right, title, estate, interest in or lien upon the real property or any part thereof described in the Complaint herein as John Doe and Mary Roe, including all persons who may be deceased, minors, in the military service of the United States with the naming of Title 50 United States Code, referred to as the Service Members Civil Relief Act, as amended, persons Compos Mentis and any other disability, Defendants,

Of whom Michael F. Rivers is the Respondent.

RESPONDENT'S MOTION FOR COSTS

The Respondent, Michael F. Rivers, by and through his undersigned counsel, hereby moves for attorney's fees and costs on appeal, pursuant to Rule 222, SCACR. This motion is supported by the Itemized Statement of Costs, which is attached hereto as Exhibit A and incorporated herein by reference.

Respectfully submitted,

KUHN LAW FIRM, LLC.

Beaufort, South Carolina
April 8, 2026

By: _____



M. Fred Kuhn, Jr.
1501 North Street (29902)
Post Office Drawer 507
Beaufort, South Carolina 29901-0507
843-524-3373 - Telephone
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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Maite Murphy

Trial Court Case No.: 2020-CP-07-00829
Appellate Court Case No.: 2023-001278

Carol Jenkins Jackson and Judy Sharon Jenkins Watson, Appellants.

v.

Michael F. Rivers, R.M. Lapp, Trustee for St. Helena Asset Trust, Heirs of Harrison Rivers, Heirs of Ophelia Rivers, Heirs of Harold W. Rivers, Heirs of Rachel Chisholm, Heirs of Florence C. Parker, Heirs at Law of Rueben M. Chisholm, and also Vernell I. Smashum, Barbara McClarking, Beverly J. Scott, Amos Williams, Clifford Huff, Sandra Mack-Huff, a Trustee for the Margaret Loyd Sumpter Trust dated August 30, 2002, Joseph A. Moore all of whom are believed to be adjacent landowners and are made Defendants in this action, and also all other persons unknown having or claiming to have any right, title, estate, interest in or lien upon the real property or any part thereof described in the Complaint herein as John Doe and Mary Roe, including all persons who may be deceased, minors, in the military service of the United States with the naming of Title 50 United States Code, referred to as the Service Members Civil Relief Act, as amended, persons Compos Mentis and any other disability, Defendants,

Of whom Michael F. Rivers is the Respondent.


CERTIFICATE OF SERVICE

Undersigned certifies that the Respondent's Motion for Costs and Itemization of Costs to which this certificate is affixed, was served upon the party (s) to this action by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed or by email to the attorney(s) of record:

R. Thayer Rivers, Jr., Esquire
Law Office of R. Thayer Rivers, Jr., Esquire
Post Office Box 668
Ridgeland, South Carolina 29936
Email: riverslaw@gmail.com

in a post office or official depository under the exclusive care and custody of the United States
Postal Service, on April 8, 2026.

KUHN LAW FIRM, LLC

By: 
Sue Radford



**KUHN
LAW
FIRM
LLC**

**H. FRED KUHN, JR. ESQUIRE
1501 North Street
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Mr. Kuhn's Email: fred@fkuhnlawfirm.com
Sue's Email: sue@fkuhnlawfirm.com

April 8, 2026

Via Email: ctappfilings@sccourts.org
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
Apr 08 2026
SC Court of Appeals

RE: Carol Jenkins Jackson v. Michael F. Rivers
Appellate Case No.: 2023-001278

Dear Ms. Kitchings:

Enclosed please find the Respondent's Motion for Costs, Statement of Costs and Certificate of Service for filing in the above-referenced matter.

By copy of this letter and the enclosed documents, the same are being served upon R. Thayer Rivers, Jr., Esquire.

Thank you for your attention to this matter.

With kindest regards, I am

Very truly yours,

KUHN LAW FIRM, LLC


H. Fred Kuhn, Jr.

HFkj:sr
Enclosures

cc: R. Thayer Rivers, Jr.