

TODD ELLIS

LAW OFFICE OF TODD ELLIS, P.A.

7911 BROAD RIVER ROAD, SUITE 100
IRMO, SOUTH CAROLINA 29063

December 20, 2013

VIA FIRST CLASS U.S. MAIL

The Honorable Daniel A. Shearouse
Clerk of the Supreme Court of South Carolina
P.O. Box 11330
Columbia, South Carolina 29211

Re: Shelby King v. Amy Bennett
Appellate Case No. 2012-212218
Todd Ellis Law File No. 11-0058

RECEIVED
DEC 23 2013
SC Court of Appeals

Dear Clerk Shearouse:

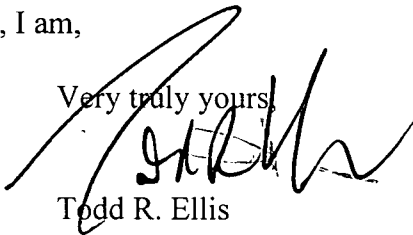
I am enclosing the original and six copies of a motion and memorandum for costs, an itemized, sworn statement of costs and a certificate of service showing that these documents have been served on counsel for the appellant. I have also enclosed this firm's check in the amount of \$25.00 as the filing fee for this motion.

In addition to all the material referenced above, I have enclosed an additional copy of the motion and memorandum and itemized statement and ask that this copy be stamped "Filed" and returned to me in the envelope provided.

Your assistance in this matter is greatly appreciated.

With kind regards, I am,

Very truly yours,


Todd R. Ellis

TRE:da

Enclosures (as referenced)

Cc: Amy Bennett
Thomas Jefferson Goodwyn, Jr., Esq.

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
DeAndrea G. Benjamin, Circuit Court Judge

Appellate Case No. 2012-212218

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Shelby KingAppellant

v.

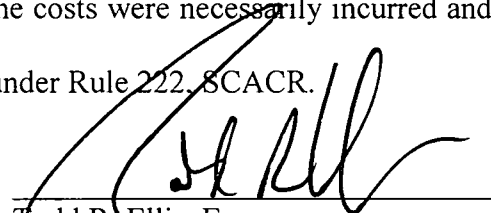
Amy Bennett, The Amy D. Bennett Trust and Amy Bennett, Trustee.....Respondent

MOTION AND MEMORANDUM
FOR COSTS

Appellant hereby moves pursuant to Rule 222(d), SCACR for recovery of costs allowed by the provisions of Rule 222(b), SCACR in the amount of Three Thousand Six Hundred Sixteen and 49/100 (\$3,616.49) Dollars as shown on the sworn, itemized statement of costs accompanying this motion. The costs sought to be recovered are for the filing fee, copying of the final brief and record on appeal and the prescribed attorney fee, each of which is authorized by Rule 222(b), SCACR. The undersigned certifies that the costs were necessarily incurred and believes that the taxation against Appellant is appropriate under Rule 222, SCACR.

Irmo, South Carolina

December 23, 2013



Todd R. Ellis, Esq.
Law Office of Todd Ellis, P.A.
7911 Broad River Road, Suite 100
Irmo, South Carolina 29063
(803) 732-0123 (telephone)
(803) 732-0124 (facsimile)
ATTORNEY FOR RESPONDENT

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
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Shelby KingAppellant

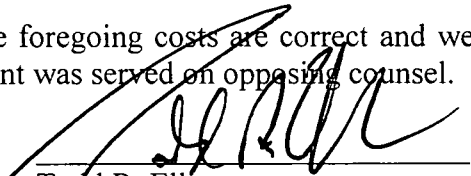
v.

Amy Bennett, The Amy D. Bennett Trust and Amy Bennett, Trustee.....Respondent

The Court of Appeals is requested to tax the following costs against Shelby King:

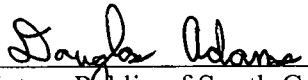
COSTS TAXABLE UNDER RULE 222, SCACR	REQUESTED ALLOWED
Cost of Copying Final Brief	\$91.49
Motion to file Motion for Costs	\$25.00
Attorney's Fee	\$3,500.00
Total	\$3,616.49

I, Todd R. Ellis, do swear that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was served on opposing counsel.



Todd R. Ellis
Attorney for Respondent

Subscribed and sworn to before me this 23rd day of December, 2013.



Notary Public of South Carolina

My Commission Expires: 8/17/18

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
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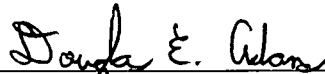
PROOF OF SERVICE

I, Douglas E. Adams, Legal Assistant to Todd R. Ellis, an employee of the Law Office of Todd Ellis, P.A., hereby certify that I have, on the date indicated below, served counsel below with the Motion and Memorandum of Costs by mailing a copy of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel at the following address:

Thomas Jefferson Goodwyn, Jr.
2519 Devine Street
Suite A
Columbia, South Carolina 29205

Irmo, South Carolina

December 23, 2013



Douglas E. Adams