

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Jul 30 2026

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Robert J. Bonds, Circuit Court Judge

Case No. 2023-CP-10-01790
Appellate Case No.: 2024-000293

Jerome B. Crites Jr., Trustee of the
BAC Trust U/ A Dated April 9, 2021,

Respondent,

v.

Lawrence E. Miller,

Appellant.

MOTION FOR COSTS

Respondent hereby moves this Court to award its recoverable costs and attorney's fees pursuant to Rule 222, SCACR, in the amount of \$2,500.00. Respondent was the prevailing party in the above-captioned appeal. A sworn, itemized statement of costs incurred is attached hereto.

Respectfully submitted,

COOPER | TIERNEY

/s/ Lindsey W. Cooper Jr. _____

Lindsey W. Cooper Jr. (SC Bar 75712)

Nicholas P. Tierney (SC Bar 102381)

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Counsel for Respondent

July 29, 2026

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Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Motion for Costs on counsel of
record on July 29, 2026, by electronic mail and U.S. Mail to the following:

E. Gordon Hay, VI, Esq.
John H. Guerry, Esq.
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Angela Gibson, Legal Assistant

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ANGELA GIBSON

July 30, 2026

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SC Court of Appeals

VIA ELECTRONIC MAIL & U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Jerome B. Crites Jr., Trustee of the BAC Trust U/A Dated April 9, 2021 v. Lawrence E. Miller. Appellate Case No.: 2024-000293

Dear Ms. Kitchings:

This firm represents the Respondent in the above-referenced matter. Enclosed for filing, please find Respondent's *Motion for Costs* together with *Proof of Service*. Enclosed is our firm's check to cover the filing fee with mailed copy.

Please note service on counsel of record by copy of this letter. If you have any questions, please call our office at 843-375-6622. Thank you for your assistance in this matter.

Sincerely,



Angela Gibson
Legal Assistant

Enclosures: As Stated.

cc (via electronic mail): john@theoslaw.com
gordon@theoslaw.com