

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

70208

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Robin B. Stillwell Circuit Court Judge

Appellate Case No.: 2013-001788

Ronald E. Ferguson and Susan M. Ferguson.....Appellants,

v.

Christopher Todd Usher, Addison Corporation and
Addison Homes, LLC.....Respondents.

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OCT 28 2013

SC Court of Appeals

**RESPONDENTS' MOTION FOR COSTS
TO BE PAID BY APPELLANT**

Respondents, Christopher Todd Usher, Addison Corporation and Addison Homes, LLC, by and through their undersigned counsel, move, pursuant to Rule 224, South Carolina Appellate Court Rules, for Appellant to pay the costs of the Respondents as provided for in Rule 222 of the South Carolina Appellate Court Rules.

This Motion is based on the fact that the Appellants appeal was dismissed by the Court's decision filed October 2, 2013. Remittitur was issued on October 18, 2013.

Respectfully submitted this 13 day of October, 2013.

**BROWN, MASSEY, EVANS, McLEOD
& HAYNSWORTH, LLC**



E. Zachary Horton (S.C. Bar #68436)
P.O. Box 2464
Greenville, SC 29602
(864) 271-7424
Attorneys for Respondents

Other parties of record:

Ronald E. Ferguson and
Susan M. Ferguson, Pro Se
103 Mill Creek Road
Piedmont, SC 29673

ITEMIZED STATEMENT OF COSTS

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Appellants.

v.

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The Appellate Court is requested to tax the following costs against:

Ronald E. Ferguson and Susan M. Ferguson

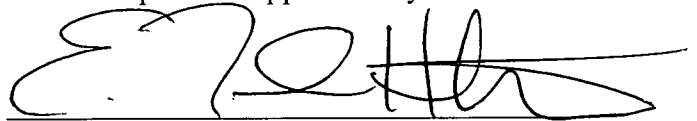
(Name of Party)

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				
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00*	
Other (specify and explain):				

COSTS TAXABLE UNDER RULE 226(j), SCACR				
Cost of Printing or Copying Brief				
Cost of Printing or Copying Reply Brief				
Cost of Printing or Copying Appendix				
Filing fee paid under Rule 226(c), SCACR				
Attorney's fee provided by Rule 226(j)(2), SCACR				
Other (specify and explain):				
			TOTAL	\$1,000.00

*per July 24, 1997 Order of the Supreme Court of South Carolina

I, E. Zachary Horton, 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 the Appellants by mail.



(Signature)

Attorney for Respondents

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

Jeressa S. Porter

Notary Public for SC

My Commission Expires: 5/13/2019
(Seal)

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CERTIFICATE OF SERVICE

I CERTIFY THAT I have served the Respondents' Motion for Costs to be Paid by Appellant on the Pro Se Appellants, Ronald E. Ferguson and Susan M. Ferguson by depositing a copy of the same in the United States Mail, postage prepaid, on October 23, 2013 addressed to 103 Mill Creek Road, Piedmont, SC 29673.

**BROWN, MASSEY, EVANS, McLEOD
& HAYNSWORTH, LLC**



E. Zachary Horton (S.C. Bar #68436)

P.O. Box 2464

Greenville, SC 29602

(864) 271-7424

Attorneys for Respondents

October 23, 2013

R. David Massey
F. Douglas P. Evans
Stanley E. McLeod
Knox L. Haynsworth, III
E. Zachary Horton

BROWN, MASSEY, EVANS, MCLEOD & HAYNSWORTH, LLC

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OF COUNSEL
C. Vincent Brown

October 23, 2013

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Ronald E. Ferguson and Susan M. Ferguson v.
Christopher Todd Usher, et al.
Appellate Case No. 2013-001788

Dear Ms. Kitchings:

This firm represents the Respondents Christopher Todd Usher, Addison Corporation and Addison Homes, LLC in the above referenced appeal. Enclosed please find the original and six (6) copies of a Motion for Cost to be Paid By Appellant. We have enclosed our filing fee of \$25.00.

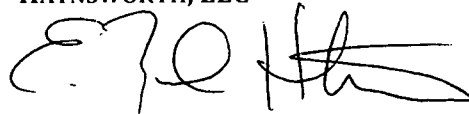
Also enclosed for filing, please find the original and two copies of the Proof of Service. Please forward a clocked copy of the Proof of Service to me in the enclosed self-addressed stamped envelope.

Thank you for your assistance in this matter. If you have any questions or need any additional information please feel free to give me a call.

With kind regards, I remain,

Sincerely,

BROWN, MASSEY, EVANS, MCLEOD &
HAYNSWORTH, LLC



E. Zachary Horton

cc: Ronald E. Ferguson
Susan M. Ferguson

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SC Court of Appeals

BROWN, MASSEY, EVANS, MCLEOD & HAYNSWORTH, LLC ATTORNEYS AT LAW POST OFFICE BOX 2464 GREENVILLE, SOUTH CAROLINA 29602	To: The Honorable Jenny Abbott Kitchings Clerk, South Carolina Court of Appeals Post Office Box 11629 Columbia, South Carolina 29211
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