

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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MAR 13 2014

APPEAL FROM THE ADMINISTRATIVE LAW COURT **SC Supreme Court**

Carolyn C. Matthews, Administrative Law Judge

Appellate Case No. 2011-194026

ON WRIT OF CERTIORARI TO THE COURT OF APPEALS

South Carolina Department of Motor Vehicles..... Respondent,

v.

Phillip Samuel Brown..... Petitioner.

RETURN TO MOTION FOR COSTS

Pursuant to Rule 222, SCACR, Petitioner hereby respectfully files this return to Respondent's Motion for Costs. Rule 222 (d), SCACR requires a party seeking costs to file the motion seeking costs within fifteen (15) days of the issuance of the remittitur. The remittitur was issued by the Court on February 6, 2014. Respondent's motion was dated March 7, 2014 and mailed to the Court for filing on March 10, 2014. Because the motion was not timely filed as required by Rule 222 (d), the motion should be denied and no costs should be assessed against Petitioner.

For the forgoing reasons, Petitioner urges this Court to deny Respondent's Motion for Costs.

Respectfully Submitted,

TAYLOR LAW FIRM LLC

March 13, 2014

A large, stylized handwritten signature in black ink, appearing to read 'Heath P. Taylor', is written over the printed name and address.

HEATH P. TAYLOR

3618 Sunset Boulevard, Suite D

West Columbia, South Carolina 29169

Telephone: 803/926-2205

Telecopier: 803/926-4966

Email: heath@taylorlawsc.com

Attorney for Petitioner

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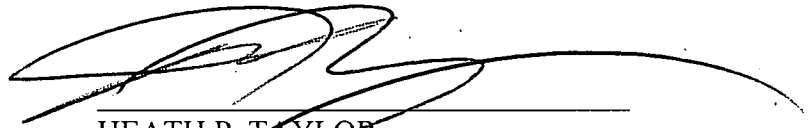
Phillip Samuel Brown..... Petitioner.

PROOF OF SERVICE

I certify that I have served the Return to Motion for Costs on the South Carolina Department of Motor Vehicles by causing it to be mailed to its attorneys of record, Linda Annette Grice, Esquire, Phillip S. Porter, Esquire and Frank L. Valenta, Jr., Esquire, at their office at 10311 Wilson Boulevard, Blythewood, South Carolina 29016-0020 on March 13, 2014.

March 13, 2014

TAYLOR LAW FIRM LLC



HEATH P. TAYLOR
3618 Sunset Boulevard, Suite D
West Columbia, South Carolina 29169
Telephone: 803/ 926-2205
Telecopier: 803/ 926-4966
Email: heath@taylorlawsc.com
Attorney for Appellant