

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

71792

---

Appeal from Dorchester County  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

---

Case No. 2011-CP-18-1716

---

King's Grant Homeowners Association, Inc.,

Respondent,

v.

Elwood Dixon and Jennifer Dixon,

Appellants.

---

**RESPONDENT'S MOTION FOR COSTS ON APPEAL**

---

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown  
Joseph E. DaPore  
Nicholas J. Rivera  
Russell G. Hines  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for the Respondent*

**RECEIVED**

APR 04 2014

**SC Court of Appeals**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT  
OF APPEALS

COMES NOW the Respondent, King's Grant Homeowners Association, Inc. ("King's Grant"), by and through its undersigned counsel, pursuant to Rule 222, SCACR, and respectfully moves as follows for costs on appeal to be taxed against the Appellants, Elwood Dixon and Jennifer Dixon ("The Dixons").

1. This appeal arises out of proceedings in the magistrates court.
2. After King's Grant successfully appealed the magistrates court's decision to the circuit court, the Dixons appealed the circuit court's order reversing the magistrates court to this Court of Appeals.
3. In a per curiam opinion filed February 26, 2014, this Court affirmed the circuit court. (The case was decided without oral argument pursuant to Rule 215, SCACR.)
4. The Dixons did not petition for rehearing, and the case was duly remitted by the Court on March 17, 2014.
5. This motion timely follows within fifteen (15) days of the Court's issuance of the remittitur, and requests that the following costs on appeal be taxed against The Dixons in favor of King's Grant:

<b>Costs Taxable Under Rule 222, SCACR</b>	<b>No. of Pages</b>	<b>Rate</b>	<b>Requested</b>	<b>Allowed (For Court Use Only)</b>
Cost of Printing or Copying Final Brief of Respondent	320 total pages (20 pages each times 16 copies)	.25/page	\$80.00	
Cost of Printing or Copying Supplemental Record on Appeal <sup>1</sup>	528 total pages (33 pages each times 16 copies)	.25/page	\$132.00	
Cost of Court Reporter's Transcript	22 pages	.75/page	\$16.50	
Attorney's Fee Provided by Rule 222(b), SCAR			\$1,000.00	
		<b>TOTAL:</b>	<b><u>\$1,228.50</u></b>	

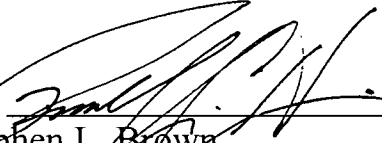
WHEREFORE, King's Grant moves this Honorable Court to tax costs on appeal in the total amount of \$1,228.50 in its favor against The Dixons.

**<SIGNED ON THE FOLLOWING PAGE>**

<sup>1</sup> The Supplemental Record on Appeal was prepared and filed (upon motion and as allowed by this Court's Order filed April 2, 2014) by King's Grant because certain matters that King's Grant designated for inclusion were not included in the record on appeal.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

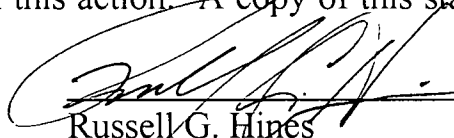
By:   
Stephen L. Brown  
Joseph E. DaPore  
Nicholas J. Rivera  
Russell G. Hines  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
Attorneys for the Respondent

Charleston, South Carolina

Dated: 4/1/14


**VERIFICATION**

I, Russell G. Hines, do swear that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed to the Appellants.

  
Russell G. Hines  
Attorney for the Respondent

Sworn to and subscribed before me  
this 1st day of April, 2014.



  
Elizabeth Riley O'Neil  
Notary Public for South Carolina  
My commission expires: Nov. 4, 2020

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

---

Appeal from Dorchester County  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

---

Case No. 2011-CP-18-1716

---

King's Grant Homeowners Association, Inc.,

Respondent,

v.

Elwood Dixon and Jennifer Dixon,

Appellants.

---

**PROOF OF SERVICE**

---

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown  
Joseph E. DaPore  
Nicholas J. Rivera  
Russell G. Hines  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for the Respondent*

**RECEIVED**

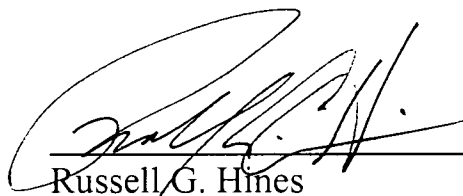
APR 04 2014

**SC Court of Appeals**

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Respondent above named, do hereby certify that the **Respondent's Motion for Costs on Appeal** was served on the above-named Appellants by depositing a copy of the same in the United States Mail, postage prepaid, on April 1, 2014, addressed as follows:

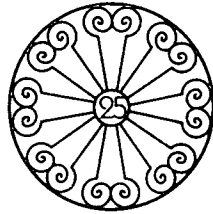
Elwood Dixon  
Jennifer Dixon  
209 Stratford Drive  
Summerville, SC 29485

YOUNG CLEMENT RIVERS, LLP

  
\_\_\_\_\_  
Russell G. Hines

Charleston, South Carolina

Dated: 4/1/14



**YCR LAW**  
Young Clement Rivers, LLP

Russell G. Hines

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1327  
E-mail: RHines@ycrlaw.com

April 1, 2014

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: *King's Grant Homeowners Assoc., Inc. vs. Elwood Dixon and Jennifer Dixon*  
Case No.: 2011-CP-18-1716  
Appellate Case No.: 2012-211934  
YCR File: 14353-20110460

Dear Ms. Kitchings:

Enclosed for filing please find the following:

- The original and two (2) copies of Respondent's Motion for Costs on Appeal;
- The original and two (2) copies of a Proof of Service regarding same; and
- Our firm check in the amount of \$25.00 to cover the cost of the motion;

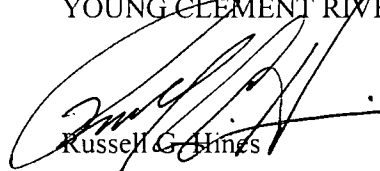
Kindly return one copy of each document to us in the self addressed stamped envelope provided.

Thank you, in advance, for your prompt attention to this request.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines

RGH/ero

cc: Elwood and Jennifer Dixon (via U.S. Mail)

Hasler

FIRST-CLASS MAIL

04/01/2014

US POSTAGE \$001.82<sup>0</sup>



ZIP 29401  
011D12603180

**FIRST CLASS MAIL**



**YCRLAW**

25 Calhoun Street, Suite 400  
P.O. Box 993  
Charleston, SC 29402-0993

DDT  
14353-  
20110460

Jenny Abbott Kitchings, Clerk of  
Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

APR 04 2014

SC Court of Appeals

