

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

72947

Appellate Case No. 2013-001462
Trial Court Case Number: 2009-CP-23-5079

Martha Lynne Angradi and Donald Scott McLorie,
individually and on behalf of their minor child, Jessie M.....Respondents,

v.

Edgar Jack Lail and Leola Lail,
Sylvester Golden, Golden Property, LLC,
Nationwide Homes, and Fayssoux Real Estate.....Defendants,

Of whom Sylvester Golden and
Golden Property, LLC are the.....Appellants.

RESPONDENT'S MOTION FOR THE TAXING OF COSTS

RECEIVED
JUL 21 2014
SC Court of Appeals

William S. F. Freeman (#16676)
THOMERSON MACCHIAVERNA
SMITH & FREEMAN, PC
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Richard S. Stewart
4115 East North Street, Suite 201
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ATTORNEYS FOR RESPONDENTS

The Court of Appeals is requested to tax the following costs against Appellants,
Sylvester Golden and Golden Property, LLC.

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED
Cost of Printing or Copying Final Reply Brief	192	\$1.25 / pg	\$240.19	
Cost of Court Reporter's Transcript			\$245.45	
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00	
		TOTAL	\$1,485.64	

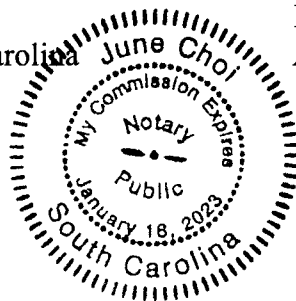
Exhibit A is a true and accurate copy of the check tendered for payment of the cost of the court reporter's transcript. Exhibit B is a true and accurate copy of the check tendered for payment of the cost of printing and copying the final reply brief. I, William S. F. Freeman, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action.

For the foregoing reasons, Respondents respectfully request that the Court tax costs in the amount of \$1,485.64 against Appellants, Sylvester Golden and Golden Property, LLC.

Sworn to and subscribed before me
This 17th day of July, 2014.

June Choi
Notary Public for the State of
South Carolina

Greenville, South Carolina
July 17, 2014



William S. F. Freeman
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Attorney for Respondents

EXHIBIT A

Greenville FIRST

WILLIAM S.F. FREEMAN, LLC OPERATING ACCOUNT POST OFFICE BOX 383 GREENVILLE, SOUTH CAROLINA 29602		2865
DATE <u>Mar 15, 2012</u>		67-801-532
PAY TO THE ORDER OF <u>DONNA HARTLY</u>	\$ <u>245</u> ⁴⁵	
<u>TWO HUNDRED FORTY FIVE & 45/100</u>		DOLLARS
03/19/12 291027 0048 CC \$245.45	FIRST	
FOR <u>ANDROS-transcript</u>	<u>Wm Freeman</u>	
⑈002865⑈ ⑆053208011⑆ 0015859⑈		

03/20/2012 2865 \$245.45

EXHIBIT B

WILLIAM S.F. FREEMAN, LLC
OPERATING ACCOUNT
POST OFFICE BOX 383
GREENVILLE, SOUTH CAROLINA 29602

2958

67-901-532

DATE July 16, 2012

PAY TO THE ORDER OF

PALMETTO LEAD COPK

\$ 240.19

Two Hundred Forty and 19/100

DOLLARS

Greenville
FIRST

FOR

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W. Freeman

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07/20/2012 2958 \$240.19

IN THE STATE OF SOUTH CAROLINA

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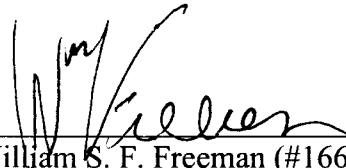
Edgar Jack Lail and Leola Lail,
Sylvester Golden, Golden Property, LLC,
Nationwide Homes, and Fayssoux Real Estate.....Defendants,

Of whom Sylvester Golden and
Golden Property, LLC are the.....Appellants.

PROOF OF SERVICE

I certify that I have this 17th day of July, 2014, served a copy of Respondents' Motion for Costs in the above matter by sending a copy of the same via United States Mail to the following:

Jerry L. Finney, Esq.
Stephanie Fajardo, Esq.
The Finney Law Firm, Inc.
2117 Park Street
Columbia, South Carolina 29201
Attorney for Appellants



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Attorney for Respondents

Greenville, South Carolina
July 17, 2014

THOMERSON MACCHIAVERNA SMITH & FREEMAN P.C.

ATTORNEYS AT LAW

July 17, 2014

VIA US Mail

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

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JUL 21 2014

SC Court of Appeals

Re: Martha Lynne Angradi et al. (Respondents) v. Sylvester Golden III and Golden Properties, LLC (Appellants)
Appellate Case Number: 2013-001462
Trial Court Case Number: 2009-CP-23-5079

Dear Ms. Kitchings:

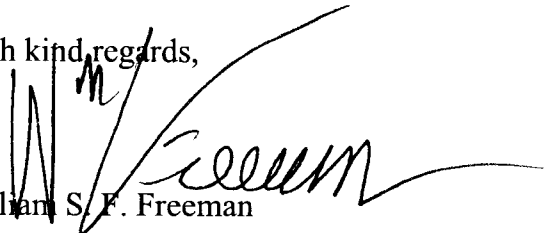
I hope this letter finds you doing well. At this time, I would like to file a Rule 222(d) motion for costs in the above-referenced case, for which I include the required \$25.00 filing fee.

Please find enclosed the original and seven copies of the motion, itemized statement of costs, and certificate of service. Please file the original and return a file-stamped copy to my office in the postage prepaid, self-addressed envelope provided within.

By copy of this letter, I hereby serve the same on Appellants' counsel.

Thank you for your help with this matter. Please let me know if there is anything further I need to do.

With kind regards,


William S. Freeman

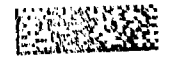
Enclosures

Cc w/ enc. Jerry L. Finney, Esq.
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Richard S. Stewart, Esq.
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**THOMERSON MACCHIAVERNA
SMITH & FREEMAN P.C.**
Attorneys at Law

Post Office Box 473 | Greenville, South Carolina 29602

TO: The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

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