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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable C. Victor Pyle, Jr., Circuit Court Judge

Trial Court Case Number: 2009-CP-23-5079
Appellate Case Number: 2013-001462

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JUL 23 2014

SC Court of Appeals

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

v.

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

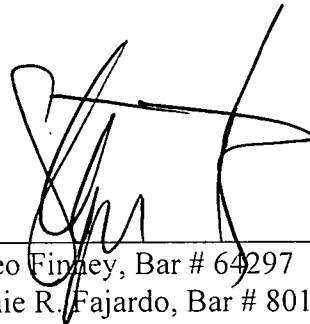
Of Whom Sylvester Golden and Golden Property, LLC are the Appellants.

**REPLY IN OPPOSITION TO RESPONDENT'S MOTION FOR THE TAXING
OF COSTS**

Appellants Sylvester Golden and Golden Property, LLC, by and through the undersigned counsel of record, hereby respond in opposition to Respondent's Motion for the Taxing of Costs. Because the Appellant raised important and valid issues on appeal that necessitated this Court to review the trial court's evidentiary rulings as well as the trial court's denial of Appellant's motions for directed verdict and motion for judgment

notwithstanding the verdict, Appellant must oppose Respondent's Motion for Costs. Additionally, Appellant is considering filing further appeals in regards to this matter which may result in the trial court's rulings and jury verdict being reversed and Appellant succeeding on his appeal, eliminating the Respondent's right to recover costs. Finally, and in the alternative, should this Court award Respondent costs and fees, Appellant would respectfully request that Respondent's requested fees be reduced due to Respondent's rate for printing or copying the Final Reply Brief is a little over eight times the normal rate charged for copying costs. In fact, Appellant contacted Palmetto Legal Copy regarding their rates and was informed that they charge Fifteen Cents (\$.15) per page for copying of a Final Brief, not the stated \$1.25 per page present in Respondent's Affidavit of Costs.

Therefore, the Appellant, by and through the undersigned counsel of record, hereby respectfully requests that Respondent's Motion for Taxing of Costs be denied, or in the alternative, greatly reduced.



Jerry Leo Finney, Bar # 64297
Stephanie R. Fajardo, Bar # 80159
The Finney Law Firm, Inc.
2117 Park Street
Columbia, South Carolina 29201
Phone: (803) 254-7408
Attorneys for Appellant

Columbia, South Carolina
July 22, 2014

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The Honorable C. Victor Pyle, Jr., Circuit Court Judge

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Fayssoux Real Estate Defendants,

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

PROOF OF SERVICE

I certify that I have furnished a copy of the **Appellant's Reply in Opposition to Respondent's Motion for the Taxing of Costs** in the above matter by depositing a copy of the same in the United States Mail, postage prepaid, on July 22, 2014 addressed as follows:

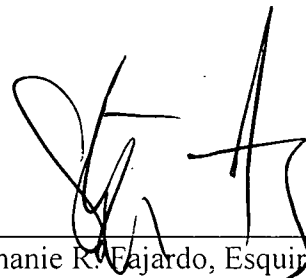
Richard S. Stewart, Esquire
355 Woodruff Road, Suite 101
Greenville, South Carolina 29607

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SC Court of Appeals

William S. F. Freeman, Esquire
Post Office Box 473
Greenville, South Carolina 29602

A handwritten signature in black ink, appearing to read 'Stephanie R. Fajardo', written over a horizontal line.

Stephanie R. Fajardo, Esquire
Jerry L. Finney, Esquire
The Finney Law Firm, Inc.
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Phone: (803) 254-7408

Columbia, South Carolina
July 22, 2014

THE FINNEY LAW FIRM, INC.

Attorneys and Counselors at Law
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JERRY LEO FINNEY

RETIRED CHIEF JUSTICE
SOUTH CAROLINA SUPREME COURT
ERNEST A. FINNEY, JR.
OF COUNSEL

STEPHANIE R. FAJARDO

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July 22, 2014

Reply to Columbia Office

Clerk of Court for the
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Martha Lynne Angradi, et. al., Respondents v. Sylvester Golden III and Golden Property, LLC, et al., Appellants
Civil Action No.: 2009-CP-23-5079
Appellate Case Number.: 2013-001462

Dear Clerk of Court:

Enclosed, please find the original and six (6) copies of the **Reply in Opposition to Respondent's Motion for the Taxing of Costs** and the original **Proof of Service** for the same.

Please note that by copy of this letter to opposing counsel, I am serving them of the same.

If you should have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

A handwritten signature in cursive script that reads "Stephanie R. Fajardo".

Stephanie R. Fajardo
Attorney at Law
SRF:bng

Cc: Richard S. Stewart, Esquire
William S. Freeman, Esquire

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