

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

JUL 24 2014

APPEAL FROM FAIRFIELD COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Brooks P. Goldsmith, Circuit Court Judge

72979

Appellate Case Number: 2012-213071

James R. Glover, as Presiding Elder of the Lancaster District of the African Methodist Episcopal (A.M.E.) Church, Appellant,

v.

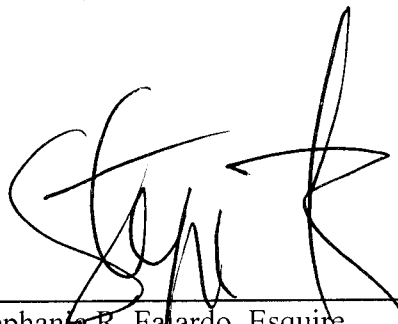
James Stevenson, Roddie Armstrong, Lyndsay Hopkins, Freddie Armstrong, Janice Samuels, Daisy McGraw, Jeannie Hall, Rosa Chappell, Alzine Woodard and Jean McCory, Respondents,

MOTION FOR COSTS AND FEES PURSUANT TO RULE 222

Respondents by and through their undersigned counsel of record, hereby moves this Honorable Court for an Order requiring the Appellant to pay costs and fees pursuant to Rule 222 of the South Carolina Appellate Court Rules. This Court issued an Order on June 25, 2014 affirming the trial court's dismissal of this action and the Remittitur was issued on July 18, 2014. In defense of this appeal, Respondents have expended \$138.07 in applicable costs and in excess of \$1,000.00 in attorney's fees. A sworn affidavit attesting to these costs and fees and copies of supporting documents are attached as Exhibit 1 and incorporated herein.

Therefore, the Respondents, by and through their undersigned counsel of record,

respectfully requests this Court issue an Order for all applicable costs and fees allowable
in this matter.

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

Stephanie R. Fajardo, Esquire
THE FINNEY LAW FIRM, INC.
2117 Park Street
Columbia, South Carolina 29201
Tel: (803) 254-7408
Fax: (803) 254-1941
Attorneys for Respondents

Columbia, South Carolina
July 22, 2014

EXHIBIT

1

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FAIRFIELD COUNTY
Court of Common Pleas

The Honorable Brooks P. Goldsmith, Circuit Court Judge

Appellate Case Number: 2012-213071

James R. Glover, as Presiding Elder of the Lancaster District of the African Methodist Episcopal (A.M.E.) Church, Appellant,

v.

James Stevenson, Roddie Armstrong, Lyndsay Hopkins, Freddie Armstrong, Janice Samuels, Daisy McGraw, Jeannie Hall, Rosa Chappell, Alzine Woodard and Jean McCorry, Respondents,

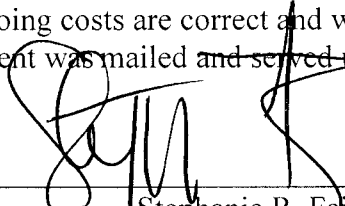
SWORN AFFIDAVIT OF ITEMIZED COSTS AND FEES

The Appellate Court is requested to tax the following costs against James R. Glover, as Presiding Elder of the Lancaster District of the African Methodist Episcopal (A.M.E.) Church.

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	15 pages per brief, 17 copies of the brief for a total of 238 pages plus costs for binding.	\$0.21 per page (Rate calculated by taking total price charged and dividing by number of pages)	\$54.57	
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	40 pages	\$.75 per page, plus \$5.15 postage	\$17.50 (Transcript cost was equally shared with companion case Respondent)	
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00	

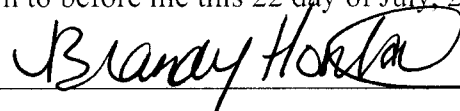
Other (specify and explain): Cost of Printing or Copying Reply to Amicus Curiae Brief	15 pages per brief, 21 copies of the brief for a total of 315 pages plus costs for binding.	\$0.19 per page (Rate calculated by taking total price charged and dividing by number of pages)	\$66.00	
		TOTAL	\$1,138.07	

I, Stephanie R. Fajardo, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed and served upon opposing counsel.



 Stephanie R. Fajardo, Esquire
 Attorney for Respondents

Subscribed and sworn to before me this 22 day of July, 2014.



 Notary Public for South Carolina

My Commission Expires: March 10, 2020

(Seal)

FINNEY LAW FIRM, INC.

10861

Name: MICHAEL WATKINS
Check Date: 02/14/13
Check Amount: 35.00

MEMO:

Transcript fee
Client: Pine Grove/Shady Grove



COPY PICKUP INC.
 2733 MILLWOOD AVE.
 COLUMBIA, SC 29205

Invoice

Date 4/15/2013
 Invoice # 5158

Bill To

FINNEY LAW FIRM
 2117 PARK ST.
 COLUMBIA, SC 29201
 ATTN: ADAM L. WHITSETT

Ship To

P.O. #
 Terms

Ship Date 4/15/2013
 Due Date 4/15/2013
 Other

Item	Description	Qty	Price	Amount
SALES	17 FINAL BRIEF JAMES GLOVER VS JAMES STEVENSON		51.00	51.00T
SALES	17 FINAL BRIEF JAMES GLOVER VS COTHRAN MANNING		51.00	51.00T
			Subtotal	\$102.00
			Sales Tax (7.0%)	\$7.14
			Total	\$109.14

COPY PICKUP INC.
 COPYPICKUP@COPYPICKUP.COM
<http://www.copypickup.com>

803-799-2679
 Fax 803-252-2431

Payments/Credits \$0.00
 Balance Due \$109.14

COPY PICKUP INC.
2733 MILLWOOD AVE.
COLUMBIA, SC 29205

*Shady Grove
amicus brief reply*

Invoice

Date 2/20/2014
Invoice # 6124

Bill To

THE FINNEY LAW FIRM INC
2117 PARK STREET
COLUMBIA SC 29201

Ship To

P.O. #
Terms

Ship Date 2/20/2014
Due Date 2/20/2014
Other

Item	Description	Qty	Price	Amount
SALES	21 Briefs bound 13 pages		19.11	19.11T
SALES	binds		42.00	42.00T
		Subtotal		\$61.11
		Sales Tax (8.0%)		\$4.89
		Total		\$66.00

COPY PICKUP INC.
COPYPICKUP@COPYPICKUP.COM
<http://www.copypickup.com>

803-799-2679
Fax 803-252-2431

Payments/Credits \$0.00
Balance Due \$66.00

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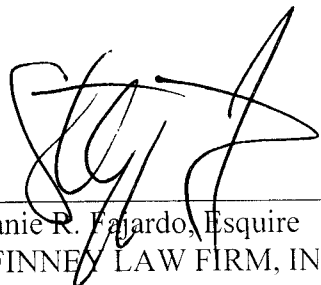
v.

James Stevenson, Roddie Armstrong, Lyndsay Hopkins, Freddie Armstrong, Janice Samuels, Daisy McGraw, Jeannie Hall, Rosa Chappell, Alzine Woodard and Jean McCory, Respondents,

PROOF OF SERVICE

I certify that I have served the **Motion for Costs and Fees Pursuant to Rule 222** and **Affidavit in Support of Fees and Costs** in the above matter on opposing counsel of record, by depositing a copy of the same in the United States Mail, postage prepaid, on July 23, 2014, addressed as follows:

Randall R. Williams, Esquire
Post Office Box 3461
Greenwood, South Carolina 29648-3461



Stephanie R. Fajardo, Esquire
THE FINNEY LAW FIRM, INC.
2117 Park Street
Columbia, South Carolina 29201
Tel: (803) 254-7408
Fax: (803) 254-1941
Attorneys for Respondents

THE FINNEY LAW FIRM, INC.

Attorneys and Counselors at Law
thefinneylawfirm.com



JERRY LEO FINNEY

STEPHANIE R. FAJARDO

2117 Park Street • Columbia, South Carolina 29201
Telephone (803) 254-7408 • Facsimile (803) 254-1941

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

July 23, 2014

Reply to Columbia Office

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

Re: James R. Glover v. James Stevenson, et al.
Court of Appeals Tracking No.: 2012-213071

Dear Clerk of Court:

Enclosed please find the original and six (6) copies of the **Motion for Costs and Fees Pursuant to Rule 22** and the original **Proof of Service** in the above referenced matter. Please file the original and return the clocked copies to me in the enclosed envelope.

By copy of this letter to the attorney for the Appellant, I am hereby serving them with the Motion for Costs and Fees Pursuant to Rule 22 and Proof of Service in the above referenced matter.

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 black ink that reads "Stephanie R. Fajardo".

Stephanie R. Fajardo

Attorney at Law

SRF:bng

Enclosures – listed in text

cc: Randall Williams, Esquire

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SC Court of Appeals

THE FINNEY LAW FIRM, INC.
Attorneys and Counselors at Law



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Columbia, South Carolina 29201

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Clerk of Court for the
South Carolina Court of Appeals
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Columbia, South Carolina 29211