

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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AUG 05 2014

SC Court of Appeals

173102

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

Brooks P. Goldsmith, Circuit Court Judge

Trial Court Case No. 2011-CP-12-0323
Court of Appeals Case No. 2014-212330

Mell Woods Petitioner,

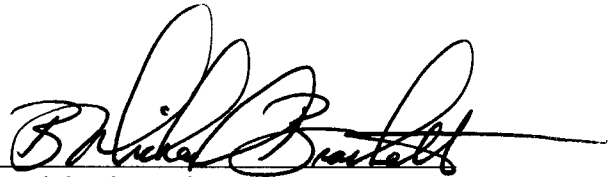
v.

John D. Hinson; Christine Jones; John C. Hinson; Kathy Huffstickle;
Charles J. Hinson; William L. Hinson; Lois Hinson; Robert Breakfield,
as Personal Representative of the Estate of Reba P. Hinson;
Elaine H. Hensley; Robert H. Hinson; George Stanford, as Personal
Representative of the Estate of Linda H. Stanford; William C.
Hinson, Jr.; Darrell W. Hinson; Mary Roe and John Doe, fictitious names
used to designate all other parties, whose names are unknown, and any and all
other persons claiming any right, title, estate interest or lien upon the
real estate described in the complaint; Respondents.

Respondents' Motion for Appeal Costs

Respondents move the court for an award of costs pursuant to Rule 222, SCACR.
The grounds for the motion are that the lower court's judgment was affirmed by this Court
in Unpublished Opinion No. 2014-UP-010, filed January 8, 2014. The Appellant's Petition
for Rehearing was denied by Order filed February 20, 2014. Appellant filed a Petition for

Writ of Certiorari which was denied by Order of the South Carolina Supreme Court dated July 24, 2014. This Court issued its Remittitur to the Circuit Court on August 1, 2014. This Motion is supported by the attached Statement of Costs. The costs sought, as detailed in the Statement of Costs, total \$2,104.85.



B. Michael Brackett, #838
Moses & Brackett, PC
P. O. Box 100261
Columbia, SC 29202
803.461.2312
Attorney for Respondents

August 4, 2014

ITEMIZED STATEMENT OF COSTS

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Court of Appeals Case No. 2012-212330
Trial Court Case No. 2011-CP-12-0323

Mell Woods)
)
)
 v.)
)
 John D. Hinson; Christine Jones; John C.)
 Hinson; Kathy Huffstickle; Charles J.)
 Hinson; William L. Hinson; Lois Hinson;)
 Robert Breakfield, as Personal Repre-)
 sentative of the Estate of Reba P. Hinson;)
 Elaine H. Hensley; Robert H. Hinson;)
 George Stanford, as Personal Repre-)
 sentative of the Estate of Linda H. Stanford;)
 William C. Hinson, Jr.; Darrell W. Hinson;)
 Mary Roe and John Doe, fictitious names)
 used to designate all other parties, whose)
 names are unknown, and any and all other)
 persons claiming any right, title, estate)
 interest or lien upon the real estate)
 described in the complaint.)

The Appellate Court is requested to tax the following costs against

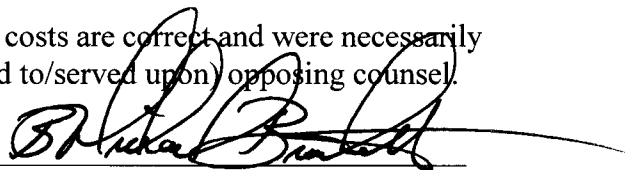
Appellant Mell Woods

(Name of Party)

| COSTS TAXABLE UNDER RULE 222, SCACR | NO. OF PAGES | RATE | REQUESTED | ALLOWED (For Court Use Only) |
|---|------------------------|---------------------------------|-----------|------------------------------|
| Cost of Printing or Copying Final Brief | 757 pages 18 briefs | 0.07 (copies) 2.50 (binding) | \$104.85 | |
| Cost of Printing or Copying Final Reply Brief | | | | |
| Cost of Printing or Copying Record on Appeal | | | | |

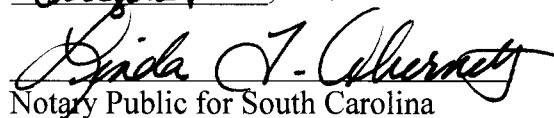
| | | | | |
|--|--|--------------|-------------------|--|
| Filing Fee Paid Under Rule 203(d), SCACR | | | | |
| Cost of Court Reporter's Transcript | | | | |
| Attorney's Fee Provided By Rule 222(b), SCACR | | | \$1,000.00 | |
| Other (specify and explain): | | | | |
| COSTS TAXABLE UNDER RULE 242(J), SCACR | | | | |
| Cost of Printing or Copying Brief | | | | |
| Cost of Printing or Copying Reply Brief | | | | |
| Cost of Printing to Copying Appendix | | | | |
| Filing fee paid under Rule 242(c), SCACR | | | | |
| Attorney's fee provided by Rule 242(j)(2), SCACR | | | \$1,000.00 | |
| Other (specify and explain): | | | | |
| | | TOTAL | \$2,104.85 | |

I, B. Michael Brackett, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was (mailed to/served upon) opposing counsel.



B. Michael Brackett, Attorney
for Respondents

Subscribed and sworn to before me this 4th day of August, 2014.



Notary Public for South Carolina

My Commission Expires: 11-14-18 (Seal)

RICOH

INVOICE

| | |
|----------------|-------------|
| Invoice # | L0713040071 |
| Invoice Date: | 04/24/2013 |
| Due Date: | 05/24/2013 |
| Terms: | Net 30 Days |
| Customer Code: | L07-MOSK |
| Natl ID: | 34905 |

Ricoh USA, Inc. - Columbia, SC
 Phone: (803) 779-9778 Fax:
 Federal ID: 230334400

BILL TO:
MOSES BRACKETT
 1333 MAIN STREET
 SUITE 650
 COLUMBIA, SC 29201

SHIP TO:
MOSES BRACKETT
 1333 MAIN STREET
 SUITE 650
 COLUMBIA, SC 29201
 Attn: LINDA ABERNETHY

Price using: STANDARD Price

| | | | |
|--------------------------------|-------------|-------------|---------------------------------|
| Reference / Case # 120085.4 | Reference 2 | Reference 3 | Account Manager MATT COLLINS |
|--------------------------------|-------------|-------------|---------------------------------|

| Sales Order | Order Date | Ordered By | Quantity | Unit Price | Extension |
|--------------|-------------------------|----------------------------------|----------|------------|-----------|
| SO-1304-0088 | 04/24/2013 | LINDA ABERNETHY - MOSES BRACKETT | | | |
| 602 | Binds - GBC | | 18.00 | 2.5000 | 45.00 |
| 565 | B&W Copies A - Autofeed | | 757.00 | 0.0700 | 52.99 |

Please Pay From This Invoice

Customer's duly authorized signature below is an agreement that the above-described work, project or deliverable has been received and accepted by Customer and Customer hereby agrees that such work, project or deliverable is complete and satisfactory for all purposes. Customer assures payment of this invoice when due. Interest at the rate of the lesser of 1.5% per month or the maximum rate permitted by law, will be charged on invoices not paid timely. Customer agrees to pay reasonable legal fees incurred in connection of past due accounts.

| | |
|----------------|-------|
| Taxable Sales: | 97.99 |
| Sales Tax: | 6.86 |
| Non-Taxable: | 0.00 |
| Postage: | 0.00 |
| Delivery: | 0.00 |

PAY THIS AMOUNT \$ 104.85

THE PERSON SIGNING THIS INVOICE ON BEHALF OF CUSTOMER REPRESENTS THAT HE/SHE HAS THE AUTHORITY TO DO SO

Received/Accepted by: {Print} _____ {Signature} _____ Date: _____

Please pay from this copy. The party named on this bill is held responsible for payment.

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

Brooks P. Goldsmith, Circuit Court Judge

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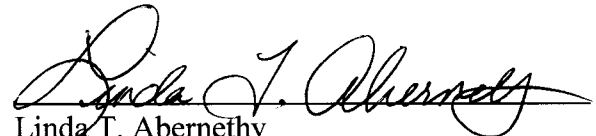
v.

John D. Hinson; Christine Jones; John C. Hinson; Kathy Huffstickle;
Charles J. Hinson; William L. Hinson; Lois Hinson; Robert Breakfield,
as Personal Representative of the Estate of Reba P. Hinson;
Elaine H. Hensley; Robert H. Hinson; George Stanford, as Personal
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used to designate all other parties, whose names are unknown, and any and all
other persons claiming any right, title, estate interest or lien upon the
real estate described in the complaint; Respondents.

CERTIFICATE OF SERVICE

I, Linda T. Abernethy, Legal Assistant to B. Michael Brackett, Esquire,
attorney for the Respondent in the above-captioned matter, do hereby certify that I have
served the Petitioner, Mell Woods, with copies of **Respondents' Motion for Appeal
Costs**, postage prepaid and return address clearly indicated on said envelope, on this 4th day
of August, 2014 at the following address:

Mell Woods
P. O. Box 2603
Lancaster, SC 29721
Plaintiff, pro se


Linda T. Abernethy

MOSES & BRACKETT, PC

ATTORNEYS AND COUNSELORS AT LAW

1333 Main Street, Suite 260 (29201)
Post Office Box 100261
Columbia, South Carolina 29202-3261

Telephone (803) 461-2300
Facsimile (803) 461-2309

B. Michael Brackett
Direct Dial: (803) 461-2312
Email: mbrackett@mkb-law.com

August 4, 2014

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

Re: Woods v. Hinson, et. al.
Trial Court Case no.: 2011-CP-12-0323
Court of Appeals Case No. 2014-212330
MB File No.: 12085.4

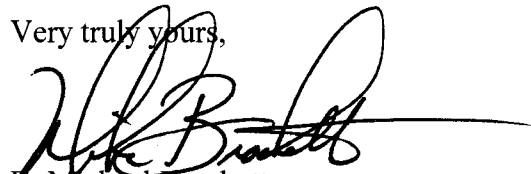
Dear Ms. Kitchings:

Enclosed for filing please find the original and six copies of Respondents' Motion for Appeal Costs. Also enclosed is the Certificate of Service and my check for the filing fee.

By copy of this letter, I am serving the Appellant, who is pro se.

Please return a clocked copy of the Motion using the envelope provided.

Very truly yours,



B. Michael Brackett

BMB/Ita
Enclosures

cc. Robert H. Breakfield, Esquire
Mell Woods

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OSSES & BRACKETT, PC
Attorneys & Counselors-At-Law
P.O. Box 100261
Columbia, SC 29202-3261

12085.4

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
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