

73536
RECEIVED

SEP 15 2014

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

S. Jackson Kimball, Special Circuit Court Judge

Case No. 2011-CP-46-1090

Brian and Deborah C. Pulliam, Monica Bradshaw, Helen K. Cook, Kala Craig, Victor E. Dirienzo, Cynthia Ditursi, J. Scott Drexel, Kathleen Kramer, Robert Loebe, Melanie McDaniel, Don and Debbie Neff, David Osborne, Celeste Arrowood, Vincent Dionna, Mikel Marcuse, James P. Wheaton, Jr., Joseph Manfredini, Elena Manfredini, David Cox, Jonathan B. Dillard, and Eric Wilson, and Marianna Junda, Respondents,

v.

Travelers Indemnity Company, M.U.I. Carolina Corporation, Kensington Place Owners' Association, Inc., and Regent Carolina Corporation, and Regent Corporation, Defendants.

Of whom Travelers Indemnity Company is the Appellant.

**RESPONDENTS' MOTION FOR
AN ASSESSMENT OF COSTS**

W. Jefferson Leath, Jr., Esq.
S.C. Bar No.: 003244
Michael S. Seekings, Esq.
S.C. Bar No.: 64850
Leath, Bouch & Seekings, LLP
92 Broad Street
P. O. Box 59
Charleston, SC 29402
(843) 937-8811

Attorneys for the Respondents

Due to unexpected circumstances including, but not limited to, preparation for trial in another county and mediation in two matters, Respondents have been unable to complete their filing for Motion for Costs and Itemized Statement for Costs until today.

Obviously, this late filing will not prejudice defendants.

Respondents hereby move for leave to file their Motion for Costs and Itemized Statement of Costs out of time.

Respectfully submitted,

LEATH, BOUCH & SEEKINGS, LLP

By: Jefferson Leath
W. Jefferson Leath, Jr., Esq.
S.C. Bar No.: 003244
Michael S. Seekings, Esq.
S.C. Bar No.: 64850
92 Broad Street
P. O. Box 59
Charleston, SC 29402
(843) 937-8811
Attorneys for the Respondents

Charleston, South Carolina
September 11, 2014

OTHER COUNSEL OF RECORD:

William P. Davis, Esq.
Susan Drake Debose, Esq.
Jenny A. Draffin, Esq.
Baker, Ravenel & Bender, LLP
3710 Landmark Drive, Suite 400
P.O. Box 8057
Columbia, SC 29202
(803) 799-9091
Attorneys for Appellants

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

SEP 15 2014

APPEAL FROM YORK COUNTY
Court of Common Pleas

SC Court of Appeals

S. Jackson Kimball, Special Circuit Court Judge

Case No. 2011-CP-46-1090

Brian and Deborah C. Pulliam, Monica Bradshaw, Helen K. Cook, Kala Craig, Victor E. Dirienzo, Cynthia Ditursi, J. Scott Drexel, Kathleen Kramer, Robert Loebe, Melanie McDaniel, Don and Debbie Neff, David Osborne, Celeste Arrowood, Vincent Dionna, Mikel Marcuse, James P. Wheaton, Jr., Joseph Manfredini, Elena Manfredini, David Cox, Jonathan B. Dillard, and Eric Wilson, and Marianna Junda, Respondents,

v.

Travelers Indemnity Company, M.U.I. Carolina Corporation, Kensington Place Owners' Association, Inc., and Regent Carolina Corporation, and Regent Corporation, Defendants.

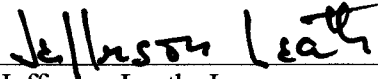
Of whom Travelers Indemnity Company is the Appellant.

PROOF OF SERVICE

W. Jefferson Leath, Jr., Esq.
S.C. Bar No.: 003244
Michael S. Seekings, Esq.
S.C. Bar No.: 64850
Leath, Bouch & Seekings, LLP
92 Broad Street
P. O. Box 59
Charleston, SC 29402
(843) 937-8811
Attorneys for the Respondents

I, W. Jefferson Leath, Jr., do hereby certify that on September 11, 2014 I served opposing counsel with a copy of Respondents' Motion for An Assessment of Costs Out of Time via regular first class United States mail, postage prepaid, addressed as follows:

William P. Davis, Esq.
Susan Drake Debose, Esq.
Jenny A. Draffin, Esq.
Baker, Ravenel & Bender, LLP
3710 Landmark Drive, Suite 400
P.O. Box 8057
Columbia, SC 29202



W. Jefferson Leath, Jr.

Charleston, South Carolina

September 11, 2014