

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM LEXINGTON COUNTY  
FRANK R. ADDY, CIRCUIT COURT JUDGE  
EDGAR W. DICKSON, CIRCUIT COURT JUDGE  
Case No. 2011-CP-32-1109

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Adele J. Pope,

Respondent,

Vs.

Gloria P. Corley and Samuel M. Corley  
Individually and as Trustee of the M. L.  
Corley Marital Trust,

Defendants,

Of whom,

Gloria P. Corley is,

Appellant.

**RECEIVED**

AUG 29 2014

**SC Court of Appeals**

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**RESPONSE TO MOTION FOR COSTS**

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Appellant Gloria P. Corley responds to the Motion for Costs by Respondent Adele Pope and asks that the motion be denied. Appellant would show:

1. Mrs. Corley did not attempt to keep the appeal alive when it was pointed out (via the motion to dismiss) that the appeal was not timely filed. Mrs. Corley has acted in

good faith; she is informed and believes that an award of attorneys' fees and costs would be disproportionate to any real costs incurred by Respondent Pope, such that an award of costs and fees against Mrs. Corley would be punitive.

Wherefore, Mrs. Corley respectfully requests that Respondent Pope's motion be denied



Desa Ballard  
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Email: [desab@desaballard.com](mailto:desab@desaballard.com)

ATTORNEY FOR APPELLANT

August 27, 2014

STATE OF SOUTH CAROLINA

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**PROOF OF SERVICE**

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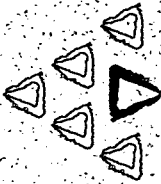
I, Beth Cogan, an employee with Ballard & Watson, do hereby certify that on August 27, 2014, I served a copy of **Appellant's Response to Motion for Costs** in the above-captioned case on the following individual(s) by placing the same in United States Mail, with sufficient first-class postage affixed, addressed as follows:

Mr. Adam T. Silvernail, Esquire  
Law Office of Adam T. Silvernail, LLC  
Post Office Box 1898  
Columbia, South Carolina 29202

Charlie 'Bru' McDonald Pender, Esquire  
2001 Assembly Street, Suite 201  
Columbia, South Carolina 29201

  
Beth Cogan, Paralegal

August 27, 2014  
West Columbia, South Carolina



**Ballard & Watson**  
Attorneys at Law  
PERSISTENT. UNWAVERING.

Desa Ballard  
Harvey M. Watson III

Post Office Box 6338 | West Columbia, SC 29171  
226 State Street | West Columbia, SC 29169  
ph. 803.796.9299 | fx. 803.796.1066 | [desaballard.com](http://desaballard.com)

August 27, 2014

*Via U.S. Mail*

Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: *Adele J. Pope v. Gloria P. Corley, and Samuel M. Corley individually and as  
Trustee of the M.L. Corley Marital Trust.*  
Appellate Case No.: 2014-000618

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Appellant Gloria P. Corley's Response to Motion for Costs and an original and one copy of the Proof of Service. Please return a clocked copy of the Response and Proof of Service to me in the enclosed self-addressed, stamped envelope I have provided.

By copy of this letter, I am serving the Response on opposing counsel and counsel for Defendant Samuel M. Corley, Individually and as Trustee of the M.L. Corley Marital Trust.

Thank you for your time and assistance with this matter. With warm personal regards, I am,

Sincerely yours,

Beth Cogan, Paralegal  
[beth@desaballard.com](mailto:beth@desaballard.com)

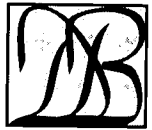
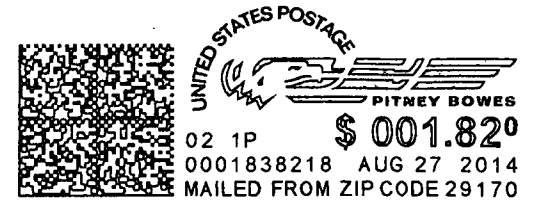
Enclosures

c: via U.S. Mail  
Adam Silvernail, Esquire  
Charlie "Bru" Pender, Esquire  
Angie Williams

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**SC Court of Appeals**



*Law Offices of Desa Ballard*

226 State Street  
West Columbia, SC 29169

To:

Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
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