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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Carmen T. Mullen, Circuit Court Judge

Case No. 2012-CP-07-3746
Appellate Case No. 2014-000827

Albert R. LaFleur and Eileen M. LaFleur,Appellants,

v.

Coral Resorts, LLC, Hilton Head Hospitality, LLC d/b/a Hilton Head Guest Services,
Sunrise Vacation Properties, Ltd., Sherri J. Smith, Patrick Budnik, Steven Deutsch,
Katherine Swisher, and Reba Management, Inc.,.....Respondents.

RESPONDENTS' JOINT MOTION FOR COSTS

Respondents hereby give notice and move the South Carolina Court of Appeals, pursuant to Rule 222, SCACR, for an order taxing all costs permitted under Rule 222(b), SCACR, including the set attorney's fee as provided. This Motion is accompanied by a sworn, itemized statement of costs as required by Rule 222(d), SCACR.

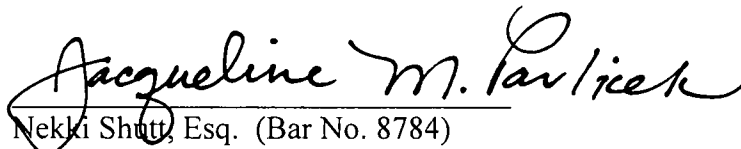
The basis for this Motion is that this Court dismissed Appellants' appeal from the circuit court's orders dated November 1, 2013, and April 4, 2014, because they were not immediately appealable. Additionally, this court dismissed Appellants' appeal from the circuit court's orders dated June 10, 2013, and June 20, 2013, orders because Appellants failed to timely appeal these orders pursuant to Rule 203(b)(1), SCACR. This Court issued the Remittitur on August 11, 2014.

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AUG 13 2014

SC Court of Appeals

Respectfully submitted,



Nekki Shutt, Esq. (Bar No. 8784)

Kathleen McDaniel, Esq. (Bar No. 74826)

Jacqueline M. Pavlicek, Esq. (Bar No. 100556)

CALLISON TIGHE & ROBINSON, LLC

P.O. Box 1390

Columbia, South Carolina 29202-1390

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kathleenmcdaniel@callisontighe.com

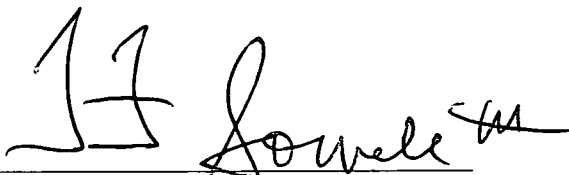
pavlicek@callisontighe.com

**ATTORNEYS FOR RESPONDENTS CORAL
RESORTS, LLC, HILTON HEAD HOSPITALITY,
LLC D/B/A HILTON HEAD GUEST SERVICES, AND
REBA MANAGEMENT, INC.**

Columbia, South Carolina

August 12, 2014

AND



Thornwell F. Sowell, III, Esq. (Bar No. 5197)

Bess J. DuRant, Esq. (Bar No. 77920)

SOWELL, GRAY, STEPP & LAFITTE, LLC

P.O. Box 11449

Columbia, South Carolina 29211

Tel. (803) 929-1400

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bsowell@sowellgray.com

bdurant@sowellgray.com

**ATTORNEYS FOR RESPONDENTS SUNRISE
VACATION PROPERTIES, LTD., SHERRI J.
SMITH, PATRICK BUDNIK, STEVEN DEUTSCH,
AND KATHERINE SWISHER**

Columbia, South Carolina

August 12, 2014

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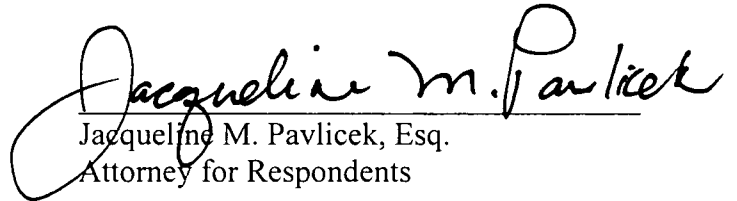
RESPONDENTS' ITEMIZED STATEMENT OF COSTS

Respondents respectfully request this Court tax the following costs against

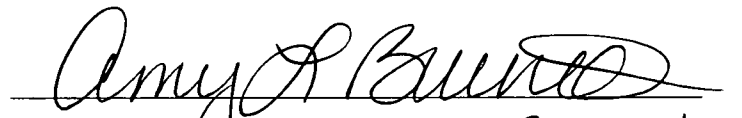
Appellants.:

Costs Taxable Under Rule 222, SCACR	No. of Pages	Rate	Requested	Allowed (Court Use Only)
Attorney's Fee Provided by Rule 222(b), SCACR	n/a		\$1,000.00	
Total:				<u>\$1,000.00</u>

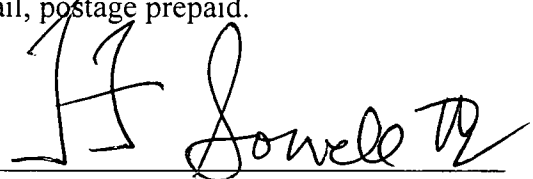
I, Jacqueline M. Pavlicek do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was served upon opposing counsel by First Class United States Mail, postage prepaid.


Jacqueline M. Pavlicek, Esq.
Attorney for Respondents

Subscribed and sworn to before me this 12 day of August, 2014.

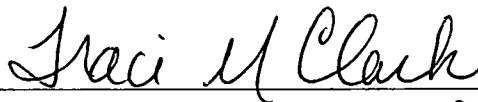

Notary Public for South Carolina
My Commission Expires: 10-5-21

I, Thornwell F. Sowell do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was served upon opposing counsel by First Class United States Mail, postage prepaid.



Thornwell F. Sowell, Esq.
Attorney for Respondents

Subscribed and sworn to before me this 12th day of August, 2014.



Notary Public for South Carolina

My Commission Expires: 3/11/21

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Katherine Swisher, and Reba Management, Inc.,Respondents.

CERTIFICATE OF SERVICE

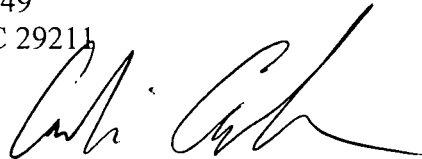
I do hereby certify I have served a copy of the following as indicated herein below, by mailing a copy of the following documents by first class U.S. Mail postage pre-paid on the date below to the following:

DOCUMENTS SERVED: Respondents' Joint Motion for Costs and Respondents' Itemized Statement of Costs

PARTIES SERVED:

Zachary Steven Naert, Esq.
Joseph DuBois, Esq.
NAERT & DUBOIS, LLC
Post Office Box 7228
Hilton Head Island, SC 29938

Thornwell F. Sowell, III, Esq.
Bess Jones DuRant, Esq.
SOWELL GRAY, STEPP & LAFFITTE, LLC
P.O. Box 11449
Columbia, SC 29211



Carli N. Cochran

Columbia, South Carolina
August 13, 2014

Jacqueline M. Pavlicek - Attorney
Ph: 803-404-6900
Fax: 803-404-6901
pavlicek@callisontighe.com

August 13, 2014

VIA HAND DELIVERY

The Honorable Jenny Abbot Kitchings, Clerk
SOUTH CAROLINA COURT OF APPEALS
Calhoun Building
1015 Sumter Street
Columbia, South Carolina 29201

**Re: Albert R. Lafleur and Eileen M. LaFleur v. Coral Resorts, LLC, Hilton
Hilton Head Hospitality, LLC d/b/a Hilton Head Guest Services,
Sunrise Vacation Properties, Ltd., Sherri J. Smith, Patrick Budnik,
Steven Deutsch, Katherine Swisher, and Reba Management, Inc.
Appellate Case No.: 2014-000827
Our File No.: 5387.015**

Dear Madam Clerk:

Enclosed for filing, please find an original and seven (7) copies of the Respondents' Joint Motion for Costs and Respondents' Itemized Statement of Costs, along with a Certificate of Service in the above-referenced matter. Please file the original and six of the copies, clock-in the seventh copy, and return it to us via the courier delivering same.

By copy of this letter, I am serving all counsel of record with a copy of the same.

If you have any questions or need anything further regarding this matter, please do not hesitate to contact me at my office.

With kind regards, I remain

Very truly yours,


Jacqueline M. Pavlicek, Esquire

JMP 
Enclosures

cc: Nekki Shutt, Esquire (w/o enclosure)
Kathleen M. McDaniel, Esq. (w/o enclosure)
Thornwell F. Sowell, Esq. (w/enclosure)
Bess Jones DuRant, Esq. (w/enclosure)
Joseph DuBois, Esq. (w/enclosure)
Zachary Steven Naert, Esq. (w/enclosure)

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