



THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM AIKEN COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Doyet A. Early, III, Circuit Court Judge

Lower Court Case Nos. 2008-CP-02-1647; 2009-CP-02-1810; 2007-ES-02-0056

174052

Appellate Case No. 2013-002582

Alan Wilson, in his Capacity as Attorney General of
South Carolina; and others Plaintiffs,

v.

Albert H. Dallas and others, Defendants.

Of whom Adele J. Pope, individually and on behalf of Others under
South Carolina Trust Code Section 62-7-405, is the Appellant,

And Terry Brown, Forlando Brown, James B., David G. Cannon,
Albert H. Dallas and Tommie Ray Hynie are Respondents.

And Alan Wilson in his Capacity as Attorney General of South Carolina,
Deanna J. Brown Thomas and Robert L. Buchanan, Jr. are Additional Interested Persons.

In Re: The Estate of James Brown a/k/a James Joseph Brown 2000
Irrevocable Trust u/a/d August 1, 2000 Ex parte: Adele Pope, Appellant,

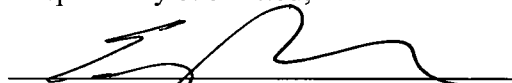
In Re: The Estate of James Brown a/k/a James Joseph Brown, Respondent.

MOTION FOR COSTS

In light of this Court's dismissal of Appellant Adele Pope's appeal and the

Supreme Court's subsequent denial of her Petition for Writ of Certiorari, Defendant/Respondent Albert H. Dallas files this motion for costs pursuant to Rule 222, SCACR. ("Unless otherwise ordered by the appellate court or agreed by the parties, costs shall be taxed against the appellant when the appeal is dismissed or judgment on appeal is affirmed."). As reflected in the attached itemized statement of costs, Defendant/Respondent Dallas requests **\$1,000.00** be taxed against Appellant Pope.

Respectfully submitted,



Eugene C. Covington, Jr. (#1422)
Covington, Patrick, Hagins, Stern & Lewis, P.A.
P.O. Box 2343
Greenville, SC 29602
(864) 242-9000
(864) 233-9777 fax
gcovington@covpatlaw.com
Attorney for Albert H. Dallas

Dated: 10/31, 2014
Greenville, South Carolina

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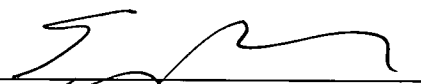
ITEMIZED STATEMENT OF COSTS

The South Carolina Court of Appeals is requested to tax the following costs

against Appellant Adele Pope:

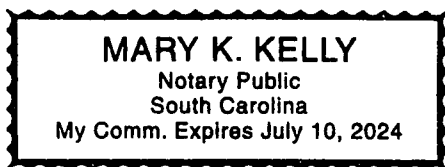
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Attorney's Fee Provided by Rule 222(b), SCACR			\$1,000.00	
Total			\$1,000.00	

I, Eugene C. Covington, Jr., 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 opposing counsel.


Eugene C. Covington, Jr.
Attorney for Albert H. Dallas

Subscribed and sworn to before me
this 31st day of OCTOBER,
2014.

Mary K. Kelly
Notary Public for South Carolina
My Commission Expires: _____



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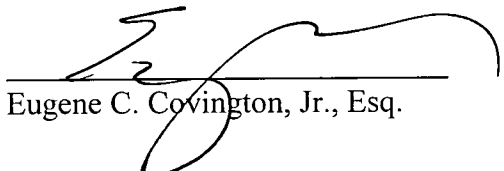
In Re: The Estate of James Brown a/k/a James Joseph Brown, Respondent.

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing **MOTION FOR COSTS**

has been served upon counsel of record by depositing a copy of the same first-class postage prepaid, in the United States Mail, on the 31 day of Oct., 2014, to the addresses shown below.

Adele J. Pope, Esq. 1228 Walnut Street Newberry, SC 29108	Albert P. Shahid, Jr., Esq. 89 Broad Street Charleston, SC 29401
Robert N. Rosen, Esq. S. Alan Medlin, Esq. 18 Broad Street, Suite 201 Charleston, SC 29401	John A. Donsbach, Esq. Donsbach & King, LLC P.O. Box 212139 Martinez, GA 30917-2139
David B. Bell, Esq. Law Office of David B. Bell P.O. Box 1011 Augusta, GA 30903-1011	Matt Bodman, Esq. Matt Bodman, PA 1500 Calhoun Street Columbia, SC 29201
Tanya A. Gee, Esq. Nexsen Pruet, LLC P.O. Box 2426 Columbia, SC 29202	David G. Cannon P.O. Box 864 Barnwell, SC 29801


Eugene C. Covington, Jr., Esq.

Greenville, South Carolina

COVINGTON, PATRICK, HAGINS, STERN & LEWIS, P.A.

Eugene C. Covington, Jr.
Douglas F. Patrick
John A. Hagins, Jr.*
T. S. Stern, Jr.
Stephen R. H. Lewis

211 Pettigru Street (29601)
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*Of Counsel

October 31, 2014

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

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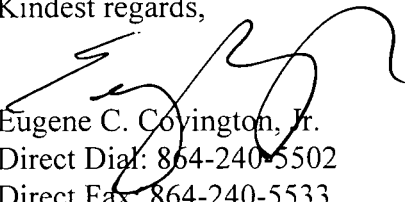
Re: Appellate Case No. 2013-002582

Dear Ms. Kitchings:

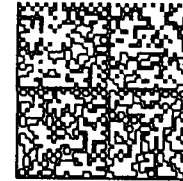
Enclosed for filing with the Court is an original and one Copy of Defendant/Respondent Albert H. Dallas' Motion for Costs in the above-referenced matter along with my firm's check in the amount of \$25.00 for the motion filing fee. Please return the copy, clocked-in, to me in the self-addressed stamped envelope provided.

Thank you for your assistance in this matter.

Kindest regards,


Eugene C. Covington, Jr.
Direct Dial: 864-240-5502
Direct Fax: 864-240-5533
gcovington@covpatlaw.com
ECC/mkk
Encl.

cc: Adele J. Pope, Esq. (w/encl.)
Robert N. Rosen, Esq. (w/encl.)
David B. Bell, Esq. (w/encl.)
David G. Cannon (w/encl.)
Matt Bodman, Esq. (w/encl.)
John A. Donsbach, Sr., Esq. (w/encl.)
Albert P. Shahid, Jr., Esq. (w/encl.)
Tanya A. Gee, Esq. (w/encl.)



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FROM: Covington, Patrick, Hagins, Stern & Lewis, P.A.
Attorneys at Law
Post Office Box 2343
Greenville, South Carolina 29602

TO:

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201