

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

John M. Milling, Circuit Court Judge  
Civil Action No.: 2006-CP-22-0914  
Appellate Case No.: 2011-188346

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**RECEIVED**

NOV 24 2014

**S.C. Supreme Court**

AJG Holdings, LLC; Stalvey Holdings, LLC;  
David Croyle; Linda Croyle; Jean C. Abbott;  
Linda T. Courtney; Sumter L. Langston;  
Diane Langston; Carl B. Singleton, Jr.;  
Virginia M. Owens; and Stoney Harrelson,

Respondents,

v.

Levon Dunn, Pamela S. Dunn, and  
Robin H. Sasser and Charles E. Sasser, as  
Personal Representatives for the Estate of Helen Sasser,

Petitioners.

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RESPONDENTS' MOTION FOR ASSESSMENT  
OF COSTS AND ATTORNEY FEES

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Jack M. Scoville, Jr., P.A.  
Jack M. Scoville, Jr.  
Post Office Drawer 1228  
Georgetown, South Carolina 29442  
(843) 546-1130 (telephone)  
(843) 546-0726 (facsimile)  
Attorney for Respondents

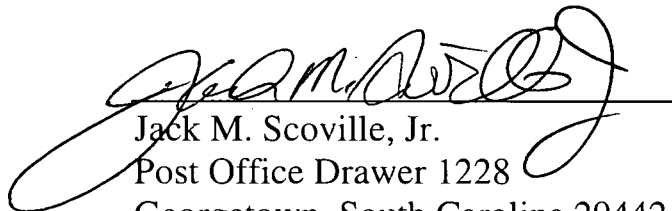
TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA SUPREME  
COURT

The Respondents, by and through their undersigned attorney, move this Court for an order approving the taxation of costs form attached hereto.

The grounds for this motion are that the Respondents prevailed on this appeal.

The Respondents request an order to tax the attached costs and fee against Petitioners.

Jack M. Scoville, Jr., P.A.



Jack M. Scoville, Jr.  
Post Office Drawer 1228  
Georgetown, South Carolina 29442  
(843) 546-1130 (telephone)  
(843) 546-0726 (facsimile)

Attorney for Respondents

November 18, 2014

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V.

Levon Dunn, Pamela S. Dunn, and  
Robin H. Sasser and Charles E. Sasser, as  
Personal Representatives for the Estate of Helen Sasser,

Petitioners.

The Supreme Court is requested to tax the following costs against Petitioners:

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	546	See attached invoice	\$123.58	
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	43	See attached invoice	\$34.50	

Attorney's Fee Provided By Rule 222(b); SCACR – State of SC – Court of Appeals			\$1,000.00	
Attorney's Fee Provided by Rule 222(b); SCACR State of SC – Supreme Court			\$1,000.00	
Other (specify and explain):				
<b>COSTS TAXABLE UNDER RULE 242(j), SCACR</b>				
Cost of Printing or Copying Brief				
Cost of Printing or Copying Reply Brief				
Cost of Printing or Copying Appendix				
Filing fee paid under Rule 242(c), SCACR				
Attorney's fee provided by Rule 242(j)(2), SCACR				
Other (specify and explain):				
		TOTAL	\$2,158.08	

I, Jack M. Scoville, 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.

  
 Attorney for Respondents

SWORN to before me this 18  
 day of November, 2014.

  
 Notary Public for South Carolina

My Commission Expires: 1/30/2014

The UPS Store  
 202 North Fraser Street  
 Georgetown, SC 29440

# Statement

DATE
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9/1/2009

BILL TO
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Jack Scoville  
 PO Box 1228  
 Georgetown, SC 29442  
 USA

					DUE DATE	AMOUNT DUE
					10/1/2009	\$123.58
DATE	DESCRIPTION				AMOUNT	BALANCE
07/31/2009	Balance forward					0.00
08/04/2009	INV #0000004476. Jack Scoville				123.58	123.58
	--- Copies, 504 @ \$0.07 = 35.28					
	--- Copies, 42 @ \$0.15 = 6.30					
	--- Laminating, 20 @ \$3.75 = 75.00					
	--- SalesTax, 1 @ \$7 = 7.00					
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE	
123.58	0.00	0.00	0.00	0.00	\$123.58	

**BETTYE S. GUM, CVR-CM**  
Certified Court Reporter  
4295 Rivergate Lane  
Little River, South Carolina 29566-6826  
(843) 249-0286

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**DATE: February 25, 2009**

**TO: J. Sam Scoville, Esquire  
Scoville Law Firm  
P. O. Drawer 1228  
Georgetown, South Carolina 29442**

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**RE: AJG Holdings, LLC, et al. Vs. Levon Dunn and Pamela S. Dunn  
Case Number: 2006-CP-22-914**

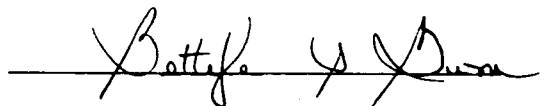
**For Requested Copy of Transcript of Record -- Hearing of August 18, 2008**

<b>43 Pgs. @\$ .75/pg.</b>	<b>\$ 32.25</b>
<b>Postage &amp; Handling</b>	<b><u>2.25</u></b>
	<b>\$ 34.50 TOTAL DUE ON RECEIPT</b>

**(Transcribed for Dixie Cox Eubank, Official Reporter)**

**THANK YOU VERY MUCH !**

**S.S. # 248-68-1917**



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**This Statement Due and Payable On Receipt**

Jack M. Scoville, Jr.  
Attorney at Law  
A Professional Association  
1001 Front Street  
Post Office Drawer 1228  
Georgetown, South Carolina 29442

**RECEIVED**

NOV 24 2014

TELEPHONE: (843) 546-1130  
FAX # (843) 546-0726  
EMAIL: scorac@aol.com

**S.C. SUPREME COURT**

November 18, 2014

The Honorable Daniel E. Shearouse  
Clerk of Court  
The Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, SC 29211

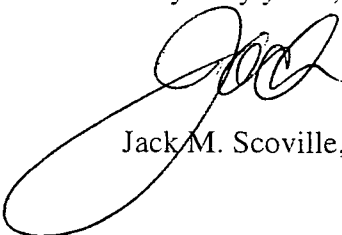
Re: AJG Holdings, LLC, et al. v. Levon Dunn, et al.  
Appellate Case No.: 2011-188346  
Civil Action Number: 2006-CP-22-0914

Dear Mr. Shearouse:

Please find enclosed the original and six copies of the Respondents' Motion for Assessment of Costs and Attorney Fees along with the \$25 filing fee regarding the above-referenced matter. Also enclosed is the Proof of Service.

With kindest regards, I remain

Very truly yours,

  
Jack M. Scoville, Jr.

JMSjr/mmw

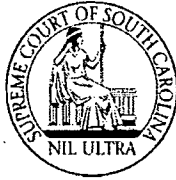
Enclosures

cc: Stephen P. Groves, Sr., Esquire  
Edward B. Bowers, Jr., Esquire

SECRET

CONFIDENTIAL

THIRD MEMORANDUM



# The Supreme Court of South Carolina

Jack M. Scoville, Jr.  
PO Drawer 1228  
Georgetown SC 29442

11/24/2014

## RECEIPT #74254

**Case No:** 2011-188346  
**Case Short Title:** AJG Holdings, LLC v. Levon Dunn  
**Event:**  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 24245  
**Check/Money Order Date:** 11/18/2014  
**Comments:**