

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

NOV 24 2014

SC Court of Appeals

M4265

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Ralph P. Stroman, Special Referee

Case No: 2009-CP-26-1909

Randy A. Beverly, L.L.C. and Donald Godwin, L.L.C.....Plaintiffs

v.

Bucksville Farms, Inc..... Defendant & Third Party Plaintiff

v.

Benjamin J. Creel, individually and as surviving director
of Bucksville Farms, Inc. Fourth Party Defendants

OF WHOM


Bucksville Farms, Inc. and Benjamin J. Creel individually and
as surviving Director of Bucksville Farms, Inc are..... Appellants

and

Randy A. Beverly, L.L.C., Donald Godwin, L.L.C.,
Randy A. Beverly and Donald Godwin, are Respondents

MOTION TO TAX COSTS

Pursuant to Rules 222 and 224, SCACR, counsel for the Respondents moves the Court to tax costs against the Appellants in this matter as per the verified statement of costs attached hereto and incorporated herein by reference. The grounds for this Motion are the furtherance of justice. This Motion is based upon the record in this cause, the cited Rules and upon the law of South Carolina.



J. Dwight Hudson, Esquire
Hudson Law Offices
1203 48th Avenue North
Suite 111
Myrtle Beach, SC 29577
(843) 692-9889

Attorney For RESPONDENTS

Date: November 20, 2014

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Ralph P. Stroman, Special Referee

Case No: 2009-CP-26-1909

Randy A. Beverly, L.L.C. and Donald Godwin, L.L.C.....Plaintiffs

v.

Bucksville Farms, Inc..... Defendant & Third Party Plaintiff

v.

Benjamin J. Creel, individually and as surviving director
of Bucksville Farms, Inc. Fourth Party Defendants

OF WHOM

Bucksville Farms, Inc. and Benjamin J. Creel individually and
as surviving Director of Bucksville Farms, Inc are..... Appellants

and

Randy A. Beverly, L.L.C., Donald Godwin, L.L.C.,
Randy A. Beverly and Donald Godwin, are Respondents

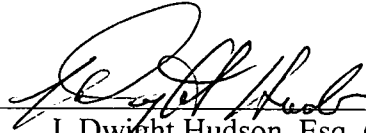
The Appellate Court is requested to tax the following costs against

Bucksville Farms, Inc. and Benjamin J. Creel, individually and as surviving director of Bucksville Farms, Inc

(Name of Party)

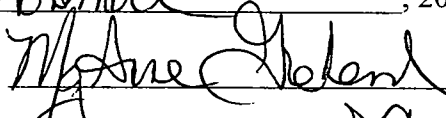
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief <i>30 pgs plus covers x 18 copies</i>	540	.20	108.00	
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript <i>(including each party's payment/charge for 1/2 of the Special Referee's Copy)</i>	672		1179.87 <i>Advantage Court Reporting of Myrtle Beach</i>	
Attorney's Fee Provided By Rule 222(b), SCACR			1000.00	
Other (specify and explain):				
COSTS TAXABLE UNDER RULE 242(j), SCACR				
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	\$2,287.87	

I, J. Dwight Hudson, 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/served upon) opposing counsel.



J. Dwight Hudson, Esq. (Signature)
Attorney for **RESPONDENTS**

Subscribed and sworn to before me this 20th day of November, 20 14.



Notary Public for DC

My Commission Expires: 3-20-2019

(Seal)

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

NOV 24 2014

APPEAL FROM Horry COUNTY
Court of Common Pleas

SC Court of Appeals

Ralph P. Stroman, Special Referee

Opinion No. 2014-UP-028 (S.C. Ct. App. filed Jan. 22, 2014)

Randy A. Beverly, L.L.C. and Donald Godwin, L.L.C.....Plaintiffs

v.

Bucksville Farms, Inc..... Defendant & Third Party Plaintiff

v.

Randy A Beverly and Donald GodwinThird Party Defendants & Fourth Party Plaintiffs

v.

Benjamin J. Creel, individually and as
surviving director of Bucksville Farms, Inc.Fourth Party Defendant

OF WHOM

Bucksville Farms, Inc. and Benjamin J. Creel individually and
as surviving Director of Bucksville Farms, Inc are..... Petitioners,

and

Randy A. Beverly, L.L.C., Donald Godwin, L.L.C.,
Randy A. Beverly and Donald Godwin, are Respondents.

PROOF OF SERVICE

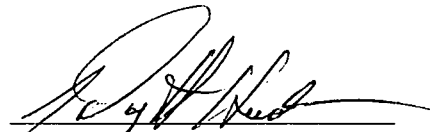
I certify that I have served the Respondents' MOTION FOR COSTS and VERIFIED

STATEMENT OF COSTS on the Appellants by depositing a copy of the same in the United States Mail, postage prepaid, on November 20, 2014. addressed to their counsel at the addresses noted below:

James B. Richardson, Jr. Esq.
Attorney at Law
1229 Lincoln Street
Columbia, SC 29201

James P. Stevens Jr. Esq.
Attorney at Law
PO Drawer 127
Loris, SC 29569-0127

Dated: November 20, 2014, 2014



J. Dwight Hudson, Esquire
Hudson Law Offices
1203 48th Avenue North
Suite 111
Myrtle Beach, SC 29577
(843) 692-9889

Attorney For Respondents

HUDSON LAW OFFICES

1203 48th AVENUE NORTH
SUITE 111

MYRTLE BEACH, SOUTH CAROLINA 29577

TELEPHONE (843) 692-9889
TOLL FREE: 1-877- 874-5256
FAX (843) 692-9190
www.hudsonlawoffice.com

SHALLOTTE OFFICE:
5101 SELLERS ROAD
SHALLOTTE, NORTH CAROLINA 28459
TELEPHONE: (910) 755-6543
FAX (843) 692-9190
TOLL FREE: 1-877- 874-5256

CONWAY:

BY APPOINTMENT ONLY
TELEPHONE: (843) 692-9889
FAX (843) 692-9190
TOLL FREE: 1-877- 874-5256

J. DWIGHT HUDSON*
MARY ANNE GRAHAM

EMAIL: hudsonlaw@sc.rr.com
OR: hudsonlaw@hudsonlawoffice.com

*ADMITTED IN S.C. AND N.C.

REPLY TO: MYRTLE BEACH OFFICE

November 20, 2014

The Hon. Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
PO Box 11629
Columbia, SC 29211

RECEIVED

NOV 24 2014

SC Court of Appeals

Re: Beverly v. Bucksville Farms
(Appellate Case No: 2012-212984)

Dear Ms. Kitchings:

Enclosed is my check for the filing fee together with the following for filing:

- An Original and Seven copies of a Motion For Costs;
- A Verified Statement of Costs;
- Proof of Service regarding the foregoing;

Please return a clocked copy to me via the enclosed stamped, self-addressed, return envelope.

By copy of this letter, I serve the same upon counsel.

If more is needed, I ask that you please advise.

Thanking the Court for its consideration, and with best regards, I remain

J. Dwight Hudson, Esq.

J. Dwight Hudson, Esq.
Hudson Law Offices

JDH: mag

Enclosure(s): as stated

cc: James B. Richardson, Jr. Esq.
James P. Stevens Jr. Esq.

