

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Judge

Case No.: 2011-CP-10-2028

Joseph M. Bettelli, Jr. and Susan B. Bettelli.....Appellants

v.

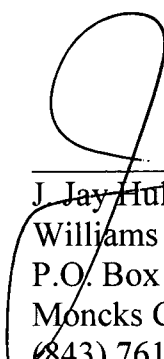
Town of Awendaw Board of Zoning Appeals  
and Berkeley Electric Cooperative, Inc.,.....Respondents

SWORN STATEMENT IN SUPPORT OF RESPONDENT'S MOTION FOR  
COSTS

The Court of Appeals is requested to tax the following costs against  
Appellants Joseph M. Bettelli, Jr. and Susan B. Bettelli.

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	19 books	\$4.86	\$92.34	
Attorney's Fee Provided by Rule 222 (b), SCACR			\$1,000.00	
		Total	\$1,092.34	

I, Jary J. Hulst, 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.

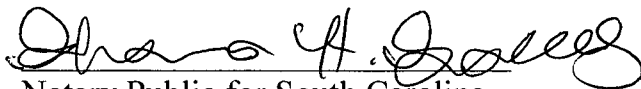


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J. Jay Hulst  
Williams & Hulst, LLC  
P.O. Box 1288  
Moncks Corner, SC 29461  
(843) 761-8232  
Facsimile (843) 899-5834

Attorneys for the Respondent  
Berkeley Electric Cooperative, Inc.

SWORN to before me this 4th  
day of December, 2014.



Notary Public for South Carolina  
My Commission Expires: 12/20/2017

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v.

Town of Awendaw Board of Zoning Appeals  
and Berkeley Electric Cooperative, Inc.,.....Respondents

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RESPONDENT'S MOTION FOR COSTS

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Jary J. Hulst  
John B. Williams  
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JJH@WilliamsandHulst.com

Attorneys for the Respondent,  
Berkeley Electric Cooperative, Inc.

Dated: December 4, 2014

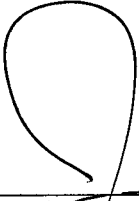
## ARGUMENTS AND AUTHORITIES

Pursuant to SCACR Rule, 222 (a) and (b), Respondent, Berkeley Electric Cooperative, Inc. hereby requests that the Court tax costs against Appellants Joseph M. Bettelli, Jr. and Susan B. Bettelli as set forth in the accompanying sworn statement.

As set forth in Rule 222 (a) "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." The judgment of the trial court in favor of Respondents was affirmed, and there is no order that costs not otherwise authorized be awarded.

## CONCLUSION

Based on the foregoing, Respondent, Berkeley Electric Cooperative, Inc. respectfully request that the Court award costs as set forth in the sworn statement of Jary J. Hulst.



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Jary J. Hulst  
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Attorneys for Respondent  
Berkeley Electric Cooperative, Inc.

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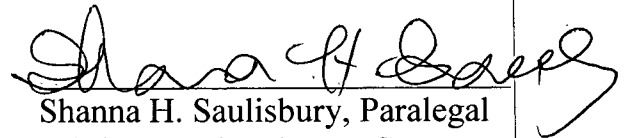
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v.

Town of Awendaw Board of Zoning Appeals  
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PROOF OF SERVICE

I certify that I have served Respondent, Berkeley Electric Cooperative, Inc.'s Motion for Costs and Sworn Statement in Support of said Motion for Costs on Appellants by depositing a copy of said pleadings in the United States Mail, postage prepaid on December 4, 2014, addressed to their attorney of record Christopher M. Holmes, 222 W Coleman Blvd., Ste. 124, Mt Pleasant, SC 29464



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# WILLIAMS AND HULST, LLC.

ATTORNEYS AT LAW



December 4, 2014

Appellate work  
Aviation law  
Business formation  
Commercial disputes  
Condemnation  
Construction law  
Contracts  
Insurance coverage  
Municipal law  
Personal injury  
Probate and estate matters  
Real estate  
Utility industry related matters  
Wills  
Wrongful death

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SC Court of Appeals

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

RE: Joseph Bettelli v. Town of Awendaw  
Appellate Case No.: 2013-001286  
Lower Court Case No.: 2011CP1002028

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Respondent Berkeley Electric Cooperative, Inc.'s Motion for Costs, Sworn Statement in Support of Motion, and our firm's check in the amount of \$25.00 for the filing fee. Also enclosed are an original and two (2) copies of a Proof of Service.

Please return a filed copy of each document to me in the self-addressed stamped envelope enclosed. By copy of this letter I am serving counsel for the Appellants with a copy of this Motion.

With kindest regards, I remain

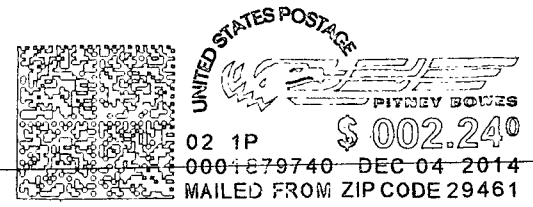
Sincerely,

WILLIAMS AND HULST, LLC

Jary J. Hulst


JBW:shs

cc: Christopher M. Holmes, Esq.  
Dwayne Marvin Green, Esq.  
(Both via U.S. mail w/enclosures)



**WILLIAMS AND HULST, LLC.**

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