

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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**RECEIVED**

DEC 18 2014

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

**SC Court of Appeals**

J. Derham Cole, Circuit Court Judge

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DEC 19 2014

Trial Court Case No. 2009-CP-42-5567  
Appellate Case No. 2013-000-125

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**S.C. Supreme Court**

Melanie Taylor

Petitioner.

v.

Converse College

Respondent.

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RESPONDENT'S MOTION FOR COSTS

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COMES NOW Respondent, by and through its undersigned counsel and pursuant to Rules 242 and 240, SCACR, and hereby files this Motion for Costs with respect to the above-referenced matter. Respondent shows the following grounds in support of its Motion:

1. The Court of Appeals filed its decision in this matter on November 7, 2012, in which it wholly affirmed the trial court's decision with respect to all issues on appeal. On November 9, 2012, upon Motion by Respondent, the Court of Appeals awarded Respondent its costs in the amount of \$1,124.06 under Rule 222, SCACR.

2. On June 12, 2014, this Court granted Petitioner's Petition for Writ of Certiorari as to one of her two questions for review. On December 3, 2014, this Court entered its decision dismissing certiorari as improvidently granted. This decision has the

effect of affirming the judgment of the lower court which was reviewed by the Court of Appeals.

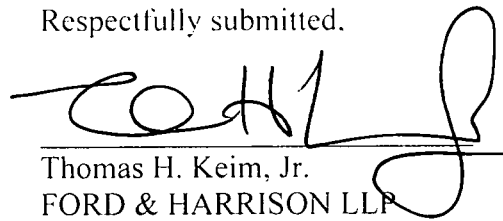
3. Respondent is entitled to an award of costs in the amount of \$,1049.60 under Rule 242, SCACR, in addition to the \$1,124.06 previously awarded to it by the Court of Appeals under Rule 222, SCACR, for a total of \$,2173.66.

4. A sworn, Itemized Statement of Costs is attached hereto.

WHEREFORE, Respondent hereby requests that costs in the amount of \$2,173.66 be taxed against Appellant and collected by Respondent in accordance with Rule 242, SCACR.

Respectfully submitted,

December 16<sup>th</sup> 2014



Thomas H. Keim, Jr.  
FORD & HARRISON LLP  
Post Office Box 5398  
Spartanburg, SC 29304-5398  
Telephone: (864) 699-1100  
Facsimile: (864) 699-1101  
Attorney for Respondent

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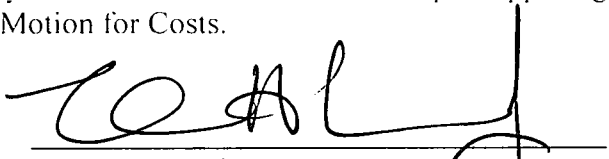
RESPONDENT'S ITEMIZED STATEMENT OF COSTS

The Supreme Court is requested to tax the following costs against Petitioner Melanie Taylor, including but not limited to the \$1,124.06 previously taxed to her by the Court of Appeals under Rule 222, SCACR:


COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	19 bound copies of 48-page Final Brief, with applicable cover sheets	Approx. \$6.53 per bound copy	\$ 124.06 (invoice from FedEx Office attached to original Motion for Costs to the Court of Appeals)	
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00	

COSTS TAXABLE UNDER RULE 242(j), SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Brief	16 bound copies of 31-page Brief, with applicable cover sheets	\$3.10 per bound copy	\$ 49.60	
Attorney's Fee Provided By Rule 242(j)(2), SCACR			\$1,000.00	
		<b>TOTAL</b>	<b>\$2,173.66</b>	

I, Thomas H. Keim, Jr., 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 in conjunction with Respondent's Motion for Costs.

  
 Thomas H. Keim, Jr.  
 Attorney for Respondent Converse College

SWORN to and subscribed before me  
 this 16 day of December, 2014.

 Sandra Helen Bryant (SEAL)

Notary Public for Spartanburg County

My commission expires 08-03-2015  
**MY Commission Expires**  
**08-03-2015**

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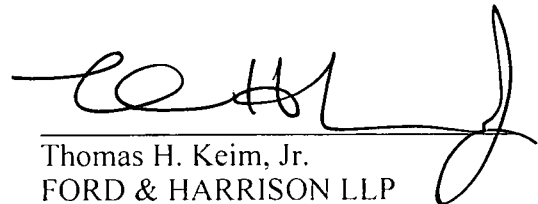
CERTIFICATE OF SERVICE

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I hereby certify that a copy of Respondent's Motion for Costs and Itemized Statement of Costs have been served upon Plaintiff by placing a copy of same in the U.S. Mail with the correct amount of postage affixed thereon and properly addressed to:

Nancy Bloodgood  
Foster Law Firm, L.L.C.  
895 Island Park Drive, Suite 202  
Charleston, SC 29492

This the 16th day of December, 2014.



Thomas H. Keim, Jr.  
FORD & HARRISON LLP  
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Spartanburg, South Carolina 29306  
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