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FEB 10 2015

**STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

S.C. SUPREME COURT

**APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas**

Carmen Tevis Mullen, Circuit Court Judge

**Opinion No. 4750
S.C. Court of Appeals, filed July 1, 2011**

**Robert L. Cullen, Andrew A. Corriveau,
and Andrea Hucks, Petitioners,**

-vs-

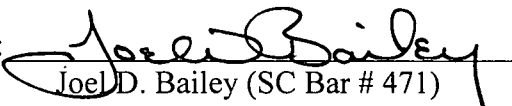
**J. Bennett McNeal, B. McNeal Partnership, L.P.,
Anthony R. Porter, and Wright's Point Home
Owners Association, Inc. Respondents.**

RESPONDENTS' MOTION FOR COSTS

The above-named Respondents in the above-captioned matter hereby move for an Order of this Court awarding the recoverable costs and attorneys' fees pursuant to Rules 222 and 242(j)(2), SCACR. Respondents were the prevailing party in the appeal in the South Carolina Court of Appeals and in the above-captioned appeal before the South Carolina Supreme Court. A sworn, itemized statement of costs incurred is attached hereto.

Respectfully submitted,

Joel D. Bailey
THE BAILEY LAW FIRM, P.A.
PO Box 1437
Beaufort, SC 29901-1437
(843) 525-6090 tel
baileylawfirm@charter.net

By: 
Joel D. Bailey (SC Bar # 471)
Counsel for Respondents

February 6, 2015

**STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

**APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas**

Carmen Tevis Mullen, Circuit Court Judge

**Opinion No. 4750
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**Robert L. Cullen, Andrew A. Corriveau,
and Andrea Hucks, Petitioners,**

-vs-

**J. Bennett McNeal, B. McNeal Partnership, L.P.,
Anthony R. Porter, and Wright's Point Home
Owners Association, Inc. Respondents.**

RESPONDENTS' ITEMIZED STATEMENT OF COSTS

The Supreme Court is requested to tax the following costs against Appellants Robert L. Cullen, Andrew A. Corriveau and Andrea Hucks:

COST TAXABLE UNDER RULE 222, SCACR COURT OF APPEALS	# OF PAGES	RATE	REQUESTED	ALLOWED (FOR COURT USE ONLY)
Cost of Court Reporter Trial Transcript (Mia Peron)		\$ 608.50	\$ 608.50	
Cost of Printing Final Brief (Court of Appeals)	1064	\$.15	\$ 159.60	
	Cover Sheets/ Binding	\$ 87.58	\$ 87.58	
Attorneys' Fee (Court of Appeals)			\$ 1,000.00	
COST TAXABLE UNDER RULE 242(j)(2), SCACR SUPREME COURT	# OF PAGES	RATE	REQUESTED	ALLOWED (FOR COURT USE ONLY)
Cost of Printing Final Brief (Supreme Court)	1086	\$.15	\$ 162.90	
	Cover Sheets/ Binding	\$ 82.22	\$ 82.22	
Attorneys' Fee (Supreme Court)			\$ 1,000.00	
		TOTAL:	\$ 3,100.80	

I, Joel D. Bailey, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed and served upon opposing counsel on the 6th day of February, 2015.

By Joel D. Bailey
Joel D. Bailey (SC Bar # 471)
Counsel for Respondents

THE BAILEY LAW FIRM, P.A.
PO Box 1437
Beaufort, SC 29901-1437
(843) 525-6090

Subscribed and sworn to
before me this 6th day of February, 2015.

Sandra H Bailey
Notary Public for South Carolina
My Commission Expires: 5.27.21

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen Tevis Mullen, Circuit Court Judge

Opinion No. 4750
S.C. Court of Appeals, filed July 1, 2011

Robert L. Cullen, Andrew A. Corriveau,
John Caldwell, Andrea Hucks, Jamie Bellamy,
Michael Pearson and David Mandell Plaintiffs,

-vs-

J. Bennett McNeal, B. McNeal Partnership, L.P.,
Anthony R. Porter, and Wright's Point Home
Owners Association, Inc. Respondents,

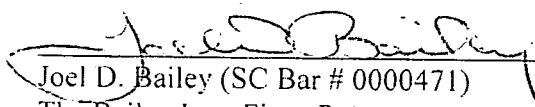
Of Whom

Robert L. Cullen, Andrew A. Corriveau
and Andrea Hucks are Petitioners.

PROOF OF SERVICE

I certify that I served the Respondents' Motion for Costs and Itemization of Costs, by depositing a copy in the United States Mail, postage prepaid, on February 6, 2015, addressed to the attorneys of record for the Appellants, John E. North, Jr., 916 Bay Street, Suite 100, Beaufort, South Carolina 29902.

February 11, 2015


Joel D. Bailey (SC Bar # 0000471)
The Bailey Law Firm, P.A.
PO Box 1437, 510 Ribaut Road
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843-525-6090

Attorney for Respondents



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February 6, 2015

Honorable Daniel E. Shearouse
South Carolina Supreme Court
PO Box 11330
Columbia, SC 29211

RE: Cullen, et al. vs. McNeal, et al.
Case # 2011-196126

Dear Mr. Shearouse:

With regard to the above-referenced matter, enclosed for filing please find an original and six (6) copies of Respondents' Motion for Costs, together with Respondents' Itemized Statement of Costs and proof of service. I am also enclosing my firm's check in the amount of \$25.00.

By copy of this letter, I am serving Appellants' counsel with three (3) copies of these documents.

I would appreciate you filing these documents at your earliest convenience. Thank you for your assistance with this matter.

With kindest regards, I am

Very truly yours,

THE BAILEY LAW FIRM, P.A.

Joel D. Bailey

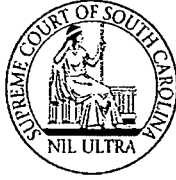
JDB/shb
enclosures

cc: John North, Esquire (with enclosures)

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FEB 10 2015

S.C. SUPREME COURT



The Supreme Court of South Carolina

Bailey Law

02/10/2015

RECEIPT #75000

Case No: 2011-196126
Case Short Title: Robert L. Cullen v. J. Bennett McNeal
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 1410
Check/Money Order Date: 02/06/2015
Comments: