

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

FEB 24 2015

D. Garrison Hill, Circuit Court Judge

S.C. Supreme Court

Court of Appeals Case No. 2001-193026
Supreme Court Case No. 2013-000651

DAVID W. KELLER.....Respondent,

v.

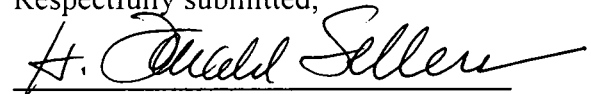
ING FINANCIAL PARTNERS, INC., WILLIAM C. JOHNSON,
DIVERSIFIED BUSINESS CONCEPTS, INC. and
JACKSON NATIONAL LIFE INSURANCE COMPANY.....Defendants,

Of Whom ING FINANCIAL PARTNERS, INC.,
WILLIAM C. JOHNSON and DIVERSIFIED BUSINESS
CONCEPTS, INC., are.....Appellants.

MOTION FOR COSTS ON APPEAL

The Respondent, David W. Keller, by and through its undersigned counsel, hereby moves to recover costs on appeal pursuant to Rule 242(j), SCACR. An Itemized Statement of Costs is attached to this motion as Exhibit A and incorporated herein by reference.

Respectfully submitted,



H. Donald Sellers, SC Bar No. 5018

J.W. Matthews III, SC Bar No. 68581

Pierce T. MacLennan, SC Bar No. 101797

Haynsworth Sinkler Boyd, P.A.

ONE North Main, 2nd Floor (29601)

Post Office Box 2048

Greenville, South Carolina 29602

Telephone: 864-240-3200

Attorneys for Respondent

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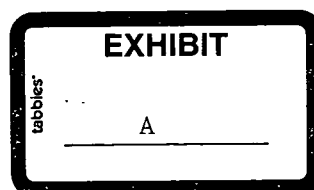
v.

ING FINANCIAL PARTNERS, INC., WILLIAM C. JOHNSON,
DIVERSIFIED BUSINESS CONCEPTS, INC. and
JACKSON NATIONAL LIFE INSURANCE COMPANY.....Defendants,

Of Whom ING FINANCIAL PARTNERS, INC.,
WILLIAM C. JOHNSON and DIVERSIFIED BUSINESS
CONCEPTS, INC., are.....Appellants.

**ITEMIZED STATEMENT OF COSTS OF
RESPONDENT DAVID W. KELLER**

H. Donald Sellers, SC Bar No. 5018
J.W. Matthews III, SC Bar No. 68581
Pierce T. MacLennan, SC Bar No. 101797
Haynsworth Sinkler Boyd, P.A.
ONE North Main, 2nd Floor (29601)
Post Office Box 2048
Greenville, South Carolina 29602
Telephone: 864-240-3200
Attorneys for Respondent



The Appellate Court is requested to tax the following costs against appellants:

David W. Keller

Costs Taxable Under Rule 242, SCACR	No. of Pages	Rate	Requested	Allowed (For Court Use Only)
Cost of Printing Respondent's Brief			\$111.30	
Cost of Printing Respondent's Response to <i>Amicus Curiae</i> Brief			\$85.75	
Attorney's Fee Provided by Rule 242(j)	N/A	N/A	\$1,000.00	
Other (specify and explain)	N/A	N/A		
Total:	N/A	N/A	\$1,197.05	

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PROOF OF COST AND SERVICE

I, H. Donald Sellers, 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.

H. Donald Sellers

H. Donald Sellers, SC Bar No. 5018
Attorneys for Respondent

Subscribed and sworn to before me this 20th day of February, 2015.

Rita R. Storie

Notary Public for South Carolina

My Commission Expires: 11/19/19