

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM LAURENS COUNTY  
Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

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Appellate Case No. 2014-001720

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Michael D. Ficklin ..... Appellant,

vs.

Security Forces, Inc., Employer and  
Sentry Insurance Co., Carrier ..... Respondents.

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**RETURN TO RESPONDENTS'  
MOTION FOR COSTS ON APPEAL**

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Kathryn Williams  
Kathryn Williams, P.A.  
P.O. Box 10693  
Greenville, S.C. 29603  
(864) 235-6254  
Attorney for Appellant

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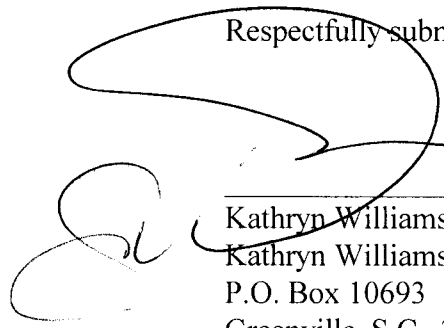
MAR 11 2015

**SC Court of Appeals**

Respondents Security Forces, Incorporated and Sentry Insurance Company move pursuant to Rule 222, SCACR, for costs and attorney fees following this Court's decision to dismiss the appeal as interlocutory. Ficklin urges the Court to deny the motion. Though the instant appeal has been dismissed, this appeal is not final, as the matter has been remanded to the Workers' Compensation Commission, will return from there to the circuit court, and will very likely then return to this Court. As such, a determination of costs is premature. Furthermore, the instant appeal did not proceed through the full course of briefing and argument but was dismissed as interlocutory following a motion and before any briefs were filed. As such, if this Court were to allow some costs and/or attorney fee, Ficklin urges the Court to find that the full \$1,000.00 attorney fee allowed by court rules is inappropriate under the circumstances of this case and that a reduction as allowed by Rule 222(d) is in order here.

Accordingly, Ficklin argues that the current motion should be denied. In the alternative, Ficklin urges the Court to set an attorney fee far lower than that requested by Respondents.

Respectfully submitted,



16672

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Kathryn Williams (SC Bar #6140)  
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Attorney for Respondent/Appellant

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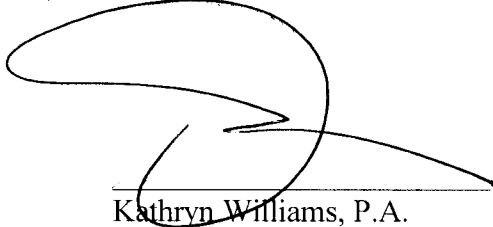
Security Forces, Inc., Employer and  
Sentry Insurance Co., Carrier ..... Respondents.

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**CERTIFICATE OF SERVICE**

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I certify that I have served the RETURN TO RESPONDENTS' MOTION FOR COSTS ON APPEAL on Respondents by depositing a copy in the United States Mail, postage prepaid on 3/3/15, addressed to their attorney of record, Grady L. Beard, Esq. of Sowell Gray Stepp & Lafitte, LLC at P.O. Box 11449, Columbia, SC 29211.



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**SC Court of Appeals**

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March 9, 2015

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: **Michael D. Ficklin v. Security Forces, Inc., et al.**  
Court of Appeals Case Tracking No.: **2014-001720**

Dear Ms. Kitchings:

Enclosed herein please find the following items for filing in the above matter:

1. Return to Respondents' Motion for Costs on Appeal (original and six copies);
2. Certificate of Service by Mail.

By copy of this letter, I am also serving defendants' attorney with copies of the same.

Kindest regards,

Yours truly,

  
Kathryn Williams

KW:d  
Enclosures

cc: Grady L. Beard, Esq.  
B. Gibbs Leaphart, Jr., Esq.  
Sowell Gray Stepp & Lafitte, LLC  
P.O. Box 11449  
Columbia, SC 29211

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**SC Court of Appeals**

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