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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

175054

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, III, Master in Equity and Circuit Court Judge for Beaufort County
Case No.: 2011-CP-07-02216

Appellate Case No.: 2012-213582

HELENA P. TIRONE AND TRUMAN'S ECLECTIC IRISH PUB, INC.....Respondents

-vs.-

THOMAS W. DAILEYAppellant

**RESPONDENTS'
MOTION FOR COSTS ON APPEAL**

Pursuant to Rule 222 of the Appellate Court Rules of Civil Procedure, Respondents hereby motion the Court for costs and fees to be taxed against Appellant, which shall be taxed when an appeal is dismissed or judgment on the appeal is affirmed. The South Carolina Court of Appeals affirmed the judgment on appeal on May 28, 2014. The South Carolina Court of Appeals denied Appellant's Petition for Rehearing on September 4, 2014. The Supreme Court of South Carolina denied Petitioner's Petition for a writ of certiorari to on January 23, 2015. The remittitur was issued by the South Carolina Court of Appeals on January 30, 2015.

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FEB 17 2015

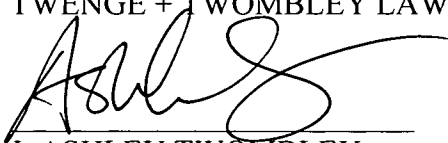
SC Court of Appeals

Respondents incurred costs in the amount of \$151.63, as detailed in the Itemized Statement of Costs. Respondents are also entitled to \$1,000.00 in attorney's fees pursuant to Rule 222, SCACR, for a total of \$1,151.63.

Respectfully submitted,

TWENGE + TWOMBLEY LAW FIRM

BY:



J. ASHLEY TWOMBLEY

311 Carteret Street
Beaufort, SC 29902

Telephone: (843) 982-0100

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ATTORNEYS FOR RESPONDENTS

Beaufort, South Carolina

February 11, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, III, Master in Equity and Circuit Court Judge for Beaufort County
Case No.: 2011-CP-07-02216

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-vs.-

THOMAS W. DAILEYAppellant

ITEMIZED STATEMENT OF COSTS

The Appellate Court is requested to tax the following costs against Appellant,

Thomas W. Dailey:

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing and Copying Final Brief	510	.21	\$113.53	
Costs of Printing and Copying Return to Petition For a Writ of Certiorari	254		\$ 38.10	
Attorney's Fee Provided by Rule 222(b), SCACR			\$1,000.00	
		TOTAL:	\$1,151.63	

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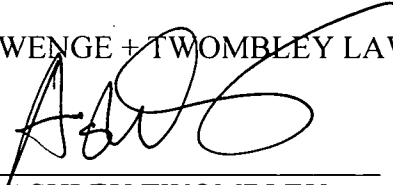
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SC Court of Appeals

I, J. Ashley Twombly, 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.

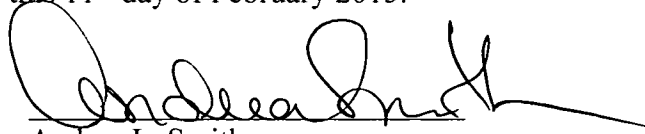
TWENGE + TWOMBLY LAW FIRM

BY:



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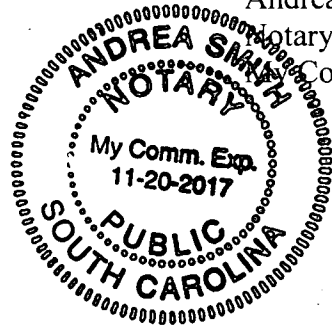
Subscribed and sworn to before me this 11th day of February 2015.



Andrea L. Smith

Notary Public for South Carolina

Commission Expires November 20, 2017



THE STATE OF SOUTH CAROLINA
Beaufort County of Common Pleas

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, III, Master in Equity and Circuit Court Judge for Beaufort County
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HELENA P. TIRONE AND TRUMAN'S ECLECTIC IRISH PUB, INC.....Respondents

-vs.-

THOMAS W. DAILEYAppellant

CERTIFICATE OF SERVICE

The undersigned, Andrea Smith, hereby avers that she is a Paralegal with TWENGE + TWOMBLEY LAW FIRM, Attorneys for Respondents, and that on the 11th day of February 2015 a true and accurate copy of the attached Respondents' Motion for Costs on Appeal and Itemized Statement of Costs was placed in an envelope with first class postage thereon prepaid through the United States Postal Service and mailed to the following:

André DuBose Rembert, Esquire
Attorney at Law
P.O. Box 20341
Charleston, SC 29413
Telephone: (843) 518-3232
andrerembert@gmail.com
Attorney for Appellant

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SC Court of Appeals

BY:



Andrea Smith, Paralegal to
TWENGE + TWOMBLEY LAW FIRM

TWENGE + TWOMBLEY LAW FIRM LLC

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**J. ASHLEY TWOMBLEY
KARL D. TWENGE
JENNIFER I. CAMPBELL**

**••• LICENSED IN SC + GA
••• OF COUNSEL**

February 11, 2015

Via U.S. Mail

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

**RE: Helena P. Tirone et al. v. Thomas Dailey
Appellate Case No.: 2012-213582**

Dear Ms. Kitchings:

Please find enclosed an unbound original and seven (7) copies of Respondents' Motion for Costs on Appeal, Itemized Statement of Costs and Certificate of Service regarding the referenced matter. I would appreciate it if you would file the original and six copies and return one clocked copy to me in the enclosed self-addressed, stamped envelope. Enclosed is my firm's check in the amount of \$25.00, which represents the required filing fee.

By copy of this letter, I am serving the same upon counsel for Appellant.

Thank you for your consideration in this matter. If you have any questions, please do not hesitate to contact me.

With kindest regards, I remain,

Cordially,



J. Ashley Twombley

cc: Ms. Helena P. Tirone
André DuBose Rembert, Esquire

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