

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

S.C. Supreme Court

Alison Renee Lee, Circuit Court Judge

Appellate Case No. 2011-197986

Columbia/CSA-HS Greater Columbia Healthcare
System, LP d/b/a Providence Hospital,.....Petitioner,

v.

The South Carolina Medical Malpractice Liability Joint
Underwriting Association and Michael P. Taillon,.....Respondents.

MOTION FOR COSTS

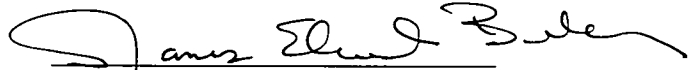
The Petitioners South Carolina Medical Malpractice Liability Joint Underwriting Association and Michael P. Taillon respectfully move this Court for an award of costs to be assessed against the Appellant Columbia/CSA-HS Greater Columbia Healthcare System, LP d/b/a Providence Hospital in accordance with the provisions of Rule 222(b) of the South Carolina Appellate Court Rules, and in support of this motion state as follows:

1. Appellant sued Respondents on June 7, 2007, in Richland County, South Carolina, for indemnification. Dr. Taillon and the JUA answered and moved for summary judgment based upon the six year statute of repose.

2. Judge Allison Lee heard oral arguments on the motion for summary judgment and granted the motion in favor of Dr. Taillon and the JUA.
3. Columbia/CSA filed a Rule 59(e) motions which was denied by Judge Lee.
4. Columbia/CSA appealed to the South Carolina Court of Appeals which affirmed the decision of the trial court on April 13, 2011.
5. Columbia/CSA filed a Petition for Rehearing and Rehearing En Banc which was denied by the Court of Appeals.
6. Columbia/CSA filed a Petition for Writ of Certiorari to this Court which was granted.
7. The South Carolina Supreme Court affirmed the trial court's order on January 21, 2015.
8. Columbia/CSA filed a Petition for Rehearing on February 19, 2015.
9. The South Carolina Hospital Association filed a Motion for Leave to File *Amicus Curiae* Brief in Support of Petition for Rehearing on March 17, 2015.
10. On April 9, 2015, the South Carolina Supreme Court granted the South Carolina Hospital Association's Motion for Leave to File *Amicus Curiae* Brief but denied Columbia/CSA's Petition for Rehearing.
11. The Remittitur in this matter was issued on April 9, 2015.
12. The Respondents seek costs as set forth in the sworn itemization of costs.

Wherefore, Respondents respectfully ask the Court to enter an order assessing costs against the Appellant in the amount of \$2,233.57.

Respectfully submitted,



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Attorneys for Respondents

April 15, 2015

West Columbia, South Carolina

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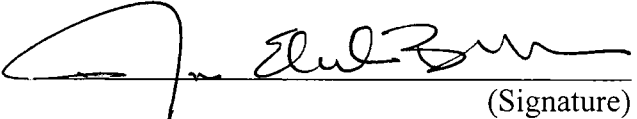
ITEMIZED STATEMENT OF COSTS

The Appellate Court is requested to tax the following costs against Appellant
Columbia/CSA-HS Greater Columbia Healthcare System, LP d/b/a Providence Hospital:

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	16 per Brief	\$0.22 per page	\$93.09	
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript	56	\$0.85 per page	\$47.60	

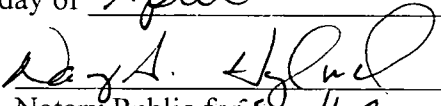
Attorney's Fee Provided By Rule 222(b), SCACR		\$1,000.00	\$1,000.00	
Other (specify and explain):				
COSTS TAXABLE UNDER RULE 242(j), SCACR				
Cost of Printing or Copying Brief	22 per brief	\$0.21 per page	\$92.88	
Cost of Printing or Copying Reply Brief				
Cost of Printing or Copying Appendix				
Filing fee paid under Rule 242(c), SCACR				
Attorney's fee provided by Rule 242(j)(2), SCACR		\$1,000.00	\$1,000.00	
Other (specify and explain):				
		TOTAL	\$2,233.57	

I, James Edward Bradley, 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.


(Signature)

Attorney for Respondents/Petitioners The South Carolina Medical Malpractice Liability Joint Underwriting Association and Michael P. Taillon

Subscribed and sworn to before me this 17th day of April, 2015.


Notary Public for South Carolina
My Commission Expires: 5/28/2018
(Seal)
Nancy A. Hazelwood

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v.

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PROOF OF SERVICE

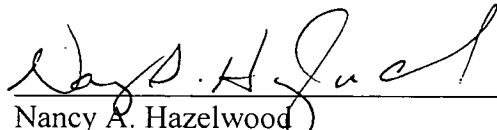
I certify that I have served the Respondents' Motion for Costs on the Petitioner by depositing a copy of same in the United States Mail, postage prepaid, on April 17, 2015, addressed to their attorneys of record as follows:

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April 17, 2015



Nancy A. Hazelwood
Legal Assistant to James Edward Bradley