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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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MAY 14 2015

SC Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appellate Panel
Richland County
WCC File No.: 1217409

Appellate Case No.: 2014-002279

Reginald Warner,Appellant,

v.

Gallman Personnel Services, Inc.,Employer,

and

Zurich American Insurance Company c/o
Gallagher Bassett Services, Inc., Respondents.

MOTION FOR TAXING OF COSTS AND
ATTORNEYS' FEES AGAINST APPELLANT

YOU WILL PLEASE TAKE NOTICE that pursuant to SCACR Rule 222 and Rule 224,
Respondents hereby move for the taxing of costs and attorneys' fees as allowed under the Rules.
Said Motion is based upon the following:

1. Pursuant to the Order of the Court of Appeals dated April 23, 2015 (attached hereto and incorporated by reference), Appellants appeal was dismissed by this court.

2. SCACR Rule 222(a) provides that "...costs shall be taxed against the appellant when the appeal is dismissed..."
3. SCACR Rule 222(b) permits Respondent to recover costs, including attorneys' fees.
4. By Order dated July 24, 1997, Respondent is entitled to recover attorneys' fees in the amount of \$1,000.

Wherefore, based on the decision of the court and the Appellate Court Rules, Respondent hereby moves for the taxing of attorneys' fees and costs in this matter.

Respectfully submitted,

McANGUS GOUDELOCK & COURIE, LLC



C. Barrett Burley

Brett H. Bayne

Post Office Box 12519, Capitol Station
Meridian, 1320 Main Street, 10th Floor (29201)
Columbia, South Carolina 29211-2519
(803) 779-2300

Attorneys for Respondents

May 14, 2015

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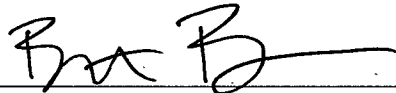
Zurich American Insurance Company c/o
Gallagher Bassett Services, Inc., Respondents.

The Court of Appeals is requested to tax the following costs against Appellant:

Costs Taxable Under Rule 222, SCACR	No. of Pages	Rate	Requested	Allowed (For Court Use Only)
Costs of Printing or Copying Final Brief				
Costs of Printing or Copying Final Reply Brief				
Costs of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript				

Attorney's Fee Provided by Rule 222(b), SCACR		\$1,000	\$1,000	
Other (specify and explain)				
Costs Taxable Under Rule 242(j), SCACR				
Costs of Printing or Copying Brief				
Costs of Printing or Copying Reply Brief				
Costs of Printing or Copying Appendix				
Filing Fee Paid Under Rule 242(c), SCACR				
Attorney's Fee Provided By 242(j)(2), SCACR				
Other (specify and explain):				
TOTAL		\$1,000.	\$1,000	

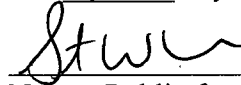
I, C. Barrett Burley, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed to and served upon opposing counsel.



C. Barrett Burley
 Brett H. Bayne
 Post Office Box 12519, Capitol Station
 Meridian, 1320 Main Street, 10th Floor (29201)
 Columbia, South Carolina 29211-2519
 (803) 779-230

Attorneys for Respondents

Subscribed and sworn to before me
 this 14th day of May, 2015


 Notary Public for South Carolina

My Commission Expires: 1/28/2019

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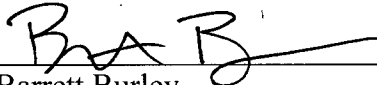
Gallman Personnel Services, Inc.,Employer,

and

Zurich American Insurance Company c/o
Gallagher Bassett Services, Inc.,Respondents.

PROOF OF SERVICE

I certify that I have served a copy of Respondent's Motion for the Taxing of Costs and Attorneys' Fees Against Appellant and an Itemized Statement of Costs by depositing a copy in the United States Mail, postage prepaid, on May 14, 2015, addressed to Counsel of Record: Stephen Benjamin Samuels.



C. Barrett Burley
Brett H. Bayne
Post Office Box 12519, Capitol Station
Meridian, 1320 Main Street, 10th Floor (29201)
Columbia, South Carolina 29211-2519
(803) 779-230

May 14, 2015

Attorneys for Respondents

Reply To

C. BARRETT BURLEY
Direct Dial: (803) 227-4953
barrett.burley@mgclaw.com

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SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RE: Reginald Warner v. Gallman Personnel Services and Zurich American
Insurance Company c/o Gallagher Bassett Services, Inc.
Date of Accident: November 29, 2012
WCC File No.: 1217409
Our File No.: 2098.13012
Claim No.: 001627-070257-WC-01

Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of our Motion for Taxing of Costs and Attorneys' Fees against Appellant for your review in the above-referenced claim.

By copy of this letter to Claimant's attorney, Stephen B. Samuels, Esquire, we are forwarding a copy of the Motion for Taxing of Costs and Attorneys' Fees against Appellant to him by mail.

With kindest regards,

Very truly yours,



C. Barrett Burley

Enclosures

CBB/jmm

cc: Rachel Simmons, Gallagher Bassett Services, Inc. (via email)
Stephen B. Samuels, Esquire, Samuels Law Firm
Karen Smith, Gallman Personnel Services, Inc. (via email)