

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger M. Young, Circuit Court Judge

RECEIVED

MAY 27 2015

SC SUPREME COURT

Appellate Case No. 2012-213171
Case No. 2009-CP-10-2846

Errol Washington as Personal Representative of the
Estate of Danny Washington, Petitioner,

v.

Alice R. Stewart, Leroy Stewart, Alvin E. Burch, Sr., a/k/a Alvin E. Birch,
Rudell S. Burch, Sterling Lending Group, Inc., a South Carolina
Corporation, Regent Bank, and Wachovia Bank, N.A., Defendants,

Of Whom Alice R. Stewart, Leroy Stewart, Alvin E. Burch, a/k/a
Alvin E. Birch, Rudell S. Burch and Wachovia Bank, N.A., are the Respondents.

PETITIONER'S RETURN TO
MOTION OF RESPONDENT WACHOVIA BANK, N.A.
FOR COSTS AND FEES ON APPEAL

The Petitioner herein, by and through his counsel, pursuant to Rules 222 and 242 of the
South Carolina Appellate Court Rules, hereby makes this Return to Motion of Respondent
Wachovia Bank, N.A. for costs and fees on appeal.

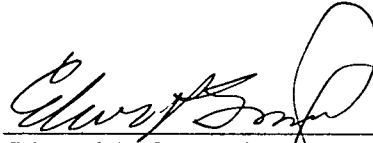
The Petitioner does not object to attorney's fees of \$1,000 but objects to fees under both
Rules 222 and 242 SCACR in connection with a dismissal on the grounds of an improvidently
granted Writ of Certiorari.

Wherefore, in consideration of the above, Petitioner seeks to reimburse Respondent bank

for the total costs of \$156.78 which were incurred during this appeal and attorneys' fees in the amount allowed of \$1,000.

This 20th day of May, 2015.

Respectfully submitted,



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Attorneys for Petitioner

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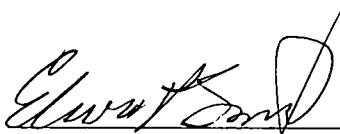
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PROOF OF SERVICE

I certify that I have served the Petitioner's Return to Motion of Respondent Wachovia Bank, N.A. for Costs and Fees on Appeal on opposing counsel by depositing a copy of it in the United States Mail, postage prepaid, on May 20, 2015, addressed to opposing counsel at their offices as set forth below:

Trudy H. Robertson, Esq.
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Charleston, SC 29401

*Attorneys for Respondent
Wachovia Bank, N.A.*



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