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THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY JUN 01 2015

Court of Common Pleas

SC Court of Appeals

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2013-001273

South Carolina Public Interest Foundation and Waring S. Howe, Jr., individually, and on behalf of all others similarly situated, ..... Appellants,

v.

James H. "Jay" Lucas, in his official capacity as Speaker of the South Carolina House of Representatives, Hugh K. Leatherman, in his official capacity as President of the South Carolina Senate, Representative Peter M. McCoy, Jr., Senator George E. "Chip" Campsen, and the State of South Carolina, ..... Respondents.

APPELLANTS' CONSENT TO DISMISSAL AND MOTION FOR ATTORNEYS' FEES UNDER SC CODE ANN. § 15-77-300

James G. Carpenter, S.C. Bar No. 1136  
819 E. North Street  
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(864) 235-1269  
Attorney for Appellants

Other Counsel of Record:

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Michael J. Anzelmo, S.C. Bar No. 72933  
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Columbia, SC 29211  
(803) 255-9595; -9312  
Attorneys for Respondent Lucas

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Attorneys for Respondents Leatherman and Campsen

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Attorney for Respondent State of S.C.

Respondents have moved the Court to dismiss this appeal on grounds of mootness, due to the legislative repeal of the unconstitutional Act 130 of 2007. Appellants consent to the dismissal, and move the Court for attorneys' fees and costs under S.C. Code Ann. § 15-77-300, SCRPC 54, and § 15-37-10.

This motion incorporates a memorandum of law, and an affidavit of counsel supports it.

In any civil action brought by . . . any party who is contesting state action, . . . the court may allow the **prevailing party** to recover **reasonable attorney's fees to be taxed as court costs** against the appropriate agency if:

- (1) The court finds that the agency acted without substantial justification in pressing its claim against the party; and
- (2) The court finds that there are no special circumstances that would make the award of attorney's fees unjust.”

S.C. Code Ann. § 15-77-300. Thus, the citizen must prove three elements to claim attorney's fees: (1) the citizen must be the prevailing party; (2) the government entity must have acted without substantial justification; and (3) no special circumstances would have made the award of attorney's fees unjust. *Heath v. County of Aiken*, 302 S.C. 178, 394 S.E.2d 709 (1990); *Richland County v. Kaiser*, 351 S.C. 89, 567 S.E.2d 260 (Ct. App. 2002). The award of attorneys' fees is discretionary with the court. *Heath v. County of Aiken*, 302 S.C. 178, 394 S.E.2d 709 (1990). Appellants meet the three elements for an award of attorney's fees under this statute.

#### **I. APPELLANTS ARE PREVAILING PARTIES.**

Respondents litigated against the Petitioners for three and a half years, until finally, the General Assembly (including several Respondents) repealed the unconstitutional Act.

The Supreme Court ruled that a prevailing party is “one who successfully prosecutes an action or successfully defends against it, prevailing on the main issue, even

though not to the extent of the original contention [and] is the one in whose favor the decision or verdict is rendered and judgment entered.” *Sloan v. Friends of the Hunley*, 393 S.C. 152, 156, 711, S.E.2d 895, 897 (2011), citing *Heath v. County of Aiken*, 302 S.C. 178, 182–83, 394 S.E. 2d 709, 711 (1990) (alteration in original) (quoting *Buza v. Columbia Lumber Co.*, 395 P.2d 511, 514 (Alaska 1964)).

The Supreme Court ruled that a citizen may be a prevailing party when the government body takes action that gives the citizen what he sought through litigation, even without a formal court ruling for the citizen.

[U]nder the facts of this case, we find that ***Sloan is the prevailing party*** under section 30-4-100(b). When a public body frustrates a citizen’s FOIA request to the extent that the citizen must seek relief in the courts and incur litigation costs, the public body should not be able to preclude prevailing party status to the citizen by producing the documents after litigation is filed.

*Id.* 393 S.C. 152, 157, 711, S.E.2d 895, 897 (2011) (emphasis added), citing *Litchfield Plantation Co. v. Georgetown County Water & Sewer Dist.*, 314 S.C. 30, 34, 443 S.E.2d 574, 576 (1994) (Toal, J., concurring in part, dissenting in part) (“A governmental agency should not be allowed to stonewall an FOIA request without some penalty for its actions.”).

The Court explained its ruling:

Here, Sloan’s complaint prompted Friends to do what a series of FOIA letter-requests could not accomplish—produce the requested documents. Accordingly, ***Sloan prevailed and is entitled to an award of attorney’s fees.***

\* \* \*

***We affirm the trial court’s finding that Sloan is a prevailing party*** under FOIA and is thus entitled to an award of his attorney’s fees.

*Id.* 393 S.C. 152, 158-159, 711, S.E.2d 895, 898 (2011) (emphasis added)

In this ruling, the Supreme Court held that a plaintiff can be a prevailing party, entitled to attorneys’ fees even in the absence of an actual court ruling. The Court was

persuaded by the Montana Supreme Court's ruling that a party prevailed when a public entity mooted a FOIA case by turning over the requested documents, but in doing so provided the relief sought through litigation without court intervention. *Sloan v. Friends of the Hunley*, 393 S.C. 152, 157, 711, S.E.2d 895, 897 (2011) (2011) citing *Havre Daily News, LLC v. City of Havre*, 142 P.3d 864, 878 (Mont. 2006). Similarly, the Court was persuaded by the District Court of Montana's ruling that when a party seeks an injunction under FOIA, if the relief sought is obtained "via . . . unilateral change in position by the agency,' he is entitled to fees under the federal FOIA statute." *Id.*, citing *Wildlands CPR v. U.S. Forest Serv.*, 558 F. Supp. 2d 1096, 1098 (D. Mont. 2008). Furthermore, the Court agreed with the courts of Washington: "[P]ermitting an agency to avoid attorney fees by disclosing the documents after the plaintiff has been forced to file a lawsuit . . . would undercut the policy behind the act." *Id.*, 393 S.C. 152, 157-58, 711, S.E.2d 895, 897-98 (2011) citing *Spokane Research & Def. Fund v. City of Spokane*, 117 P.3d 1117, 1125 (Wash. 2005) (en banc) (alteration in original) quoting *Coal. on Gov't Spying v. King County Dep't of Pub. Safety*, 801 P.2d 1009, 1013 (Wash. Ct. App. 1990). The Supreme Court reasoned that Mr. Sloan was a prevailing party because Friends of the Hunley would not have produced the requested documents if Mr. Sloan had not filed suit and therefore Friends of the Hunley could not avoid attorneys' fees simply because no court had adjudicated its status as a "public body." Such a result would "undercut the policy behind the act." *Id.*, 393 S.C. 152, 158, 711, S.E.2d 895, 898 (2011)

In a similar case, the Supreme Court again ruled that Mr. Sloan was a prevailing party, even when his case was dismissed on mootness.

Sloan is the prevailing party. See *Sloan v. Friends of the Hunley, Inc. (Friends II)*, 393 S.C. 152, 157, 711 S.E.2d 895, 897 (2011) ("When a public body frustrates a

citizen's FOIA request to the extent that the citizen must seek relief in the courts and incur litigation costs, the public body should not be able to preclude prevailing party status to the citizen by producing the documents after litigation is filed."(citations omitted)). As the prevailing party under these circumstances, the trial court erred in not awarding Sloan his reasonable attorney's fees and costs. Sloan is entitled to recover his reasonable attorney's fees and costs in this action. See *Litchfield Plantation Co. v. Georgetown Cnty. Water & Sewer Dist.*, 314 S.C. 30, 34, 443 S.E.2d 574, 576 (1994) (Toal, J., concurring in part, dissenting in part) ("A governmental agency should not be allowed to stonewall an FOIA request without some penalty for its actions.").

*Sloan v. South Carolina Department of Revenue*, 409 S.C. 551, 555-56, 762 S.E.2d 687, 698 (2014) (footnote omitted)

Just as the Supreme Court ruled in the *Friends of the Hunley* case, and in *Sloan v. South Carolina Department of Revenue*, this Court should also rule that the Appellants are the prevailing parties, because the Respondents made a unilateral change in position (repealing Act 130) long after suit was filed, and thereby provided the Appellants the very relief they sought through litigation.

In the *Friends of the Hunley* case, the Respondents waited until oral argument before the Supreme Court, before admitting that they were subject to FOIA. Similarly in this case, Respondents waited until after the case had been argued before this Court, before repealing Act 130, when, years earlier, most of the Respondents had admitted its unconstitutionality. Because the Appellants obtained the relief they sought, albeit without a formal court order, they are nevertheless the prevailing parties for purposes of attorneys' fees under § 15-77-300. Appellants have prevailed.

## **II. RESPONDENTS ACTED WITHOUT SUBSTANTIAL JUSTIFICATION.**

Respondents acted without substantial justification in pressing their claims in this lawsuit. In analyzing this element, courts look to whether the governmental defendant had a reasonable basis in law and fact. *Video Gaming Consultants, Inc. v. South Carolina Dept.*

*of Revenue*, 358 S.C. 647, 595 S.E.2d 890 (Ct. App. 2004). As discussed throughout this action, the Attorney General agreed from the beginning that Act 130 violated S.C. Constitution Article III, § 34 and Article VIII, § 7, because Act 130 was single county legislation and special legislation (Transcript, February 14, 2013, p. 32, ll. 12-22; R. p. 63). Similarly, Respondents McConnell and Campsen agreed that service by a legislator on the CCAA violates the Dual Office Holding and Separation of Powers provisions of the South Carolina Constitution (Transcript, February 14, 2013, p. 34, ll. 7-18; R. p. 65). Nevertheless, all Respondents continued to litigate the matter without having a good faith basis for arguing that the Act was constitutional. No Respondent has argued persuasively that Act 130 was constitutional. Respondents did not have a reasonable basis in law and fact for their litigation position. Respondents were not “substantially justified” in pressing their claims in this lawsuit. Appellants were required to litigate and expend attorney’s fees and costs, which are recoverable under S.C. Code Ann. § 15-77-300 et seq.

### **III. NO SPECIAL CIRCUMSTANCES MAKE AN AWARD OF FEES UNJUST.**

No special circumstances make an award of fees unjust. Appellants funded this litigation to uphold the Constitution. The State benefits when civic-minded citizens bring such actions. “It is very commendable that public-spirited citizens should endeavor to protect the taxpayers of a county from the efforts of an accommodating fiscal court to make unauthorized and unlawful appropriations of public funds.” *Shillito v. City of Spartanburg*, 214 S.C. 11, 26, 51 S.E.2d 95 (1948), quoting *Fox v. Lantrip*, 169 Ky. 759, 185 S.W. 136, 139. The Court continued, “Citizens should be encouraged to bring suits like these.” Appellants’ action benefitted the citizens of South Carolina by upholding the Constitution.

Accordingly, Appellants meet the qualifications for an award of attorneys' fees under S.C. Code Ann. § 15-77-300.

#### **IV. APPELLANTS ARE ENTITLED TO RECOVER COSTS.**

Attorneys for are entitled to recover costs in this matter.

In every civil action commenced or prosecuted in the courts of record in this State, except cases in chancery, the attorneys for the plaintiff or defendant shall be entitled to recover costs and disbursements of the adverse party as prescribed in §§ 15-37-20, 15-37-60, 15-37-70, and 15-37-120 to 15-37-160, and Chapter 21 of Title 8, Article 3 of Chapter 11 of Title 14, Chapter 19 of Title 14, Article 7 of Chapter 23 of Title 14, Chapter 19 of Title 19, Chapter 7 of Title 22, Article 3 of Chapter 9 of Title 22, and Article 1 of Chapter 19 of Title 23, *such costs to be allowed as of course* to the attorneys for the plaintiff or defendant and all officers of the court thereto entitled accordingly as the action may terminate and to be inserted in the judgment against the losing party. *In cases in chancery the same rule as to costs shall prevail* unless otherwise ordered by the court.

S.C. Code Ann. § 15-37-10 (emphasis added). Accordingly, Appellants should be awarded costs.

#### **V. APPELLANTS' ACTUAL ATTORNEYS' FEES AND COSTS ARE REASONABLE.**

As to the amount, this case presented a financial risk for Appellants. The public benefited from this litigation. Appellants' counsel attaches an affidavit and statements documenting attorneys' fees and costs (Affidavit and Exhibits to Affidavit). Through May 23, 2015, Appellants incurred \$148,931.25 in attorneys' fees and \$4,756.38 in costs pursuing this matter, for a total of \$153,687.63. Appellants' actual attorneys' fees and costs were reasonable, and Appellants are entitled to an award of attorneys' fees and costs.

“There are six factors for the trial court to consider when determining an award of attorneys fees: (1) the nature, extent, and difficulty of the case; (2) the time necessarily devoted to the case; (3) professional standing of counsel; (4) contingency of compensation;

(5) beneficial results obtained; and (6) customary legal fees for similar services.” *Burton v. York County Sheriff’s Dept.*, 358 S.C. 339, 357, 594 S.E.2d 888, 898 (Ct. App. 2004) *citing Jackson v. Speed*, 326 S.C. 289, 486 S.E.2d 750 (1997). “Upon request for attorneys fees that are authorized by contract or statute, the trial court should make specific findings of fact on the record for each of these factors.” *Id. citing Jackson*, 326 S.C. at 308, 486 S.E.2d at 760 and *Blumberg v. Nealco, Inc.*, 310 S.C. 492, 494, 427.

First, as to the nature, extent and difficulty of the case, Appellants brought this action and spent significant time, effort and money compelling these Respondents to honor the Constitution to honor and the rulings of the Courts of this State.

Second, as to the time necessarily devoted to the case, as shown by the affidavit of Appellants’ counsel, Appellants spent significant time in compelling these Respondents to honor the Constitution to honor and the rulings of the Courts of this State.

Third, Appellants’ counsel are experienced attorneys of high professional standing and well known to the courts of this State. *See, inter alia, South Carolina Public Interest Foundation v. Harrell*, 378 S.C. 441, 663 S.E.2d 52 (2008); *Sloan v. Department of Transportation*, 379 S.C. 160, 666 S.E.2d 236 (2008); *Sloan v. Hardee*, 371 S.C. 495, 640 S.E.2d 457 (2007); *Sloan v. Department of Transportation*, 365 S.C. 299, 618 S.E.2d 876 (2005), *Sloan v. Wilkins*, 362 S.C. 430, 608 S.E.2d 579 (2005), *Sloan v. Sanford*, 357 S.C. 431, 593 S.E.2d 470 (2004), *Sloan v. Greenville County*, 356 S.C. 531, 590 S.E.2d 338 (Ct. App. 2003), *Sloan v. School District of Greenville County*, 342 S.C. 515, 537 S.E.2d 299 (Ct. App. 2000).

Fourth, counsel did not work on a contingency fee, but rather Appellants paid these fees as they accrued. They should be reimbursed for their fees and expenses.

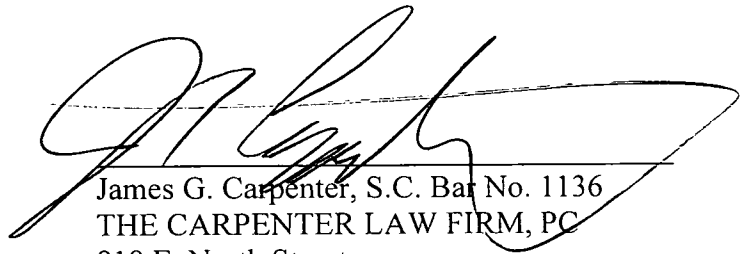
Fifth, Appellants obtained beneficial results. Upholding the Constitution and the rulings of the Courts of this State was the Appellants' objective. Furthermore, Appellants' litigation benefits every citizen by requiring the Respondents to follow the Constitution and the rulings of the Courts of this State.

Sixth, as to the customary legal fees for similar services, Appellants have presented Counsel's affidavit supported by detailed time records showing that Plaintiff incurred attorneys' fees and costs. Appellants respectfully suggest that based upon counsel's affidavit and the Court's familiarity with attorney fees customarily charged in this legal community, the time spent and the hourly rates requested by Counsel are reasonable. The Court should find that Appellants' actual attorneys' fees and costs were reasonable, and that Appellants are entitled to a full award of attorney's fees and costs.

### CONCLUSION

Appellants are prevailing parties. The Respondents were not substantially justified in pressing their claims. No other factors make an award of attorneys' fees unjust. Wherefore, Appellants pray the Court for an award of actual and reasonable attorneys' fees and costs from the Respondents.

Respectfully submitted,



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(864) 235-1269  
Attorneys for Appellants

May 27, 2015

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

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Case No. 2013-001273

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South Carolina Public Interest Foundation and Waring S. Howe, Jr., individually, and on behalf of all others similarly situated, ..... Appellants,

v.

James H. "Jay" Lucas, in his official capacity as Speaker of the South Carolina House of Representatives, Hugh K. Leatherman, in his official capacity as President of the South Carolina Senate, Representative Peter M. McCoy, Jr., Senator George E. "Chip" Campsen, and the State of South Carolina, ..... Respondents.

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**AFFIDAVIT IN SUPPORT OF MOTION FOR ATTORNEYS' FEES  
UNDER SC CODE ANN. § 15-77-300**

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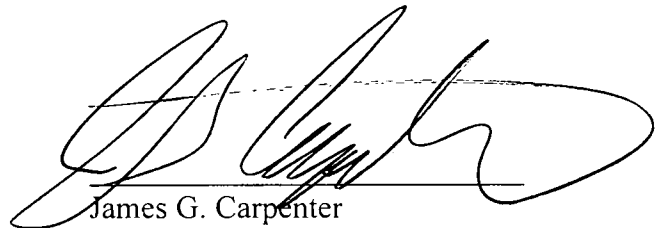
James G. Carpenter, S.C. Bar No. 1136  
819 E. North Street  
Greenville, South Carolina 29601  
(864) 235-1269  
Attorneys for Appellants

James G. Carpenter, being first duly sworn, states as follows:

1. I am lead counsel for the Appellants. I graduated from the University of South Carolina School of Law in 1984. After working a year for a federal judge, I was admitted to the Bar in South Carolina in 1985 and in North Carolina in 1986. I am also admitted to practice before several United States District Courts and the United States Court of Appeals for the Fourth Circuit.
2. I have been practicing civil litigation in my own firm since 1994. Since 1997, this firm has represented Mr. Edward D. Sloan, Jr., the South Carolina Public Interest Foundation, and other taxpayers in public interest litigation. As far as I know, our firm is the only one in this State with an established, regular practice in taxpayer and public interest litigation.
3. We maintain daily detailed time records of our professional services. I attach to this Affidavit reports from QuickBooks showing daily work records detailing the hours and costs we expended in litigating this case.
4. My normal billing rate is \$300 per hour, which is what I billed in this case. My associates, Jennifer Miller and Warren Clayton, billed their time at a \$225.00 per hour, their normal hourly rates.
5. Our records show that through May 23, 2015, Appellants incurred \$148,931.25 in attorneys' fees and \$4,756.38 in costs pursuing this matter, for a total of **\$153,687.63**.
6. In the hearings and pleadings in this case, various Respondents *admitted* that Act 130 violated *four different provisions* of the South Carolina Constitution.

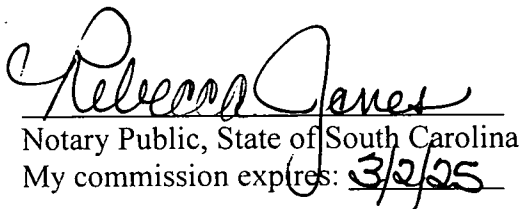
7. The record and time descriptions in this case demonstrate that despite their admissions, Defendants vigorously contested this action. Nevertheless, Appellants prevailed when the Respondents repealed the unconstitutional Act 130, after oral argument at the Court of Appeals.
8. I believe the State as a whole and its citizens benefited as a result of this litigation.
9. As prevailing parties, Appellants should be awarded attorneys' fees and costs under S.C. Code Ann. § 15-77-300 and § 15-37-10.
10. Appellants' actual attorneys' fees and costs were reasonable, and Appellants are entitled to an award of attorneys' fees and costs.

Further the affiant saith naught.



James G. Carpenter  
SC Bar No. 1136  
819 East North Street  
Greenville, SC 29601  
Tel. (864) 235-1269  
Fax (864) 331-3083

Subscribed and sworn to before me  
this 27<sup>th</sup> day of May, 2015



Notary Public, State of South Carolina  
My commission expires: 3/2/25

The Carpenter Law Firm P.C.  
Transaction Detail Report  
Charleston County Aviation

Date	Num	Memo	Class	Amount	Balance
10/31/2011	4825	Receipt & review of email from client; review of prior case argument and opinion; call t...	James G. Carpenter	225.00	225.00
10/31/2011	4825	Call from client; call to SCPIF; Letter to client, analysis of Act 130 and house bill;...	James G. Carpenter	450.00	675.00
10/31/2011	4825	Library Research - Receipt of acts.	James G. Carpenter	56.25	731.25
10/31/2011	4825	Emails from and to client; Tel. conf. with SCPIF; Analysis of prior related Acts;	James G. Carpenter	375.00	1,106.25
10/31/2011	4825	Call and letter to Waring Howe; research on prohibition against dual office holding;	James G. Carpenter	675.00	1,781.25
10/31/2011	4825	Calls from and to Waring Howe;	James G. Carpenter	150.00	1,931.25
10/31/2011	4825	Emails from and to client; Tel. conf. with SCPIF; conf. with Paralegal, re: statute on o...	James G. Carpenter	600.00	2,531.25
10/31/2011	4825	Library research for Act that supported the Article 2 sec. 2 change from 1970. The act was 321 s...	James G. Carpenter	131.25	2,662.50
10/31/2011	4825	Drafting Petition for Original Jurisdiction, Complaint, and related papers;	James G. Carpenter	600.00	3,262.50
10/31/2011	4825	Letter from client; call to SCPIF; Research on Home Rule and Airport Commission; Conf. with...	James G. Carpenter	1,500.00	4,762.50
10/31/2011	4825	Document search from previous issues/trip to library research 1970's Acts.	James G. Carpenter	75.00	4,837.50
10/31/2011	4825	Analysis of legislation on Aviation Authority; revisions to Draft Affidavit, Complaint, Petition...	James G. Carpenter	2,925.00	7,762.50
10/31/2011	4825	Faxes from SCPIF; revisions to Sup.Ct. Pleadings;	James G. Carpenter	150.00	7,912.50
10/31/2011	4825	Research on SC caselaw; revisions to Petition for Original Jurisdiction, Common Interest Agreeeme...	James G. Carpenter	1,425.00	9,337.50
10/31/2011	4825	Review and make editing changes to agreement for JGC; conf. with JGC.	James G. Carpenter	337.50	9,675.00
10/31/2011	4825	Revisions to Sup. Ct. Pleadings;	James G. Carpenter	75.00	9,750.00
10/31/2011	4825	Fax from SCPIF; call to Waring Howe; conf. with Warren Clayton, re: draft pleadings; fax to SCPIF;	James G. Carpenter	150.00	9,900.00
10/31/2011	4825	Review and edit petition for JGC.	James G. Carpenter	168.75	10,068.75
10/31/2011	4825	Fax from SCPIF; Revisions to Sup. Ct. Pleadings; tel. conf. with and email to Waring Howe;	James G. Carpenter	300.00	10,368.75

The Carpenter Law Firm P.C.  
Transaction Detail Report  
Charleston County Aviation

Date	Num	Memo	Class	Amount	Balance
10/31/2011	4825	Emails from and to client; receipt & review of affidavit and Common Interest Agreement f...	James G. Carpenter	600.00	10,968.75
11/30/2011	4853	Email to client, Howe; fax to SCPIF;	James G. Carpenter	75.00	11,043.75
11/30/2011	4853	Calls from and to Rob Tyson, atty. for Chip Limehouse; fax to Mr. Sloan;	James G. Carpenter	75.00	11,118.75
11/30/2011	4853	Call from counsel for Limehouse; email to clients; tel. conf. with Mr. Sloan;	James G. Carpenter	75.00	11,193.75
11/30/2011	4853	Receipt & review of requests for extension of time; fax to SCPIF; email to clients;	James G. Carpenter	75.00	11,268.75
11/30/2011	4853	Receipt of Limehouse mail package; Calls from and to Counsel for Limehouse;	James G. Carpenter	75.00	11,343.75
11/30/2011	4853	(airport commission) reviewing complaint; research; beginning initial brief; conf. w/JGC	Jennifer J. Miller	393.75	11,737.50
11/30/2011	4853	Call from and email to Rick Brundrett; (airport commission); additional research;	James G. Carpenter	150.00	11,887.50
11/30/2011	4853	continuing to draft initial brief	Jennifer J. Miller	450.00	12,337.50
12/31/2011		Receipt & review of Harrell's request for an additional extension of Time; email to clients; fax...	James G. Carpenter	75.00	12,412.50
12/31/2011		E-mail to clients regarding article on Supreme Court case;	James G. Carpenter	75.00	12,487.50
12/31/2011		westlaw research for initial brief; reviewing cases	Jennifer J. Miller	225.00	12,712.50
12/31/2011		reviewing Ashmore;	Jennifer J. Miller	281.25	12,993.75
12/31/2011		conf. w/JGC; developing additional argument for initial brief	Jennifer J. Miller	281.25	13,275.00
01/31/2012	4912	Receipt & review of Return of State of SC; conf. with and fax to Mr. Sloan; e-mail to clients;	James G. Carpenter	150.00	13,425.00
01/31/2012	4912	Receipt and review of Return.	Warren Clayton	112.50	13,537.50
01/31/2012	4912	Receipt & review of Return of Limehouse; Tel. conf. with Mr. Sloan; e-mail to clients;	James G. Carpenter	75.00	13,612.50
01/31/2012	4912	reviewing Harrell response; conf. w/JGC	Jennifer J. Miller	225.00	13,837.50
01/31/2012	4912	Tel. conf. with Mr. Sloan; conf. with JJ Miller; conf. w/JGC; reviewing returns to petition;	James G. Carpenter	75.00	13,912.50
01/31/2012	4912	drafting reply	Jennifer J. Miller	450.00	14,362.50
01/31/2012	4912	drafting Reply to Returns to Petition	Jennifer J. Miller	506.25	14,868.75
01/31/2012	4912	Receipt & review of Return of Ard and McConnell; fax to SCPIF; e-mail to Clients;	James G. Carpenter	150.00	15,018.75
01/31/2012	4912	Emails from and to Clients; faxes to and from Mr. Sloan; Drafting and revising Reply to Returns ...	James G. Carpenter	750.00	15,768.75

The Carpenter Law Firm P.C.  
Transaction Detail Report  
Charleston County Aviation

Date	Num	Memo	Class	Amount	Balance
01/31/2012	4912	revising Reply to Return E-mail from and to clients; faxes to Mr. Sloan; Tel. confs. with Mr. Sloan; Revisions to Reply;	Jennifer J. Miller	393.75	16,162.50
01/31/2012	4912	... revising Reply to Returns to Petition; conf. w/JGC	James G. Carpenter	600.00	16,762.50
01/31/2012	4912	conf. w/JGC; research on collateral estoppel	Jennifer J. Miller	168.75	16,931.25
01/31/2012	4912	E-mail from client re: legislation re: Charleston County Aviation; fax to Mr. Sloan;	Jennifer J. Miller	168.75	17,100.00
01/31/2012	4912	Faxes from Mr. Sloan; call from Mr. Sloan;	James G. Carpenter	75.00	17,175.00
01/31/2012	4912	Monitoring progress of bill re: Charleston County Aviation Commission;	James G. Carpenter	75.00	17,250.00
02/29/2012	4947	Receipt & review of order denying petition for original jurisdiction; faxes and emails to and fr...	James G. Carpenter	75.00	17,325.00
02/29/2012	4947	Email from client; fax to and tel. conf. with client;	James G. Carpenter	150.00	17,475.00
02/29/2012	4947	Revisions to Complaint; preparation for filing in Circuit Court; faxes to and from client; email...	James G. Carpenter	75.00	17,550.00
02/29/2012	4947	Emails from and to client; conf. and tel. conf. with client;	James G. Carpenter	300.00	17,850.00
02/29/2012	4947	conf. w/JGC regarding summary judgment; reviewing pleadings and research	James G. Carpenter	150.00	18,000.00
02/29/2012	4947	Revisions, filing and service of Summons, Complaint; calls and to opposing counsel, re: acceptan...	Jennifer J. Miller	225.00	18,225.00
02/29/2012	4947	reviewing Initial Brief; conf. w/JGC; drafting Memorandum of Law	James G. Carpenter	450.00	18,675.00
02/29/2012	4947	reviewing affidavit; drafting statement of facts for memorandum of law; conf. w/JGC	Jennifer J. Miller	225.00	18,900.00
02/29/2012	4947	drafting argument in Memorandum of Law	Jennifer J. Miller	393.75	19,293.75
02/29/2012	4947	Receipt & review of acceptance of service; fax to Mr. Sloan;	Jennifer J. Miller	281.25	19,575.00
02/29/2012	4947	editing argument	James G. Carpenter	75.00	19,650.00
02/29/2012	4947	Preparing Civil Action Cover Sheet; letter to Clerk of Court;	Jennifer J. Miller	281.25	19,931.25
02/29/2012	4947	Call and letter from Clerk of Court;	James G. Carpenter	75.00	20,006.25
02/29/2012	4947	Receipt & review of email from Emery Smith, re: acceptance of service;	James G. Carpenter	75.00	20,081.25
02/29/2012	4947	Letter from Clerk of Court; Faxes to Mr. Sloan; emails to and from opposing counsel;	James G. Carpenter	75.00	20,156.25
02/29/2012	4947		James G. Carpenter	150.00	20,306.25

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02/29/2012	4947	Email from opposing counsel; email to client; Receipt & Review of acceptance of service	James G. Carpenter	150.00	20,456.25
03/31/2012	4976	from opposing counsel;	James G. Carpenter	75.00	20,531.25
03/31/2012	4976	Fax from Mr. Sloan;	James G. Carpenter	75.00	20,606.25
03/31/2012	4976	Emails from and to Emory Smith;	James G. Carpenter	75.00	20,681.25
03/31/2012	4976	Emails from and to Emory Smith;	James G. Carpenter	75.00	20,756.25
03/31/2012	4976	Letters and email from Emory Smith;	James G. Carpenter	75.00	20,831.25
03/31/2012	4976	Fax and email to clients;	James G. Carpenter	75.00	20,906.25
03/31/2012	4976	Fax to and tel. conf. with Mr. Sloan; Faxes from and to Mr. Sloan; calls and emails to opposing counsel; Tel. conf. with Mike Hitchcock;	James G. Carpenter	75.00	20,981.25
03/31/2012	4976	Receipt & review of letter from Anzelmo; fax to Mr. Sloan;	James G. Carpenter	150.00	21,131.25
03/31/2012	4976	Call from M. Anzelmo; emails from and to Anzelmo; Receipt & review of Answer of Limehouse; fax to...	James G. Carpenter	75.00	21,206.25
03/31/2012	4976	Tel.conf. with Mr. Sloan;	James G. Carpenter	150.00	21,356.25
03/31/2012	4976	Receipt & Review of Motion for Change of Venue; fax and email to clients;	James G. Carpenter	75.00	21,431.25
03/31/2012	4976	Receipt & Review of fax from Mr. Sloan;	James G. Carpenter	150.00	21,581.25
04/30/2012	5006	Receipt & Review of fax from Mr. Sloan;	James G. Carpenter	75.00	21,656.25
04/30/2012	5006	Emails from and to client; Drafting and revising Memorandum in Opposition to Motion for Change of Venue; Tel. confs. with c...	James G. Carpenter	75.00	21,731.25
04/30/2012	5006	reviewing memorandum in response to motion for change of venue; reviewing research; conf. w/JGC	James G. Carpenter	900.00	22,631.25
04/30/2012	5006	Conf. with JJ Miller, re: Motion for Change of Venue;	Jennifer J. Miller	225.00	22,856.25
04/30/2012	5006	revising memorandum	James G. Carpenter	75.00	22,931.25
04/30/2012	5006	Emails from and to atty. Nancy Bloodgood; Tel. conf. with Mr. Sloan;	Jennifer J. Miller	150.00	23,081.25
04/30/2012	5006	revising memorandum in opposition to change of venue; conference with JGC regarding best approac...	James G. Carpenter	150.00	23,231.25
04/30/2012	5006	Review of revised memo in opposition to Motion for Change of Venue; conf. with JJ Miller; reviewing edited version including JGC's changes; additional revision to Memo	James G. Carpenter	187.50	23,418.75
04/30/2012	5006	Review of revised memo in opposition to Motion for Change of Venue; conf. with JJ Miller; reviewing edited version including JGC's changes; additional revision to Memo	Jennifer J. Miller	375.00	23,793.75
04/30/2012	5006	Review of revised memo in opposition to Motion for Change of Venue; conf. with JJ Miller; reviewing edited version including JGC's changes; additional revision to Memo	Jennifer J. Miller	225.00	24,018.75

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04/30/2012	5006	Faxes and call from Mr. Sloan; review and revision of memo in opposition to Motion for Change of...	James G. Carpenter	525.00	24,543.75
04/30/2012	5006	Final proofread and editing of memo; reviewing Mr. Sloan's comment	Jennifer J. Miller	187.50	24,731.25
04/30/2012	5006	Filing and serving Memo in Opposition to Motion for Change of Venue; fax to Mr. Sloan; Receipt &...	James G. Carpenter	150.00	24,881.25
04/30/2012	5006	conf. w/JGC; drafting proof of service, cover letter; filing memorandum in opposition to change ...	Jennifer J. Miller	187.50	25,068.75
04/30/2012	5006	Receipt & review of Answer of Ard and McConnell; email and fax to clients; Call and fax to other...	James G. Carpenter	375.00	25,443.75
04/30/2012	5006	conf. w/JGC; drafting memorandum in support of motion for summary judgment	Jennifer J. Miller	75.00	25,518.75
04/30/2012	5006	revising memorandum in support of motion for summary judgment	Jennifer J. Miller	75.00	25,593.75
04/30/2012	5006	further revision of memorandum of law in support of motion for summary judgment	Jennifer J. Miller	337.50	25,931.25
04/30/2012	5006	Receipt & review of Answer of Harrell; fax and email to clients; Review of Minutes of Commission...	James G. Carpenter	900.00	26,831.25
05/29/2012	5032	Filing Fee to Richland County chk reissued original check never cleared - billed twice to client...	James G. Carpenter	-150.00	26,681.25
05/31/2012	5034	Email from client; fax to Mr. Sloan; Tel. conf. with attorney in related case; Drafting Summary ...	James G. Carpenter	300.00	26,981.25
05/31/2012	5034	drafting memorandum of law; conf. w/JGC; reviewing minutes; adding argument	Jennifer J. Miller	1,012.50	27,993.75
05/31/2012	5034	Drafting and revising Summary Judgment Memo; faxing drafts to and from Mr. Sloan; tel. conf. wit...	James G. Carpenter	2,025.00	30,018.75
05/31/2012	5034	revising memorandum of law; drafting additional argument; conf. w/JGC	Jennifer J. Miller	956.25	30,975.00
05/31/2012	5034	Fax from Mr. Sloan; revisions to Memo in Support of Motion for Summary Judgment;	James G. Carpenter	150.00	31,125.00
05/31/2012	5034	sending minutes to be numbered; conf. w/JGC; proofreading and revising memorandum of law	Jennifer J. Miller	843.75	31,968.75
05/31/2012	5034	proofreading and revision; conf. w/JGC reviewing Minutes and adding descriptions and citations to memorandum	Jennifer J. Miller	337.50	32,306.25
05/31/2012	5034		Jennifer J. Miller	506.25	32,812.50

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05/31/2012	5034	revising memorandum; conf. w/JGC	Jennifer J. Miller	562.50	33,375.00
		Review and revision of Summary Judgment			
05/31/2012	5034	Memo; fax to Mr. Sloan;	James G. Carpenter	525.00	33,900.00
05/31/2012	5034	Revisions to Summary Judgment Memo;	James G. Carpenter	1,425.00	35,325.00
		Call and fax from Mr. Sloan; revisions to Memo			
05/31/2012	5034	in Support of Motion for Summary Judgment;	James G. Carpenter	75.00	35,400.00
		Review and revision of Memo in Support of			
		Motion for Summary Judgment; fax to Mr.			
05/31/2012	5034	Sloan;	James G. Carpenter	825.00	36,225.00
		Call and fax from Mr. Sloan; revisions to			
05/31/2012	5034	Summary Judgment Memo; email to clients;	James G. Carpenter	225.00	36,450.00
		Emails from and to client, re: Summary			
		Judgment Memo; revisions to Summary			
05/31/2012	5034	Judgment Memo.	James G. Carpenter	150.00	36,600.00
06/30/2012	5075	conf. w/JGC re. Memo for SJ and hearing date	Jennifer J. Miller	56.25	36,656.25
06/30/2012	5075	revising Memorandum of Law;	Jennifer J. Miller	450.00	37,106.25
		revising Memorandum of Law; compiling exhibit			
06/30/2012	5075	list	Jennifer J. Miller	450.00	37,556.25
		gathering exhibits; conf. w/JGC; revising exhibit			
06/30/2012	5075	list	Jennifer J. Miller	393.75	37,950.00
		revising Memorandum of Law in Support of			
06/30/2012	5075	Motion for Summary Judgment	Jennifer J. Miller	393.75	38,343.75
		revising exhibit citations; searching for exhibits;			
		proofreading Memorandum of Law; conf.			
06/30/2012	5075	w/JGC	Jennifer J. Miller	337.50	38,681.25
		additional proofreading and revision of			
06/30/2012	5075	Memorandum of Law	Jennifer J. Miller	393.75	39,075.00
		compiling and ordering exhibits; conf. w/JGC;			
06/30/2012	5075	faxing to Mr. Sloan	Jennifer J. Miller	281.25	39,356.25
		sending Memorandum of Law to printer; cover			
		letter and proof of service; filing and serving;			
06/30/2012	5075	con...	Jennifer J. Miller	225.00	39,581.25
06/30/2012	5075	drafting Memorandum of Law	Jennifer J. Miller	337.50	39,918.75
		drafting and revising Memorandum of Law;			
07/31/2012	5089	conf. w/JGC	Jennifer J. Miller	562.50	40,481.25
		final revision and proofreading, filing and			
		serving Memorandum of Law; proof of service;			
07/31/2012	5089	cover l...	Jennifer J. Miller	675.00	41,156.25
		reviewing correspondence from printer;			
		questing printer to forward pdf to JGC to			
07/31/2012	5089	forward to clients	Jennifer J. Miller	56.25	41,212.50

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<u>Date</u>	<u>Num</u>	<u>Memo</u>	<u>Class</u>	<u>Amount</u>	<u>Balance</u>
07/31/2012	5089	Email from Printer; email to clients; call from Client re: Motion for Change of Venue; Preparati...	James G. Carpenter	675.00	41,887.50
07/31/2012	5089	Trip to Columbia for hearing on Motion for Change of Venue; Drafting proposed order; Motion for Summary Judgment; Certificate of Service; call to Court regarding scheduling (must wa...	James G. Carpenter	1,950.00	43,837.50
07/31/2012	5089	drafting cover letter and certificate of service and Motion cover sheet; calls to and from court...	Jennifer J. Miller	393.75	44,231.25
07/31/2012	5089	call to printer; conf. w/JGC; proofreading motion and certificate of service; reviewing correspo...	Jennifer J. Miller	562.50	44,793.75
07/31/2012	5089	Emails to and from client; email to Court and opposing counsel with proposed order; Receipt & review of email with Order granting Motion to Transfer Venue; faxes and email to clien...	James G. Carpenter	393.75	45,187.50
07/31/2012	5089		James G. Carpenter	150.00	45,337.50
07/31/2012	5089		James G. Carpenter	150.00	45,487.50
08/31/2012	5115	E-mail to Nick Nicholson to request copy of pleadings; Status Memo and e-mail to client;... calls to and from the Clerk's office, re: time and date for hearing on motion for summary Judgme...	James G. Carpenter	225.00	45,712.50
08/31/2012	5115		James G. Carpenter	225.00	45,937.50
08/31/2012	5115	E-mails from and to client; Receipt & review of filed motion from Court; call from Mr. Sloan; fax to Mr. Sloan;	James G. Carpenter	75.00	46,012.50
08/31/2012	5115		James G. Carpenter	75.00	46,087.50
09/30/2012	5145	Fax from Mr. Sloan; call from Mr. Sloan;	James G. Carpenter	75.00	46,162.50
09/30/2012	5145	Fax from Mr. Sloan; Calls from and to Clients; research on availability of terms of court; call ...	James G. Carpenter	375.00	46,537.50
09/30/2012	5145	Faxes from Mr. Sloan; re; Charleston County Aviation case;	James G. Carpenter	75.00	46,612.50
09/30/2012	5145	E-mail from Clerk of Court; review of rosters; e-mail and fax to clients; fax from Mr. Sloan; re...	James G. Carpenter	225.00	46,837.50
09/30/2012	5145	Receipt & review of article on dispute over appointment to Aviation Authority Board; call and fa...	James G. Carpenter	150.00	46,987.50
09/30/2012	5145	Call from Waring Howe; fax from Mr. Sloan; e-mails from Waring Howe; faxes to Mr. Sloan; calls f...	James G. Carpenter	300.00	47,287.50
09/30/2012	5145	Fax from Mr. Sloan; call from Mr. Sloan;	James G. Carpenter	75.00	47,362.50

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Date	Num	Memo	Class	Amount	Balance
09/30/2012	5145	Fax from Mr. Sloan; conf. with Mr. Sloan; call and e-mail to opposing counsel;	James G. Carpenter	75.00	47,437.50
09/30/2012	5145	Fax from Mr. Sloan, re: Airport Authority; call from Mr. Sloan; call to Mike Hitchcock;	James G. Carpenter	150.00	47,587.50
09/30/2012	5145	Review of article by Campsen; article re: Aviation Authority; fax from Mr. Sloan;	James G. Carpenter	150.00	47,737.50
09/30/2012	5145	Call and fax from Mr. Sloan; review of pleadings; call to Mike Hitchcock;	James G. Carpenter	150.00	47,887.50
09/30/2012	5145	Receipt & review of Motion to Dismiss and Notice of Deposition; e-mails and faxes to clients; T...	James G. Carpenter	150.00	48,037.50
09/30/2012	5145	Call and fax from Mr. Sloan; Call from Waring Howe; e-mail to opposing counsel;	James G. Carpenter	150.00	48,187.50
09/30/2012	5145	Call from Mr. Sloan; emails from opposing counsel re: depositions; email to clients;	James G. Carpenter	150.00	48,337.50
09/30/2012	5145	Email from Emory Smith; email to clients; tel. conf. with Mr. Sloan;	James G. Carpenter	75.00	48,412.50
10/31/2012	5168	Receipt & review of email and Motion from Limehouse counsel; e-mails and faxes to and from clien...	James G. Carpenter	600.00	49,012.50
10/31/2012	5168	Calls from and to Michael Anzelmo; Calls to Waring Howe's office, re: scheduling of deposition;	James G. Carpenter	75.00	49,087.50
10/31/2012	5168	Call from Mike Hitchcock; Call from Judge's office; Email to clients; conf with Mr. Sloan; fax t...	James G. Carpenter	450.00	49,537.50
10/31/2012	5168	Calls from Mr. Sloan; fax to Mr. Sloan; Tel.conf. with Mr. Sloan re: deposition Notice and subpo...	James G. Carpenter	150.00	49,687.50
10/31/2012	5168	Receipt & review of fax copy of Mr. Sloan's deposition notice; Tel. conf. with Mr. Sloan; email...	James G. Carpenter	375.00	50,062.50
10/31/2012	5168	Preparation for Deposition of Waring Howe; Tel.conf. with Mr. Sloan;	James G. Carpenter	150.00	50,212.50
10/31/2012	5168	Preparation for Deposition of Howe;	James G. Carpenter	150.00	50,362.50
10/31/2012	5168	Trip to Charleston; Deposition Preparation with Waring Howe; tel. confs. with client;	James G. Carpenter	2,400.00	52,762.50
10/31/2012	5168	Preparation for and representation in Deposition; return trip to Greenville, tel. confs. with cl...	James G. Carpenter	2,250.00	55,012.50
10/31/2012	5168	Tel. conf. with JJ Miller, re: motions to be heard on Monday;	James G. Carpenter	75.00	55,087.50
10/31/2012	5168	conf. w/JGC; correspondence with opposing counsel and Mr. Howe	Jennifer J. Miller	168.75	55,256.25

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10/31/2012	5168	Receipt & review of email from Court, re: Monday hearing; email to clients; drafting correspondence to opposing counsel; reviewing Anzelmo affidavit; call from court; sendi...	James G. Carpenter	75.00	55,331.25
10/31/2012	5168	Receipt & review of Second discovery requests to Howe; email and fax to clients;	Jennifer J. Miller	393.75	55,725.00
10/31/2012	5168	Receipt & review of Affidavit from Anzelmo; Review of Rule 56(f);	James G. Carpenter	75.00	55,800.00
10/31/2012	5168	Drafting Memorandum of Law in Opposition to Rule 56 Affidavit of Michael Anzelmo; drafting, revi...	James G. Carpenter	75.00	55,875.00
10/31/2012	5168	Trip to Charleston for argument on Harrell's Motion to Dismiss/ Judgment on the Pleadings; Limeh...	James G. Carpenter	2,550.00	58,425.00
10/31/2012	5168	Receipt & review of fax from Mr. Sloan; calls to Client; Letter to clerk of Court; call and emai...	James G. Carpenter	2,925.00	61,350.00
10/31/2012	5168	Preparation of reply memo in support of motion for summary judgment;	James G. Carpenter	900.00	62,250.00
10/31/2012	5168	Receipt of transcript of Howe Deposition; email to clients; conf. with Mr. Sloan;	James G. Carpenter	600.00	62,850.00
10/31/2012	5168	Tel. confs. with Mr. Sloan; fax from Mr. Sloan; review of transcript of Howe deposition; Researc...	James G. Carpenter	75.00	62,925.00
10/31/2012	5168	Tel. conf. and conf. with Mr. Sloan, re: preparation for deposition; Revisions to Reply Memorandum;	James G. Carpenter	1,575.00	64,500.00
10/31/2012	5168	Conf. with Mr. Sloan; representation of Mr. Sloan at his deposition; emails to and from clients;...	James G. Carpenter	1,950.00	66,450.00
10/31/2012	5168	revising and proofreading Plaintiff's Reply Memo of Law	James G. Carpenter	1,650.00	68,100.00
10/31/2012	5168	Tel. confs. with Mr. Sloan; faxes from and to Mr. Sloan; Call from Greg English, re: assertion o...	Jennifer J. Miller	393.75	68,493.75
11/30/2012	5196	revising Reply to Motion for Summary Judgment	James G. Carpenter	750.00	69,243.75
11/30/2012	5196	Receipt and review of Transcript of Sloan's deposition; email to clients; Tel.conf. with Mr. Slo...	Jennifer J. Miller	562.50	69,806.25
11/30/2012	5196	revising and proofreading Reply to Motion for Summary Judgment	James G. Carpenter	750.00	70,556.25
11/30/2012	5196	Call and fax from Mr. Sloan; email to clients; fax to Mr. Sloan;	Jennifer J. Miller	618.75	71,175.00
11/30/2012	5196		James G. Carpenter	75.00	71,250.00

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11/30/2012	5196	Proofreading Reply; conf. w/JGC	Jennifer J. Miller	450.00	71,700.00
11/30/2012	5196	Calls from Clients; emails to clients; Tel. conf. with client; emails to clients and opposing counsel; Call to Michael Anzelmo; fax to ...	James G. Carpenter	300.00	72,000.00
11/30/2012	5196	Email from Michael Anzelmo; email and fax to clients;	James G. Carpenter	225.00	72,225.00
11/30/2012	5196	Call and fax from Mr. Sloan;	James G. Carpenter	75.00	72,300.00
11/30/2012	5196	Email from client; tel. conf. with Mr. Sloan;	James G. Carpenter	75.00	72,375.00
11/30/2012	5196	Call to Clerk's office, re: consent order for substitution of parties;	James G. Carpenter	75.00	72,450.00
11/30/2012	5196	Receipt and review of order for substitution of parties; fax to Mr. Sloan;	James G. Carpenter	75.00	72,525.00
11/30/2012	5196	Receipt and review of order for substitution of parties; fax to Mr. Sloan;	James G. Carpenter	75.00	72,600.00
12/31/2012	5221	Emails from and to client; emails to and from Michael Anzelmo, and other opposing counse...	James G. Carpenter	150.00	72,750.00
12/31/2012	5221	Call from Mr. Sloan; email from client;	James G. Carpenter	75.00	72,825.00
12/31/2012	5221	Receipt & review of Harrell's Interrogatories and Requests for Production; Notice of Continuatio...	James G. Carpenter	150.00	72,975.00
12/31/2012	5221	Tel. conf. and conf. with Mr. Sloan and Greg English, re: strategy for discovery responses; Draf...	James G. Carpenter	1,425.00	74,400.00
12/31/2012	5221	reviewing discovery requests and responses; revising; conf. w/JGC	Jennifer J. Miller	506.25	74,906.25
12/31/2012	5221	Revisions to Discovery Responses; Research on Freedom of Association;	James G. Carpenter	225.00	75,131.25
12/31/2012	5221	Revisions to proposed discovery responses; e- mail to Greg English, attorney for the foundation; ...	James G. Carpenter	300.00	75,431.25
12/31/2012	5221	E-mail from Greg English; teleconference with Mr. Sloan; e-mail to clients;	James G. Carpenter	75.00	75,506.25
01/31/2013	5239	Email from client; call to client;	James G. Carpenter	75.00	75,581.25
01/31/2013	5239	Tel.conf. with client; Tel. conf. with Mr. Sloan; Preparation and service of Discovery R...	James G. Carpenter	450.00	76,031.25
01/31/2013	5239	Tel. conf. with Mr. Sloan; drafting Requests for Production to Defendants; Drafting FOIA Request...	James G. Carpenter	225.00	76,256.25
01/31/2013	5239	Fax to Mr. Sloan; tel. conf. with Mr. Sloan;	James G. Carpenter	75.00	76,331.25
01/31/2013	5239	Emails from and to Clerk of Court's office, re: scheduling of hearing; review of online schedule...	James G. Carpenter	150.00	76,481.25

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		Drafting and Service of Discovery requests and FOIA requests; Tel. conf. with Mr. Sloan; Fax to ...			
01/31/2013	5239	...	James G. Carpenter	375.00	76,856.25
01/31/2013	5239	Calls to opposing counsel, Mr. Sloan, Greg English, Waring Howe;	James G. Carpenter	375.00	77,231.25
01/31/2013	5239	Letter from Secretary of State; tel. conf. with Mr. Sloan; fax to Mr. Sloan;	James G. Carpenter	75.00	77,306.25
02/28/2013	5261	Fax to Mr. Sloan;	James G. Carpenter	75.00	77,381.25
02/28/2013	5261	Email from client;	James G. Carpenter	75.00	77,456.25
02/28/2013	5261	Receipt & review of memo and exhibits from Limehouse's lawyer; email to clients; fax to SCPIF;	James G. Carpenter	150.00	77,606.25
02/28/2013	5261	Tel. conf. with Mr. Sloan; email from client;	James G. Carpenter	75.00	77,681.25
02/28/2013	5261	Emails from and to clients; call from Michael Anzelmo; tel. conf. with and faxes to Mr. Sloan; E...	James G. Carpenter	1,425.00	79,106.25
02/28/2013	5261	Revisions to Reply Memorandum; Conf. with JJ Miller;	James G. Carpenter	525.00	79,631.25
02/28/2013	5261	revising memorandum	Jennifer J. Miller	450.00	80,081.25
02/28/2013	5261	Preparation for argument on Motions; Emails to Printer; emails to Court, opposing counsel, clien...	James G. Carpenter	1,575.00	81,656.25
02/28/2013	5261	revising memorandum	Jennifer J. Miller	618.75	82,275.00
02/28/2013	5261	Trip to Charleston for hearing on Motions; return;	James G. Carpenter	2,625.00	84,900.00
02/28/2013	5261	Research on Statute that repealed act governing appointment of additional members to Aviation Au...	James G. Carpenter	225.00	85,125.00
02/28/2013	5261	Tel. conf. with Mr. Sloan, re: need for supplemental memoranda on Act 270 of 2012; Research and ...	James G. Carpenter	300.00	85,425.00
02/28/2013	5261	Tel. confs. with Mr. Sloan, re: changes to code and reservation of sections vs. repeal of statutes;	James G. Carpenter	75.00	85,500.00
02/28/2013	5261	Tel. confs. with clients re: Judge Dennis; statutes removed from code, but not repealed;	James G. Carpenter	75.00	85,575.00
02/28/2013	5261	Receipt & review of letter and affidavit from Limehouse's lawyer; letter to Clerk of Court;	James G. Carpenter	75.00	85,650.00
02/28/2013	5261	Receipt & review of Discovery Responses from Limehouse; fax and email to clients;	James G. Carpenter	150.00	85,800.00
03/31/2013	5284	Emails from Court and opposing counsel, re: decision on Standing; calls to clients;	James G. Carpenter	225.00	86,025.00

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Charleston County Aviation

Date	Num	Memo	Class	Amount	Balance
03/31/2013	5284	Fax from Mr. Sloan; Faxes to Mr. Sloan; Conf. with Mr. Sloan, re: new legislation on Charleston...	James G. Carpenter	300.00	86,325.00
03/31/2013	5284	Call from media; email to media; tel. confs. with clients; Fax to Mr. Sloan;	James G. Carpenter	150.00	86,475.00
03/31/2013	5284	Tel. conf. with Mr. Sloan; call to Clerk of Court; Letter to Court Reporter; Drafting Appellant...	James G. Carpenter	600.00	87,075.00
03/31/2013	5284	Emails from and to Emory Smith;	James G. Carpenter	75.00	87,150.00
03/31/2013	5284	Calls from Mr. Sloan; fax to Mr. Sloan;	James G. Carpenter	75.00	87,225.00
03/31/2013	5284	Receipt & Review of letter from Court, obtaining Form 4 Judgment from Court website; Receipt & r...	James G. Carpenter	525.00	87,750.00
03/31/2013	5284	Drafting Statement of issues on Appeal; fax to and from Mr. Sloan; Revisions to Draft Appellant...	James G. Carpenter	900.00	88,650.00
03/31/2013	5284	Email from court; fax to Mr. Sloan;	James G. Carpenter	75.00	88,725.00
03/31/2013	5284	Call from Waring Howe, re: proposed order; Drafting objections to proposed order fax and email t...	James G. Carpenter	1,200.00	89,925.00
03/31/2013	5284	Call and fax from Mr. Sloan;	James G. Carpenter	75.00	90,000.00
03/31/2013	5284	email from client; final preparations to objections to proposed order; serving objections fax an...	James G. Carpenter	75.00	90,075.00
03/31/2013	5284	reviewing and revising letter to court; conf. w/JGC	Jennifer J. Miller	112.50	90,187.50
03/31/2013	5284	Email from Michael Anzelmo; fax and email to clients; tel. conf. with Mr. Sloan; Email from Judg...	James G. Carpenter	75.00	90,262.50
04/30/2013	5311	Revisions to Initial Appellate Brief;	James G. Carpenter	75.00	90,337.50
04/30/2013	5311	Email from client; fax to Mr. Sloan; Tel. conf. with Mr. Sloan;	James G. Carpenter	75.00	90,412.50
05/31/2013	5339	Email from client;	James G. Carpenter	75.00	90,487.50
05/31/2013	5339	Receipt & review of Notice of filing of order of dismissal; fax to Mr. Sloan; Tel.conf. with Mr....	James G. Carpenter	225.00	90,712.50
05/31/2013	5339	Conf. with Mr. Sloan; faxes to Mr. Sloan;	James G. Carpenter	225.00	90,937.50
05/31/2013	5339	Drafting Notice of Appeal;	James G. Carpenter	225.00	90,937.50
05/31/2013	5339	Notice of Appeal	Jennifer J. Miller	56.25	90,993.75
05/31/2013	5339	Letter from Anzelmo; compilation of papers for Notice of Appeal;	James G. Carpenter	75.00	91,068.75

The Carpenter Law Firm P.C.  
Transaction Detail Report  
Charleston County Aviation

Date	Num	Memo	Class	Amount	Balance
05/31/2013	5339	Filing and serving Notice of Appeal, with copies to opposing counsel, court administration, and ...	James G. Carpenter	300.00	91,368.75
06/30/2013	5367	Fax from Mr. Sloan, re: legislative actions on bill re: CCAA;	James G. Carpenter	75.00	91,443.75
06/30/2013	5367	Review of Statement of Issues on Appeal and Draft of Initial Brief; conf. with Warren Clayton;	James G. Carpenter	600.00	92,043.75
06/30/2013	5367	Meeting with JGC; work on editing brief; research cases from memo; review prior order of the Court.	Warren Clayton	1,237.50	93,281.25
06/30/2013	5367	review of file and correspondence with Court Reporter; call from Court of Appeals; Letter to Cou...	James G. Carpenter	300.00	93,581.25
06/30/2013	5367	Work on editing memo; conference with JGC.	Warren Clayton	1,068.75	94,650.00
06/30/2013	5367	Continued work on editing of brief.	Warren Clayton	562.50	95,212.50
06/30/2013	5367	Revisions to Appellants' Initial Brief; Review and analysis of recent Sup. Ct. decision, and its application to appeal;	James G. Carpenter	1,725.00	96,937.50
06/30/2013	5367	Revisions to dra...	James G. Carpenter	1,050.00	97,987.50
06/30/2013	5367	Revisions to Appellants' Initial Brief;	James G. Carpenter	825.00	98,812.50
06/30/2013	5367	correspondence with JGC; revising initial brief	Jennifer J. Miller	337.50	99,150.00
06/30/2013	5367	correspondence with JGC; revising initial brief	Jennifer J. Miller	450.00	99,600.00
06/30/2013	5367	Emails from and to JJ Miller; revisions to Appellants' Initial Brief; Fax and email to clients;	James G. Carpenter	150.00	99,750.00
06/30/2013	5367	correspondence with JGC; revising initial brief	Jennifer J. Miller	675.00	100,425.00
07/31/2013	5395	conf. w/JGC re. letter from Court of Appeals	Jennifer J. Miller	56.25	100,481.25
07/31/2013	5395	drafting, filing and serving response to Court	Jennifer J. Miller	337.50	100,818.75
08/31/2013	5418	Review and revision of Appellants' Initial Brief;	James G. Carpenter	600.00	101,418.75
08/31/2013	5418	Preparation of Tables for Initial Brief; conf. with JJ Miller; revisions to order and structure ...	James G. Carpenter	1,125.00	102,543.75
08/31/2013	5418	Tel. conf. with Mr. Sloan; revisions to Appellants' Initial Brief; Emails from and to client; fa...	James G. Carpenter	225.00	102,768.75
08/31/2013	5418	conf. w/JGC; revising brief	Jennifer J. Miller	618.75	103,387.50
08/31/2013	5418	revising brief;	Jennifer J. Miller	562.50	103,950.00
08/31/2013	5418	Revisions to Appellants' Initial Brief;	James G. Carpenter	825.00	104,775.00

The Carpenter Law Firm P.C.  
Transaction Detail Report  
Charleston County Aviation

Date	Num	Memo	Class	Amount	Balance
08/31/2013	5418	Preparation of Designation of Record on Appeal;	James G. Carpenter	150.00	104,925.00
08/31/2013	5418	Preparation of Designation of Record on Appeal; Revisions to Initial Brief; Tel. Confs. with pri...	James G. Carpenter	450.00	105,375.00
08/31/2013	5418	Service of Brief and Designation by email; email to clients; Tel. conf. with Mr. Sloan;	James G. Carpenter	75.00	105,450.00
09/30/2013	5444	Receipt & review of Harrell's Motion to Strike; fax to Mr. Sloan; Tel.conf. with Mr. Sloan, re: ...	James G. Carpenter	750.00	106,200.00
09/30/2013	5444	Review of transcript; revisions to Response to Motion to Strike; Conf. with JJ Miller; Fax to Mr...	James G. Carpenter	1,050.00	107,250.00
09/30/2013	5444	revising reply to petition to strike	Jennifer J. Miller	393.75	107,643.75
09/30/2013	5444	Tel.conf. with and fax from Mr. Sloan; email to clients; Conf. with JJ Miller;	James G. Carpenter	450.00	108,093.75
09/30/2013	5444	Email from Waring Howe; fax from Mr. Sloan; conf. with Mr. Sloan; Research on vacating and rema...	James G. Carpenter	300.00	108,393.75
09/30/2013	5444	Tel. conf. with Mr. Sloan; preparation of Petition to Supreme Court;	James G. Carpenter	75.00	108,468.75
09/30/2013	5444	Drafting revised Appellants' Initial Brief;	James G. Carpenter	150.00	108,618.75
09/30/2013	5444	Revisions to Appellants' Initial Brief; Revisions to Response to Motion to Strike; faxes to Mr. ...	James G. Carpenter	225.00	108,843.75
09/30/2013	5444	Call and fax from Mr. Sloan; review of Response to Motion to Strike; Review and revision of Revi...	James G. Carpenter	900.00	109,743.75
09/30/2013	5444	revising motion and brief	Jennifer J. Miller	900.00	110,643.75
09/30/2013	5444	Review and revision of Revised Initial Brief;	James G. Carpenter	450.00	111,093.75
09/30/2013	5444	revising brief	Jennifer J. Miller	1,012.50	112,106.25
09/30/2013	5444	receipt & review of letter from Emory Smith; fax to Mr. Sloan; revisions to appellants initial ...	James G. Carpenter	600.00	112,706.25
09/30/2013	5444	revising brief	Jennifer J. Miller	1,068.75	113,775.00
09/30/2013	5444	Revisions to Revised Appellants's Initial Brief and Motion;	James G. Carpenter	1,275.00	115,050.00
09/30/2013	5444	revising brief and motion to file brief	Jennifer J. Miller	1,125.00	116,175.00
09/30/2013	5444	Final preparations of Revised Appellants' Initial Brief; letters to Court, opposing counsel; Tel...	James G. Carpenter	525.00	116,700.00

## The Carpenter Law Firm P.C. Transaction Detail Report

### Charleston County Aviation

Date	Num	Memo	Class	Amount	Balance
09/30/2013	5444	Receipt & review of Harrell's Reply; fax to Mr. Sloan; email to client;	James G. Carpenter	225.00	116,925.00
09/30/2013	5444	Fax to Mr. Sloan email to Waring Howe;	James G. Carpenter	75.00	117,000.00
10/31/2013	5463	Receipt & review of Harrell's Response to Appellants' Motion to File Revised Appellants' Initia...	James G. Carpenter	300.00	117,300.00
10/31/2013	5463	Revisions to Reply in Support of Motion; fax to Mr. Sloan; email to clients;	James G. Carpenter	75.00	117,375.00
10/31/2013	5463	Revision, filing and service of Reply in Support of Motion to file Revised Appellants' Initial B...	James G. Carpenter	150.00	117,525.00
11/30/2013	5483	Receipt & Review of order from Court; fax to Mr. Sloan; email to W. Howe;	James G. Carpenter	75.00	117,600.00
11/30/2013	5483	Emails from and to opposing counsel; Tel. conf. with Mr. Sloan; reply to all opposing counsel;	James G. Carpenter	150.00	117,750.00
11/30/2013	5483	Receipt & review of Motion for Extension of Time;	James G. Carpenter	75.00	117,825.00
12/31/2013	5500	Receipt & review of letter from Emory Smith; fax and email to clients;	James G. Carpenter	75.00	117,900.00
01/31/2014	5517	Receipt & Review of letter brief of the State; fax and email to clients;	James G. Carpenter	75.00	117,975.00
01/31/2014	5517	Receipt & review of Respondents' Initial Brief; fax and email to clients; call from Mr. Sloan;	James G. Carpenter	300.00	118,275.00
01/31/2014	5517	Legal analysis of Respondents' Initial Brief; preparation for writing Initial Reply Brief;	James G. Carpenter	900.00	119,175.00
01/31/2014	5517	Compiling ideas for Reply Brief; Tel. conf. with and faxes to Mr. Sloan; Research on collateral ...	James G. Carpenter	1,725.00	120,900.00
01/31/2014	5517	Preparation and revision of Reply Brief; review designation of record;	James G. Carpenter	1,725.00	122,625.00
01/31/2014	5517	revising reply brief; conf. w/JGC; recommendations	Jennifer J. Miller	618.75	123,243.75
01/31/2014	5517	Revisions to Reply Brief; conf. with Mr. Sloan; conf. with JJ Miller, re: arguments of Respondents;	James G. Carpenter	900.00	124,143.75
01/31/2014	5517	revising reply brief	Jennifer J. Miller	618.75	124,762.50
01/31/2014	5517	Revisions to Reply Brief; Preparation of cover page, tables, and certificate of service; faxes t...	James G. Carpenter	1,575.00	126,337.50
01/31/2014	5517	revising reply brief	Jennifer J. Miller	168.75	126,506.25
01/31/2014	5517	Revisions to Reply Brief; filing and service of Reply Brief; fax and email to clients;	James G. Carpenter	2,100.00	128,606.25
01/31/2014	5517	revising Reply Brief	Jennifer J. Miller	618.75	129,225.00

The Carpenter Law Firm P.C.  
Transaction Detail Report  
Charleston County Aviation

Date	Num	Memo	Class	Amount	Balance
01/31/2014	5517	Document proofing and mail preparation reviewing briefs and comparing to designation to ascertain that record is complete; conf.	Paralegal	56.25	129,281.25
01/31/2014	5517	w/JGC reviewing briefs; preparing record on appeal and final briefs	Jennifer J. Miller	618.75	129,900.00
01/31/2014	5517	preparing record and final briefs	Jennifer J. Miller	618.75	130,518.75
01/31/2014	5517	record on appeal; final briefs	Jennifer J. Miller	506.25	131,025.00
01/31/2014	5517	Conf. with JJ Miller, re: preparation of Record on Appeal;	Jennifer J. Miller	393.75	131,418.75
01/31/2014	5517	Record on Appeal/final briefs	James G. Carpenter	75.00	131,493.75
01/31/2014	5517	Record on Appeal	Jennifer J. Miller	562.50	132,056.25
01/31/2014	5517	record on appeal	Jennifer J. Miller	393.75	132,450.00
01/31/2014	5517	record on appeal	Jennifer J. Miller	450.00	132,900.00
01/31/2014	5517	record on appeal	Jennifer J. Miller	506.25	133,406.25
01/31/2014	5517	index to record on appeal; final briefs	Jennifer J. Miller	506.25	133,912.50
02/28/2014	5538	index; record	Jennifer J. Miller	506.25	134,418.75
02/28/2014	5538	record	Jennifer J. Miller	450.00	134,868.75
02/28/2014	5538	index; record	Jennifer J. Miller	393.75	135,262.50
02/28/2014	5538	record	Jennifer J. Miller	225.00	135,487.50
02/28/2014	5538	record on appeal; index	Jennifer J. Miller	281.25	135,768.75
02/28/2014	5538	conf. w/JGC; petition for extension to file record on appeal due to weather and printing/deliver...	Jennifer J. Miller	393.75	136,162.50
02/28/2014	5538	revising index; Re. Record: voicemail to opposing counsel, opposing counsels' assistants; Ct. Ad...	Jennifer J. Miller	281.25	136,443.75
02/28/2014	5538	Re. Record: teleconf. w/opposing counsel; email correspondence with Ct. Admin. and opposing cou...	Jennifer J. Miller	281.25	136,725.00
02/28/2014	5538	Review of file, to prepare record on appeal;	James G. Carpenter	281.25	137,006.25
02/28/2014	5538	calls and emails to and from opposing counsel and Clerk; revising index; conf. w/JGC	Jennifer J. Miller	300.00	137,306.25
02/28/2014	5538	calls to and from printer; conf. w/JGC; obtaining documents from Clerk; completing index and cov...	Jennifer J. Miller	506.25	137,812.50
02/28/2014	5538	cover letter, proof of service, certificate of counsel, revising index, calls to and from printe...	Jennifer J. Miller	618.75	138,431.25
02/28/2014	5538	final briefs	Jennifer J. Miller	843.75	139,275.00
02/28/2014	5538		Jennifer J. Miller	506.25	139,781.25

The Carpenter Law Firm P.C.  
Transaction Detail Report  
Charleston County Aviation  
Class

Date	Num	Memo	Class	Amount	Balance
02/28/2014	5538	final briefs	Jennifer J. Miller	337.50	139,612.50
03/31/2014	5557	final briefs	Jennifer J. Miller	506.25	140,118.75
03/31/2014	5557	final briefs	Jennifer J. Miller	393.75	140,512.50
03/31/2014	5557	final briefs	Jennifer J. Miller	393.75	140,906.25
03/31/2014	5557	final briefs	Jennifer J. Miller	506.25	141,412.50
03/31/2014	5557	final briefs	Jennifer J. Miller	450.00	141,862.50
03/31/2014	5557	Conf. with JJ Miller, re: citation for Final Briefs; updating tables of contents in Record on Appeal; proofreading final briefs	James G. Carpenter	75.00	141,937.50
03/31/2014	5557	Conf. with JJ Miller, re: filing final briefs; receipt & review of filed final brief from opposi... cover letter; cover page; certificate of counsel; proof of service; filing and serving record on...	Jennifer J. Miller	506.25	142,443.75
03/31/2014	5557	conf. w/JGC; organizing file for oral argument	James G. Carpenter	75.00	142,518.75
03/31/2014	5557	Fax and e-mail to client;	Jennifer J. Miller	450.00	142,968.75
03/31/2014	5557	Receipt and review of letter from the court of appeals regarding oral argument; e-mail and fax t...	Jennifer J. Miller	337.50	143,306.25
09/30/2014	5705	Receipt and review of letter from Court of Appeals regarding probable oral argument dates; revie...	James G. Carpenter	75.00	143,381.25
10/31/2014	5726	Receipt and review of letter and motion to withdraw from counsel for the Senators; fax to Mr. Sl...	James G. Carpenter	75.00	143,456.25
10/31/2014	5726	Receipt and review of order from the Court of Appeals substituting Counsel of the defendants; Receipt and review of notice of oral argument at the Court of Appeals for March, 2015; adjustmen...	James G. Carpenter	75.00	143,531.25
11/30/2014	5744	Receipt and review of order from the Court of Appeals substituting Counsel of the defendants; Receipt and review of notice of oral argument at the Court of Appeals for March, 2015; adjustmen...	James G. Carpenter	75.00	143,606.25
12/31/2014	5760	Receipt and review of order from the Court of Appeals substituting Counsel of the defendants; Receipt and review of notice of oral argument at the Court of Appeals for March, 2015; adjustmen...	James G. Carpenter	75.00	143,681.25
02/28/2015	5792	Receipt, review, and calendaring notice of oral argument; fax and emails to clients; Letter to ...	James G. Carpenter	75.00	143,756.25
02/28/2015	5792	Receipt and review of motion for substitution of party;	James G. Carpenter	75.00	143,831.25
02/28/2015	5792	Receipt and review of order from the court changing Harold to Lucas as the defendant; fax to Mr....	James G. Carpenter	75.00	143,906.25
02/28/2015	5792	Receipt and review of order from the court changing Harold to Lucas as the defendant; fax to Mr....	James G. Carpenter	75.00	143,981.25

The Carpenter Law Firm P.C.  
 Transaction Detail Report  
 Charleston County Aviation

<u>Date</u>	<u>Num</u>	<u>Memo</u>	<u>Class</u>	<u>Amount</u>	<u>Balance</u>
02/28/2015	5792	Fax from Mr. Sloan; emails from and to client; review article about bill to make the case moot; ...	James G. Carpenter	525.00	144,506.25
02/28/2015	5792	Call and emails from Michael Anzelmo; faxes to Mr. Sloan; telephone conferences with Mr. Sloan; ...	James G. Carpenter	375.00	144,881.25
03/31/2015	5807	Memorandum of law in opposition to motion for continuance; faxes from and to Mr. Sloan;	James G. Carpenter	450.00	145,331.25
03/31/2015	5807	Emails to and from opposing counsel regarding substitution of party for Limehouse; Call from opp...	James G. Carpenter	825.00	146,156.25
03/31/2015	5807	Trip to Columbia for argument at the Court of Appeals;	James G. Carpenter	1,950.00	148,106.25
03/31/2015	5807	Telephone conferences with Waring Howe and Mr. Sloan;	James G. Carpenter	150.00	148,256.25
05/22/2015	5842	Emails to and from Charles Rowe at the Post and Courier about proposed legislative changes to th...	James G. Carpenter	75.00	148,331.25
05/22/2015	5842	Research on proposed legislation regarding the Charleston County aviation authority; fax to Mr. ...	James G. Carpenter	75.00	148,406.25
05/22/2015	5842	Receipt & review of Motion to Dismiss Appeal; fax to Mr. Sloan;	James G. Carpenter	75.00	148,481.25
05/22/2015	5842	rel. contr. with Mr. Sloan; Preparation of consent to dismissal; preparation of Motion for Attorn...	James G. Carpenter	300.00	148,781.25
<b>Total</b>				<b>148,781.25</b>	<b>148,781.25</b>

The Carpenter Law Firm P.C.  
 Expenses by Job

All Transactions

Date	Num	Source Name	Memo	Account	Amount
Chas. Co. Aviation					
02/15/2012	5142	Richland County Clerk of Court	SCPIF v. Harrell	Filing Fee	150.00
02/22/2012	5146	Richland County Clerk of Court		Filing Fee	150.00
05/10/2012	68572	Legal Eagle	Copies and Documents Set up	Copies	36.36
07/03/2012	68808	Legal Eagle	Copies Legal Evidence	Copies	131.95
07/10/2012	7-10-12	Carpenter, James	Trip to Columbia & Parking	Travel Expense	125.77
07/10/2012	68813	Legal Eagle	Process Legal Evidence	Copies	52.73
07/11/2012	5252	Richland County Clerk of Court		Filing Fee	25.00
08/14/2012	68854	Legal Eagle	Process Legal Evidence	Copies	16.62
10/15/2012		Carpenter, James	Hearing - Lodging, Parking	Travel Expense	193.61
10/18/2012		Carpenter, James	Travel Exp - Hearing	Travel Expense	239.21
10/22/2012		Carpenter, James	Mileage, Parking	Travel Expense	242.43
10/23/2012	5326	Charleston County Clerk of Court	Filing Fee	Filing Fee	25.00
10/23/2012	10/17/2012	Carpenter, James	Meals - Hearing	Travel Expense	27.80
10/23/2012	10/19/2012	Carpenter, James	Hearing - Meals	Travel Expense	12.77
10/29/2012	187222	A. William Roberts, Jr. & Assoc., Inc.	Transcript copy	Court Reporting	235.00
11/06/2012	187539	A. William Roberts, Jr. & Assoc., Inc.	Transcript Copy Ed Sloan, Jr.	Court Reporting	225.80
02/13/2013	69598	Legal Eagle	Process Legal Evidence	Copies	321.66
03/07/2013	5424	Melissa Raye Singletary	Transcript 2.14.13	Court Reporting	50.00
05/24/2013	5481	Court of Appeals	Filing Fee	Filing Fee	100.00
08/08/2013	7-26-2013	Melissa Raye Singletary	Transcript Of Hearing	Court Reporting	67.00
08/28/2013	70319	Legal Eagle	Processing Legal Evidence	Copies	98.82
09/21/2013	5555	South Carolina Court of Appeals	Motion filing fee	Filing Fee	25.00
02/10/2014	5642	Court of Appeals	Filing Fee - Chas Cnty Aviation	Filing Fee	25.00
02/21/2014	70873	Legal Eagle	Legal Doc. Copies	Copies	1,717.76
03/14/2014	70929	Legal Eagle	Process Legal Evidence	Copies	346.09
03/03/2015		Carpenter, James	Travel to Columbia - Hearing	Travel Expense	115.00
Total Chas. Co. Aviation					<u>4,756.38</u>
TOTAL					<u><u>4,756.38</u></u>

**Certificate of Service**

The undersigned attorney hereby certifies that he has served a copy of the foregoing Consent to Dismissal and Motion for Attorneys' Fees on counsel for Respondents by email and US Mail, postage prepaid, on Wednesday, May 27, 2015 addressed as follows:

C. Mitchell Brown  
Michael J. Anzelmo  
P.O. Box 11070  
Columbia, SC 29211

Robert E. Tyson, Jr.  
PO Box 11449  
Columbia, SC 29211

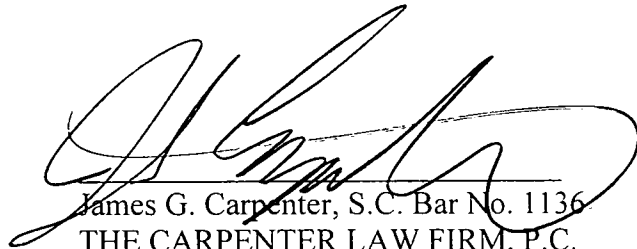
J. Emory Smith, Jr.  
PO Box 11549  
Columbia, SC 29211

Edward Bender  
Ken Moffitt  
P.O. Box 142  
Columbia, SC 29202

**RECEIVED**

JUN 01 2015

**SC Court of Appeals**



James G. Carpenter, S.C. Bar No. 1136  
THE CARPENTER LAW FIRM, P.C.  
819 E. North Street  
Greenville, South Carolina 29601  
Tel. (864) 235-1269  
Fax (864) 331-3083  
Attorneys for Appellants



ATTORNEYS AND COUNSELORS AT LAW

\*JAMES G. CARPENTER  
james.carpenter@carpenterlawfirm.net

JENNIFER J. MILLER  
jennifer.miller@carpenterlawfirm.net

L. WARREN CLAYTON, III  
warren.clayton@carpenterlawfirm.net

\*LICENSED IN S.C. & N.C.

May 27, 2015

V. Claire Allen, Deputy Clerk  
SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

RECEIVED

JUN 07 2015

SC Court of Appeals

Re: *South Carolina Public Interest Foundation et al. vs. Harrell, et al*  
Court of Appeals Case No. 2013-001273

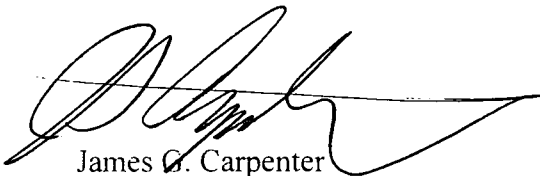
Dear Ms. Allen:

I enclose the original and seven copies of Appellants' Consent to Dismissal and Motion for Attorneys' Fees under SC Code Annotated § 15-77-300, with an affidavit in support.

Please file the originals and return a clocked in copy to me in the enclosed, postage paid envelope.

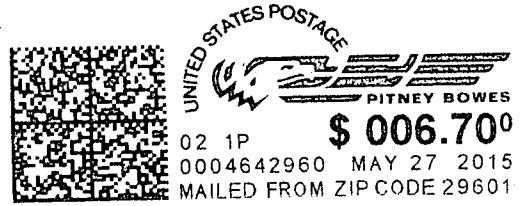
Thank you very much.

Sincerely yours,  
THE CARPENTER LAW FIRM, PC



James G. Carpenter

Enclosure  
CC w/encl: all opposing counsel



THE CARPENTER LAW FIRM, P.C.  
9 EAST NORTH STREET GREENVILLE, SC 29601

V. Claire Allen, Deputy Clerk  
SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

**RECEIVED**  
JUN 07 2015  
SC Court of Appeals