

70290

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

JUN 12 2015

SC Court of Appeals

Appellate Case No. 2013-001381

Centennial Casualty Co., Inc. Petitioner,

v.

Western Surety Co., d/b/a CNA Surety Respondent.

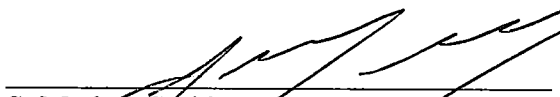
Western Surety Co., d/b/a CNA Surety Defendant/Third-Party Plaintiff

v.

Charleston Auto Auction, A3 Auto Center, LLC,
And Wylie Mickle Third-Party Defendants.

**MOTION TO LIMIT COSTS SERVED BY PETITIONER
TO THOSE SET FORTH IN RULE 242(j)**

Pursuant to Rule 242(j)(2) of the South Carolina Appellate Court Rules, Respondent requests that fees be limited as set forth therein to the filing fee for Writ of Certiorari (2) the cost of printing the appendix under Rule 242(e) and the cost of preparing the party's briefs under Rule 242(i) and the award of attorney's fees of \$1,000.00. The amount of fees asserted with respect to the decision of the Appellate Court would be inappropriate as Respondent prevailed at the Appellate Court and should not be allowed.



S. Markey Stubbs
BAKER, RAVENEL & BENDER, L.L.P
3710 Landmark Drive, Suite 400
Post Office Box 8057
Columbia, South Carolina 29202
803.799.9091 (telephone)
803.779.3423 (facsimile)
Attorneys for Respondent

June 12, 2015

Other Counsel of Record:

Ian S. Ford
Ford Wallace Thomson, LLC
715 King Street
Charleston, SC 29403
843.277.2011
Ian.ford@fordwallace.com
Attorney for Petitioner

RECEIVED

JUN 12 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appellate Case No. 2013-001381

Centennial Casualty Co., Inc. Petitioner,

v.

Western Surety Co., d/b/a CNA Surety Respondent.

Western Surety Co., d/b/a CNA Surety Defendant/Third-Party Plaintiff

v.

Charleston Auto Auction, A3 Auto Center, LLC,
And Wylie Mickle Third-Party Defendants.

PROOF OF SERVICE

I, Catherine M. Gwyn, Legal Assistant to S. Markey Stubbs, and an employee of Baker, Ravenel & Bender, L.L.P., hereby certify that I have, on the date indicated below, served counsel below with a Respondents Motion to Limit Costs Served By Petitioner to Those Set Forth In Rule 242(j) by mailing a copy of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel at the following address:

APPELLANT'S COUNSEL OF RECORD:

Ian S. Ford
FORD, WALLACE THOMPSON LLC
715 King Street
Charleston, S.C. 29403

Catherine M Gwyn
Catherine M. Gwyn

June 12, 2015



BAKER RAVENEL BENDER

ATTORNEYS AT LAW

S. Markey Stubbs
Direct Dial (803) 343-3864
Mstubbs@brblegal.com

RECEIVED

JUN 12 2015

SC Court of Appeals

June 12, 2015

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court Of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

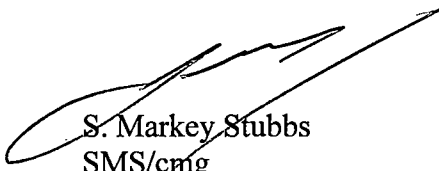
Re: Centennial Casualty Co., Inc. v. Western Surety Company d/b/a
CNA Surety v. Charleston Auto Auction, A3 Auto Center, LLC
and Wylie Mickle
Appellate Case No. 2013-0013816577
Our File 7753.67

Dear Ms. Kitchings:

Enclosed please find for filing the original and six copies of Respondent's Motion to Limit Costs Served By Petitioner To Those Set Forth In Rule 242(j). Also attached please find my Proof of Service for the same.

Thank you for your assistance in this matter. Should you have any questions or concerns, please do not hesitate to contact me.

Yours truly,


S. Markey Stubbs
SMS/cmig

Enclosure: Respondent's Motion to Limit Costs
Proof of Service

cc: Ian Ford, Esquire (w/enclosures) (ian.ford@fordwallace.com and U.S. Mail)
715 King Street
Charleston, South Carolina 29403