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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

Charles B. Simmons, Jr., Special Referee

Case No. 2008-CP-39-56
Appellate Case No. 2013-002154

RECEIVED
JUN 19 2015
SC Court of Appeals

Palmetto State Enterprises, LLC,

Respondent,

v.

Clegg Lamar Greene a/k/a
Lamar Greene, Juleene
Greene, a/k/a Julie Greene,
J&P Enterprises of the
Carolinas, Inc. and Gaston
Engineering, Inc.,

Defendants,

Of Which J & P Enterprises of the
Carolinas, Inc., is the

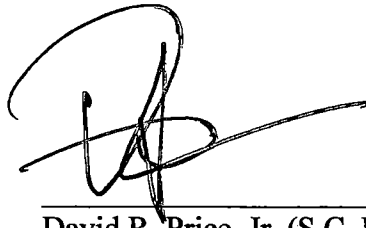
Appellant.

MOTION FOR COSTS

The undersigned, as attorney for the Respondent Palmetto State Enterprises, LLC, does hereby move for costs incurred during the above-entitled matter.

This Motion is based upon Rule 222, SCACR.

The Itemized Statement of Costs is attached to this Motion.



David R. Price, Jr. (S.C. Bar # 75140)

David R. Price, Jr., P.A.

318 W. Stone Ave.

Post Office Box 2446

Greenville, South Carolina 29602

(864) 271-2636 office

(864) 271-2637 fax

David@GreenvilleLegal.com

Attorney for the Respondent

Date: June 17, 2015

GREENVILLE, SC

**FORM 17
ITEMIZED STATEMENT OF COSTS**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Palmetto State Enterprises, LLC,)
)
 v.)
)
 Clegg Lamar Greene a/k/a Lamar Greene,)
 Juleene Greene, a/k/a Julie Greene, J&P)
 Enterprises of the Carolinas, Inc. and Gaston)
 Engineering, Inc.,)

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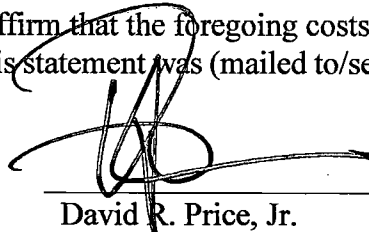
The Appellate Court is requested to tax the following costs against

Appellant J & P Enterprises of the Carolinas, Inc.
(Name of Party)

| COSTS TAXABLE UNDER RULE 222, SCACR | NO. OF PAGES | RATE | REQUESTED | ALLOWED (For Court Use Only) |
|--|---|--------------------------|--|---|
| Cost of Printing or Copying Final Brief | <u>Copies =</u> 419 | <u>Per Page</u> \$.10 | <u>For copies</u> \$41.90 | |
| | <u>Covers =</u> 40 (front & back) | <u>Per Page</u> \$.35 | <u>For 20 copies</u> \$14.00 | |
| | | <u>Binding</u> \$1.75 | <u>For 19 copies</u> \$33.25 | |
| 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 | 418 | \$950.50 | \$950.50 | |

| | | | | |
|--|--|--------------|-------------------|--|
| Attorney's Fee Provided By Rule 222(b), SCACR | | | \$1,000.00 | |
| Other (specify and explain): | | | | |
| COSTS TAXABLE UNDER RULE 226(j), SCACR | | | | |
| Cost of Printing or Copying Brief | | | | |
| Cost of Printing or Copying Reply Brief | | | | |
| Cost of Printing or Copying Appendix | | | | |
| Filing fee paid under Rule 226(c), SCACR | | | | |
| Attorney's fee provided by Rule 226(j)(2), SCACR | | | | |
| Other (specify and explain): | | | | |
| | | TOTAL | \$2,039.65 | |

I, DAVID R. PRICE, JR., 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.



David R. Price, Jr.
Attorney for Respondent

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

Michelle L. Al Fakir

Notary Public for Greenville County

My Commission Expires: 3/24/16



Cannon Court Reporting

Cannon Court Reporting
 204 W. Stone Ave.
 PO Box 2727
 Greenville, SC 29602

(864)298-0082
 cannonreporting@charter.net
 http://www.cannoncourtreporting.com

Invoice

| | |
|------------|-------------|
| Date | Invoice No. |
| 01/09/2014 | 9757 |
| Terms | Due Date |
| Net 30 | 02/08/2014 |

| |
|---|
| Bill To |
| David R. Price, Jr., Esquire David R. Price, Jr., P.A. 318 West Stone Ave Greenville, SC 29609 |

| | |
|------------|----------|
| Amount Due | Enclosed |
| \$961.33 | |

✕ Please detach top portion and return with your payment ✕

| Description | Amount |
|---|-----------------|
| <ul style="list-style-type: none"> • RE: Palmetto State Enterprises, LLC vs The Estate of Clegg Lamar Greene • FOR SERVICES RENDERED: • COURT REPORTING - Hearing taken on 5/9/13 and 5/10/13; Requested 10/14 • TRANSCRIPTION: <ul style="list-style-type: none"> • 250 pages (atty copy) - Volume I 562.50 • 168 pages (atty copy) - Volume II 378.00 • Condensed transcript & word indexing 10.00 • POSTAGE AND HANDLING (mailed 1/10/14) 10.83 | |
| <div style="font-size: 2em; font-family: cursive;"> pd 11/15/14 CR # 2619 </div> | |
| Total | \$961.33 |

Thank you. We appreciate your business.

71183

6/12/14

Michelle Alfakir
David R. Price, Jr. PA
318 West Stone Ave.
Greenville, SC 29609

Michelle Alfakir

6/9/14

7/12/14

Net 30 Days

Quantity

19 Minutes; Processing Legal Evidence

419

B&W 8 1/2 X 11 BASIC LEGAL EVIDENCE - GVL

0.100

\$41.90

19

COMB BIND 3/8 INCH - GVL

1.750

33.25

40

INDEX COVERS RED - GVL

0.350

14.00

Billing Reference: Palmetto State Enterprises; dkp

\$89.15

Please remit payment to:

5.35

PO Box 5682

Greenville, SC 29606

0.00

We appreciate your business!

7/12/14

~~\$94.50~~

THE STATE OF SOUTH CAROLINA
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Of Which J & P Enterprises of the
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Appellant.

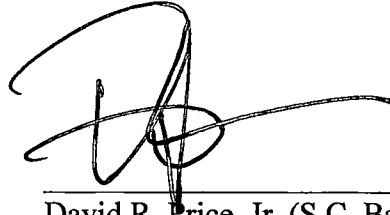
PROOF OF SERVICE

I certify that I have served the MOTION FOR COSTS and the ITEMIZED STATEMENT OF COSTS on the Appellant by depositing a copy of it in the United States mail, postage prepaid, June 17, 2015, addressed to the counsel of record, Scott F. Talley, of Talley Law Firm, P.A., 2500 Winchester Place, Ste. 100, Spartanburg, South Carolina, 29301.

Other Counsel of Record:

Scott F. Talley, Esq.
Talley Law Firm, P.A.
2500 Winchester Place, Ste. 100
Spartanburg, SC 29301
Fax No.: 864-595-2969
*Attorney for Appellant
J&P Enterprises of the
Carolinas, Ins.*

Dan Hunt, Esq.
502 North A Street
Easley, SC 29640
Fax No.: 803-779-4749
P. R. for Estate of Lamar Greene



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Attorney for the Respondent



DAVID R. PRICE, JR., P.A.
ATTORNEY AT LAW

June 17, 2015

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JUN 19 2015

SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk of Court of Appeals
Post Office Box 11629
Columbia, SC 29211

**Re: Palmetto State Enterprises, LLC, v. Clegg Lamar Greene a/k/a Lamar Greene,
Juleene Greene, a/k/a Julie Greene, J&P Enterprises of the Carolinas, Inc. and
Gaston Engineering, Inc.
C. A. No.: 2008-CP-39-56
Appellate Case No. 2013-002154**

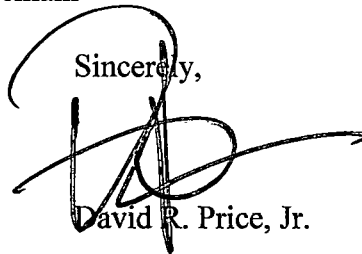
Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of the Motion for Costs in the above referenced matter, as well as the Proof of Service.

I have also enclosed a check in the amount of Twenty Five and no/100ths (**\$25.00**) Dollars for your filing fee.

With kindest regards, I remain

Sincerely,



David R. Price, Jr.

DRP/mla

Enclosures

cc: **Other Counsel of Record**
Scott F. Talley, Esq.
Talley Law Firm, P.A.
2500 Winchester Place, Ste. 100
Spartanburg, SC 29301
Attorney for J & P Enterprises
Of the Carolinas, Inc.

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GREENVILLE, SC 29602

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GREENVILLE, SOUTH CAROLINA
29609

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WWW.GREENVILLELEGAL.COM

Dan Hunt, Esq.
P.O. Box 887
Easley, SC 29641
Fax No.: (864) 859-2434
*Personal Representative of
the Estate of Lamar Greene*

David R. Price, Jr., P.A.
P.O. Box 2446
Columbia SC 29602-2446

\$3.180
US POSTAGE
FIRST-CLASS
FROM 29609
JUN 17 2015
stamps.com
06250008376680

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SC Court of Appeals



Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia SC 29211-1629