

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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JUL 20 2015

APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

SC Court of Appeals

Charles B. Simmons, Jr., Special Referee

Case No. 2008-CP-39-56

Appellate Case No. 2013-002154

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.

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**RETURN TO MOTION FOR COSTS**

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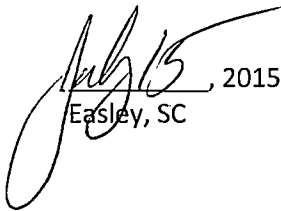
The undersigned, as Personal Representative for the Estate of Clegg Lamar Greene, hereby responding to the motion of Respondent, Palmetto State Enterprises, LLC, would show unto this Honorable Court as follows:

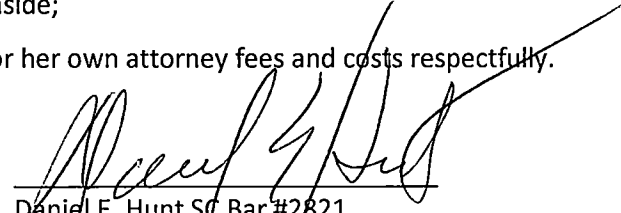
1. Defendants deny each and every allegation contained in the Respondent's Motion for Costs and demands strict proof thereof;

2. Defendants would show that each party has incurred certain attorney fees and costs associated with the pursuit or defense of this action, and that each party should be responsible for his or her fees and costs respectfully.

WHEREFORE, Defendants, The Estate of Clegg Lamar Greene, respectfully request the following

1. Respondents' Motion for Costs be set aside;
2. That each party be ordered to pay his or her own attorney fees and costs respectfully.

  
July 15, 2015  
Easley, SC

  
Daniel E. Hunt SC Bar #2821  
502 North A. Street (29640)  
Post Office Box 887 (29641)  
Easley, SC  
(864)859-7127/(864)859-2434  
Attorney/Personal Representative for  
Estate of Clegg Lamar Greene

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Defendants,

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

Appeallant.

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**PROOF OF SERVICE**

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**PERSONALLY** appeared before me Shaun D. Malone, who under oath states that I am employed by Daniel E. Hunt, Attorney at Law and I am a person of such age and discretion as to be competent to serve papers. I hereby certify that I have this date served a copy of the following pleading(s) upon the individual(s) named below, by placing a copy of the same in an envelope addressed as shown below and

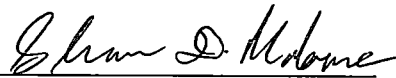
depositing the same in the United States mail with proper postage affixed thereto on the 15<sup>th</sup> day of July, 2015 to the address(es) below:

**DATE OF SERVICE:** July 15, 2015

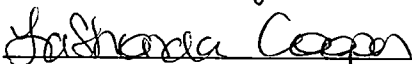
**PLEADINGS:** Return to Motion for Costs

**PERSON(S):** 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, Inc.*

David R. Price, Jr.  
David R. Price, Jr., P.A.  
P.O. Box 2446  
Greenville, SC 29602  
Fax No.: 864-271-2637  
*Attorney for Respondent*

  
Shaun D. Malone

Sworn to before me this 15<sup>th</sup>  
day of July, 2015

  
Notary Public for South Carolina  
My commission expires: 5/16/20

LAW OFFICES OF  
DANIEL E. HUNT, P.A.

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JUL 20 2015

SC Court of Appeals

*Physical Address:*

502 NORTH A. STREET  
EASLEY, SOUTH CAROLINA 29640

DANIEL E. HUNT

*Mailing Address:*

POST OFFICE BOX 887  
EASLEY, SOUTH CAROLINA 29641-0887

TELEPHONE (864) 859-7127

FACSIMILE (864)859-2434

July 15, 2015

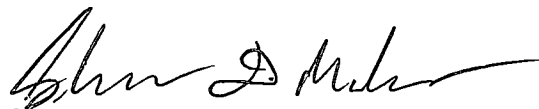
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: Palmetto State Enterprises, LLC v. Clegg Lamar Greene, et al.  
Case No. 2008-CP-39-56  
Appellate Case No. 2013-002154

Dear Sir or Madam,

Please find enclosed an original and three (3) copies of the Return to Motion for Costs and Proof of Service in the above referenced matter. Please file in your usual manner and return the clocked copies in the self-addressed stamped envelope provided. Thank you for your assistance in this matter. If you have any questions or concerns, please do not hesitate to contact our office.

Thank you,



Shaun D. Malone  
Paralegal for Daniel E. Hunt

/sdm

Enclosures

Law Offices of Daniel E. Hunt, P.A.

P.O. Box 887

Easley, SC 29641



02 1P \$ 000.48<sup>5</sup>  
0001961636 JUL 15 2015  
MAILED FROM ZIP CODE 29640

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Clerk of Court

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1220 Senate Street

Columbia, South Carolina 29201

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