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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

RECEIVED

JUL 17 2015

Diane Schaefer Goodstein, Circuit Court Judge

SC Court of Appeals

Case No. 2008-CP-18-2286
Appellate Case No. 2011-195626

A.M. Kelly Grove,

Appellant,

v.

South Carolina Department of Health
and Environmental Control, BabyNet,
Debra M. McCoy, in both her official
and individual capacities, and Office of
South Carolina First Steps to School
Readiness,

Respondents-Petitioners.

RESPONDENTS' MOTION TO SET AND ASSESS COSTS

Respondents-Petitioners South Carolina Department of Health and Environmental Control, BabyNet, Debra M. McCoy, in both her official and individual capacities, and Office of South Carolina First Steps to School Readiness, as the prevailing parties in this appeal, hereby move pursuant to Rule 222 SCACR for the Court to set, assess, and order the payment of their recoverable costs of \$2,614.39 against Appellant A.M. Kelly Grove as stated on the attached ITEMIZED STATEMENT OF COSTS.

Respectfully moved,

Alissa C. Lietzow
JAMES A. STUCKEY
ALISSA C. LIETZOW

STUCKEY LAW OFFICES, LLC.
123 Meeting Street
Charleston, South Carolina 29401
(843)577-9323
Attorneys for Petitioners

July 15, 2015

Charleston, South Carolina

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THE STATE OF SOUTH CAROLINA
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SC Court of Appeals

Appellate Case No. 2011-195626
Unpublished Opinion No. 2013-UP-322

A.M. Kelly Grove, Appellant,

v.

South Carolina Department of Health and Environmental Control,
BabyNet, Debra M. McCoy, in both her official and
individual capacities, and Office of South Carolina First
Steps to School Readiness, Respondents-Petitioners.

ITEMIZED STATEMENT OF COSTS

The Appellate Court is requested to tax the following costs against A.M. KELLY GROVE:

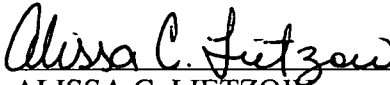
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief			\$138.42	
Cost of Printing Final Reply Brief			0	
Cost of Printing Record on Appeal			\$126.27	
Filing Fee Paid Under Rule 203(d), SCACR			0	
Cost of Court Reporter's Transcript			\$1,349.70	
Attorney's Fee Provided by Rule 222(b), SCACR			\$1,000.00	
Other (specify and explain)				

COSTS TAXABLE UNDER RULE 242(j), SCACR			0	
Cost of Printing or Copying Brief			0	
Cost of Printing or Copying Reply Brief			0	
Cost of Printing or Copying Appendix			0	
Filing fee paid under Rule 242(c), SCACR			0	
Attorney's fee provided by Rule 242(j)(2), SCACR			0	
Other (specify and explain):				
		TOTAL:	\$2,614.39	

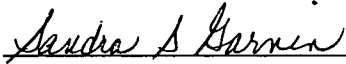
I, ALISSA C. LIETZOW, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed to counsel for Appellant A.M. Kelly Grove on July 15, 2015, by First Class U.S. Mail addressed to:

Brian C. Duffy, Esquire
Duffy & Young, LLC
96 Broad St.
Charleston, SC 29401

Seth W. Whitaker, Esquire
Duffy & Young, LLC
96 Broad St.
Charleston, SC 29401


ALISSA C. LIETZOW
Attorney for Petitioners

SUBSCRIBED AND SWORN TO before me this 15th day of July, 2015.


Notary Public of South Carolina
My Commission Expires: 6-13-21

(S)

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123 MEETING STREET
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ALISSA C. LIETZOW

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July 15, 2015

The Honorable V. Claire Allen
Deputy Clerk
The South Carolina Court of Appeals
PO Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

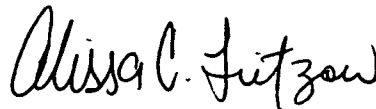
RE: Grove, A.M. Kelly v. Debra McCoy
Case # 2011195626
2008-CP-18-02286
Unpublished Opinion: 2013-UP-322

Dear Ms. Allen:

Pursuant to Rule 222 COSTS OF APPEAL, SCACR, we hand you herewith for filing our RESPONDENTS' MOTION TO SET AND ASSESS COSTS and ITEMIZED STATEMENT OF COSTS. As evidenced by the enclosed, we served a copy on plaintiff's counsel today.

Kindest regards.

Sincerely,



Alissa C. Lietzow
Direct E-mail: acollins@stuckeylaw.com

ssg

Enclosure

cc: Ms. Nancy Stevenson(IRF Claim #48138)