

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Benjamin H. Culbertson, Circuit Court Judge

RECEIVED

Appellate Case No. 2013-000712

SEP 21 2015

SC Court of Appeals

Bonnie N. Charlton, Ronald L. Charlton, and Bayside Property, Inc. Plaintiffs,

v.

South Bay Properties, LLC, Stantec Consulting Services, Inc. f/k/a Trico Engineering Consultants, Inc., Milone & MacBroom, Inc., John Steven Goodwin, Louise C. Goodwin, Thomas I. Puckett, Brenda C. Puckett, Robert Nahama, Jeanne E. Nahama, Thomas Holland Sharon Louise Holland, Joyce K. Sobel, Robert W. Waruszewskiu, Richard N. Taylor, Robert K. Spillers (a/k/a Robert Spillers) Deborah T. Spillers (a/k/a Deborah Spillers), Patrick A. DiAngelo, Deborah A. DiAngelo, Gary E. Owens, and Joyce M. Owens, Fount L. Shults, Lynda M. Shults, Dennis Ridgeway, Teresa Lynn Ridgeway and Georgetown County Forfeited Land Commission Defendants,

Of Whom

John Steven Goodwin, Louise C. Goodwin, Gary E. Owens, and Joyce M. Owens are Appellants,

and

Bonnie N. Charlton, Ronald L. Charlton, Bayside Property, Inc., South Bay Properties, LLC, Stantec Consulting Services, Inc. f/k/a Trico Engineering Consultants, Inc., Milone & MacBroom, Inc., Patrick A. DiAngelo, Deborah A. DiAngelo, and Georgetown County Forfeited Land Commission are Respondents.

MOTION FOR COSTS

Charles T. Smith
608 Cypress Street
Georgetown, South Carolina 29440
(843) 545-6578
Attorney for Respondents Bonnie N. Charlton,
Ronald L. Charlton, and Bayside Property, Inc.

Respondents Bonnie N. Charlton, Ronald L. Charlton, and Bayside Property, Inc. respectfully request that the following costs be assessed against Appellants John Steven Goodwin, Louise C. Goodwin, Gary E. Owens, and Joyce M. Owens.

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED
Cost of Printing or Copying Final Brief	360	.25	\$ 90.00
Cost of Court Reporter's Transcript	12	.75	\$ 9.00
Attorney's Fee Provided By Rule 222(b), SCACR			\$ 1,000.00
		TOTAL	\$ 1,099.00

Charles T. Smith
Charles T. Smith
608 Cypress Street
Georgetown, South Carolina 29440
(843) 545-6578
Attorney for Respondents Bonnie N. Charlton,
Ronald L. Charlton, and Bayside Property, Inc.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Benjamin H. Culbertson, Circuit Court Judge

RECEIVED

SEP 21 2015

Appellate Case No. 2013-000712

SC Court of Appeals

Bonnie N. Charlton, Ronald L. Charlton, and Bayside Property, Inc. Plaintiffs,

v.

South Bay Properties, LLC, Stantec Consulting Services, Inc. f/k/a Trico Engineering Consultants, Inc., Milone & MacBroom, Inc., John Steven Goodwin, Louise C. Goodwin, Thomas I. Puckett, Brenda C. Puckett, Robert Nahama, Jeanne E. Nahama, Thomas Holland Sharon Louise Holland, Joyce K. Sobel, Robert W. Waruszewskiu, Richard N. Taylor, Robert K. Spillers (a/k/a Robert Spillers) Deborah T. Spillers (a/k/a Deborah Spillers), Patrick A. DiAngelo, Deborah A. DiAngelo, Gary E. Owens, and Joyce M. Owens, Fount L. Shults, Lynda M. Shults, Dennis Ridgeway, Teresa Lynn Ridgeway and Georgetown County Forfeited Land Commission Defendants,

Of Whom

John Steven Goodwin, Louise C. Goodwin, Gary E. Owens and Joyce M. Owens are Appellants,

and

Bonnie N. Charlton, Ronald L. Charlton, Bayside Property, Inc., South Bay Properties, LLC, Stantec Consulting Services, Inc. f/k/a Trico Engineering Consultants, Inc., Milone & MacBroom, Inc., Patrick A. DiAngelo, Deborah A. DiAngelo, and Georgetown County Forfeited Land Commission are Respondents.

PROOF OF SERVICE

Charles T. Smith
608 Cypress Street
Georgetown, South Carolina 29440
(843) 545-6578
Attorney for Respondents Bonnie N. Charlton,
Ronald L. Charlton, and Bayside Property, Inc.

I hereby certify that on the 17th day of September, 2015 I served a Motion for Costs on behalf of Respondents Bonnie N. Charlton, Ronald L. Charlton and Bayside Property, Inc. by depositing copies in the United States Mail, postage prepaid, addressed to:

John W. Davidson, Esquire
Nexsen Pruet
Post Office Drawer 2426
Columbia, SC 29202
Attorney for Stantec Consulting Services, Inc.

Bryon L. Saintsing, Esquire
Smith Debnam
Post Office Box 26268
Raleigh, NC 27611-6268
Attorney for Milone & MacBroom, Inc.

K. Douglas Thornton, Esquire
Thornton Law Firm, LLC
1025 Third Avenue
Conway, SC 29526
Attorney for John Steven Goodwin, Louise C. Goodwin, Gary E. Owens and Joyce M. Owens

John M. Leiter, Esquire
Law Offices of John M. Leiter, PA
1203 48th Avenue N, Suite 109
Myrtle Beach, SC 29577
Attorney for John Steven Goodwin, Louise C. Goodwin, Gary E. Owens and Joyce M. Owens

Wesley P. Bryant, Esquire
Georgetown County Attorney
Post Office Box 421270
Georgetown, SC 29442
Attorney for Georgetown County Forfeited Land Commission

Donald G. Hunt, Jr., Esquire
Kristin G. Atkins, Esquire
Atkins-Hunt-Atkins, PC..
Post Office Box 266
Fuquay-Varina, NC 27526
Attorneys for South Bay Properties, LLC

Patrick A. DiAngelo
1713 Perdez Covey
Myrtle Beach, SC 29588
Defendant

Deborah A. DiAngelo
1713 Perdez Covey
Myrtle Beach, SC 29588
Defendant

Charles T. Smith

Charles T. Smith
608 Cypress Street
Georgetown, South Carolina 29440
(843) 545-6578
Attorney for Respondents Bonnie N. Charlton,
Ronald L. Charlton, and Bayside Property, Inc.

September 17, 2015

CHARLES T. SMITH

ATTORNEY AND COUNSELOR AT LAW
608 CYPRESS STREET
GEORGETOWN, SOUTH CAROLINA 29440

(843) 545-6578

charles.smith@scbar.us

September 17, 2015

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

RECEIVED

SEP 21 2015

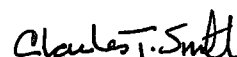
SC Court of Appeals

Re: Bonnie N. Charlton, et al. v. South Bay Properties, LLC, et al.
Appellate Case Number 2013-000712

Dear Ms. Kitchings:

In accordance with my telephone conversation yesterday afternoon with your deputy, enclosed for filing are the original and six copies of a motion requesting that costs be assessed under Rule 222, SCRAP and proof of service. By copy of this letter copies of the motion are being served on opposing counsel.

Yours very truly,

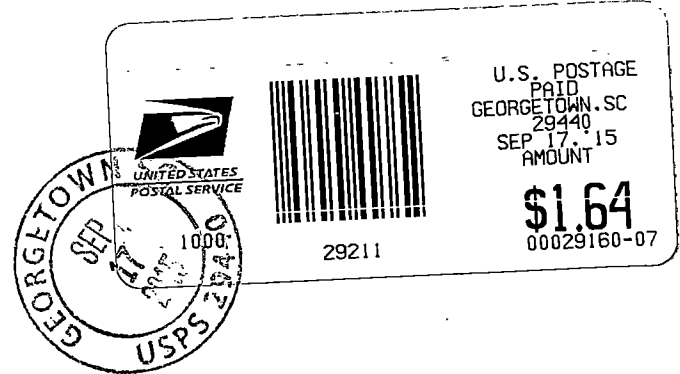


Charles T. Smith

Enclosures

cc: Bonnie N. Charlton
K. Douglas Thornton, Esquire
John M. Leiter, Esquire
John W. Davidson, Esquire
Bryon L. Saintsing, Esquire
Donald G. Hunt, Jr., Esquire
Wesley P. Bryant, Esquire
Patrick A. DiAngelo
Deborah A. DiAngelo

FIRST CLASS



Charles T. Smith
608 Cypress Street
Georgetown, SC 29440

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

RECEIVED

SEP 21 2015

SC Court of Appeals

