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SEP 21 2015
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2012-CP-10-7919

Hallenbeck Sisters, LLC.....Appellant,

v.

Ronald D. Hall and Mary M. Scarborough, Solely in Their Capacities
as Acting Delinquent Tax Collector and Delinquent Tax Collector,
Respectively for Charleston County, SC,Respondents.

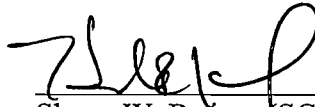
**MOTION TO AWARD COSTS
PURSUANT TO RULE 222, SCACR**

Appellant, pursuant to Rule 222, SCACR, hereby moves for an Order taxing costs against the Respondents as set forth on the attached Itemized Statement of Costs.

The grounds for this Motion are as follows:

1. The Court of Appeals issued Unpublished Opinion No. 2015-UP-454 in this matter on September 9, 2015.
2. The judgment of the Trial Court having been reversed, Appellant requests that this Court tax costs against the Respondents as set forth on the attached Sworn, Itemized Statement of Costs.

Respectfully Submitted,



Shane W. Rogers (SC Bar No. 16701)
Howard R. Kinard (SC Bar No. 74912)
Steven M. Querin (SC Bar No. 11560)
Johnson, Smith, Hibbard & Wildman Law Firm
Post Office Drawer 5587
Spartanburg, South Carolina 29304-5587
Telephone: (864) 582-8121
Facsimile: (864) 585-5328

Attorneys for Appellant

September 18, 2015

Spartanburg, South Carolina

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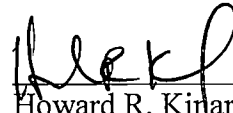
ITEMIZED STATEMENT OF COSTS

The Appellate Court is requested to tax the following costs against Respondents:

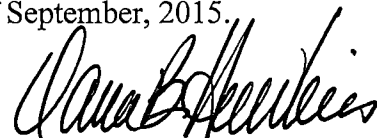
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court use only)
Cost of Printing or Copying Final Brief	306	.20/page	\$61.20	
Cost of Printing or Copying Record on Appeal	1,258	.20/page	\$251.60	
Filing Fee Paid Under Rule 203(d), SCACR			\$100.00	
Cost of Court Reporter's Transcript			\$22.75	
Attorney's Fee Provided by Rule 222(b), SCACR			\$1,000.00	

		TOTAL	\$1,435.55	
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I, Howard R. Kinard, 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 opposing counsel.


Howard R. Kinard
Attorney for Appellant

Subscribed and sworn to before me this 18th day of September, 2015.


(SEAL)
Notary Public for South Carolina
My Commission Expires: 3/21/2017

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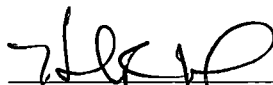
.....Respondent.

PROOF OF SERVICE

The undersigned certifies that a copy of the *Motion to Award Pursuant to Rule 222, SCACR* and *Itemized Statement of Costs* has been served upon counsel of record by depositing a copy of the same in the United States Mail, first-class postage prepaid on the 18th day September 2015, to the address below:

Bernard E. Ferrara, Jr., Esq.
Chief Deputy County Attorney
Charleston County Attorney's Office
Lonnie Hamilton, III Public Services Building
4045 Bridge View Drive
North Charleston, South Carolina 29405

September 18, 2015



Howard R. Kinard (SC Bar No. 74912)
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Johnson, Smith, Hibbard & Wildman

LAW FIRM, L.L.P.

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EDWIN W. JOHNSON (1904-1979)
PAUL R. HIBBARD (1941-2004)

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SC Court of Appeals

Sender's E-Mail Address:
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KRISTIN BURNETT BARBER
SHANE W. ROGERS

JOSHUA O.C. LONON
HOWARD R. KINARD
REID WILDMAN^
DANIEL A. CRAIG
^ also admitted in North Carolina

September 18, 2015

Via First Class U.S. Mail

Jenny Abbott Kitchings
Clerk, SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: Hallenbeck Sisters, LLC v. Ronald D. Hall and Mary M. Scarborough, Solely in their Capacities as Acting Delinquent Tax Collector and Delinquent Tax Collector, Respectively for Charleston County, South Carolina
Case No.: 2012-CP-10-7919 – Appeal from Charleston County Court of Common Pleas
JSHW File No.: 211290


Dear Madam Clerk:

Enclosed for filing in the above-referenced matter are the original and six (6) copies of Appellant's **Motion to Award Costs Pursuant to Rule 222, SCAR**, together with Proof of Service and our firm check in the amount of \$25.00 as filing fee. I have also enclosed an extra copy which I ask that you stamp and return to me in the postage-paid envelope provided.

Thank you for your attention to this matter.

With best regards, I remain

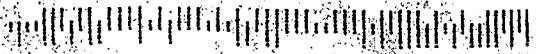
Sincerely,



Howard R. Kinard

HRK/dbh
Enclosures

cc: Bernard E. Ferrara, Jr., Esq. (w/enclosure)
Client



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