

7/11/8

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

SEP 01 2015

The Honorable Letitia H. Verdin, Circuit Court Judge

**SC Court of Appeals**

Appellate Case No.: 2013-001892

Trial Court Case No.: 2013-CP-2305822

South Carolina Second Injury Fund,.....Appellant,

v.

Specialty Risk Services,.....Respondent.

**RESPONDENT'S NOTICE OF MOTION AND MOTION  
FOR COSTS TAXABLE PURSUANT TO RULE 222, SCACR**

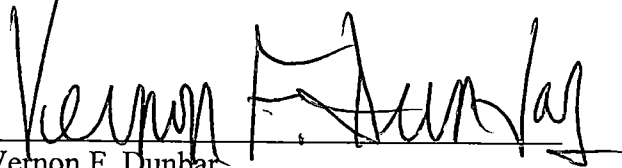
TO: THE HONORABLE JENNY ABBOTT KITCHINGS, CLERK OF COURT, SOUTH CAROLINA COURT OF APPEALS; AND LATONYA DILLIGARD EDWARDS, ESQUIRE, ATTORNEY FOR THE SOUTH CAROLINA SECOND INJURY FUND, APPELLANT:

Appellant, The South Carolina Second Injury Fund ("The Fund") appealed an Order of the South Carolina Workers' Compensation Commission awarding reimbursement to Specialty Risk Services. By Order dated July 22, 2015, this Court issued Unpublished Opinion No. 2015-UP-366 affirming the Commission's decision awarding reimbursement from The Fund to Specialty Risk Services, Respondent. The Fund did not file a Petition for Rehearing, and thus,

the matter was remitted to the lower court or tribunal by letter dated August 14, 2015. Counsel for Respondent received Notice of Remittitur on August 20, 2015.

Pursuant to Rule 222(b), Respondent hereby files a motion for costs pursuant to Rule 222(b) and (d) associated with the costs of printing Respondent's Final Brief and for attorneys' fees. The attached itemized Statement of Costs sets forth the total amount Respondent is requesting this Court to tax attorneys' fees and costs against The Fund.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Vernon F. Dunbar", written over a horizontal line.

Vernon F. Dunbar

MCANGUS GOUDELOCK AND COURIE  
55 E. Camperdown Way, #300  
PO Box 2980  
Greenville, SC 29602

*Attorney for Respondent*

August 28, 2015

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Letitia H. Verdin, Circuit Court Judge

---

Appellate Case No.: 2013-001892

Trial Court Case No.: 2013-CP-2305822

---

South Carolina Second Injury Fund,.....Appellant,

v.

Specialty Risk Services,.....Respondent.

---

**ITEMIZED STATEMENT OF COSTS**

---

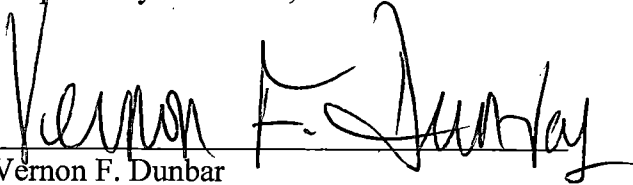
The Appellate Court is requested to tax the following costs against the South Carolina Second Injury Fund, Appellant.

Pursuant to Rule 222, SCACR, Respondent requests recovery of the following costs and attorneys' fees:


<u>COSTS TAXABLE UNDER RULE 222, SCACR</u>	<u>NO. OF PAGES</u>	<u>RATE</u>	<u>REQUESTED</u>	<u>ALLOWED</u>
Cost of Printing or Copying Final Brief, 20 copies			\$97.31	
Attorneys' Fee Provided by Rule 222(b), SCACR			\$1,000.00	
	<b>TOTAL</b>		<b>\$1097.31</b>	

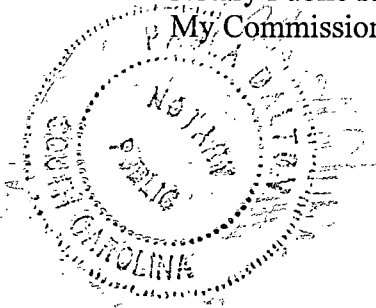
I, Vernon F. Dunbar, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was served upon Latonya Dilligard Edwards, opposing counsel, via U.S. Mail on August 28, 2015.

Respectfully submitted,

  
Vernon F. Dunbar  
*Attorney for Respondent Specialty Risk Services*

SUBSCRIBED and sworn to  
before me this 28th day  
of August, 2015.

  
Notary Public for South Carolina  
My Commission Expires: 1/24/21



I certify that I have served the Respondents, Specialty Risk Services, Final Brief and Certificate of Counsel and Compliance on the attorney of record for Latonya Dilligard Edwards, by depositing a copy of it in the United States Mail, postage prepaid, on the 22nd day of July, 2014 addressed to her attorney of record,

Latonya Dilligard Edwards, Esquire  
Dilligard Edwards, LLC  
3790 Fernandina Road, Suite 103  
Columbia, SC 29210

South Carolina Workers' Compensation Commission  
Post Office Box 1715  
Columbia, South Carolina 29202-1715

August 28, 2015



---

Paula Dalton  
Legal Assistant for Vernon F. Dunbar  
McAngus, Goudelock & Courie LLC  
Post Office Box 2980 (29602)  
55 East Camperdown Way, Suite 300 (29601)  
Greenville, South Carolina 29602  
(864) 239-4000

**Reply To**  
VERNON F. DUNBAR  
Direct Dial: (864) 239-6735  
vernon.dunbar@mgclaw.com

**RECEIVED**

August 28, 2015

SEP 01 2015  
SC Court of Appeals

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

RE: SC Second Injury Fund v. Specialty Risk Services  
Appellate Case No.: 2013-001892  
Lower Court Case No.: 2012CP2305822  
Our File No.: 20194.14092  
Claim No.: YMG93962C

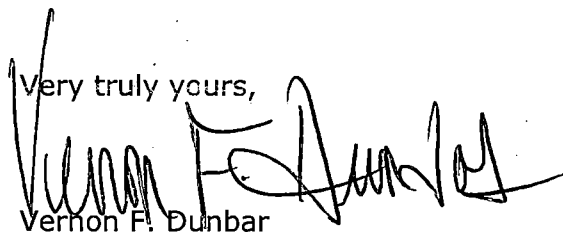
Dear Ms. Kitchings:

Please find enclosed for filing in the above-referenced matter respondent's Motion requesting the Reimbursement of Costs Taxable Pursuant to Rule 222 SCACR. I am also enclosing an Itemized Statement of Costs and Proof of Service upon opposing counsel.

By copy of this letter to LaTonya Dilligard Edwards, Esquire, attorney for the South Carolina Second Injury Fund, Appellant, I am serving the same upon her.

Finally, I am also enclosing the \$25.00 filing fee required for this motion. With kind and warm regards, I remain

Very truly yours,



Vernon F. Dunbar

VFD/pbd  
cc: Francine Proulx  
Andrew Walker

**mgc**

**INSURANCE  
DEFENSE**

POST OFFICE BOX 2980  
GREENVILLE, SC 29602



**20194.14092/VFD/bhg**

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

**RECEIVED**

SEP 01 2015

SC Court of Appeals

2921181629 B012

