

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

AUG 31 2015

SC Court of Appeals

J. C. Nicholson, Circuit Court Judge

Case No. 2012-CP-1006357
Appellate Case No. 2013-000412

Virendra Puniyani, Deceased Employee, and
Rajkumari Puniyani, Claimant, Respondents,

v.

Avni Grocers, Employer, and South Carolina
Uninsured Employers' Fund, Carrier Defendants,

of whom
South Carolina Uninsured Employers' Fund, Carrier, is Appellant.

MOTION FOR COSTS

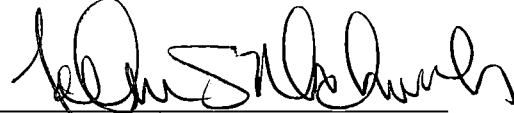
Pursuant to Rule 222, SCACR, Rajkumari Puniyani requests that the costs of this appeal be taxed against South Carolina Uninsured Employers' Fund, who was the appellant.

Rule 222(a) provides that when a judgement is affirmed, costs shall be taxed against the appellant unless the court orders otherwise. This Court affirmed the judgment of the circuit court on January 28, 2015, and the Supreme Court denied the petition for writ of certiorari August 20, 2015. Because the Court has not ordered otherwise and because the parties have not agreed otherwise, the rule provides that the Court should

award costs to Rajkumari Puniyani, who is the respondent.

In accordance with the instructions of Rule 222(d), an itemized statement of costs is attached to this motion.

Respectfully submitted,



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BLUESTEIN, NICHOLS,
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North Charleston, South Carolina 29406
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August 31, 2015

Attorneys for Respondents

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Virendra Puniyani, Deceased Employee, and Rajkumari Puniyani, Claimant,)
)
Respondent,)
)
v.)
)
Avni Grocers, Employer, and South Carolina Uninsured Employers' Fund, Carrier,)
)
Defendants,)
)
of whom)
South Carolina Uninsured Employers' Fund, Carrier, is)
)
Appellant.)
)

The Appellate Court is requested to tax the following costs against

South Carolina Uninsured Employers' Fund, Carrier (the appellant)				
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	629	\$64.91 (plus 5.19 tax)	\$70.10	
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript				

Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00	
Other (specify and explain):				
COSTS TAXABLE UNDER RULE 242(j), SCACR				
Cost of Printing or Copying Brief				
Cost of Printing and Copying Reply Brief				
Cost of Printing or Copying Appendix				
Filing fee paid under Rule 242(c), SCACR				
Attorney's fee provided by Rule 242(j)(2), SCACR				
Other (specify and explain):				
		TOTAL	\$1,070.10	

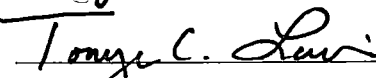
I, John S. Nichols, do swear or affirm that the forgoing costs are correct and were necessarily incurred in this action. A copy of this statement was (mailed to/served upon) opposing counsel.


(Signature)

Attorney for

Respondent

Subscribed and sworn before me this 31st day of Augusta, 2015.



Notary Public for South Carolina

My Commission Expires: 11/17/16

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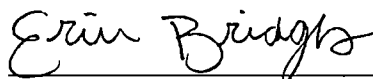
Avni Grocers, Employer, and South Carolina
Uninsured Employers' Fund, Carrier Defendants,

of whom
South Carolina Uninsured Employers' Fund, Carrier, is Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served
counsel for the Appellant with a copy of the *Motion for Costs* and *Itemized Statement of
Costs* by mailing copies of the same by United States Mail with first class postage prepaid
to the following address:

Margaret M. Urbanic, Esquire
Clawson & Staubes, LLC
126 Seven Farms Drive, Suite 200
Charleston, South Carolina 29492



Erin Bridges
BLUESTEIN, NICHOLS, THOMPSON
& DELGADO, LLC

August 31, 2015



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

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August 31, 2015

AUG 31 2015
SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: Virendra Puniyani, Deceased Employee, and Rajkumari Puniyani vs. The South
Carolina Uninsured Employers' Fund
Case Tracking No.: 2013-000412

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of the *Motion for Costs* along with an itemized statement of costs in regards to the above referenced matter. I have also enclosed a proof of service upon counsel for the Appellant along with a check in the amount of \$25.00 for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges
Paralegal to John S. Nichols
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Jarrel L. Wigger, Esquire
Margaret M. Urbanic, Esquire