

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

RECEIVED

OCT 02 2015

SC Court of Appeals

Case Number: 2014-CP-40-01469
Appellate Court No: 2014-000058

Hugh Allen Hoover..... Appellant
v.
L.A. Blue and Kem Dempsey..... Respondents

OBJECTIONS TO RESPONDENTS' MOTION FOR COSTS

NOW COMES the Appellant, who, by and through his undersigned counsel of record listed below, objects to the Respondents' Motion for Costs and requests that this Honorable Court deny the Respondents' Motion for Costs pursuant to SCACR 222. The Appellant's grounds for objecting to this Motion are as follows:

- 1) The costs requested exceed the amount allowed under SCACR 222 (b), footnote 1.
- 2) The form of the Motion does not comply with SCACR 222.
- 3) Further, this Motion for Costs was not properly served upon the Appellant's Attorney at his current address in AIS. (See Attachment)

As such, Appellant would request that this Honorable Court deny the Respondent's Motion for Costs.

Respectfully Submitted,



John Carrigg
Carrigg Law Firm
120 North Lake Drive
Lexington, S.C. 29072
Phone: (803) 785-5511
Facsimile: (803) 785-5513

Attorney for Appellant

October 1, 2015
Lexington, S.C.

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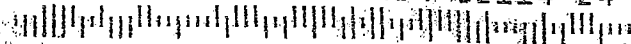


John Carrigg, Jr., Esquire
Carrigg Law Firm
137 E. Butler Street, Suite 6
Lexington SC 29072-3566

296 NYE 104031510009/24/15
NOTIFY SENDER OF NEW ADDRESS
JOHN CARRIGG ATTORNEY AT LAW
120 N LAKE DR
LEXINGTON SC 29072-2836

BC: 29072283620 *1454-02114-24-43

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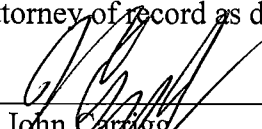
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Hugh Allen Hoover..... Appellant
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PROOF OF SERVICE

I certify that I have served the Objections to Respondents' Motion for Costs on the above-listed Respondents by depositing a copy of it in the United States Mail, postage prepaid, on October 1, 2015, addressed to Respondent's attorney of record as detailed below.

October 1, 2015



John Carrigg
120 North Lake Drive
Lexington, South Carolina 29072
(803) 785-5511
Attorney for Appellant

Other Counsel of Record:

Stephanie R. Farjardo, Esquire
The Fajardo Law Firm
Post Office Box 2177
Irmo, S.C. 29063
Attorney for Respondents

John Carrigg

ATTORNEY AT LAW

Phone: (803) 785-5511

120 North Lake Drive
Lexington, South Carolina 29072

Fax: (803) 785-5513

jcarrigg@carrigglaw.com

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October 1, 2015

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SC Court of Appeals

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

RE: Hugh Allen Hoover vs. L.A. Blue and Kem Dempsey
Civil Action No.: 2013-CP-40-1469
Appellate Case No: 2014-000058

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of the Objections to Respondents' Motion for Costs. Please file the original and copies, and return one (1) of the clocked copies to my office in the enclosed return envelope.

By copy of this letter, I am also serving the Appellant's Objections to the Motion for Costs upon Respondents' counsel of record.

Thank you for your assistance in this matter.

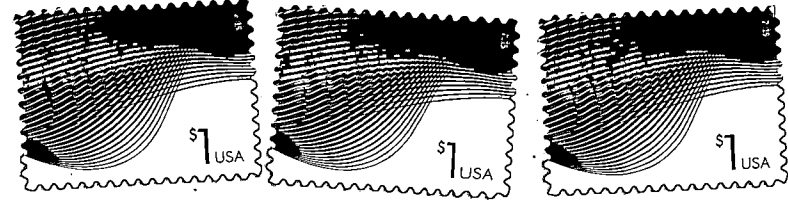
With highest regards, I remain

Very truly yours,


JOHN W. CARRIGG, JR.

JWC/adr
Enclosure(s)

cc: Stephanie R. Fajardo, Attorney for Respondents



CARRIGG LAW FIRM
120 NORTH LAKE DRIVE
LEXINGTON, S.C. 29072

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SC Court of Appeals

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

