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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge  
Marvin H. Dukes, III, Master-In-Equity

**RECEIVED**  
DEC 03 2015  
SC Court of Appeals

Case No. 2011-CP-07-2546

Appellate Case No. 2011-204367

Joseph C. Sun,

Appellant,

v.

Olesya Matyushevsky, Citizens Opposing  
Domestic Abuse, Christine Varg and Liling  
Sun,

Respondents.

**RESPONDENT'S MOTION FOR COSTS ON APPEAL**

J. Samuel Scoville, Esquire  
HARVEY & BATTEY, P.A.  
P.O. Drawer 1107  
Beaufort, SC 29901  
(843)-524-3109  
Attorney for Respondent  
Liling Sun, now known as Liling Walsh

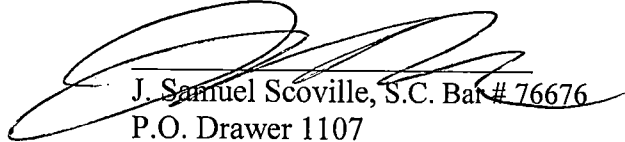
Respondent hereby moves pursuant to Rule 222, SCACR, for the taxation of costs on appeal against the Appellant. The grounds for this motion are that the Respondent is entitled to the taxation of her costs on appeal against the Appellant, as the following shows:

1. Rule 222, SCACR, provides for the taxation of costs on appeal against an Appellant when the judgment of the lower court is affirmed. In this case, the judgment of the lower court was affirmed.
2. This motion is timely. "A party desiring costs to be taxed shall, within fifteen (15) days of the issuance of the remittitur, serve and file a motion requesting that costs be assessed under this Rule." Rule 222(d), SCACR. The remittitur was issued on November 20, 2015, less than 15 days before the service and filing of this motion.
3. The Respondent has actually incurred taxable costs in the amount of 75.00, as is shown on the attached itemized statement of costs. Additionally, Respondent has incurred attorney's fees in this matter on appeal and asks that the Court award her \$1,000.00 in attorney's fees as part of her costs.
4. The Respondent is entitled to an Order taxing costs against the Appellant.

WHEREFORE, Respondent prays for an Order taxing costs in the amount of \$1,075.00 or, in the alternative, in the amount deemed appropriate by the Court, against the Appellant in this appeal.

Respectfully submitted,

HARVEY & BATTEY, P.A.



J. Samuel Scoville, S.C. Bar # 76676

P.O. Drawer 1107

Beaufort, SC 29901

(843)-524-3109

Attorney for Respondent

Liling Sun, now known as Liling Walsh

Dated: November 30, 2015.

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

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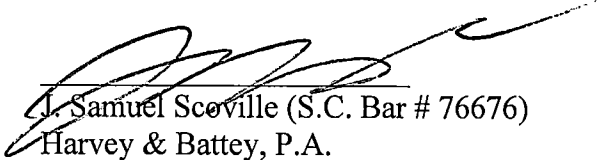
**PROOF OF SERVICE**

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I certify that I have served *Respondent's Motion For Costs on Appeal and Itemized Statement of Costs* upon the parties below by depositing a copy of it in the United States Mail, postage prepaid, on the 30 day of November, 2015, addressed as follows:

Joseph C. Sun  
Post Office Box 151  
Bluffton, SC 29910  
Appellant, pro se

Jackson H. Daniel, III, Esq.  
40 Calhoun Street, Suite 400  
Charleston, SC 29401  
Attorney for Defendants  
Matyushevsky, Citizens  
Opposing Domestic Abuse,  
and Varg



J. Samuel Scoville (S.C. Bar # 76676)  
Harvey & Battey, P.A.  
P.O. Drawer 1107  
Beaufort, SC 29901  
(843)-524-3109  
Attorney for Respondent  
Liling Sun

**HB** HARVEY & BATTEY  
ATTORNEYS AT LAW

W. BRANTLEY HARVEY, SR.  
(1893-1981)

W. BRANTLEY HARVEY, JR.  
(Retired)

COLDEN R. BATTEY, JR.  
(Of Counsel)

WILLIAM B. HARVEY, III  
(SC Circuit Court Mediator)

JOHN M. TATUM, III

THOMAS C. DAVIS

THOMAS A. HOLLOWAY  
(also admitted in PA and NJ)

EUGENE PARRS  
(also admitted in NY, NC, FL  
and GA)

J. SAMUEL SCOVILLE

KEVIN E. DUKES

November 30, 2015

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

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SC Court of Appeals

Re: *Joseph Sun v. Olesya Matyushevsky, et al.*  
Appellate Case No. 2011-204367  
File No. 24644

Dear Madam Clerk:

Please find enclosed for filing an original and six (6) copies of *Respondent's Motion For Costs on Appeal, Itemized Statement of Costs*, and a *Proof of Service* relative to the above referenced matter. I would appreciate you filing the originals and returning a stamped copy to me in the self-addressed envelope provided. Also, enclosed is this firm's check in the amount of \$25.00 for the filing fee.

By copy of this letter with enclosures, I am serving Joseph C. Sun, *Pro Se* Appellant, and Jackson H. Daniel, III, counsel for Defendants Matyushevsky, Citizens Opposing Domestic Abuse, and Varg, with the same.

With kind personal regards I am,

Yours very truly,

HARVEY & BATTEY, PA

  
J. Samuel Scoville

JSS/jaw

Enclosures

cc: Joseph C. Sun, *Pro Se*  
Jackson H. Daniel, III, Esquire  
Client (via email)



**HARVEY & BATTEY, PA**

ATTORNEYS AT LAW

SINCE 1922

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
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