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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Edward W. Miller, Circuit Court Judge

Case No. 2011-CP-23-06482

Appellate Case No. 2013-000329

Harrison Partners, LLC,..... Appellant,
v.
Renewable Water Resources, Respondent.

RESPONDENT'S MOTION FOR FEES AND COSTS

Rivers S. Stilwell
Lane W. Davis
NELSON MULLINS RILEY & SCARBOROUGH LLP
104 South Main Street
Poinsett Plaza, Suite 900
P.O. Box 10084 (29603)
Greenville, SC 29601
(864) 250-2300

Attorneys for Respondent Renewable Water Resources

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DEC 17 2015

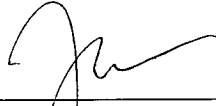
SC Court of Appeals

Pursuant to Rule 222 of the South Carolina Appellate Court Rules, Respondent Renewable Water Resources hereby files this Motion for Fees and Costs. Respondent moves this Court for an order taxing all recoverable costs and fees against Appellant Harrison Partners, LLC (“Appellant”) as allowed by Rule 222(b), SCACR, in the above-captioned appeal.

This Court affirmed the judgment of the circuit court's order, which affirmed the decision of the administrative hearing officer, in Unpublished Opinion No. 2015-UP-527, filed November 18, 2015. Accordingly, Respondent moves to have costs taxed against Appellant herein. See Rule 222(a), SCACR (“Unless otherwise ordered by the appellate court . . . costs shall be taxed against the appellant when the appeal is dismissed or judgment on appeal is affirmed.”). This Court remitted this matter to the lower court on December 4, 2015. This motion comes within the time period proscribed in Rule 222(d), SCACR. A sworn, itemized statement of fees and costs incurred by Respondent is attached to this Motion as Exhibit A as required by Rule 222(d), SCACR.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: _____


Rivers S. Stilwell
Lane W. Davis
104 South Main Street
Poinsett Plaza, Suite 900
P.O. Box 10084 (29603)
Greenville, SC 29601
(864) 250-2300

Attorneys for Respondent Renewable Water

Greenville, South Carolina

December 15, 2015

EXHIBIT A

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Edward W. Miller, Circuit Court Judge

Case No. 2011-CP-23-06482

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SC Court of Appeals

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ITEMIZED STATEMENT OF COSTS

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

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief				
Cost of Printing or Copying Final Reply Brief	1,273 pages 19 bindings 38 Index Covers	\$0.10 page; \$1.75 binding \$0.35 Index Cover Plus tax	\$184.28	
Cost of Printing or Copying Record on Appeal				

Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript			\$3,305.75	
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00	
Other (specify and explain):				
TOTAL:			\$4,490.03	

I, Rivers S. Stilwell, 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.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: _____

Lane W. Davis
 104 South Main Street
 Poinsett Plaza, Suite 900
 P.O. Box 10084 (29603)
 Greenville, SC 29601
 (864) 250-2300

Attorneys for Respondent Renewable Water

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DEC 17 2015

SC Court of Appeals

Greenville, South Carolina
 December 15, 2015

SWORN to and subscribed before me

this 15th day of December, 2015

[Signature] (L.S.)
 Notary Public for South Carolina

My Commission Expires: 3/27/25



THE STATE OF SOUTH CAROLINA
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Appellate Case No. 2013-000329

Harrison Partners, LLC, Appellant,
v.
Renewable Water Resources, Respondent.

PROOF OF SERVICE

I, the undersigned Attorney of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Respondent, do hereby certify that I have served all counsel in this action with a copy of the Respondent's Motion for Fees and Costs by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Counsel Served:

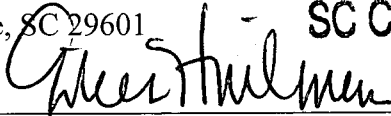
Robert C. Childs, III
2100 Poinsett Hwy, Suite D
Greenville, SC 29609

J. Faulkner Wilkes
114 Whitsett Street
Greenville, SC 29601

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DEC 17 2015

SC Court of Appeals



Eileen Hindman

December 15, 2015

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

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Lane W. Davis
Tel: 864.250.2245
lane.davis@nelsonmullins.com

December 15, 2015

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

Re: Harrison Partners v. Renewable Water
Appellate Case No. 2013-000329

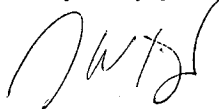
Dear Ms. Kitchings:

Enclosed please find an original and seven copies of Respondent's Motion for Fees and Costs in the above-referenced matter. Please file the original and return a clocked-in copy to me in the enclosed envelope. Also enclosed is our check in the amount of \$25.00 to cover the filing fee. Should you have any questions, please do not hesitate to contact me.

By copy of this letter to counsel of record, we are serving them with a copy of these pleading.

With kind regards, I remain

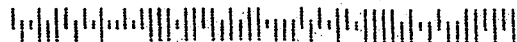
Very truly yours,



Lane W. Davis

LWD:eh
Enclosure
cc: Robert C. Childs, III, Esquire
J. Faulkner Wilkes, Esquire

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SC Court of Appeals



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12/15/2015

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Nelson Mullins

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Attorneys and Counselors at Law

Post Office Box 10084

Greenville, SC 29603-0084

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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