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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM ANDERSON COUNTY  
COURT OF COMMON PLEAS  
The Honorable J. Cordell Maddox, Circuit Judge

JAN 11 2016  
SC Court of Appeals

Case No. 2009-CP-04-4528  
Appellate Case No. 2014-002614

Richard Freemantle, individually and on behalf of himself and all others similarly situated,..... Appellant,

v.

Joey Preston, in his official capacities and individually, while the Administrator of Anderson County; Anderson County, a political subdivision of the State of South Carolina; Anderson County Council, the legislative and executive body of Anderson County; Ron Wilson, in his official capacities and individually; Bill McAbee, in his official capacities and individually; Larry Greer, in his official capacities and individually; Michael Thompson, in his official capacities and individually; Grace Floyd, in her official capacities and individually,..... Respondents.

**RESPONDENTS' MOTION FOR COSTS**

Respondents having prevailed on appeal, and the remittur having been issued on December 3, 2015, now moves for the taxation of costs pursuant to Rules 222 of the South Carolina Appellate Court Rules against Appellant Richard Freemantle.

Attached in support of this motion is the sworn itemization of Respondents' costs incurred in this action allowable under the Rules.

Respectfully submitted,



D. Randle Moody II, S.C. Bar # 14135

Joseph O. Smith, S.C. Bar # 77475

**ROE CASSIDY COATES & PRICE, P.A.**

1052 North Church Street

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*Attorneys for Respondents*

Greenville, South Carolina

January 7, 2016

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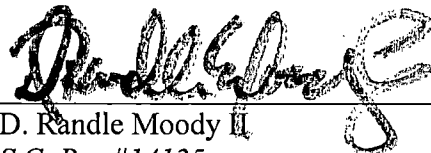
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**RESPONDENTS' AFFIDAVIT OF ITEMIZATION COSTS**

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In regards to the above appeal, Respondents' counsel D. Randle Moody, II expended 9.3 hours for a total fee of \$2,650.50 in assisting six (6) Respondents in this appeal. Photocopying charges were \$5.00 and postage charges were \$2.09 for total fees and costs in the amount of \$2,657.59. These fees and charges were necessitated by multiple motions, initial briefs, and repeated notices from the court. Co-counsel Andrew Lindemann and Candy Kern-Fuller have additional fees and costs not reflected by this itemization.



D. Randle Moody II

*S.C. Bar #14135*

Joseph O. Smith

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Greenville, South Carolina

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**PROOF OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing RESPONDENTS' MOTION FOR COSTS was served upon counsel of record in the above-referenced action this 7 day of January, 2016, by depositing same in the United States Mail, sufficient postage affixed thereon, and addressed as follows:

Charles R. Griffin, Jr.  
The Griffin Law Firm, LLC  
136 North Main Street  
Anderson, SC 29621  
*Attorney for Appellant*

(signature on following page)

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Randle Moody II", with a long, sweeping flourish extending to the right.

D. Randle Moody II, S.C. Bar # 14135

Joseph O. Smith, S.C. Bar # 77475

**ROE CASSIDY COATES & PRICE, P.A.**

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[JSmith@roecassidy.com](mailto:JSmith@roecassidy.com)

*Attorneys for Respondents*

Greenville, South Carolina

January 7, 2016

October 19, 2011

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

**RECEIVED**

JAN 11 2016

SC Court of Appeals

**Re:        *Freeman v. Preston, et al.***  
***Appeal Case No. 2014-002614***

Dear Ms. Kitchings:

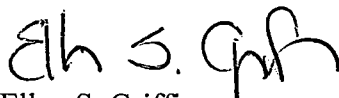
Enclosed please find the original and one (1) copy of the Respondents' Motion for Costs in the above-referenced appeal. Kindly file the enclosed motion in your usual manner and return one clocked copy of the same to me in the stamped, self-addressed envelope provided herein.

If you have any questions or concerns, please do not hesitate to call. Thank you.

With highest regards,

Sincerely,

**ROE CASSIDY COATES & PRICE, P.A.**



Ellen S. Griffin  
Paralegal to D. Randle Moody, II

Enclosures: (as stated above)

cc: Charles R. Griffin, Jr.



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