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IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

RECEIVED
FEB 04 2016
SC Court of Appeals

Case No. 2012-CP-26-5222
Appellate Case No. 2013-002137

Thomas P. and Desiree J. Lyons,

Respondents.

v.

Fidelity National Title Insurance Company as successor by merger to
Lawyers Title Insurance Corporation, Bobby Gene Martin, and The
Security Title Guarantee Corporation of Baltimore,

Defendants,

Of Whom The Security Title Guarantee Corporation of Baltimore is the

Appellant.

RESPONDENTS' MOTION FOR COSTS AND FEES PURSUANT TO SCRAP RULE 222

Respondents respectfully move for an order pursuant to SCRAP Rule 222 for an order awarding them costs and fees in this matter. Pursuant to the rule, the Lyons pray for an award of \$95.26 in printing cost (See Exhibit A) and \$1,000 in attorneys fees as allowed by SCRAP Rule 222(b). The total award of costs and fees requested by the Lyons is \$1,095.26.

Prayer and Signature Block Follow Next Page

WHEREFORE the respondents pray for the relief requested herein and for such other relief as the court deems just, prudent, and proper.

HALLER LAW FIRM, P.C.

A handwritten signature in black ink, appearing to read "D. Haller", written over a horizontal line.

David K. Haller
115 River Landing Drive; Suite 102
Charleston, SC 29492
(843) 849-1384
(843) 853-9377 FACSIMILE

26th day of January, 2016

Charleston, South Carolina



Charleston

INVOICE

Date	Invoice #
4/17/2014	CHS135118

Bill To
 David Haller
 HALLER LAW FIRM PC
 115 River Landing Drive Suite 102
 Charleston, SC 29492

Job #: CHS7337

Client Ref. #	Terms	Rep	Ordered By
Lyons v Fidelity	Net 30	CDavis	David Haller

Description	Qty	Rate	Amount
Printing:8.5 x 11 B&W Digital Prints	358	\$0.100	\$35.80T
Binding:Card Covers	18	\$1.000	\$18.00T
Binding:Spiral Bind 1 in.	17	\$2.000	\$34.00T

Unless written notice to the contrary is given to ProLegal Copies, Inc. within 7 days of the receipt of invoice, all services delivered to customer are deemed to have been performed in a satisfactory manner and are accepted by customer.

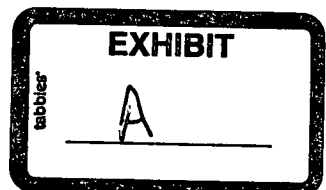
Send only your payment to the payment address indicated on this invoice. All payments are due within your terms upon receipt of this invoice. All late payments may be subject to finance charges or other late charge fees assessable against you; provided, however, that such amount shall automatically reduced to the maximum amount permitted by law if such amount is deemed to be usunous or unlawful. If payments are not received within your terms after invoiced, financing charges and/or late fees may begin to accrue at our option. Please be advised that the person or entity indicated in the Bill To block of this invoice (i.e. you) is/are responsible for any and all payments herein referenced, irrespective of whether such amounts are ultimately posted to the account of your client or other third party.

Subtotal:	\$87.80
Sales Tax(0.085):	\$7.46
Total:	\$95.26

Customer Signature: _____ **Date:** _____

Tax ID Number:
57-1051795

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PROOF OF SERVICE

I certify that I mailed the forgoing RESPONDENTS' MOTION FOR COSTS AND FEES
PURSUANT TO SCRAP RULE 222 to Ray Coit Yarborough, counsel for the appellant, at 201 Graham
St, Florence, SC 29501 by U.S. Mail on January 27, 2016.

HALLER LAW FIRM, P.C.


David K. Haller

115 River Landing Drive, Suite 102
Charleston, SC 29492
(843) 849-1384
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 day of January, 2016

Charleston, South Carolina

Haller Law Firm, P.C.

Counselors at Law

David K. Haller
Certified Civil Court Mediator

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January 27, 2016

Jenny Abbott Kitchings
Clerk of the Court of Appeals
P.O. Box 11629
Columbia, SC 29211

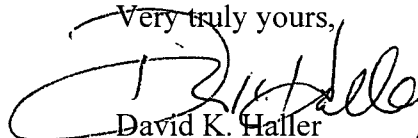
In Re: Lyons v. Security Title Guarantee Company
Appellate Case No. 2013-002137

Dear Madame Clerk:

Enclosed please find the original and seven (7) copies of Respondent's Motion for Costs and Fees Pursuant to SCRAP Rule 222 in the above matter. Please file the originals and return the copy to me in the enclosed self-addressed stamped envelope provided.

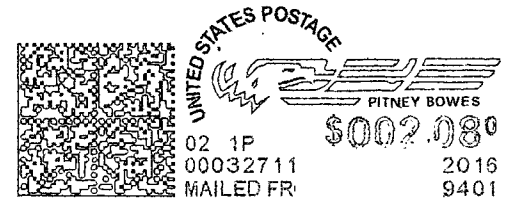
Thank you for your time and attention to this matter.

Very truly yours,



David K. Haller

cc: Client
Ray Coit Yarborough, Esq.



Haller Law Firm, P.C.

115 River Landing Drive, Suite 102
Charleston, South Carolina 29492

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