

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

MAR 09 2016

SC Court of Appeals

Spring Champion, )  
)  
Appellant, )  
)  
v. )  
)  
South Carolina Department of Motor Vehicles, )  
)  
Respondent. )  
\_\_\_\_\_ )

Appellate Case Number  
2015-000014

REPLY TO RETURN TO  
RESPONDENT'S MOTION FOR  
COSTS ON APPEAL

COMES NOW the Respondent SCDMV and replies to Appellant's Return to Respondent's Motion for Costs on Appeal.

While the Respondent SCDMV is sympathetic to the employment difficulties and associated financial hardships Appellant asserts she has suffered as a result of being declared a habitual offender and the appeals associated therewith, Respondent SCDMV invested a significant amount of attorney staff time defending this habitual offender declaration through the Office of Motor Vehicle Hearings, the Administrative Law Court, and the Court of Appeals. Due to the expenditure of this attorney staff time, Respondent SCDMV believes its' request for costs is reasonable and should be approved.



FRANK L. VALENTA, JR., SC Bar # 5682  
General Counsel  
PHILIP S. PORTER, SC Bar # 4526  
Deputy General Counsel  
BRANDY A. DUNCAN, SC Bar # 72052  
Assistant General Counsel  
South Carolina Department of Motor Vehicles  
10311 Wilson Boulevard  
Post Office Box 1498  
Blythewood, South Carolina 29016-0020  
Telephone: (803)896-9900  
Facsimile: (803)896-9901  
ATTORNEYS FOR RESPONDENT

March 7, 2016

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED  
MAR 09 2016  
SC Court of Appeals

Spring Champion, )

Appellant, )

v. )

South Carolina Department of Motor Vehicles, )

Respondent. )

Appellate Case Number  
2015-000014

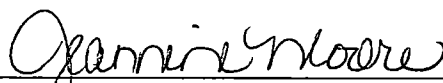
---

**PROOF OF SERVICE**

---

I HEREBY CERTIFY that I have served the Respondent South Carolina Department of Motor Vehicles **Reply to Return to Respondent's Motion for Costs on Appeal** by depositing a copy of same in the United States Mail, postage prepaid, on the 8th day of March, 2016, addressed to Counsel for Appellant Spring Champion as follows:

James R. Snell, Jr., Esquire  
Vicki Koutsogiannis, Esquire  
316 South Lake Drive  
Lexington, South Carolina 29072

  
\_\_\_\_\_  
Jeanine (Nina) Moore, Paralegal  
Office of General Counsel

March 8, 2016  
Blythewood, South Carolina

Nikki R. Haley  
Governor



Kevin A. Shwedo  
Director

*State of South Carolina*  
*Department of Motor Vehicles*

RECEIVED

MAR 09 2016

SC Court of Appeals

March 8, 2016

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

**RE: *Spring Champion v. South Carolina Department of Motor Vehicles***  
**Appellate Case No: 2015-000014**

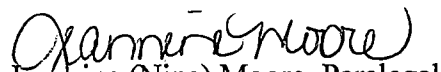
Dear Ms. Kitchings:

Pursuant to SCACR, Rule 222, please find enclosed one (1) original and seven (7) copies of Respondent South Carolina Department of Motor Vehicles Reply to Return to Respondent's Motion for Costs on Appeal together with an original and copy of our Proof of Service.

Please file the original and six (6) copies necessary for SCACR compliance and return the extra copy to me with an affixed clerk's date of filing in the enclosed self-addressed stamped envelope.

Thank you for your cooperation in this matter.

In kind regards,

  
Jeannine (Nina) Moore, Paralegal  
Office of General Counsel

Enclosures

cc: James R. Snell, Jr., Esquire  
Vicki Koutsogiannis, Esquire



MV-16

# South Carolina Department of Motor Vehicles

Post Office Box 1498  
Columbia, South Carolina 29216



U.S. POSTAGE >>> PITNEY BOWES



ZIP 29016 \$ 001.42<sup>0</sup>  
02 1W  
0001394666 MAR 08 2016

**RECEIVED**

MAR 09 2016

SC Court of Appeals

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

