

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

ORIGINAL

APPEAL FROM RICHLAND COUNTY
Administrative Law Court

S. Phillip Lenski, Administrative Law Judge

RECEIVED

Case No. 2015-CP-00-0014
Docket No. 2013-ALJ-21-0447-AP

MAR 07 2016
SC Court of Appeals

Spring Champion,

Appellant,

v.

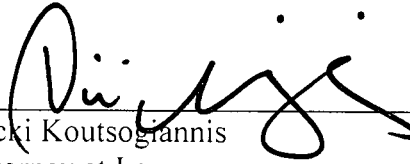
South Carolina Department of
Motor Vehicles,

Respondent.

RETURN TO RESPONDENT'S
RULE 222 MOTION FOR COSTS ON APPEAL

The Appellant hereby opposes, pursuant to Rule 222(c), the Respondent South Carolina Department of Motor Vehicles Motion for Costs. The appeal in this matter was taken from an Order of the Administrative Law Court determining her to be a habitual offender. The appellant was seeking any available relief that would allow her to maintain her driver's license and to be able to continue working to support her household. The order determining her to be a habitual offender was confirmed by this appeal, and as a result the Appellant continues to suffer employment difficulties and associated financial hardships.

Based on those circumstances the Appellant prays for an Order dismissing the Motion for Costs, or in the alternative only authorizing the \$85.00 costs for printing or copying the final brief.



Vicki Koutsogiannis
Attorney at Law
316 South Lake Drive
Lexington, South Carolina 29072
(803) 359-3301

March 3, 2016
Lexington, South Carolina

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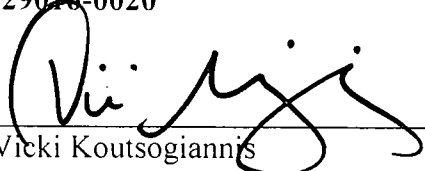
South Carolina Department of
Motor Vehicles,

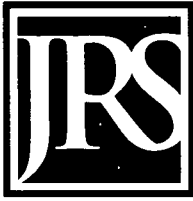
Respondent.

PROOF OF SERVICE

I certify that I have served the Appellant's Return to Respondent's Rule 222 Motion for Costs on the Respondent, South Carolina Department of Motor Vehicles, by depositing a copy of it via Certified U.S. mail, postage prepaid, on March 3, 2016, addressed to its attorney of record, Frank L. Valenta, Jr., at the address indicated below:

Frank L. Valenta, Jr.
Office of General Counsel
South Carolina Department of Motor Vehicles
Post Office Box 1498
Blythewood, South Carolina 29016-0020


Vicki Koutsogiannis
Attorney at Law
316 South Lake Drive
Lexington, South Carolina 29072
(803) 359-3301



LAW OFFICE OF
JAMES R. SNELL, JR.
James R. Snell, Jr. • Johnson M. Snell • Vicki Koutsogiannis LLC

March 3, 2016

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MAR 07 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211-1629

Re: Spring Champion, Appellant, vs. SC DMV, Respondent
Case No.: 2015-00014

Dear Ms. Kitchings:

Enclosed please find the Return to Respondent's Rule 222 Motion for Costs On Appeal, as well as six (6) copies, and a Proof of Service. Thank you.

Sincerely,

Vicki Koutsogiannis
Attorney at Law

Enclosures

cc: Frank L. Valenta, Esq.



LAW OFFICE OF
JAMES R. SNELL, JR.
LLC

316 South Lake Drive, Lexington, South Carolina 29072

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

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