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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAR 28 2016

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

SC Court of Appeals

Case No. 2014-001215

Thomas Jackson Construction,

Appellant,

v.

Larry E. Koon and Allen Lee Koon by and
through his attorney in fact, Larry E. Koon,

Respondents.

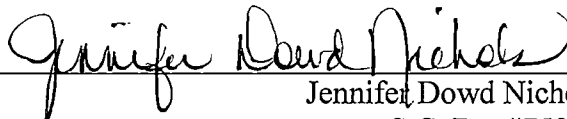
MOTION TO RECOVER COSTS AND ATTORNEY FEES

The Respondents respectfully move pursuant to Rule 222(b), SCACR, for an Order allowing the Respondents to recover costs and attorney fees. The motion is based upon the following:

- (1) The costs for printing the final brief was One Hundred Eighty-Seven and 37/100 (\$187.37) Dollars;
- (2) Rule 222 (b), SCACR, allows for the recovery of attorney fees in the amount of One Thousand and 00/100 (\$1,000.00) Dollars.

WE SO MOVE:

March 24, 2016



Jennifer Dowd Nichols
S.C. Bar #75916
Attorney for the Respondent
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MAR 28 2016

SC Court of Appeals

ATTORNEYS AT LAW

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Brent M. Takach
Robert W. Dibble, Jr. of Counsel

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March 24, 2016

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

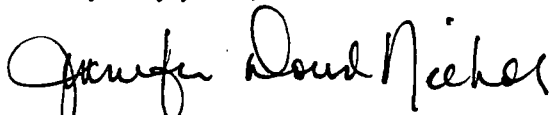
RE: Thomas Jackson Construction v. Larry E. Koon and Allen Lee Koon by and
through his attorney in fact, Larry E. Koon
Case No. 2014-001215
Our File No. 2014-080

Dear Ms. Kitchings:

Enclosed you will find the Respondents' Motion to Recover Costs and Attorney Fees and Affidavit of Costs in the above matter. We respectfully ask that you please file the original of each, returning clocked-in copies in the envelope provided.

Thank you for your time and attention to this matter. If you require any additional information, please let me know.

Very truly yours,



Jennifer Dowd Nichols

/rdb

Enclosures

cc: Mindy Westbrook-Zimmerman, Esquire
Wade Coleman Lawrimore, Esquire
Kelley B. Parr, Esquire
Mr. Larry Koon

HARRELL AND MARTIN, P.A.

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