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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APR 07 2016

**SC Court of Appeals**

APPEAL FROM COLLETON COUNTY  
Court of Common Pleas

J. Ernest Kinard, Jr., Circuit Court Judge

Appellate Case No. 2014-002733

Samuel Washington, Jr., Respondent,

v.

South Carolina Electric and Gas Company; and Emerson Electric Company d/b/a  
Emerson Network Power, and/or Emerson Network Power, Defendants,

Of Whom South Carolina Electric and Gas Company is the Appellant.

**RESPONDENT'S MOTION FOR COSTS**

Respondent Samuel Washington, Jr. hereby moves, pursuant to Rule 222, SCACR, for the taxation of costs on appeal against Appellant South Carolina Electric and Gas Company.

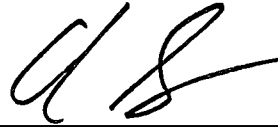
Rule 222 provides that "costs shall be taxed against the appellant when the appeal is dismissed ..." Rule 222(a), SCACR. By Order filed March 16, 2016, this appeal was dismissed, and the Court issued the remittitur on April 4, 2016.

As evidenced by the attached Itemized Statement of Costs, the Respondent has incurred taxable costs in the amount of \$98.11. Additionally, the Respondent is entitled to recover an attorney's fee in the amount of \$1,000.00, as authorized by Order of the South Carolina Supreme Court dated July 24, 1997.

Accordingly, the Respondent respectfully requests that this Court issue an Order taxing costs and attorney's fees in the amount of \$1,098.11 against Appellant South Carolina Electric and Gas Company.

April 7, 2016

Respectfully Submitted,



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Charles T. Slaughter  
S. Kirkpatrick Morgan, Jr.  
WALKER MORGAN, LLC  
135 East Main Street  
Post Office Box 949 (29071)  
Lexington, South Carolina 29072  
Telephone: (803) 359-6194  
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Margie Bright Matthews, Esquire  
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BRIGHT MATTHEWS LAW  
FIRM, LLC  
205 East Washington Street  
Walterboro, South Carolina 29488  
Telephone: (843) 549-6028  
Facsimile: (843) 549-6107

ATTORNEYS FOR RESPONDENT

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Of Whom South Carolina Electric and Gas Company is the Appellant.

**ITEMIZED STATEMENT OF COSTS**

The Appellate Court is requested to tax the following costs against the Appellant South Carolina Electric and Gas Company:

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	17 Pages (17 copies) and covers & binding	\$4.61 each (.08 per pg. and \$3.25 for binding)	\$83.86 (with \$5.49 tax)	
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				

Cost of Court Reporter's Transcript	19	.75 per pg.	\$14.25	
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00	
Other (specify and explain):				
		TOTAL	\$1,098.11	

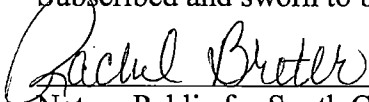
I, Charles T. Slaughter, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was (mailed to/served upon) opposing counsel.



(Signature)

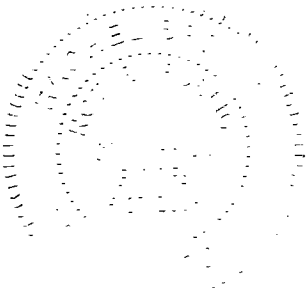
Attorney for Respondent

Subscribed and sworn to before me this 7<sup>th</sup> day of April, 2016.



Notary Public for South Carolina

My Commission Expires: 5-27-18



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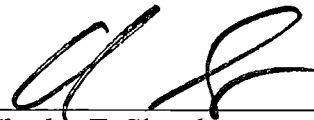
South Carolina Electric and Gas Company; and Emerson Electric Company d/b/a  
Emerson Network Power, and/or Emerson Network Power, Defendants,

Of Whom South Carolina Electric and Gas Company is the Appellant.

**PROOF OF SERVICE**

I certify that I have served Respondent's Motion for Costs and Itemized Statement of Costs on Appellant South Carolina Electric and Gas Company by depositing a copy of it in the United States Mail, postage prepaid, on April 7, 2016, addressed to its attorneys of record, John A. Massalon and I. Ryan Neville, Wills Massalon & Allen, LLC, Post Office Box 859, Charleston, South Carolina 29402, and that the same was served on Defendant Emerson Electric Company d/b/a Emerson Network Power, and/or Emerson Network Power by depositing a copy of it in the United States Mail, postage prepaid, on April 7, 2016, addressed to its attorneys of record, H. Michael Bowers, Smith Moore Leatherwood, LLP, 25 Calhoun Street, Suite 250, Charleston, South Carolina 29401.

April 7, 2016



Charles T. Slaughter  
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ATTORNEYS FOR RESPONDENT



# Walker Morgan

ATTORNEYS AT LAW

William P. Walker, Jr. ♦ S. Kirkpatrick Morgan, Jr.\*  
Charles T. Slaughter\* ♦ William P. Walker, III

April 7, 2016

**VIA HAND DELIVERY**

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SC Court of Appeals

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

*Re: Samuel Washington, Jr. v. South Carolina Electric and Gas Company;  
and Emerson Electric Company d/b/a Emerson Network Power and/or  
Emerson Network Power, Appellate Case No.: 2014-002733*

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondent's Motion for Costs and Itemized Statement of Costs in connection with the above-referenced matter. I have also enclosed a Proof of Service upon counsel of record, along with a check from my firm in the amount of Twenty Five Dollars (\$25.00) to serve as payment of the filing fee associated with this motion. I would appreciate it if you would return one (1) file-stamped copy to me via our courier.

Thank you for your assistance with this matter. Should you have any questions or concerns, please do not hesitate to contact me.

With kindest personal regards, I am

Sincerely yours,

WALKER MORGAN, LLC

Charles T. Slaughter

CTS/

Enclosures: As Stated

cc: (via U.S. Mail w/encl.)  
John A. Massalon, Esquire  
I. Ryan Neville, Esquire  
H. Michael Bowers, Esquire



**Walker & Morgan, LLC**  
ATTORNEYS AT LAW

Post Office Box 949 ♦ Lexington, South Carolina 29071

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