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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

RECEIVED
MAY 19 2016
SC Court of Appeals

Appellate Case No.: 2014-000454

Paula Russell, Appellant,

v.

Wal-Mart Stores, Inc., and
American Home Assurance,
Respondents.

APPELLANT'S MOTION FOR COSTS ON APPEAL

Appellant hereby moves pursuant to Rule 222, SCACR, for the taxation of costs on appeal against the Respondent. The grounds for this motion are that the Appellant is entitled to the taxation of his costs on appeal against the Respondent, as the following shows:

1. Rule 222, SCACR, provides for the taxation of costs on appeal against a respondent when a judgment is reversed. In this case, the judgment was reversed.
2. This motion is timely. "A party desiring costs to be taxed shall, within fifteen (15) days of the issuance of the remittitur, serve and file a motion requesting that costs be assessed under this Rule." Rule 222(d), SCACR. The remittitur was issued on May 3, 2016, less than 15 days before the service and filing of this motion.

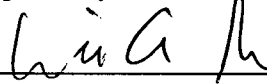
3. The Appellant has actually incurred taxable costs in the amount of \$1,801.88, as is shown on the attached itemized statement of costs.

(Appellant's attorney's fees on this appeal exceeded \$1,000.00.)

4. The Appellant is entitled to an Order taxing costs against the Respondent.

WHEREFORE Appellant prays for an Order taxing costs in the amount of \$1,801.88 or, in the alternative, in the amount deemed appropriate by the Court, against the Respondent in this appeal.

Respectfully submitted,



William A. Jordan, III
Jordan Law Center
622 Wade Hampton Boulevard
Greenville, S.C. 29609
(864) 235-0147
William@jordanlawcenter.com

Attorney for Appellant

Greenville, South Carolina

May 16, 2016

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Paula Russell Appellant.

v.

Wal-Mart Stores, Inc., and American Home
Assurance..... Respondent.

ITEMIZED STATEMENT OF COSTS

The Appellate Court is requested to tax the following costs against

Wal-Mart Stores, Inc., and American Home Assurance

<i>Costs taxable under Rule 222, SCACR</i>	<i>No. of Pages</i>	<i>Rate</i>	<i>Requested</i>	<i>Allowed</i>
<i>Filing fee paid under Rule 203(d), SCACR</i>	<i>N/A</i>	<i>\$100.00 for notice of appeal</i>	<i>\$100.00</i>	
<i>Cost of court reporter's transcript of December 16, 2013 hearing</i>			<i>\$42.50</i>	
<i>Motion Filing Fee</i>	<i>N/A</i>		<i>\$25.00</i>	
<i>Motion Filing Fee</i>	<i>N/A</i>		<i>\$25.00</i>	
<i>Motion Filing Fee</i>	<i>N/A</i>		<i>\$25.00</i>	
<i>Cost of printing/copying final brief and reply of appellant and record on appeal</i>	<i>5,040, plus covers</i>	<i>As invoiced (see attached): \$789.47</i>	<i>\$557.48</i>	
<i>Postage for Oct. 24, 2014 - 6 transcripts</i>	<i>N/A</i>	<i>Postal rate</i>	<i>\$26.90</i>	
<i>Attorney's fee provided by Rule 222(b), SCACR</i>	<i>N/A</i>	<i>Per 1997 order</i>	<i>\$1,000.00</i>	
<i>TOTAL</i>			<i>\$1801.88</i>	

I, William A. Jordan, III, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was served by mail on opposing counsel with Appellant's motion for costs.

Respectfully submitted,

W.A.J.

William A. Jordan, III
Jordan Law Center
622 Wade Hampton Boulevard
Greenville, S.C. 29609
(864) 235-0147
William@jordanlawcenter.com

Attorney for Appellant

Greenville, South Carolina

May 16, 2016

SWORN to before me this

16 th day of May, 2016

Imya Henderson (L.S.)

Notary Public for South Carolina

My Commission Expires: 1-14-2025

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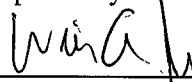
Wal-Mart Stores, Inc., and
American Home Assurance,

Respondents.

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Costs on Appeal on the Respondents by depositing a copy of the document in the United States Mail, postage prepaid, on May ~~16~~¹⁷, 2016, addressed to their attorney of record, Johnnie W. Baxley, III, 421 Wando Park Boulevard, Suite 100, Mt. Pleasant, S.C. 29464.

Respectfully submitted,



William A. Jordan, III
Jordan Law Center
622 Wade Hampton Boulevard
Greenville, S.C. 29609
(864) 235-0147
William@jordanlawcenter.com

Attorney for Appellant

Greenville, South Carolina

May 16, 2016



Jordan Law Center

Attorney William A. Jordan, Jr.

Attorney William A. Jordan, III



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SC Court of Appeals

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

RE: Paula Russell, Appellant, v. Walmart Associates Inc. and American Home Assurance, Respondents, Appellate Case No.: 2014-000454

Dear Ms. Kitchings:

Enclosed for filing please find the following documents:

- (1) Original and three (3) copies of Appellant's Motion for Costs on Appeal and Itemized Statement of Costs;
- (2) Proof of service of Motion; and
- (3) A filing fee of \$25.00.

Sincerely,

William A. Jordan, III
622 Wade Hampton Boulevard
Greenville, S.C. 29609
(864) 235-0147
Attorney for Appellant

cc: Johnnie W. Baxley, III
421 Wando Park Boulevard, Suite 100
Mount Pleasant, South Carolina 29464
(843) 284-1080
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