

THE STATE OF SOUTH CAROLINA

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IN THE COURT OF APPEALS

JUN 16 2016

APPEAL FROM BEAUFORT COUNTY

SC Court of Appeals

COURT OF COMMON PLEAS

J. DERHAM COLE, CIRCUIT COURT JUDGE

CASE NO. 2014-CP-07-0370

Norbert Breton and Claudette Breton,

Appellants

v.

Coral Resorts, LLC, Island Links Owners Association, Inc., Sunrise Vacation Properties, LTD,
Reba Management, Inc., Sherri J. Smith, Frieda McKinney, and Rob Lauderman, Respondents

RETURN IN OPPOSITION TO RESPONDENTS' MOTION FOR COSTS

Norbert Breton and Claudette Breton hereby submit their return in opposition to Respondents' Motion for Costs.

Respondents seek costs in the amount of \$1,000 pursuant to Rule 222, SCACR. Accompanying their Motion for Costs Respondents additionally submit an Affidavit signed by three (3) attorneys for Respondents attesting to a one-line statement of costs "requested" of \$1,000. No dates or number of hours are indicated, nor any billing entry.

Appellants assert that, insofar as the Court of Appeals dismissed the appeal *sua sponte* and without Respondents being required to incur the costs and expenses of responding to the appeal, Respondents' request for \$1,000 costs should be denied.

NAERT AND DUBOIS, LLC



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Zach S. Naert
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Tel: (843) 686-5500
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Attorneys for Appellants

June 13, 2016
Hilton Head Island, South Carolina

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS

J. DERHAM COLE, CIRCUIT COURT JUDGE

CASE NO. 2014-CP-07-0370

APPELLATE CASE NO.: 2016-000972

Norbert Breton and Claudette Breton,

Appellants

v.

Coral Resorts, LLC, Island Links Owners Association, Inc., Sunrise Vacation Properties, LTD,
Reba Management, Inc., Sherri J. Smith, Frieda McKinney, and Rob Lauderman, Respondents

PROOF OF SERVICE

I, the undersigned, hereby certify that I have served the *Return in Opposition to Respondent's Motion for Costs* on the following counsel of record by depositing a copy of it in the United States Mail, postage prepaid, on June 14, 2016, addressed as follows:

Kathleen McDaniel, Esquire
Nekki Shutt, Esquire
Jacqueline Pavlicek, Esquire
P.O. Box 1390
Columbia, SC 29202
Attorney for Respondents Coral Resorts, LLC and Reba Management, Inc.

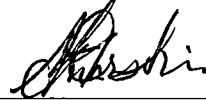
Bess J. DuRant, Esquire
Thornton F. Sowell, Esquire
P.O. Box 11449
Columbia, SC 29211
Attorney for Respondents Sunrise Vacation Properties, Ltd., Sherri J. Smith, Frieda McKinney, and Rob Lauderman

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H. Cooper Wilson, Esquire
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Attorney for Respondent Reba Management, Inc.

Drew A. Laughlin, Esquire
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Hilton Head Island, SC 29925
Attorney for Respondent Island Links Owners Association, Inc.

NAERT AND DUBOIS, LLC



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June 14, 2016
Hilton Head Island, South Carolina

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June 14, 2016

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SC Court of Appeals

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

Re: Norbert Breton and Claudette Breton v. Coral Resorts LLC, et al.
Appellate Case No. 2016-000972

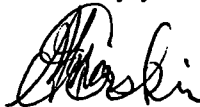
Dear Ms. Kitchings:

Enclosed for filing please find the original and six (6) copies of the *Return in Opposition to Respondent's Motion for Costs* in regards to the above referenced matter along with the *Proof of Service*. By copy of this correspondence I am serving all counsel of record.

Thank you for your attention to this matter. Please contact me if you have any questions.

With kind regards, I am,

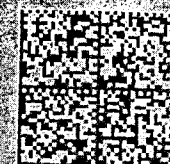
Sincerely yours,



Ana M. Erskine
Paralegal

Enclosures

cc: Nekki Shutt, Esquire, Jacqueline Pavlicek, Esquire and Kathleen McDaniel, Esquire
Thornwell F. Sowell, III, Esquire and Bess J. Durant, Esquire
Drew A. Laughlin, Esquire
Robert H. Hood, Esquire, Harry Cooper Wilson, Esquire, and Robert H. Hood, Jr, Esquire



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The Honorable Benny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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