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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Judge

Appellate Case No. 2014-002587
Common Pleas Case Nos. 2012-CP-6974

RECEIVED
JUL 29 2016
SC Court of Appeals

S. Coley Brown..... Appellant,

v.

Spring Valley Homeowners Association, Inc..... Respondent.

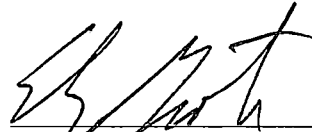
RESPONDENT'S MOTION FOR COSTS PURSUANT TO RULE 222, SCACR

Ely O. Grote, Esq.
Brown & Brehmer
1720 Main Street, Suite 201
P.O. Box 7966
Columbia, SC 29202
(803) 771-6600
Attorneys for Respondent

Pursuant to Rule 222, SCACR, Respondent hereby moves for the taxation of costs against appellant. In support of this Motion, Respondent would show that Remittitur was issued on July 18, 2016. Respondent would further show that the judgment of the Circuit Court granting summary judgment to Respondent was affirmed on appeal; therefore, costs are taxable against Appellant pursuant to Rule 222(a), SCACR. Respondent is seeking \$160.66 for the costs of copying and binding its final brief, said amount being the amount that Respondent paid to Nova Office Strategies for this service. In addition, Respondent is seeking \$1,000.00 in attorney's fees, as specified by Rule 222(b), SCACR. A sworn itemized statement of costs is attached as Exhibit A and incorporated herein by reference

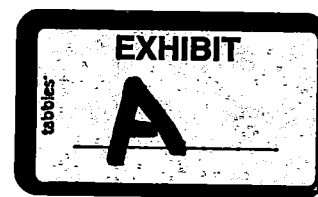
WHEREFORE, Respondent prays that costs and attorney's fees be taxed against Appellant in the amount of \$1,160.66.

Respectfully submitted,



Ely O. Grote, Esq.
Brown & Brehmer
1720 Main Street, Suite 201
P.O. Box 7966
Columbia, SC 29202
(803) 771-6600
Attorneys for Respondent

Columbia, South Carolina
July 28, 2016



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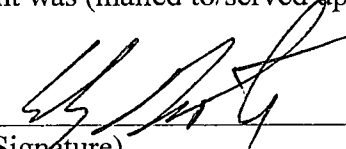
The Appellate Court is requested to tax the following costs against:

S. Coley Brown, Appellant.

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	935 (copies) 17 (velo binding) (Sales Tax)	\$.10/pg. \$3.25/each	\$93.50 \$55.25 \$11.91	
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				
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00	
Other (specify and explain):				

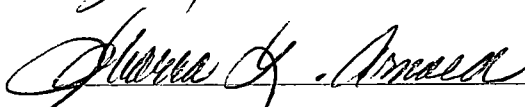
COSTS TAXABLE UNDER RULE 242(j), SCACR				
Cost of Printing or Copying Brief				
Cost of Printing or Copying Reply Brief				
Cost of Printing or Copying Appendix				
Filing fee paid under Rule 242(c), SCACR				
Attorney's fee provided by Rule 242(j)(2), SCACR				
Other (specify and explain):				
		TOTAL	\$1160.66	

I, Ely O. Grote, 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.



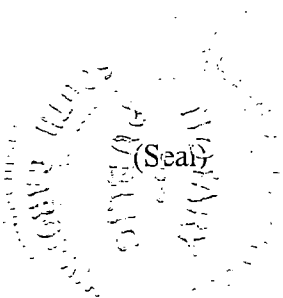
 (Signature)
 Attorney for Spring Valley Homeowners
 Association, Inc., Respondent

Subscribed and sworn to before me this 28TH day of July, 2016.



 Notary Public for SC

My Commission Expires: 4-31-20



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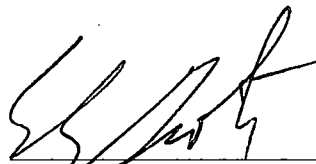
Spring Valley Homeowners Association, Inc..... Respondent.

PROOF OF SERVICE

I certify that I served the foregoing Motion for Costs by depositing a copy of it on the date shown below in the United States Mail, postage prepaid, addressed as follows:

Andrew S. Radeker, Esq.
Harrison & Radeker, P.A.
P.O. Box 50143
Columbia, SC 29250
Attorney for Appellant

Charles A. Krawczyk, Esq.
Finkel Law Firm, LLC
P.O. Box 1799
Columbia, SC 29202
Co-Counsel for Respondent



Ely O. Grote, Esq.
Brown & Brehmer
1720 Main Street, Suite 201
P.O. Box 7966
Columbia, SC 29202
(803) 771-6600
Attorneys for Respondent

Dated: July 28, 2016

BROWN & BREHMER

Attorneys at Law

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Robert C. Brown
Karl S. Brehmer
E. Dale Lang, Jr.
L. Darby Plexico, III
Ely O. Grote

July 28, 2016

V. Claire Allen, Deputy Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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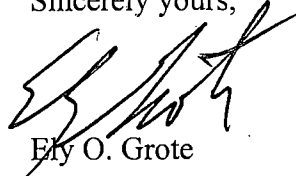
Re: *S. Coley Brown v. Spring Valley Homeowners' Association, Inc.*
Civil Action No.: 2012-CP-40-6974
Claim No.: 6139PE019484

Dear Ms. Allen:

Enclosed for filing please find an original and seven copies of a Motion for Costs, together with Proof of Service and my firm's check in the amount of \$25.00. Kindly file these documents and return a file-stamped copy to me in the self-addressed, stamped envelope provided for your convenience.

By copy of this letter, I am serving a copy of this Motion upon all counsel of record. Should you have any questions or concerns, please do not hesitate to contact me. With warmest personal regards, I remain,

Sincerely yours,



Ely O. Grote

EOG/bdp
Enclosures

cc: Andrew Sims Radeker, Esq. (with enclosures)
Charles A. Krawczyk, Esq. (with enclosures)



BROWN & BREHMER
Attorneys at Law
POST OFFICE BOX 7966
COLUMBIA, SOUTH CAROLINA 29202

TO:

V. Claire Allen, Deputy Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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