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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Circuit Court

AUG 02 2016

J.C. Nicholson, Jr., Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2015-000330

Tracy Hines,

Respondent,

v.

Tarsha Y. Alexander, Personal Representative
of the Estate of Clarence Ceal Alexander,

Appellant.

NOTICE OF MOTION
and
MOTION FOR ATTORNEY'S FEES AND COSTS

TO: TARSHA Y. ALEXANDER, PERSONAL REPRESENTATIVE OF THE ESTATE
OF CLARENCE CEAL ALEXANDER.

YOU WILL PLEASE TAKE NOTICE that the undersigned attorney for Tracy Hines, Respondent, moves before this Court for an order compelling Appellant Tarsha Y. Alexander, Personal Representative of the Estate of Clarence Ceal Alexander, to pay Hines' attorney's fees and costs in this appeal and to add the award of fees and costs to the remittitur.

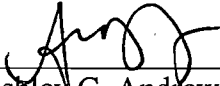
This motion shall be based upon Rule 222 of the South Carolina Appellate Court Rules and the record in this matter. Hines draws attention to the fact that the order of the Circuit Court

was affirmed, that the remittitur was issued on July 18, 2016, and this motion was made within fifteen (15) days of the issuance of the remittitur.

A sworn itemized statement of costs incurred by Hines in this appeal is attached hereto and incorporated herein by reference.

July 29, 2016

Respectfully Submitted:



Ashley G. Andrews
LaFond Law Group, PA
SC Bar No. 76667
544 Savannah Highway
Charleston, SC 29407
843.762.3554 (telephone)
843.377.1111 (facsimile)
Attorney for the Respondent

**FORM 17
ITEMIZED STATEMENT OF COSTS**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

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SC Court of Appeals

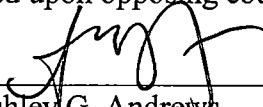
Tracey Hines,)
)
 Respondent,)
)
 v.)
)
 Tarsha Y. Alexander, Personal)
 Representative of the Estate of Clarence)
 Ceal Alexander,)
)
 Appellant.)

The Appellate Court is requested to tax the following costs against Tarsha Y. Alexander, Appellant.

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	112	0.50/page	\$56.00	
Cost of Printing or Copying Final Reply Brief	n/a			
Cost of Printing or Copying Record on Appeal	n/a			
Filing Fee Paid Under Rule 203(d), SCACR	n/a			
Cost of Court Reporter's Transcript	n/a			
Attorney's Fee Provided By Rule 222(b), SCACR	13 hours	\$250/hour	\$3,250.00	
Other (specify and explain):	n/a			


COSTS TAXABLE UNDER RULE 242(j), SCACR	n/a			
Cost of Printing or Copying Brief	16	0.50/page	\$8.00	
Cost of Printing or Copying Reply Brief	n/a			
Cost of Printing or Copying Appendix	n/a			
Filing fee paid under Rule 242(c), SCACR	n/a			
Attorney's fee provided by Rule 242(j)(2), SCACR	n/a			
Other (specify and explain):	n/a			
		TOTAL	\$3,314.00	

I, Ashley G. Andrews, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was served upon opposing counsel.



 Ashley G. Andrews
 Attorney for Tracey Hines, Respondent

Subscribed and sworn to before me this 29 day of July, 2016.


 _____ (Seal)
 Notary Public for South Carolina
 My Commission Expires: Nov 18, 2024



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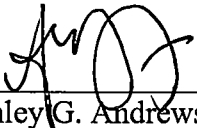
Tarsha Y. Alexander, Personal Representative
of the Estate of Clarence Ceal Alexander,

Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Motion for Attorney's Fees and Costs on Tarsha Y. Alexander, Personal Representative of the Estate of Clarence Ceal Alexander, by depositing a copy of it in the United States Mail, postage prepaid, on July 29, 2016, addressed to her attorney of record, Ira D. Levy, PO Box 31304, Charleston, SC 29417.

July 29, 2016


Ashley G. Andrews
LaFond Law Group, PA
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843.762.3554 (telephone)
843.377.1111 (facsimile)
Attorney for the Respondent

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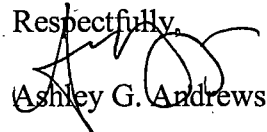
The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Tracey Hines, Respondent v. Tarha Y. Alexander, Personal Representative of the
Estate of Clarence Ceal Alexander, Appellant
Appellate Case No. 2015-000330

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of the Respondent's Notice of Motion and Motion for Attorney's Fees and Costs. I am also enclosing a check in the amount of \$25.00 for the filing fee.

With kind regards, I am

Respectfully,

Ashley G. Andrews

enclosure(s) as stated

cc: Ira D. Levy, Esq.



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CATHERINE E. LAFOND, PA

544 SAVANNAH HIGHWAY

CHARLESTON, SC 29407

843-762-3554

TO:

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
PO Box 11629
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