

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
Alexander S. Macaulay, Circuit Court Judge

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Case No. 2013-CP-04-2409  
Appellate Case Number 2014-002058

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**RECEIVED**  
AUG 29 2016  
SC Court of Appeals

Hubert Bethune, ..... Respondent,

vs.

Waffle House, Inc., ..... Appellant.

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**MOTION FOR COSTS AND ATTORNEY FEES**

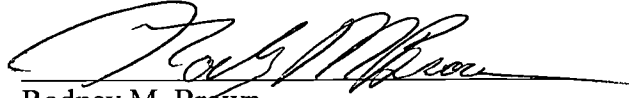
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The Respondent respectfully submits a Motion pursuant to Rule 222 of the Appellate Court rules for payment of their costs and attorney fees.

Pursuant to Rule 222, the Appellate Court will tax the costs against the Appellant when a judgment is affirmed. An Itemized Statement of Costs (Form 17) is attached hereto and incorporated herein.

Accordingly, the Respondent requests the costs and attorney fees be paid.

Respectfully submitted.

A handwritten signature in black ink, appearing to read "Rodney M. Brown", written over a horizontal line.

Rodney M. Brown  
ATTORNEY FOR RESPONDENT  
210 S. Main Street  
Fountain Inn, South Carolina 29644  
(864) 862-2528

Fountain Inn, South Carolina

August 25, 2016

**FORM 17**  
**ITEMIZED STATEMENT OF COSTS**

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

Hubert Bethune, Respondent	)	
	)	
v.	)	Appellate Case No. 2014-002058
	)	
Waffle House, Inc., Appellant	)	
	)	

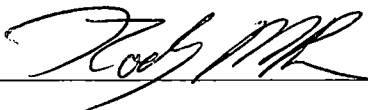
The Appellate Court is requested to tax the following costs against

Waffle House, Inc., Appellant

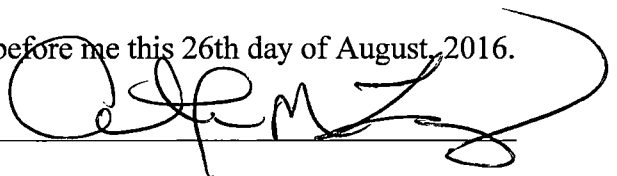
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	17	\$108.68	\$108.68	
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript	21	\$15.75	\$15.75	
Attorney's Fee Provided By Rule 222(b), SCACR		\$1,000.00	\$1,000.00	
Other (specify and explain): Motions for extensions		\$75.00	\$75.00	

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	\$1,199.43	

I, Rodney M. Brown, 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 26th day of August, 2016.

  
 \_\_\_\_\_  
 Notary Public for South Carolina

My Commission Expires: 1-29-2023

(Seal)

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**CERTIFICATE OF SERVICE**

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The undersigned employee of Rodney M. Brown, P.A., attorney for the Respondent, does hereby certify that service of the Motion for Costs and Attorney Fees, Form 17 Itemized Statement of Costs was made upon all counsel of record by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 26 day of August, 2016.

ANDREW F LINDEMANN  
DAVIDSON & LINDEMANN PA  
POST OFFICE BOX 8568  
COLUMBIA SC 29202-8568

  
Annette M. Lay

RODNEY M. BROWN PA  
ATTORNEY AT LAW

August 25, 2016

RECEIVED  
AUG 29 2016  
SC Court of Appeals

South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Hubert Bethune vs. Waffle House, Inc.  
Appellate Case No. 2014-002058

Dear Sir or Madam:

Enclosed herein is my Motion for Costs and Attorney Fees on the above-referenced case. I am copying opposing counsel by copy of this letter and Certificate of Service provided herein.

Your time and consideration is appreciated.

Sincerely,

  
Rodney M. Brown

aml

Enclosures

cc: Andrew F. Lindemann, Esquire

RODNEY M. BROWN, PA  
ATTORNEY AT LAW  
210 S. Main Street • Fountain Inn, South Carolina 29644

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SC Court of Appeals

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