

THE STATE OF SOUTH CAROLINA
COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS

IN CASE NO. 2009-CP-1000685, THE HONORABLE MIKELL R. SCARBOROUGH

Case No. 2014-001345

PAUL DAVIS.....Appellant,

v.

CHARLESTON HARBOR RESORT & MARINA.....Respondent,

RESPONDENT'S MOTION FOR COSTS ON APPEAL

WHEREAS, the decision of the Trial Court was fully affirmed by the South Carolina Appeals Court by Unpublished Opinion filed February 17, 2016. The Appeals Court issued the Remittitur on November 16, 2016, and mailed the same to Respondent.

Respondent moves that this Court tax costs on appeal against Appellant pursuant to Rule 222, SCACR. Respondent requests that the following costs be taxed against Appellant:

1. The attorney's fees for prevailing on appeal in the amount of \$1,000.00;
2. The cost of printing Respondent's Final Brief and Record on Appeal in the amount of \$428.79.

Counsel for the Respondent has attached a sworn itemized statement of costs incurred on the attached authorized form.

WHEREFORE, the Respondent prays that costs on appeal in the total of \$1,428.79 be

taxed against the Appellant in this action.

Respectfully submitted.

PEDERSEN & SCOTT, P.C.



William A. Scott (SC Bar #15148)

775 St. Andrews Blvd.

Charleston, SC 29412

Tel. (843) 556-5656

Fax: (843) 556-5635

Email: bscott@pslawpc.com

ATTORNEY FOR RESPONDENT

Dated this 28th day of November, 2016

FORM 17
ITEMIZED STATEMENT OF COSTS

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

| | |
|------------------------------------|---|
| Paul Davis, |) |
| |) |
| Appellant, |) |
| |) |
| v. |) |
| |) |
| Charleston Harbor Resort & Marina, |) |
| |) |
| Respondent. |) |

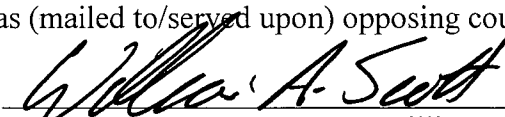
The Appellate Court is requested to tax the following costs against

Paul Davis, Appellant
(Name of Party)

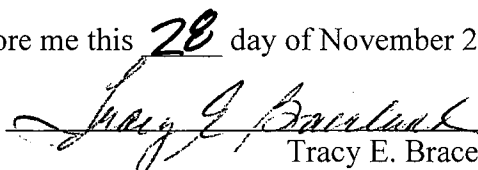
| COSTS TAXABLE UNDER RULE 222, SCACR | NO. OF PAGES | RATE | REQUESTED | ALLOWED (For Court Use Only) |
|--|-----------------|------------|------------|------------------------------------|
| Cost of Printing or Copying Final Brief | | | | |
| Cost of Printing or Copying Final Reply Brief | | | | |
| Cost of Printing or Copying Record on Appeal | 1722 | \$428.79 | \$428.79 | |
| 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 | \$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 \$1,428.39 | \$1,428.39 | |

I, William A. Scott, 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.


 William A. Scott
 Attorney for Respondent/Prevailing Party

Subscribed and sworn to before me this 28 day of November 2016.


 Tracy E. Braceland
 Notary Public for South Carolina

My Commission Expires: 11/18/2024

(Seal)

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| William Scott PEDERSEN & SCOTT, P.C. 775 St. Andrews Blvd. Charleston, SC 29483 | | Client Ref. # | Terms | Rep | Ordered By |
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SC Court of Appeals

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PAUL DAVIS.....Appellant,

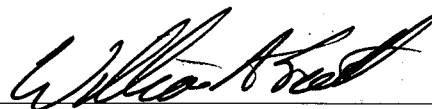
v.

CHARLESTON HARBOR RESORT & MARINA.....Respondent,

PROOF OF SERVICE

I certify that I have served the **Respondent's Motion for Costs on Appeal** by depositing a copy of it in the United States Mail, postage prepaid, on November 28, 2016, addressed to Pro Se Appellant Paul Davis, 14639 C.R. Koon Highway, Newberry, SC 29109 and Paul Davis, 107 Averill Lane, Irmo, SC 29063.

PEDERSEN & SCOTT, P.C.



William A. Scott (SC Bar #15148)
775 St. Andrews Blvd.
Charleston, SC 29412
Tel. (843) 556-5656
Fax: (843) 556-5635
Email: bscott@pslawpc.com

ATTORNEY FOR RESPONDENT

Dated this 28th day of November, 2016

PEDERSEN & SCOTT, P.C.
ATTORNEYS AT LAW

P 843-556-5656
F 843-556-5635
bscott@pslawpc.com

November 28, 2016

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SC Court of Appeals

Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: Paul Davis v. Charleston Harbor Resort & Marina
Case No. 2009-CP-1000685
Appeals Court No.: 2014-001345

Dear Ms. Kitchings:

Enclosed for filing, please find an original and seven (7) copies of the *Respondent's Motion for Costs on Appeal* in the referenced matter, along with the Form 17 Itemized Statement of Costs. Please return a filed copy to our office in the envelope provided. By copy of this letter and enclosures, I am serving Pro Se Plaintiff Paul Davis.

If you have any questions, please do not hesitate to contact me.

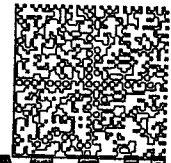
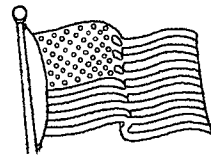
With regards,



William A. Scott

WAS/teb
Enclosures
cc: Paul Davis

William A. Scott, Esq.
Pedersen & Scott, P.C.
775 St. Andrews Boulevard
Charleston, SC 29407



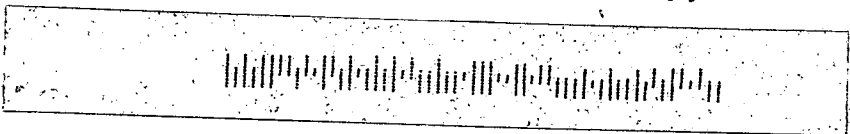
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SC Court of Appeals



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