

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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MAR -2 2017

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

S.C. SUPREME COURT

Edward W. Miller, Circuit Court Judge

Case No. 2009-CP23-7707
Appellate Case No.: 2015-001555

R.C.. Frederick Hanold, III and Rose F. Hanold, and Carol R. Mitchell and George P. Mitchell, Jr.,

Respondents,

v.

Watson's Orchard Property Owners Association, Inc., a South Carolina Corporation, and Pelham Farm, LLC, a South Carolina Corporation, Legacy One, LLC, a South Carolina Corporation, SESP LLC, a South Carolina Corporation, an unknown Trustee of the Revocable Trust Agreement Dated March 19, 1996 established by James B. Stephens as amended, and unknown Jay Stephens and Mike Stephens as Co-Personal Representative of the Estate of James B. Stephens, Defendants, Of whom Pelham Farm, LLC, a South Carolina Corporation, Legacy One, LLC, a South Carolina Corporation, an unknown Trustee of the Revocable Trust Agreement Dated March 19, 1996 established by James B. Stephens as amended, and unknown Jay Stephens and Mike Stephens as co-Personal Representative of the Estate of James B. Stephens,

Appellants.

v.

Property Owners in Watson's Orchard Subdivision: N. Carter Poe, III; McNally Reeves, as Trustee of the Residual Trust under item Five of the Last Will and Testament of Hattie L. Reeves dated February 9, 1998; Janet B. Yusi; Lucy S. Tiller; James G. Stephens; Rachel P. McKaughan; Ramon J. Ashy and Jana Ashy; Christopher D. Scalzo and Heather V. Scalzo; Erma R. Rash, as Trustee of the Erma R. Rash Revocable Trust dated February 12, 2010; James Edwin Conrad, as Trustee of the James Edwin Conrad Living Trust dated September 7, 2010; Sue Lane Conrad; Horst H. H. Eschenberg and Floride C. Eschenberg; Caryl L. Clover, as Trustee of the Caryl L. Clover Revocable Living Trust Agreement dated May 12, 1999; Mary F. Newell; Timothy M. Conroy and Elizabeth W. Conroy; Nathan Scolari; Joel Wells Norwood and Lynn Norwood; J. Lynn Shook; Juan Hernandez and Janice M. Pelletier; Scott P1 Payne and Kathleen H. Payne; Joe G. Thomason and Dana L. Henry Thomason; Traci Segura; Cameron. E. Smith and Joan B. Smith; Charles E. Howard and Sharon F. Howard; Penelope J. Galbraith; Meredith C. Vry; Delores B. Mitchell; Lisette M. Silva and Mary F. Colley; Ilona K. Alford and William G. Alford; George T. McLeod and Martha T. McLeod; Ronald S. Wilson and Robin E.

Wilson; The Merrill J. Gildersleeve and Anore L. Novak Revocable Living Trust dated November 1, 1996; Anna Marie T. Azores and Kim O. Gococo; Ashley Westrope as Trustee of Martha Randolph Westrop Trust dated June 6, 1988; Cliff C. Jollie and martha W. Jollie; David A. Saliny and Xiaoli Saliny; Lecia S. Franklin; Dean D. Varner and Deborah p. Varner; W. Frank Durham, Jr.; Christine M. Howard; Samuel P. Howard, Jr. and Jane H. Howard; Manfred E. Kramer and Jane J. Kramer; Mary J. Steele; James J. Barrett, III and Kimberly A. Barrett; Richard A. Herman and Patricia L. Herman,

Respondents.

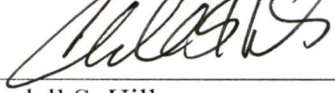
MOTION FOR COSTS

Respondent, by and through their undersigned counsel, move, pursuant to S.C.A.C.R. Rule 242(j), for attorney's fees and costs.

This Motion is based on the grounds that the amount set forth in the Sworn Itemized Statement of Costs are properly recoverable pursuant to S.C.A.C.R. Rule 242(j).

Respectfully submitted this 23rd day of February, 2017.

RANDALL S. HILLER, P.A.



Randall S. Hiller
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Attorney for Respondent

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Of whom Pelham Farm, LLC, a South Carolina Corporation, Legacy One, LLC, a South Carolina Corporation, an unknown Trustee of the Revocable Trust Agreement Dated March 19, 1996 established by James B. Stephens as amended, and unknown Jay Stephens and Mike Stephens as co-Personal Representative of the Estate of James B. Stephens,Appellants
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J. Kramer; Mary J. Steele; James J. Barrett, III and Kimberly A. Barrett; Richard A. Herman and Patricia L. Herman,.....Third Party Defendants.

SWORN ITEMIZED STATEMENT OF COSTS

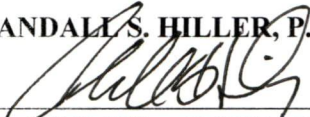
ATTORNEY FEES AND COSTS FOR SUPREME COURT:

Attorney Fees.....\$1,000.00
Cost for printing Brief.....\$ 289.00
TOTAL.....\$1,289.00

ATTORNEY FEES AND COSTS APPELLATE COURT:

Attorney Fees.....\$1,000.00
Cost for Transcript.....\$ 216.00
Cost for printing Final Brief.....\$ 289.00
TOTAL.....\$1,505.00
GRAND TOTAL.....\$2,794.00

RANDALL S. HILLER, P.A.


Randall S. Hiller (SCB#2513)
850 Wade Hampton Blvd.
Greenville, SC 29609
Attorney for Respondents

SWORN to before me this
____ day of February, 2017

Notary Public for S.C.
My commission expires:

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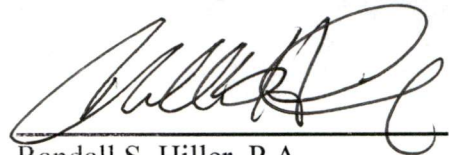
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PROOF OF SERVICE

I certify that I have served the Motion for Costs by depositing a copy of it in the United States Mail, postage prepaid, on February 24, 2017, addressed to its attorneys of record, William Herlong, Esq., Post Office Box 2003, Greenville, South Carolina 29602 and John S. Nichols, Esq., P.O. Box 7965, Columbia, SC 29202.

February 24, 2017



Randall S. Hiller, P.A.
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