

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
J. Cordell Maddox, Jr., Circuit Court Judge

Case No.: 2013-CP-23-05102
Appellate Case No. 2015-000593

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APR 13 2017

SC Court of Appeals

Ronald J. Ferguson

Appellant

vs.

Millcreek, LP

Respondent

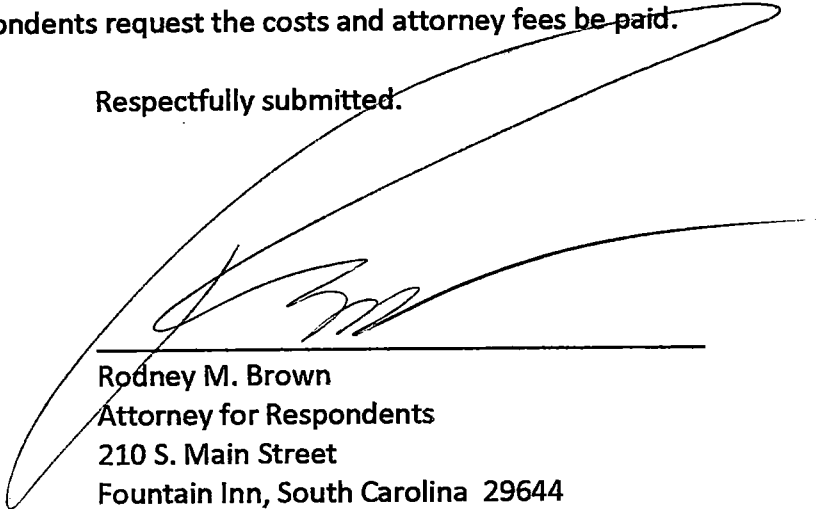
MOTION FOR COSTS AND ATTORNEY FEES

The Respondents, John D. Hatcher, Rachel Shaluly, James F. Gilbert, Molly A. Miller and Michael Stehney, individually and as members of the Architectural Committee of Mill Creek Estates respectfully submit 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 Respondents request the costs and attorney fees be paid.

Respectfully submitted.



Rodney M. Brown
Attorney for Respondents
210 S. Main Street
Fountain Inn, South Carolina 29644
(864) 862-2528

April 10, 2017

Fountain Inn, South Carolina

**FORM 17
ITEMIZED STATEMENT OF COSTS**

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

APR 13 2017
SC Court of Appeals

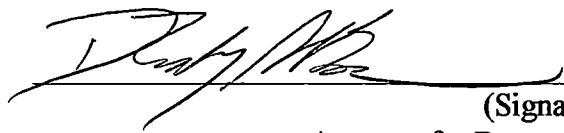
Ronald Ferguson,)	
)	
)	Appellate Case No. 2015-000593
v.)	
)	
Mill Creek, LP,)	
)	

The Appellate Court is requested to tax the following costs against
Ronald Ferguson

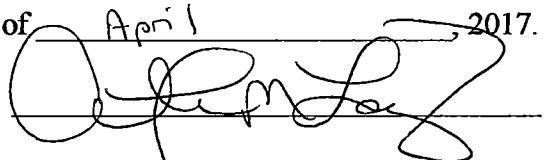
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	9	\$133.56	\$133.56	
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript				
Attorney's Fee Provided By Rule 222(b), SCACR		\$1,000.00	\$1,000.00	
Other (specify and explain): Motion to correct Record on Appeal		\$25.00	\$25.00	

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	\$1,158.56	

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 11 day of April, 2017.


 Notary Public for South Carolina

My Commission Expires: 1-29-2023

(Seal)

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Appellant

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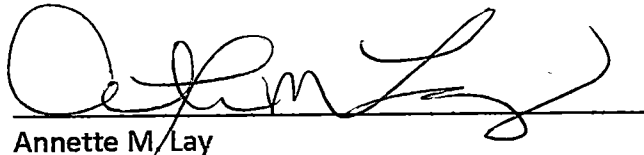
Millcreek, LP

Respondent

CERTIFICATE OF SERVICE

The undersigned employee of Rodney M. Brown, P.A., counsel for John D. Hatcher, Rachel Shaluly, James F. Gilbert, Molly A. Miller and Michael Stehney, individually and as members of the Architectural committee of Mill Creek Estates, does hereby certify that service of the Motion for Costs and Attorney Fees was made upon Appellant by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this 11 day of April, 2017.

Ronald J Ferguson
103 Mill Creek Road
Piedmont SC 29673



Annette M. Lay

RODNEY M. BROWN PA
ATTORNEY AT LAW

April 10, 2017

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APR 13 2017

SC Court of Appeals

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

RE: Ronald Ferguson vs. Mill Creek, LP
Lower Court Case No. 2013CP2305102
Appellate Case No. 2015-000593

Dear Sir or Madam:

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

Your time and considerations is appreciated.

Sincerely,


Rodney M. Brown

aml

Enclosures

cc: Ronald J. Ferguson

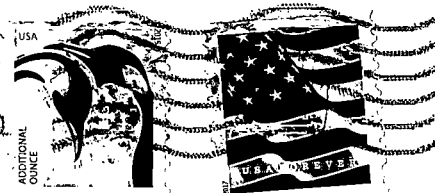
RODNEY M. BROWN, PA

ATTORNEY AT LAW

210 S. Main Street • Fountain Inn, South Carolina 29644

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SC Court of Appeals

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