

THE STATE OF SOUTH CAROLINA
In The Court of Appeals.

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, III, Master-In-Equity

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SC Court of Appeals

Case No. 2013-CP-07-3131
Court of Appeals Unpublished Opinion No. 2017-UP-112
Appellate Case No. 2015-000592

Spanish Wells Investments, LLC,.....Respondent,

v.

Greg Luckenbill and
Evelyn Luckenbill,..... Petitioners.

RESPONDENT'S MOTION FOR COSTS UNDER RULE 222(d) SCACR

Russell P. Patterson
Russell P. Patterson, P.A.
P.O. Box 8047
Hilton Head Island, SC 29938
(843) 341-9300
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SC Bar No.: 4375

Attorney for Respondent, Spanish Wells
Investments, LLC

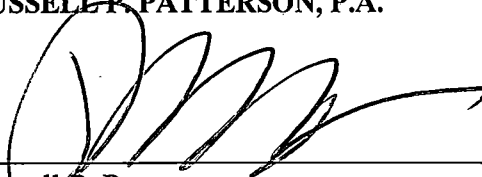
The Respondent, Spanish Wells Investments, LLC (“Respondent”), respectfully files this Motion for Costs pursuant to Rule 222(d) SCACR.

Pursuant to said Rule, Respondent requests an award of the following costs:

- | | | |
|----|---|-------------------|
| 1. | Cost of Printing Respondents’ Final Brief | \$ 107.58 |
| 2. | Attorney Fees | <u>\$1,000.00</u> |
| | Total Request | <u>\$1,107.58</u> |

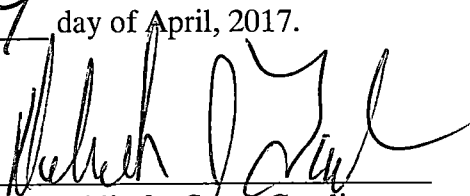
The undersigned swears and affirms that the foregoing costs are correct and were necessarily incurred in this action.

Respectfully submitted,
RUSSELL P. PATTERSON, P.A.



Russell P. Patterson
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Hilton Head Island, SC 29938
(843) 341-9300
russell@russellpattersonlaw.com
Attorney for Respondent

SWORN to before me this
17 day of April, 2017.



Notary Public for South Carolina
My Commission Expires: 10-12-17

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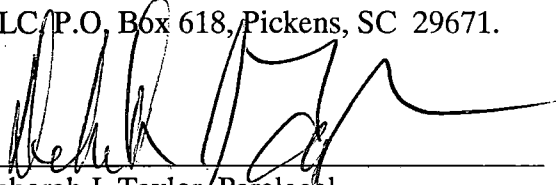
v.

Greg Luckenbill and
Evelyn Luckenbill,..... Petitioners.

CERTIFICATE OF SERVICE

I certify that I have served one (1) copy of Respondent's Motion for Costs Under Rule 222(d) SCACR on the Petitioners, Greg Luckenbill and Evelyn Luckenbill, by depositing one copy of the same in the United States Mail, postage prepaid, on October 9, 2013 addressed to Steven L. Alexander, Esquire, Alexander Law Firm, LLC/P.O. Box 618, Pickens, SC 29671.

April 17, 2017


Deborah J. Taylor, Paralegal
Russell P. Patterson, P.A.
P.O. Drawer 8047
Hilton Head Island, SC 29938
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Attorney for Respondent

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Serving the Lowcountry for over 34 years

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April 17, 2017

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

Re: Spanish Wells Investments, LLC v. Greg Luckenbill and Evelyn Luckenbill
Appellate Case No.: 2015-00592

Dear Ms. Kitchings:

On behalf of Respondent, Spanish Wells Investments, LLC, enclosed please find an original and six (6) copies of its Motion for Costs Under Rule 222(d) SCACR and Certificate of Service in connection with the above matter. Also enclosed please find our filing fee check for \$25.00.

Thank you for your attention and consideration. Please do not hesitate to contact me with any questions.

Sincerely,
RUSSELL P. PATTERSON, P.A.



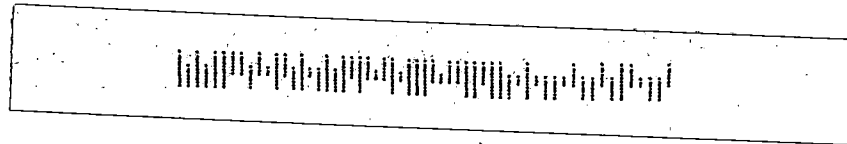
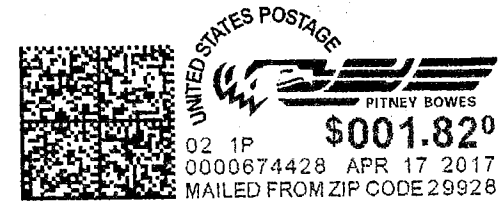
Russell P. Patterson

RPP:djt

Enclosures

cc: Steven L. Alexander, Esq. (w/encl.)
Robert W. Tillison (w/encl.)

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