

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

JUN 07 2017

SC Court of Appeals

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

The Honorable Craig D. Brown, Circuit Court Judge

Case No. 2013-CP-21-01408

Elizabeth J. Langley ..... Appellant,

v.

Wendy J. Lynch, Rebecca M. Lynch,  
James M. Lynch, II, Donald Jordan, III,  
Jimmy White and S. Porter Stewart, II, as  
Personal Representative of the Estate of  
James M. Lynch ..... Defendants

Of Whom Wendy J. Lynch is the ..... Respondent.

**RESPONDENT'S MOTION FOR COSTS**

The Respondent, by and through undersigned counsel, hereby moves pursuant to South Carolina Appellate Court Rule 222 that costs be assessed. As allowed under Rule 222, "Unless otherwise ordered by the appellate court or agreed by the parties, costs shall be taxed against the appellant when the appeal is dismissed or judgment on appeal is affirmed." Respondent seeks to recover the following costs as allowed under the rule: (1) the cost of the court reporter's transcript; (2) cost of printing the final brief under Rule 210; and (3) the attorney fee's as set forth in the rule. Respondent additionally seeks the filing fee cost of \$25.00. Respondents have attached hereto the Itemized Statement of Costs in the amount of \$1,094.50.

Based on the above, Respondents respectfully request that their Motion for Costs and Attorney's Fee pursuant to Rule 222 be granted.



---

Joseph M. McCulloch, Jr., Esq.  
Kathy R. Schillaci, Esq.  
McCulloch & Schillaci, Attorneys at Law  
1513 Hampton Street  
P.O. Box 11623  
Columbia, South Carolina 29201  
Telephone: (803) 779-0005  
Facsimile: (803) 779-0666

ATTORNEYS FOR RESPONDENTS

This 2<sup>nd</sup> day of June, 2017

Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

JUN 07 2017

The Honorable Craig D. Brown, Circuit Court Judge

SC Court of Appeals

Case No. 2013-CP-21-01408

Elizabeth J. Langley ..... Appellant,

v.

Wendy J. Lynch, Rebecca M. Lynch,  
James M. Lynch, II, Donald Jordan, III,  
Jimmy White and S. Porter Stewart, II, as  
Personal Representative of the Estate of  
James M. Lynch ..... Defendants

Of Whom Wendy J. Lynch is the ..... Respondent.

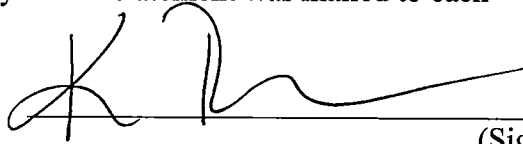
The Appellate Court is requested to tax the following costs against

**Elizabeth J. Langley**

COSTS TAXABLE UNDER RULE 222, SCAR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	315	.10	\$31.50	
Cost of Printing or Copying Final Reply Brief	N/A			
Cost of Printing or Copying Record on Appeal	N/A			
Filing Fee Paid Under Rule 203(d), SCACR	N/A			

Cost of Court Reporter's Transcript			\$38.00 (Receipt Attached)	
Attorney's Fee Provided By Rule 222(b), SCACR	\$1,000.00		\$1,000.00	
Other (specify and explain): Motion Filing Fee	\$25.00		\$25.00	
	<b>TOTAL:</b>		<b>\$1,094.50</b>	

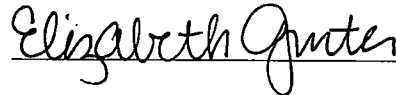
I, Kathy R. Schillaci, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed to each Appellant.



(Signature)

Attorney for Respondent

Subscribed and sworn to before me this 2<sup>nd</sup> day of June.



Notary Public for SC

My Commission Expires: 12.7.25

(Seal)

**RECEIVED**

JUN 07 2017

SC Court of Appeals

**REQUEST FOR PAYMENT FOR TRANSCRIPT**

(via e-mail)

TO: Joseph McCulloch

RE: Transcript of Record 06/17/15  
Elizabeth Langley, et al, vs. Wendy Lynch, et al  
Civil Case No. 13-CP-21-1408

Pursuant to your request of October 21, 2015,  
the following transcript is provided on October 21,  
2015.

1 Original	of	pages	\$
1 Original	of	7 pages (word index)	\$ 7.00
1 Copy	of	31 pages	\$31.00
Other (Specify):		Postage	\$
TOTAL:			\$38.00

Date: 10/21/15

L. Coconut Pantsari  
309 Willow Winds Dr.  
Columbia, SC 29210  
SS#: Available upon req.

*s/L. Coconut Pantsari*

Court Reporter

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

JUN 07 2017

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

SC Court of Appeals

The Honorable Craig D. Brown, Circuit Court Judge

Case No. 2013-CP-21-01408

Elizabeth J. Langley ..... Appellant,

v.

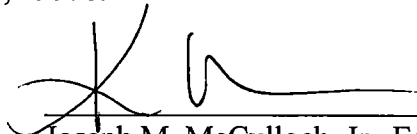
Wendy J. Lynch, Rebecca M. Lynch,  
James M. Lynch, II, Donald Jordan, III,  
Jimmy White and S. Porter Stewart, II, as  
Personal Representative of the Estate of  
James M. Lynch ..... Defendants

Of Whom Wendy J. Lynch is the ..... Respondent.

PROOF OF SERVICE

I certify that I have served the **RESPONDENT'S MOTION FOR COSTS AND ITEMIZATION** by depositing one copy of it in the United States Mail, first-class mail, postage prepaid, on June 2, 2017, addressed to J. Rene Josey, Esquire, Turner, Padgett, Graham & Laney, P.A., Post Office Box 5478, Florence, SC 29502 and James T. Irvin, Esquire, PO Box 2677, Myrtle Beach, SC, 29578.

June 2, 2017

  
\_\_\_\_\_

Joseph M. McCulloch, Jr., Esq.  
Kathy R. Schillaci, Esq.  
McCulloch & Schillaci, Attorneys at Law  
1513 Hampton Street  
P.O. Box 11623 (29211)  
Columbia, South Carolina 29201  
Telephone: 803-779-0005  
Facsimile: 803-779-0666

ATTORNEYS FOR THE RESPONDENT

RECEIVED

JUN 07 2017

SC Court of Appeals

**McCULLOCH & SCHILLACI**  
**ATTORNEYS AT LAW**

1513 HAMPTON STREET  
P.O. Box 11623 (29211)  
COLUMBIA, SC 29201  
(803) 779-0005 • FAX (803) 779-0666

JOSEPH M. McCULLOCH, JR.  
joe@mccullochlaw.com

KATHY SCHILLACI  
kathy@mccullochlaw.com

June 2, 2017


South Carolina Court of Appeals  
**Attn: Jenny Abbot Kitchings, Clerk of Court**  
P.O. Box 11629  
Columbia, South Carolina 29211

**RE: Langley v. Lynch**  
**Case No.: 2013-CP-21-01408**

Dear Ms. Kitchings:

Please find enclosed Respondent's Motion for Costs and Itemization and Proof of Service in the above captioned matter. I have enclosed the original and one copy. If you would please clock and file the original and clock and return the copy to my office in the enclosed self-addressed, pre-stamped envelope, I would be most appreciative. Thank you for your attention to this matter.

Sincerely,



Joseph M. McCulloch, Esq.

JMM/erg  
Enclosure(s)

cc: Jim Irvin, Esq.  
J. Rene Josey, Esq.  
Wendy Lynch

McCULLOCH & SCHILLACI

ATTORNEYS AT LAW

1513 HAMPTON STREET

P.O. Box 11623 (29211)

COLUMBIA, SC 29201

RECEIVED

JUN 07 2017

SC Court of Appeals

South Carolina Court of Appeals

**Attn: Jenny Abbot Kitchings, Clerk of Court**

P.O. Box 11629

Columbia, South Carolina 29211

