

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

---

Appellant Case No. 2015-000602

---

**RECEIVED**

JUN 29 2017

SC Court of Appeals

Dan Abel and Mary Abel,

Appellants,

vs.

South Carolina Department of Health and Environmental Control and  
Pawleys Island Community Church,

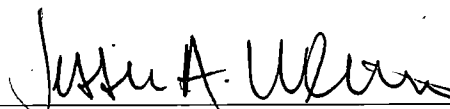
Respondents.

---

**MOTION FOR COSTS**

---

Pursuant to Rule 222 and Rule 240 of the South Carolina Appellate Court Rules, the Appellants Dan and Mary Abel hereby move this honorable Court for an order granting attorney's fees and costs as set forth in the attached Form 17 – Itemized Statement of Costs.



Amy E. Armstrong

Jessie A. White

SOUTH CAROLINA ENVIRONMENTAL LAW  
PROJECT

Mailing address: Post Office Box 1380  
Pawleys Island, SC 29585

Office address: 430 Highmarket Street  
Georgetown, SC 29440

Telephone (843) 527-0078

FAX (843) 527-0540

Georgetown, South Carolina  
June 26, 2017

**FORM 17  
ITEMIZED STATEMENT OF COSTS**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
Shirley C. Robinson, Administrative Law Judge

Dan Abel and Mary Abel, )  
Appellants, )  
v. )  
South Carolina Department of Health and )  
Environmental Control and Pawleys Island )  
Community Church, )  
Respondents. )

Appellate Case No.  
2015-000602

**RECEIVED**

JUN 29 2017

**SC Court of Appeals**

The Appellate Court is requested to tax the following costs against

Pawleys Island Community Church

(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, Final Reply Brief and Record on Appeal	11,457		\$676.67	
Filing Fee Paid Under Rule 203(d), SCACR			\$100	
Cost of Court Reporter's Transcript				
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000	
		<b>TOTAL</b>	<b>\$1,776.67</b>	

I, Jessie A. White, 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.

Jessie A. White  
(Signature)  
Attorney for Dan and Mary Abel

Subscribed and sworn to before me this 26<sup>th</sup> day of June, 2017.

Amy E. Armstrong  
Notary Public for \_\_\_\_\_  
My Commission Expires: \_\_\_\_\_

(Seal)

AMY E. ARMSTRONG  
Notary Public, State of South Carolina  
My Commission Expires 1/8/2023

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

---

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

---

Appellant Case No. 2015-000602

---

**RECEIVED**

JUN 29 2017

**SC Court of Appeals**

Dan Abel and Mary Abel,

Appellants,

vs.

South Carolina Department of Health and Environmental Control and  
Pawleys Island Community Church,

Respondents.

---

**CERTIFICATE OF SERVICE**

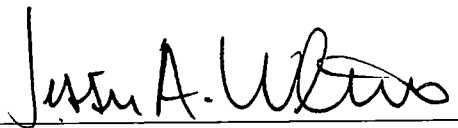
---

I hereby certify that on this date I served the foregoing Motion for Costs of Appellants on Respondents SCDHEC and Pawleys Island Community Church by placing copies of same in the U.S. Mail addressed to:

Daniel W. Stacy, Jr., Esquire  
Oxner & Stacy, PA  
90 Wall Street  
Pawleys Island, SC 29585

Nathan M. Haber, Esquire  
SCDHEC/OCRM  
1362 McMillan Avenue, Suite 400  
Charleston, SC 29405

Deborah Harrison Sheffield, Esquire  
Law Office of Deborah Harrison Sheffield, P.A.  
117 Brook Valley Road  
Columbia, SC 29223

  
\_\_\_\_\_  
Jessie A. White

Georgetown, South Carolina  
June 26, 2017



# South Carolina Environmental Law Project

Lawyers for the Wild Side of South Carolina

June 26, 2017

a 501c3  
non-profit organization.

**Amy E. Armstrong**  
Executive Director  
**Michael G. Corley**  
Staff Attorney  
**Amelia A. Thompson**  
Staff Attorney  
**Jessie A. White**  
Staff Attorney

**MAIN OFFICE**  
430 Highmarket Street  
Georgetown, SC 29440

**MAILING ADDRESSES**  
P.O. Box 1380  
Pawleys Island, SC 29585

P.O. Box 5761  
Greenville, SC 29606

(843) 527-0078  
(864) 412-7921  
Fax (843) 527-0540  
E-mail amy@scelp.org  
michael@scelp.org  
amelia@scelp.org  
jessie@scelp.org

**BOARD OF DIRECTORS**

**Frances Close**  
Chairperson

John Barton, Esq.  
John Mark Dean, PhD  
Margaret D. Fabri, Esq.  
Paula Feldman, PhD  
Susan Hilfer  
Gary W. Poljakoff, Esq.  
Leon Rice, Esq.  
Greg VanDerwerker, MD  
Nancy Vinson  
Wendy Zara

**BOARD MEMBER EMERITI**  
Daryl Hawkins, Esq.  
Robert Schofield

**ADVISORY COUNCIL**  
Josh Eagle, Esq.

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

Re: Dan Abel and Mary Abel v. SCDHEC and Pawleys Island  
Community Church;  
Appellate Case No. 2015-000602

**RECEIVED**

JUN 29 2017

**SC Court of Appeals**

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of the Appellants' Motion for Costs, along with my Certificate of Service and filing fee.

Please return a clocked-in copy in the self-addressed, stamped envelope provided.

Thank you very much for your kind cooperation and assistance.


Yours very truly,

Jessie A. White

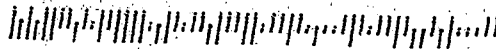
cc: Nathan M. Haber, Esq.  
Daniel W. Stacy, Jr., Esq.  
Deborah H. Sheffield, Esq.

SC Environmental  
Law Project  
PO Box 1380  
Pawleys Island, SC 29585



UNITED STATES POSTAGE  
 PITNEY BOWE  
02 1P \$ 002.24  
0004714816 JUN 26 201  
MAILED FROM ZIP CODE 2944

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



**RECEIVED**

JUN 29 2017

SC Court of Appeals