

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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SEP 06 2017

APPEAL FROM ANDERSON COUNTY
Alexander S. Macaulay, Circuit Court Judge

S.C. SUPREME COURT

Appellate Case No. 2016-001935
Lower Court Case No. 2013-CP-04-02409

Hubert Bethune, Respondent,

vs.

Waffle House, Inc., Petitioner.

MOTION FOR COSTS AND ATTORNEY FEES

The Respondent respectfully submits 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 Respondent requests the costs and attorney fees be paid.

Respectfully submitted.


Rodney M. Brown
ATTORNEY FOR RESPONDENT
210 S. Main Street
Fountain Inn, South Carolina 29644
(864) 862-2528

August 30, 2017

**FORM 17
ITEMIZED STATEMENT OF COSTS**

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THE STATE OF SOUTH CAROLINA
In The Supreme Court

S.C. SUPREME COURT

Hubert Bethune, Respondent)	
)	
)	Appellate Case No. 2016-001935
v.)	
)	
Waffle House, Inc., Appellant)	
)	

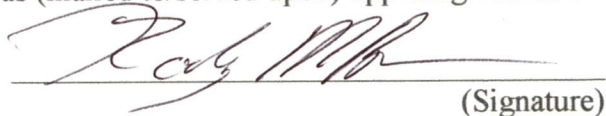
The Appellate Court is requested to tax the following costs against

_____ Waffle House, Inc. _____
(Name of Party)

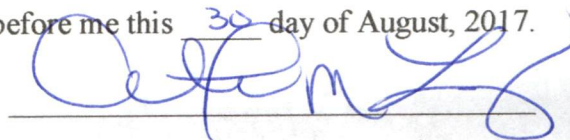
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	17	\$108.68	\$108.68	
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript	21	\$15.75	\$15.75	
Attorney's Fee Provided By Rule 222(b), SCACR		\$1,000.00	\$1,000.00	
Other (specify and explain): Motions for extensions		\$75.00	\$75.00	

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	\$1,199.43	

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 30 day of August, 2017.



Notary Public for South Carolina

My Commission Expires: 1-29-2023

(Seal)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM ANDERSON COUNTY
Alexander S. Macaulay, Circuit Court Judge

Case No. 2013-CP-04-2409
Appellate Case No. 2016-001935

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S.C. SUPREME COURT

Hubert Bethune, Respondent,

vs.

Waffle House, Inc., Appellant.

CERTIFICATE OF SERVICE

The undersigned employee of Rodney M. Brown, P.A., attorney for the Respondent, does hereby certify that service of the Motion for Costs and Attorney Fees, Form 17 Itemized Statement of Costs was made upon counsel of record by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 30 day of August, 2017.

ANDREW F LINDEMANN
DAVIDSON & LINDEMANN PA
POST OFFICE BOX 8568
COLUMBIA SC 29202-8568


Annette M. Lay