



**SOWELL GRAY
ROBINSON**

Litigation + Business

ROBERT E. TYSON, JR.

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rtyson@sowellgray.com

October 25, 2017

Via Hand Delivery

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
1231 Gervais Street
Columbia, SC 29201

RECEIVED

OCT 25 2017

S.C. SUPREME COURT

Re: Jackie Harris v. Lancaster County Election Commission
Appellate Case No. 2017-000423
Lower Court Case No. 2016-CP-29-01418
Our File No. 7019/1500

Dear Mr. Shearouse:

On October 13, 2017, Respondent Linda Blackmon-Brace filed a Motion for Costs against Appellant Jackie Harris and against Respondent Lancaster County Election Commission. Per my discussion with the Clerk's office, please find enclosed a Form 17 as to Appellant Jackie Harris and a Form 17 as to Respondent Lancaster County Election Commission.

We also wish to note that, per the entry in C-Track, neither Appellant nor the Commission filed a timely return to Respondent's motion for costs. See Rule 240(e), SCACR ("Failure of a party to timely file a return may be deemed a consent by that party to the relief sought in the motion . . .").

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

Robert E. Tyson, Jr.

Enclosures

cc: Elizabeth A. Hyatt, Esq.
John L. Weaver, Esq.
Mitchell A. Norrell, Esq.

**FORM 17
ITEMIZED STATEMENT OF COSTS**

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

OCT 25 2017

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas
Brian Gibbons, Circuit Court Judge

S.C. SUPREME COURT

Appellate Case No. 2017-000423
Case No. 2016-CP-29-1418

Jackie Harris Appellant,

v.

Lancaster County Election Commission, Lancaster Municipal Election Commission, and Linda Blackmon-Brace Respondents.

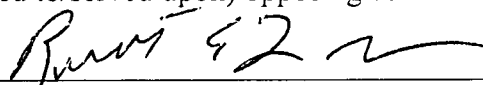
The Appellate Court is requested to tax the following costs against

Jackie Harris

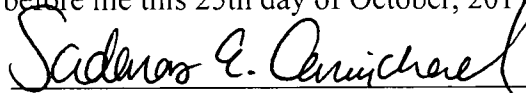
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief			\$139.75	
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR			\$75	
Cost of Court Reporter's Transcript				

Rule 222(b), SCACR			\$1,000	
Other (specify and explain): Fees and expenses incurred responding to frivolous filings made by the Commission per Rule 269, SCACR (See Motion for further explanation.)			Attorney's Fees- \$3,467 Westlaw research - \$512.65	
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	\$5,004.65	

I, Robert E. Tyson, 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.


 Attorney for Linda Blackmon-Brace

Subscribed and sworn to before me this 25th day of October, 2017.



Notary Public for South Carolina

My Commission Expires : 7/23/19

(Seal)

FORM 17
ITEMIZED STATEMENT OF COSTS

RECEIVED

THE STATE OF SOUTH CAROLINA
 In the Supreme Court

OCT 25 2017

S.C. SUPREME COURT

APPEAL FROM LANCASTER COUNTY
 Court of Common Pleas
 Brian Gibbons, Circuit Court Judge

Appellate Case No. 2017-000423
 Case No. 2016-CP-29-1418

Jackie HarrisAppellant,

v.

Lancaster County Election Commission, Lancaster Municipal Election Commission, and Linda Blackmon-Brace Respondents.

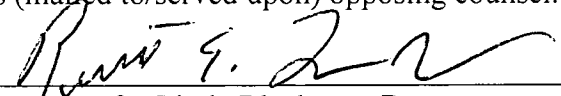
The Appellate Court is requested to tax the following costs against:

Lancaster County Election Commission

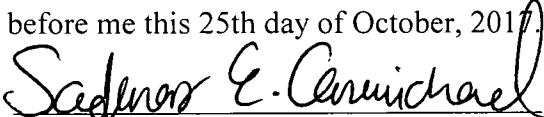
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief				
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR			\$25	
Cost of Court Reporter's Transcript				
Attorney's Fee Provided By				

Attorney's Fee Provided By Rule 222(b), SCACR			\$1000	
Other (specify and explain): Attorney's Fees per S.C. Code Ann. § 7-17-275(b); Rule 269, SCACR. (See Motion for further detail.)			\$29,000	
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	\$30,214.75	

I, Robert E. Tyson, Jr., 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.


 Attorney for Linda Blackmon-Brace

Subscribed and sworn to before me this 25th day of October, 2017.



Notary Public for South Carolina
 My Commission Expires: 7-23-19

(Seal)