

STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
J. Cordell Maddox, Jr., Circuit Court Judge

**RECEIVED**  
OCT 31 2017  
SC Court of Appeals

Case No.: 2013-CP-23-05102  
Appellate Case No. 2015-000593

Ronald J. Ferguson,

Appellant

vs.

Millcreek, LP

Respondent.

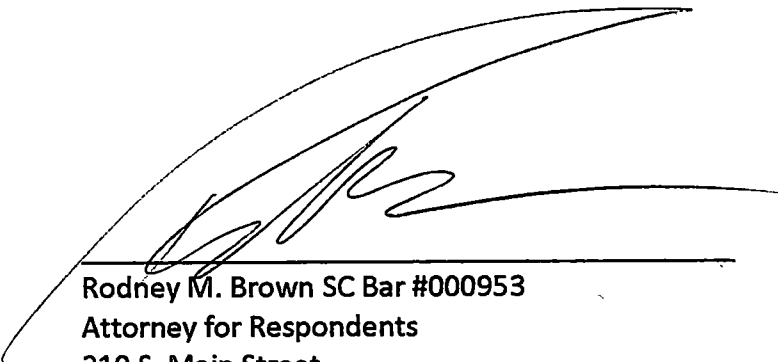
**MOTION FOR COSTS AND ATTORNEY FEES**

The Respondents, John D. Hatcher, Rachel Shaluly, James F. Gilbert, Molly A. Miller and Michael Stehney, individually and as members of the Architectural Committee of Mill Creek Estates, respectfully submit 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 Respondents request the costs and attorney fees be paid.

Respectfully submitted.



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Rodney M. Brown SC Bar #000953  
Attorney for Respondents  
210 S. Main Street  
Fountain Inn, SC 29644  
(864) 862-2528

October 25, 2017

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

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J. Cordell Maddox, Jr., Circuit Court Judge

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Appellate Case No. 2015-000593

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Ronald J. Ferguson

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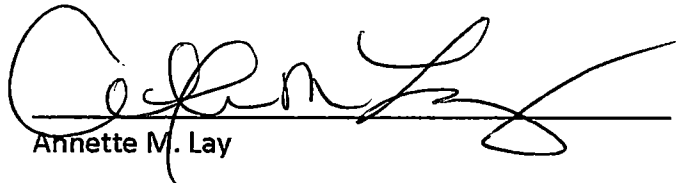
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CERTIFICATE OF SERVICE

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The undersigned employee of Rodney M. Brown, P.A., counsel for John D. Hatcher, Rachel Shaluly, James F. Gilbert, Molly A. Miller and Michael Stehney, individually and as members of the Architectural committee of Mill Creek Estates, does hereby certify that service of the Motion for Costs and Attorney Fees was made upon Appellant by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this 26th day of October, 2017.

Ronald J Ferguson  
103 Mill Creek Road  
Piedmont SC 29673



Annette M. Lay

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OCT 31 2017  
SC Court of Appeals

RODNEY M. BROWN PA  
ATTORNEY AT LAW

October 25, 2017

South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Ronald Ferguson vs. Mill Creek, LP  
~~Lower Court Case No. 2013CP2305102~~  
Appellate Case No. 2015-000593

Dear Sir or Madam:

Enclosed herein is my Motion for Costs and Attorney Fees on the above-referenced case. I am copying the opposing party by copy of this letter and Certificate of Service provided herein.

Your time and consideration is appreciated.

Sincerely,



Rodney M. Brown

aml

Enclosures

cc: Ronald Ferguson

RODNEY M. BROWN, PA  
ATTORNEY AT LAW  
210 S. Main Street • Fountain Inn, South Carolina 29644

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