

80284

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master in Equity

Appellate Case Number: 2014-002018
Lower Court Case Number: 2013-CP-10-04248

RECEIVED
MAR 27 2018
SC Court of Appeals

Belle Hall Plantation Homeowner's Association, Inc., Plaintiff,

v.

John A. Murray, Trustee of the John E. Murray &
Gloria C. Murray Family Trust, Respondent,

David Conor Keys & Karen Keys are the..... Third Party Plaintiffs, Appellants.

RESPONDENT'S MOTION FOR COSTS ON APPEAL

Respondent moves pursuant to Rule 222, SCACR, for the taxation of costs on appeal against the Appellants. The grounds for this motion are that the Respondent is entitled to the taxation of his costs on appeal as follows:

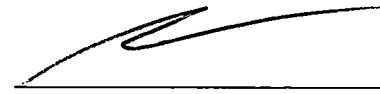
1. Rule 222, SCACR, provides for taxation of costs on appeal against the Appellant when the judgment is affirmed. In this case the judgment was affirmed.
2. The motion is timely. "A party desiring costs to be taxed shall, within (15) days of the issuance of the remittitur, serve and file a motion requesting the costs be assessed under

this Rule.” The remittitur was issued on March 13, 2018, less than 15 days before the service and filing of this motion.

3. The Respondent has actually incurred taxable costs in the amount of \$3,042.13 as reflected by the attached itemized statement of costs. (Respondent’s attorney’s fees on this appeal exceeded \$2500.00).
4. The Respondent is entitled to an Order taxing costs against the Appellants.

WHEREFORE the Respondent prays for an Order taxing costs in an amount of \$3,042.13 or, in the alternative, in an amount deemed appropriate by the Court, against the Appellants.

March 23, 2018



Amanda Reece, Esq.
Reece Law Firm, LLC
217 Lucas Street, Unit
Mount Pleasant, SC, 29464
(843-209-9830)
Attorney for the Respondent

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellant and the Plaintiff with a copy of the *Motion for Costs* and *Itemized Statement of Costs* by mailing copies of the same by United States Mail with first class postage pre-paid to the following addresses:

David Conor Keys, Esq.
843 Robert E. Lee Boulevard
Charleston, SC 29412
Third Party Plaintiffs and Appellants

Stephanie Trotter, Esq.
McCabe Trotter & Beverly, PC
P.O. Box 212069
Columbia, SC 29221-3200
Attorney for Belle Hall Plantation Homeowners Association, Inc.

March 23, 2018



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AMANDA REECE
Attorney at Law
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March 23, 2018

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

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MAR 27 2018
SC Court of Appeals

Re: *Belle Hall Plantation Homeowner's Association v. John A. Murray, Trustee of the John E. Murray and Gloria C. Murray Family Trust, Defendants, David Conor Keys & Karen Keys, Third Party Plaintiffs and Appellants*

Appellate Case Number: 2014-002018
Lower Court Case Number: 2013-CP-10-04248

Dear Ms. Kitchings,

Enclosed for filing please find the original and seven (7) copies of Respondent's *Motion for Costs* and *Itemized Statement of Costs* together with the *Certificate of Service* as to the same in reference to the above matter. Please return the additional filed copy in the enclosed self-addressed, stamped envelope.

Warm Regards,



Amanda M. Reece, Esq.

Cc: Stephanie C. Trotter, Esq.
David Conor Keys, Esq.

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