

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master in Equity

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MAR 29 2018

SC Court of Appeals

Appellate Case Number: 2014-002018  
Lower Court Case Number: 2013-CP-10-0428

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, Third-Party Plaintiff,.....Appellants.

RETURN TO RESPONDENT'S MOTION FOR COSTS ON APPEAL

Appellants were served with Respondent's for Costs on Appeal on March 26, 2018. Appellants pursuant to Rule 222, SCACR, reply to Respondent's motion by seeking a reduction in the amount \$3,042.13, which Respondent requests that this Court award. Appellants assert \$1,542.13 is the amount of fees and costs this Court should tax to Appellant pursuant to Rule 222, SCACR. The grounds for this motion are as follows:

1. Respondent filed a motion dated March 23, 2018, seeking an award \$542.13 in costs and \$2,500.00 in attorney's fees pursuant to Rule 222, SCACR, for a total requested award of \$3,042.13.

2. Appellants do not contest the \$542.13 in costs asserted by Respondent in its motion dated March 23, 2018. Rather Appellants only raise issue with the amount of the attorney's fees Respondent request this Court award pursuant to Rule 222, SCACR.

3. This Court issued a decision upon Appellant's appeal in this matter by opinion filed on February 8, 2017.

4. By order of our Supreme Court \$1,000.00 was the set amount of attorney's fees, which could be awarded pursuant to Rule 222, SCACR at the time this Court issued its decision in this matter February 8, 2017.

5. On January 17, 2018, our Supreme Court issued an Order increasing to \$2,500.00 the amount of fees which may be awarded pursuant to Rule 222(b) SCACR, wherein the Court states: "This increased fee shall apply to any appeal where a decision is filed on or after the date of this order which gives rise to the right to seek costs under Rule 222."

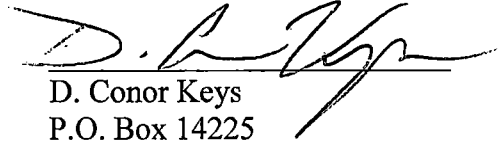
6. Appellants assert that because this Court's opinion in this matter which was filed on February 8, 2017, is the decision which gives rise to the right to seek costs under Rule 222, SCACR, then therefore \$1,000.00 not \$2,500.00, is the applicable set amount of attorney's fees which may be awarded pursuant to Rule 222, SCACR, in this matter.

WHEREFORE Appellants pray for an Order reducing the amount of costs and fees taxed to Appellants in this matter from \$3,042.13, which Respondent requested to \$1,542.13.

[SIGNATURE BLOCK TO FOLLOW]

RESPECTUFLY SUBMITTED,

THE LAW OFFICE OF  
DAVID CONOR KEYS, LLC

A handwritten signature in black ink, appearing to read "D. Conor Keys", is written over a horizontal line.

D. Conor Keys

P.O. Box 14225

Charleston, SC 29422

Phone: 843-906-3998

[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)

*As Appellant and Attorney  
for Appellant.*

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master in Equity

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Case No. 2013-CP-10-4248  
App. Case No. 2014-002018

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SC Court of Appeals

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

v.

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

David Conor Keys & Karen Keys, Third-Party Plaintiff,.....Appellants.

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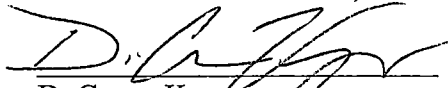
**PROOF OF SERVICE**

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I, the undersigned do hereby certify that I have on this 28<sup>th</sup> day of March 2018, mailed a true and correct copy of the Appellants' Return to the Motion for Costs of Respondent to the following counsel of record:

Amanda Megan Reece  
Reece Law Firm  
217 Lucas Street Unit J  
Mount Pleasant, SC 29464  
*Attorney for Respondent*

THE LAW OFFICE OF  
DAVID CONOR KEYS, LLC

  
D. Conor Keys

THE LAW OFFICE OF  
**DAVID CONOR KEYS LLC**  
PO Box 14225 CHARLESTON, SC 29422  
CONOR@DCONORKEYSLAW.COM  
843-906-3998

**RECEIVED**  
MAR 29 2018  
SC Court of Appeals

March 28, 2018

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, South Carolina 29211

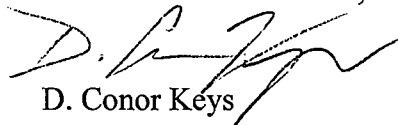
**RE: Belle Hall Plantation v. John Murray (David Keys)**  
**Appellate Case No. 2014-002018**

Ms. Kitchings:

Enclosed for filing please find an original and six copies of Appellants' Return to Respondent's Motion for Costs as well as a Certificate of Service. I kindly request that you file the same.

With kind regards,

THE LAW OFFICE OF  
DAVID CONOR KEYS, LLC

  
D. Conor Keys

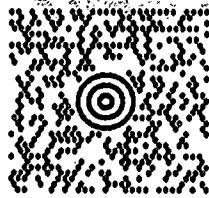
CC:  
Amanda Reece

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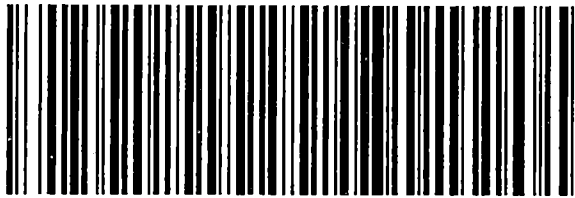


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