

THE STATE OF SOUTH CAROLINA
In the Court Of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge

Appellate Case No. 2015-000778
C.A. No. 2013-CP-23-01792

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APR 11 2018
SC Court of Appeals

Frank A. Landgraff,

Respondent,

v.

Carol Simpson,

Appellant.

Return to Motion for Attorney Fee on Appeal Pursuant to Rule 222, SCACD

Appellant respectfully requests that this Court deny Respondent's motion for attorney's fees. Respondent caused Appellant to incur additional attorney's fees by filing motions that were denied and by not following the appellate rules. Specifically, Respondent filed a final brief that contained many impermissible changes from the initial brief. This required Appellant to expend extensive resources in rebuttal. Through this return and according to Rule 222(d),

Appellant opposes the request for costs and seeks a reduction of the amount of costs in Respondent's Itemized Statement of Costs to be awarded to zero.

William G. Mayer

William G. Mayer
118 West Main Street
Laurens, SC 29360
Email
864-984-9202

Greenville, SC
April 9, 2018

CERTIFICATE OF SERVICE

The undersigned Attorney for Appellant hereby certifies that the foregoing Motion was served upon the following addressee, by this date mailing a copy thereof to the last known address stated below, by depositing same enclosed in a postpaid, properly addressed envelope in a post office or official depository under the exclusive care and custody of the United States Postal Service and by facsimile.

ADDRESSEE:

Reid T. Sherard
Lane Davis
Timothy E. Madden
104 South Main Street/Ninth Floor
Greenville, SC 29601

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W. G. Mayer

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Email: mrmayersoffice.aol.com
864-984-9202

William G. Mayer
Attorney at Law

April 9, 2018

The Honorable Jenny Abbott Kitchings
Clerk of Court
The South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201-3769

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APR 11 2018

SC Court of Appeals

Re: Frank A. Landgraff v. Carol Simpson
C.A. No. 2013-CP-23-01792
Appellate Case No. 2015-000778
N.M.R.S. No. 0353553.01502

Dear Ms. Kitchings:

Enclosed are the original and six (6) copies of Appellant's Return to Respondent's Motion for Attorney Fee on Appeal Pursuant to Rule 222, SCACR. Please file and return the filed copies to my office. Thank you for your service and cooperation.

Sincerely,



William G. Mayer

Enclosures

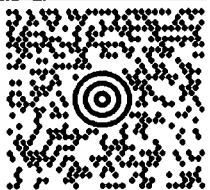
CAROL SIMPSON
864-233-4995
CAROL SIMPSON LAW OFFICES
47 GREENLAND DRIVE
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0.0 LBS LTR

1 OF 1

SHIP TO:

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803-734-1890
SC COURT OF APPEALS
1220 SENATE ST
COLUMBIA SC 29201-3769



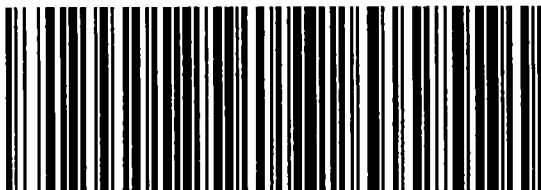
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