

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

Appellate Case No. 2015-001561

**RECEIVED**  
MAY 11 2018  
SC Court of Appeals

Jeffrey D. Allen, on behalf of Jane Doe.....Appellant.

v.

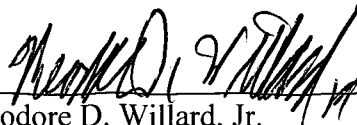
South Carolina Budget and Control Board,  
Employee Insurance Program.....Respondent.

**MOTION TO SERVE AND FILE ITEMIZED  
STATEMENT OF COSTS**

The Respondent moves pursuant to SCACR 222, for an Order allowing the service and filing of the Respondent's *Itemized Statement of Costs*. This Motion is based on the following grounds:

1. Rule 222, SCACR, provides that Counsel for the Respondent can recover taxable costs of printing in a case.
2. Rule 222(b), SCACR, provides that Counsel for the Respondent can recover attorney fees in the amount of \$1,000.00.

Based on the foregoing, the Respondent is informed and believes that this Motion should be granted.

  
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**SOUTH CAROLINA PUBLIC**  
**EMPLOYEE BENEFIT AUTHORITY**  
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Columbia, South Carolina 29223  
Telephone: (803) 734-2375

**ATTORNEYS FOR RESPONDENT**

May 11, 2018  
Columbia, South Carolina

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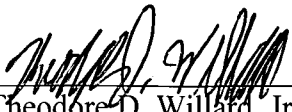
vs.

South Carolina Public Employee Benefit Authority,  
Employee Insurance Program... Respondent.

**PROOF OF SERVICE**

I certify that I have served Respondent's Motion To Serve and File Itemized Statement of Costs and Respondent's Itemized Statement of Costs by depositing copies of the same in the United States mail, postage prepaid, on May 11, 2018, addressed to the attorneys of record, John A. Massalon, Wills Massalon & Allen, LLC, Post Office Box 859, Charleston, South Carolina 29402 and Terry E. Richardson, Jr., Richardson Patrick Westbrook & Brickman, LLC, Post Office Box 1368, Barnwell, South Carolina 29812.

May 11, 2018.

  
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May 11, 2018

*Via Hand Delivery*  
The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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MAY 11 2018  
SC Court of Appeals

**Re: Jeffrey D. Allen v. SCBCB**  
**Appellate Case No. 2015-001561**  
**Our File No.: 294962**

Dear Ms. Kitchings:

Enclosed for filing, please find an original and seven copies of the Motion to Serve and File Itemized Statement of Costs and Respondent's Itemized Statement of Costs, along with the Proof of Service, in the above-referenced matter. Please provide clocked copies to our Courier delivering these documents to you. Please note that, pursuant to S.C. Appellate Rule 240(d), the motion fee is not applicable, as our client is a State of South Carolina agency.

If you have any questions, please do not hesitate to contact me.

With kind regards,

Very truly yours,

MONTGOMERY WILLARD, LLC



Theodore D. Willard, Jr.

TDW, JR/tds  
Enclosures

cc: John A. Massalon, Esquire (w/ enc.)  
Terry E. Richardson, Jr., Esquire (w/ enc.)  
Stephen R. Van Camp, Esquire (w/ enc.)