

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM JASPER COUNTY
Court of Common Pleas

Honorable J. Ernest Kinard, Jr., Circuit Court Judge

Case No. 2013-CP-27-00322
Appellate Case No. 20018-000048

George M. Hood,

Appellant,

v.

Jasper County,


Respondent.

APPELLANT'S RETURN TO MOTION FOR COSTS

Appellant George M. Hood, by and through his undersigned counsel, moves to dismiss Respondent's Motion for Costs on the basis it is untimely pursuant to Rule 242 of the South Carolina Appellate Court Rules. Appellant's counsel has been located at the address provided to, and used by, the Court of Appeals in this case for more than a year and a half. (See, e.g., attached correspondence from Court of Appeals to Appellant dated January 10, 2017.) Respondent had fifteen (15) days from the issuance of the remitter on April 26, 2018 to file a Motion for Costs. Fifteen (15) days from April 26, 2018 was May 11, 2018. Respondent filed its Motion and served it on Appellant on May 14, 2018. Appellant's correct address has been always accurately reflected on all appellate pleadings.

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As Respondent missed the deadline to file a Motion for Costs, Appellant respectfully moves Respondent's Motion be denied.



Nancy Bloodgood, Esq., SC Bar No. 6459
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Attorneys for the Appellant

Charleston, South Carolina

Date: May 22, 2018

ATTACHMENT



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The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
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January 10, 2017

Ms. Nancy Bloodgood, Esquire
242 Mathis Ferry Road, Suite 201
Mt. Pleasant SC 29464

Ms. Lucy Clark Sanders, Esquire
242 Mathis Ferry Road, Suite 201
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Mr. Christopher Wofford Johnson, Esquire
900 Elmwood Ave., Ste. 100
Columbia SC 29201

Mr. T. Foster Haselden, Esquire
900 Elmwood Avenue
Suite 100
Columbia SC 29201

Re: George Hood v. Jasper County
Appellate Case No. 2015-000310

Dear Counsel:

This case may or may not be considered during April 2017. If an argument is held, it may be held on April 10, 11, 12, 13, 18 or 20, 2017. In the event your case is selected for oral argument, we ask you to advise the Court of the specific nature of any conflict you may have on any of these dates by January 23, 2017.

received
1/12/17

Very truly yours,

V. Claire Allen, Deputy

CLERK

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George M. Hood,

Appellant,

v.

Jasper County,

Respondent.

PROOF OF SERVICE FOR APPELLANT'S RETURN TO MOTION FOR COSTS

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Attorneys for the Appellant

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I hereby certify that on May 22, 2018, I served a copy of the Appellant's Return to Motion for Costs on the following:

Christopher W. Johnson, Esquire
T. Foster Haselden, Esquire
L. Marshall Coleman Newton
Gignilliat Savitz & Bettis LLP
900 Elmwood Avenue, Suite 100
Columbia, SC 29201
Attorneys for the Respondent

by placing a copy of said documents in the United States mail with sufficient postage thereon.

A handwritten signature in cursive script that reads "Nancy Bloodgood". The signature is written in black ink and is positioned above a horizontal line.

Nancy Bloodgood, Esquire

Charleston, South Carolina

Date: May 22, 2018



May 22, 2018

The Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: *George M. Hood v. Jasper County*
Appellant Case No. 2018-000048

Dear Ms. Kitchings,

Enclosed please find for filing an original and one copy of the Proof of Service and Return in the above referenced matter reflecting today's service on Respondent of Appellant's Return to Respondent's Motion for Costs. I would appreciate you filing the originals and returning a clocked-in copy of the same to me in the enclosed self-addressed stamped envelope.

By copy of this letter to opposing counsel, I am serving a copy of the same.

With kindest regards, I am

Sincerely,

A handwritten signature in black ink that reads "Nancy Bloodgood".

Nancy Bloodgood

cc: Christopher W. Johnson, Esquire
T. Foster Haselden, Esquire
L. Marshall Coleman Newton, Esquire

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