

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

**Appeal from Charleston County  
Court of Common Pleas**

**R. Markley Dennis, Jr., Circuit Court Judge**

**CASE NO. 2013-CP-10-1686  
APPELLATE CASE 2015-001848**

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JUL 16 2018  
SC Court of Appeals**

Church of God and Church of God of South Carolina, .....Appellants,

v.

Mark Estes, Patricia Estes, Michael Timothy Brooks, Individually and as Trustee for Church of God at North Charleston Trust, Adam Boyer, Individually and as Trustee for Church of God at North Charleston, Rolando River Osorio, individually and as Trustee at Church of God at North Charleston, and North Palm Ministries, Inc., North Palm Community Church and Community First Bank and its Successor Crescom Bank, Defendants.

Of Whom Crescom Bank is the ..... Respondent,

v.

Thomas Propes and Marc Campbell, Third Party Defendants.

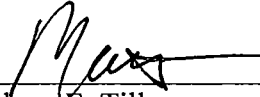
**RESPONDENT'S MOTION FOR COSTS AND FEES PURSUANT TO 222(B),  
SCACR**

Pursuant to Rule 222, SCACR, Respondent moves for its fees and costs associated with this appeal, which affirmed the circuit court's ruling. Respondent's itemized statement of costs is attached.

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

By: \_\_\_\_\_

  
Matthew E. Tillman

Daniel Q. Orvin

5 Exchange Street

P. O. Box 999

Charleston, South Carolina 29402

(843) 722-3400

ATTORNEYS FOR RESPONDENT

Other Counsel of Record  
Charles S. Altman  
Meredith L. Coker  
Altman & Coker, LLC  
575 King Street, Suite A  
Charleston, South Carolina 29403  
(843) 853-9907


July 12, 2018  
Columbia, South Carolina

**ITEMIZED STATEMENT OF COSTS**

The Appellate Court is requested to tax the following costs against Church of God and Church of God of South Carolina:

<b>Costs Taxable Under Rule 222, SCACR</b>	<b>No. of Pages</b>	<b>Rate</b>	<b>Requested</b>	<b>Allowed</b>
Cost of Printing or Copying Final Brief (including binding)	29		\$276.43	
Attorney's Fee Provided by Rule 222(b), SCACR			\$2,500.00	
<b>Total</b>			<b>\$2,776.43</b>	

I, Matthew Tillman, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed to and served upon opposing counsel.

By:   
Matthew Tillman  
Attorneys for the Respondent

Sworn to before me this 12<sup>th</sup> day of July, 2018.

Carol B. Casey  
Notary Public for the State of South Carolina

My Commission Expires: 02/13/19

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I do hereby certify that on the 12th day of July, 2018, I served a copy of the within **RESPONDENT'S MOTION FOR COSTS AND FEES PURSUANT TO 222(B), SCACR** in the within entitled matter by sending a copy of the same in an envelope with the correct postage prepaid addressed to:

Oana D. Johnson, Esq.  
215 East Bay Street  
Suite 406  
Charleston, South Carolina 29401  
*Attorney for Appellant*

George J. Kefalos, Esq.  
46 A State Street  
Charleston, South Carolina 29401  
*Attorney for Appellant*

Carol B. Ervin, Esq.  
Brian L. Quisenberry, Esq.  
Young Clement Rivers, LLP  
25 Calhoun St., Suite 400  
Charleston, South Carolina 29401  
*Attorneys for Church of God  
of South Carolina, Thomas Propes  
and Marc Campbell*

C. Steven Moskos, Esq.  
4000 Faber Place Drive  
Suite 300  
North Charleston, South Carolina 29405  
*Attorneys for Defendants Mark Estes,  
Patricia Estes, Adam Boyer, individually  
and as Trustee for Church of God at  
North Charleston and Michael Timothy  
Brooks, individually and as Trustee for  
Church of God at North Charleston  
Trust; North Palm Ministries, Inc. and  
North Palm Community Church*

Rolando Rivera Osorio  
8241 Preakness Drive, Lot 211  
North Charleston, SC 29420  
*Defendant Pro Se*

WOMBLE BOND DICKINSON (US) LLP



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ATTORNEYS FOR RESPONDENT

July 12, 2018  
Charleston, South Carolina



July 12, 2018

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

RE: Church of God v. Mark Estes  
Appellate Case No. 2018-000746

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of Respondent's Motion for Costs and Fees Pursuant to 222(B), SCACR in the above action. Please return one filed, time stamped copy to me in the enclosed pre-addressed, stamped envelope. This firm's check in the amount of \$25.00 is enclosed to cover the filing fee.

Yours very truly,

Womble Bond Dickinson (US) LLP

Matthew E. Tillman

MET/cbc  
Enclosures: as stated

cc with encl: Oana D. Johnson, Esq.  
George J. Kefalos, Esq.  
C. Steven Moskos, Esq.  
Carol B. Ervin, Esq.  
Brian L. Quisenberry, Esq.  
Charles S. Altman, Esq.  
Meridith L. Coker, Esq.

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WOMBLE  
BOND  
DICKINSON

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**FIRST CLASS MAIL**

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

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