

**THURMOND KIRCHNER
& TIMBES, P.A.**
ATTORNEYS AT LAW

15 Middle Atlantic Wharf
Charleston, SC 29401
o: 843.937.8000
f: 843.937.4200
www.TKTLawyers.com

July 18, 2018

VIA FACSIMILE & U.S. MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201
Fax to: (803) 734-1839

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JUL 19 2018

SC Court of Appeals

*Re: Case Tracking No.: 2018-000750
Harold Raynor v. Charles Byers
Case No.: 2009-CP-02-0706*

Dear Ms. Kitchings:

This firm represents Respondents Harold Raynor and Michael Caldwell in connection with the above appeal. Enclosed for filing please find an original and seven (7) copies of Respondents' Motion for Costs as well as this firm's check in the amount of \$25.00 in satisfaction of the filing fee.

I would appreciate it if you would please file these documents with the Court and return any file-stamped copies to me using the enclosed self-addressed, stamped envelope. Your assistance with this matter is greatly appreciated. Should you have any questions or concerns, please do not hesitate to contact us.

With best regards, I am

Sincerely,

THURMOND KIRCHNER & TIMBES, P.A.



Moira McIntire
Paralegal to Thomas J. Rode

cc: All Counsel of Record (w/ enclosure)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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APPEAL FROM AIKEN COUNTY
Court of Common Pleas

JUL 19 2018

SC Court of Appeals

The Honorable Doyet A. Early, Circuit Court Judge

Opinion No. 5527 (S.C. Ct. App. Filed Dec. 20, 2017)
S.C. Ct. App. Case No. 2018-000750

Harold Raynor a/k/a Harold Raynor and Michael Caldwell,

Respondents,

v.

Charles C. Byers, John T. Bakhaus, Kurt Kasler and Kenneth Smith,

Defendants,

Of whom,

Charles C. Byers, John T. Bakhaus, and Kenneth Smith are

Appellants.

**MOTION FOR COSTS AGAINST CHARLES BYERS, JOHN BAKHAUS AND
KENNETH SMITH**

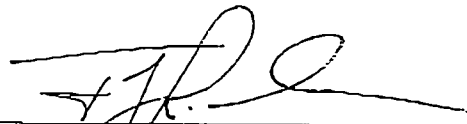
The Appellate Court is herein requested to tax the following costs against the Appellants Charles C. Byers, John T. Bakhaus, and Kenneth Smith:

COSTS TAXABLE UNDER RULE 222, SCACR	No. of Pages	Rate	Requested	Allowed (For Court Use only)
Cost of Printing or Copying Final Brief				
Costs of Printing or Copying Final Reply Brief				
Cost of Printing or Copying				

COSTS TAXABLE UNDER RULE 222, SCACR	No. of Pages	Rate	Requested	Allowed (For Court Use only)
Record on Appeal				
Filing Fee under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript				
Attorney Fees Provided by Rule 222(b), SCACR			\$2,500.00	
Other				

TOTAL: \$2,500.00

I, Thomas J. Rode, do swear and affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed to opposing counsel.



Thomas J. Rode, SC Bar No. 77480
 THURMOND KIRCHNER & TIMBES, P.A.
 15 Middle Atlantic Wharf
 Charleston, SC 29401
 Phone: 843.937.8000
 Email: thomas@tktlawyers.com

Subscribed and sworn before me this 18th day of July, 2018.



Notary Public for South Carolina
 My commission expires 11/16/2020.

(seal)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

The Honorable Doyet A. Early, Circuit Court Judge

Opinion No. 5527 (S.C. Ct. App. Filed Dec. 20, 2017).
S.C. Ct. App. Case No. 2016-000106

Harold Raynor a/k/a Harold Raynor and Michael Caldwell,

Respondents,

v.

Charles C. Byers, John T. Bakhaus, Kurt Kasler and Kenneth Smith,

Defendants,

Of whom,

Charles C. Byer, John T. Bakhaus, and Kenneth Smith are

Petitioners.

AFFIDAVIT OF SERVICE

I, Moira K. McIntire, an employee of Thurmond Kirchner & Timbes, P.A., attorneys for the Respondents, do hereby certify that I have this date, mailed, postage prepaid, a true and correct copy of the Respondents' Motion for Costs to the following counsel of record:

FOR PETITIONERS:

Spencer A. Syrett, SC Bar No. 05459
Post Office Box 7403
Columbia, SC 29202
Phone: 803-765-2110
syrettlaw@sc.rr.com



Moira K. McIntire
Paralegal to Michael A. Timbes/Thomas J. Rode

July 18, 2018
Charleston, South Carolina

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FACSIMILE TRANSMITTAL

DATE: July 18, 2018
TO: The Honorable Daniel E. Shearouse
FAX #: 803-734-1839
FROM: Moira McIntire, Paralegal to Thomas J. Rode
RE: Case Tracking No.: 2018-000750
Harold Raynor v. Charles Byers
Case No.: 2009-CP-02-0706
PAGES: 5 (including cover)

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SC Court of Appeals

Please see attached.

Thank you,

Moira

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In the Supreme Court

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

The Honorable Doyet A. Early, Circuit Court Judge

Opinion No. 5527 (S.C. Ct. App. Filed Dec. 20, 2017)
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S.C. SUPREME COURT

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Defendants,

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**MOTION FOR COSTS AGAINST CHARLES BYERS, JOHN BAKHAUS AND
KENNETH SMITH**

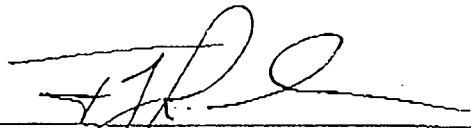
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The Honorable Doyet A. Early, Circuit Court Judge

S.C. SUPREME COURT

Opinion No. 5527 (S.C. Ct. App. Filed Dec. 20, 2017)
S.C. Ct. App. Case No. 2016-000106

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Harold Raynor a/k/a Harold Raynor and Michael Caldwell,

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Of whom,

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