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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Kristi Lea Harrington, Circuit Court Judge

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Appellate Case No. 2016-001281

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**RECEIVED**

JUL 30 2018

SC Court of Appeals

Joan Barra, Employee

v.

Charleston County, Self-Insured Employer, through the  
South Carolina Counties Workers' Compensation Trust, Carrier,

In Re: Charleston County and the South Carolina Counties  
Workers' Compensation Trust.....Respondents,

v.

South Carolina Second Injury Fund.....Appellant.

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**MOTION FOR FEES AND COSTS**

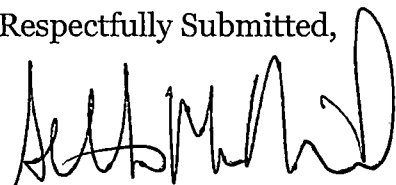
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Charleston County and the South Carolina Counties Workers' Compensation Trust, Respondents in the above-named matter, hereby moves for an award of attorney's fees and costs pursuant to Rule 222, SCACR. This Motion is based upon the South Carolina Court of Appeals's opinion affirming the Appellate Panel's Order (Unpublished Opinion No. 2018-UP-279, filed on June 27, 2018), which affirmed the circuit court's ruling that Respondents commenced their claim for reimbursement against Appellant within ten years after it accrued.

The Clerk of the Court of Appeals is requested to tax fees and costs in the amount of \$1,274.52 representing the cost of the court reporter's transcripts, the cost of printing the Record on Appeal under Rule 209, the cost of printing the final brief under Rule 210, and attorney's fees from the appeal to the Court of Appeals as provided by Rule 222(b), SCACR; against the Appellant, South Carolina Second Injury Fund. The aforementioned fees and costs are stated more particularly in the attached Itemized Statement of Fees and Costs.

The Respondents, Charleston County and the South Carolina Counties Workers' Compensation Trust, further request such other relief against the Appellant as this honorable Court may deem just and proper.

Respectfully Submitted,



July 27, 2018

F011 Kirsten L. Barr, SC Bar #15525  
Trask & Howell, L.L.C.  
P.O. Box 2167  
Mt. Pleasant, SC 29465  
(843) 881-4228  
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Attorney for Charleston County  
and the South Carolina Counties  
Workers' Compensation Trust,  
Respondents

THE STATE OF SOUTH CAROLINA  
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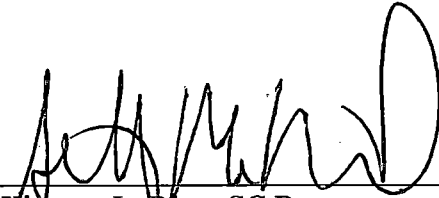
**PROOF OF SERVICE**

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The undersigned hereby certifies the above-referenced Appellant, the South Carolina Second Injury Fund, was served with copies of the attached Motion for Fees and Costs and Itemized Statement of Fees and Costs this the 27th day of July 2018, by depositing the same in the United States Mail, first class postage prepaid, addressed to their attorney of record, as follows:

Latonya Dilligard Edwards, Esq.  
Dilligard Edwards, LLC  
3790 Fernandina Road, Suite 103  
Columbia, SC 29210

July 27, 2018



FOR Kirsten L. Barr, SC Bar #15525  
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Attorney for Charleston County and the  
South Carolina Counties Workers'  
Compensation Trust, Respondents

TRASK  
HOWELL  
WORKERS' COMPENSATION DEFENSE

Reply to  
Kirsten L. Barr  
(843) 881-1027  
kbarr@trask-howell.com

July 27, 2018

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

Re: Joan Barra v. Charleston County  
W.C.C. File No.: 9613486  
SIF No.: 51595  
Appellate Case No.: 2016-001281  
Carrier File No.: 36516  
Date of Accident: April 30, 1996

**RECEIVED**

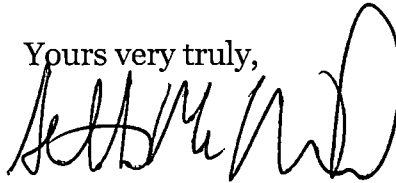
JUL 30 2018

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed herewith for filing, please find the original and six (6) copies of our Motion for Fees and Costs, Itemized Statement of Fees and Costs, and original Proof of Service of the same in the above-referenced matter. By a copy of this correspondence, I am serving the other counsel of record with a copy of our Motion. Also enclosed, please find our check in the amount of \$25.00 for the filing of this Motion.

Yours very truly,



For Kirsten L. Barr

KLB/lmc/les

Enc.

cc: Gene Jarrett., Ariel TPA (w/enc.) (email only)  
Lang Kelly, S.C. Association of Counties (w/enc.) (email only)  
Mike Schwerin, Charleston County (w/enc.)  
Latonya Dilligard Edwards, Esq. (w/enc.)



**TRASK & HOWELL L.L.C.**  
**ATTORNEYS AT LAW**  
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JUL 30 2018  
SC Court of Appeals

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**1165.110**  
**The Honorable Jenny Abbott Kitchings**  
**Clerk, South Carolina Court of Appeals**  
**P. O. Box 11629**  
**Columbia, SC 29211**

