

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

Joseph M. Strickland, Special Circuit Court Judge

Appellate Case No. 2018-001472
Trial Court Case No. 2018-CP-40-03019

RECEIVED
OCT 18 2018
SC Court of Appeals

HUB International Midwest Limited,

Respondent,

v.

Kip Bouknight,

Appellant

MOTION FOR COSTS

Respondent HUB International Midwest Limited hereby give notice and move the South Carolina Court of Appeals, pursuant to Rule 222, SCACR, for an order taxing all costs permitted under Rule 222(b), SCACR, including the attorney's fee set by the South Carolina Supreme Court's January 17, 2018 Order. Respondent's counsel's law firm has spent a total of 6.7 hours addressing this appeal. This Motion is accompanied by a sworn, itemized statement of costs, as required by Rule 222(d), SCACR.

The factual basis for this Motion is that on August 6, 2018, Appellant served his Notice of Appeal, appealing from the circuit court's July 6, 2018 order. On September 6, 2018, Appellant's motion to withdraw his appeal was filed with this Court. This Court

granted Appellant's motion to withdraw his appeal by order filed September 17, 2018.

This Court issued the remittitur on October 3, 2018.

Accordingly, counsel for Respondent respectfully requests that this Court issue an order taxing costs against Appellant pursuant to Rule 222, SCACR.

Respectfully submitted,



Nekri Shutt, Esq. (Bar No. 8784)
Kathleen McDaniel, Esq. (Bar No. 74826)
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**ATTORNEYS FOR RESPONDENT HUB
INTERNATIONAL MIDWEST LIMITED**

Columbia, South Carolina

October 18, 2018

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PROOF OF SERVICE


I do hereby certify I have served a copy of the following as indicated herein below, by mailing a copy of the following documents by first class U.S. Mail postage pre-paid on the date below to the following:

**DOCUMENTS SERVED: MOTION FOR COSTS
ITEMIZED STATEMENT OF COSTS**

PARTIES SERVED:

John Clifford Glancy, Esq.
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
P.O. Box 2757
Greenville, SC 29602

ATTORNEY FOR APPELLANT KIP BOUKNIGHT



Tammie Jackson, Legal Assistant
BURNETTE SHUTT & MCDANIEL, PA

Columbia, South Carolina
October 18, 2018



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October 18, 2018

VIA HAND-DELIVERY

The Honorable Jenny Abbot Kitchings, Clerk
SOUTH CAROLINA COURT OF APPEALS
Calhoun Building
1015 Sumter Street
Columbia, South Carolina 29201

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OCT 18 2018
SC Court of Appeals

Re: HUB International Midwest Limited v. Kip Bouknight
Trial Court Case No.: 2018-CP-40-03019
Appellate Case No.: 2018-001472
Our File No.: 18111.001

Dear Madam Clerk:

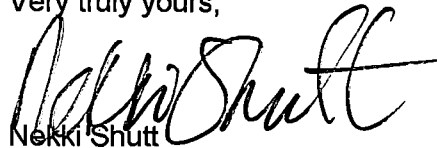
Enclosed for filing, please find an original and seven copies of the Motion for Costs and Itemized Statement of Costs in the above-referenced matter. Please file the original and the six copies, clock-in the seventh copy, and return it to me via courier delivering the same.

By copy of this letter, I am serving all counsel of record with a copy of the same.

If you have any questions or need anything further regarding this matter, please do not hesitate to contact me at my office.

With kind regards, I remain

Very truly yours,


Nekki Shutt

NS / tj
Enclosures

cc: John Clifford Glancy, Esq. (w/ encls. via U.S. Mail)
Kathleen McDaniel, Esq. (w/o encls.)
HUB International Midwest Limited (w/encls. via e-mail only)