

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Tanya A. Gee, Circuit Court Judge

Case No. 2014-CP-40-07229

**RECEIVED**  
NOV 13 2018  
SC Court of Appeals

Group III Mgt., Inc. .... Respondent,

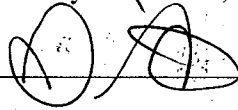
v.

Suncrete of Carolina, Inc. d/b/a Crystal Pools..... Appellant.

**MOTION FOR COSTS**

Respondent hereby moves this Court to award its recoverable attorney's fees pursuant to Rule 222, SCACR. Respondent was the prevailing party in the above-captioned appeal, which was affirmed in totality. A sworn, itemized statement is attached hereto.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'John C. Bruton, Jr.', written over a horizontal line.

HAYNSWORTH SINKLER BOYD, P.A.

John C. Bruton, Jr. (SC Bar No. 975)  
P.O. Box 11889 (2911-1889)  
Columbia, SC 29201  
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Sarah P. Spruill (SC Bar No. 68337)  
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*Attorneys for Respondent Group III Mgt., Inc.*

November 9, 2018

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**ITEMIZED STATEMENT OF COSTS**

The Appellate Court is requested to tax the following costs against the Respondent in this appeal.

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED (\$)	ALLOWED (For Court Use Only)
Attorney's Fee Provided By Rule 222(b), SCACR			\$2,500	
	<b>TOTAL</b>		<b>\$2,500</b>	

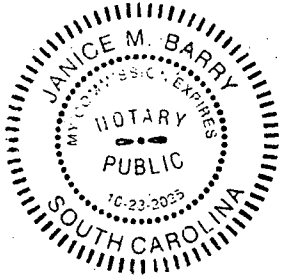
I, Sarah P. Spruill, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed to opposing counsel.

  
\_\_\_\_\_  
Sarah P. Spruill

SWORN to before me this  
9<sup>th</sup> day of November, 2018

Janice M. Barry  
Notary Public for South Carolina

MY COMMISSION EXPIRES: October 23, 2025



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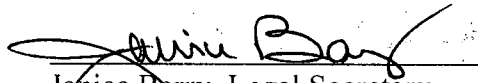
v.

Suncrete of Carolina, Inc. d/b/a Crystal Pools ..... Appellant.

**PROOF OF SERVICE**

I certify that I have served the **Respondent Group III Mgt., Inc.'s Motion for Costs** upon Appellant by depositing a copy of the same in the United States Mail, First Class postage prepaid, on November 9, 2018, addressed to Appellant's attorneys of record, addressed as follows:

Alan R. Belcher, Jr., Esquire  
Elizabeth Freeman Wieters, Esquire  
Hall Booth Smith, P.C.  
40 Calhoun Street, Suite 550  
Charleston, SC 29401

  
Janice Barry, Legal Secretary  
Haynsworth Sinkler Boyd, P.A.  
P.O. Box 2048  
Greenville, SC 29602  
(864) 240-3223

**HAYNSWORTH  
SINKLER BOYD**

HAYNSWORTH SINKLER BOYD, P.A.  
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SARAH P. SPRUILL  
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sspruill@hsblawfirm.com

November 9, 2018

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

Re: Group III Mgt., Inc. v. Suncrete of Carolina, Inc. d/b/a Crystal Pools  
Civil Action No. 2014-CP-40-07229  
Appellate Case No. 2015-002584  
HSB File No. 32275.0003

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Dear Ms. Kitchings:

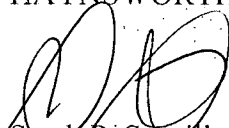
Enclosed for filing, please find an original and seven (7) copies of *Respondent's Motion for Costs* in the above-referenced matter, together with our Proof of Service of same and a check for the filing fee. Please return clocked copies to me in the enclosed self-addressed stamped envelope.

If you have any questions, please give me a call.

Thank you for your assistance in this matter.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



Sarah P. Spruill

SPS/jmb  
Enclosures

cc: Alan Ross Belcher, Jr., Esquire (w/encl.)  
Elizabeth Freeman Wieters, Esquire (w/encl.)

**HAYNSWORTH  
SINKLER BOYD**

P.O. BOX 2048  
GREENVILLE, SOUTH CAROLINA 29602-2048

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

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