

89158

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

FEB 27 2019

Case No. 2015-CP-41-139
Appellate Case No. 2017-000198

SC Court of Appeals

McCarty Enterprises, LLC, John Miles McCarty,
and Audrey S. McCarty, a/k/a/ Audrey J. McCarty Appellants

v.

Amy Potts Respondent

MOTION TO SERVE AND FILE ITEMIZED STATEMENT OF COSTS

The Respondent moves pursuant to SCACR 222, for an Order allowing the service and filing of the Respondent's Itemized Statement of Costs. This Motion is based on the following grounds:

1. Rule 222, SCACR, provides that Counsel for the Respondent can recover taxable costs of printing in a case.
2. Rule 222(b), SCACR, provides that Counsel for the Respondent can recover attorney fees in the amount of \$2,500.

Based on the foregoing, the Respondent is informed and believes that this Motion should be granted.



Frank S. Potts
Attorney at Law
(SC Bar No. 4538)
137 Stone Ridge Road
Leesville, SC 29070
(803)622-6000
lakecottage1945@gmail.com

M. Evan Lacke
Attorney at Law
(SC Bar No. 74969)
LACKE LAW FIRM
147 Wappoo Creek Drive, Ste. 204
Charleston, SC 29412
(843)327-1523
evanlacke@lackelawfirm.com

February 27, 2019
Leesville, SC

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Case No. 2015-CP-41-139
Appellate Case No. 2017-000198

RECEIVED

FEB 27 2019

SC Court of Appeals

McCarty Enterprises, LLC, John Miles McCarty, and
Audrey S. McCarty, a/k/a/ Audrey J. McCartyAppellants

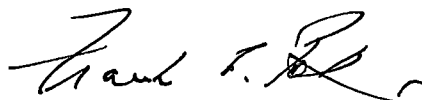
v.

Amy Potts Respondent

PROOF OF SERVICE

I certify that on this day, February 27, 2019, I served the Respondent's Motion to Serve and File Itemized Statement of Costs and Respondent's Itemized Statement of Costs on the Appellants McCarty Enterprises, LLC; John Miles McCarty; and Audrey S. McCarty, a/k/a/ Audrey J. McCarty via trackable USPS Priority Mail, and addressed to their Attorney of Record:

Candy Kern-Fuller, Esq.
Upstate Law Group, LLC
200 East Main Street
Easley, South Carolina 29640



Frank S. Potts
Attorney at Law
(SC Bar No. 4538)
137 Stone Ridge Road
Leesville, SC 29070
(803)622-6000
lakecottage1945@gmail.com

M. Evan Lacke
Attorney at Law
(SC Bar No. 74969)
LACKE LAW FIRM
147 Wappoo Creek Drive, Ste. 204
Charleston, SC 29412
(843)327-1523
evanlacke@lackelawfirm.com

February 27, 2019
Leesville, SC

FRANK S. POTTS

ATTORNEY AT LAW

137 STONE RIDGE ROAD
LEESVILLE, SOUTH CAROLINA 29070

803.622.6000
LAKECOTTAGE1945@GMAIL.COM

February 27, 2019

The Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Potts v. McCarty Enterprises, LLC et al
Case No. 2015-CP-41-139
Appellate Case No. 2017-000198

RECEIVED
FEB 27 2019
SC Court of Appeals

Dear Ms. Kitchings:

Enclosed are the originals of Respondent's Motion to Serve and File Itemized Statement of Costs and Respondent's Itemized Statement of Costs. Also enclosed is a Certificate of Service for the mailing of copies of the same to opposing counsel.

Very truly,


Frank Potts