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**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

The Honorable J.C. Nicholson, Jr., Circuit Court Judge

**RECEIVED**

FEB 28 2019

SC Court of Appeals

Appellate Case No. 2016-001156  
Circuit Case No. 2015-CP-08-00547

Cokers Commons Homeowner's Association, Inc.....Respondents,

v.

Park Investors, LLC, CCT Reserve, LLC, f/k/a Harris Street, LLC and Whipple  
Development Corporation.....Defendants,

Of which Whipple Development Corporation.....Appellant.

**MOTION FOR TAXATION OF COSTS  
&  
ITEMIZED STATEMENT OF COSTS**

Pursuant to Rule 222, SCACR, the above-named Respondent herein moves this Honorable Court  
for an order taxing costs against Appellant as set forth herein, and in support of the same states as follows:

Appellant's Petition for Writ of Certiorari to the Court of Appeals was finally denied on  
February 1, 2019; and the remittitur issued on February 21, 2019.

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Development Corporation.....Defendants,

Of which Whipple Development Corporation.....Appellant.

**AFFIDAVIT OF SERVICE**

I, Caroline Boyce, an employee of Thurmond Kirchner & Timbes, P.A., attorneys  
for Respondents, do hereby certify that I have on this date, served via U.S. Mail three (3)  
true and correct copies of the Final Brief to the following counsel of record:

**FOR APPELLANT:**  
Daniel F. Blanchard, Esquire  
Rosen, Rosen & Hagood, LLC  
151 Meeting St. Suite 400  
Charleston, SC 29401  
[dblanchard@rrhlawfirm.com](mailto:dblanchard@rrhlawfirm.com)

-and-

R. Britton Kelly, Esquire  
Kelly Law Firm, LLC  
180 Spring St.  
Charleston, SC 29403  
[britt@kellylawsc.com](mailto:britt@kellylawsc.com)

Caroline Boyce  
Caroline Boyce  
Paralegal to Michael A. Timbes and  
Thomas J. Rode

This 26 day of February, 2019  
Charleston, South Carolina

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



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Charleston, SC 29401  
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February 26, 2019

**VIA US MAIL & FAX**

The Hon. Jenny A. Kitchings  
S.C. Court of Appeals  
PO Box 11629  
Columbia, SC 29211  
803-734-1839

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SC Court of Appeals

**Re: *Cokers Commons HOA v. Park Investors, et al.***  
***Circuit Case No. 2015-CP-08-00547***  
***Appellate Case No. 2016-001156***

Dear Mrs. Kitchings,

Enclosed please find an original and seven (7) copies of my Motion for Taxation of Costs in the above referenced matter, as well as payment for filing. Please file the original and return a stamped copy to me in the self-addressed stamped envelope also enclosed for your convenience.

Thank you in advance for your assistance with this matter. Should you have any questions or concerns, please do not hesitate to contact me.

With best regards, I remain

Very truly yours,

*Caroline Boyce*

Caroline Boyce  
Paralegal to Thomas J. Rode

Ceb/TJR

cc: All counsel of record

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

15 Middle Atlantic Wharf  
Charleston, South Carolina 29401

The Hon. Jenny A. Kitchings  
SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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