

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Charles B. Simmons, Jr., Master-in-Equity

Appellate Case Number: 2018-000985

**RECEIVED**  
MAR 28 2019  
SC Court of Appeals

John D. Hatcher, Rachel Shaluly, James F. Gilbert, Molly A. Miller,  
and Michael Stehney, individually and as members of the Architectural  
Committee of Mill Creek Estates,

Respondents,

vs.

Ronald E. Ferguson, Ronald J. Ferguson and  
Susan M. Ferguson,

Appellants,

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**MOTION FOR COSTS AND ATTORNEY FEES**

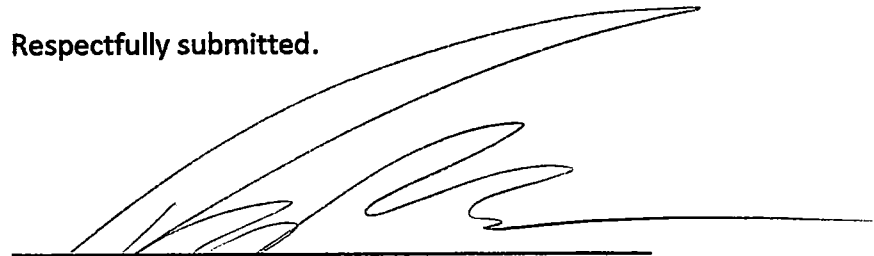
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The Respondents respectfully submit a Motion pursuant to Rule 222 of the Appellate  
Court rules for payment of their costs and attorney fees.

Pursuant to Rule 222, the Appellate Court will tax the costs against the Appellants when  
a judgment is affirmed. An Itemized Statement of Costs (Form 17) is attached hereto and  
incorporated herein.

Accordingly, the Respondents request the costs and attorney fees be paid.

Respectfully submitted.



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Rodney M. Brown, #953  
Attorney for Respondents  
210 S. Main Street  
Fountain Inn, South Carolina 29644  
(864) 862-2528

March 25, 2019

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
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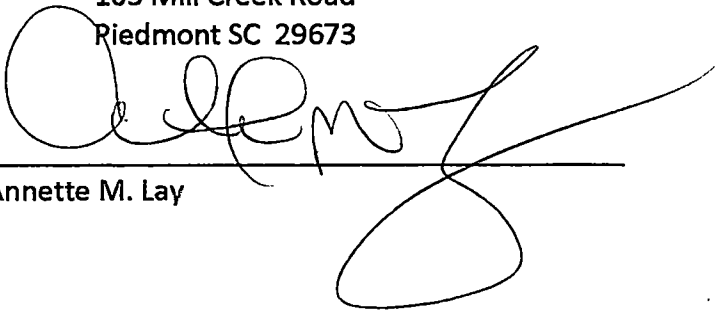
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CERTIFICATE OF SERVICE

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The undersigned employee of Rodney M. Brown, P.A., counsel for John D. Hatcher, Rachel Shaluly, James F. Gilbert, Molly A. Miller and Michael Stehney, individually and as members of the Architectural committee of Mill Creek Estates, does hereby certify that service of the Motion for Costs and Attorney Fees was made upon Appellants by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this 25th day of March, 2019.

Ronald J., Ronald E. and Susan M. Ferguson  
103 Mill Creek Road  
Riedmont SC 29673

  
Annette M. Lay

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MAR 28 2019

SC Court of Appeals

RODNEY M. BROWN PA  
ATTORNEY AT LAW

March 25, 2019

**RECEIVED**

MAR 28 2019

SC Court of Appeals

The South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: John D. Hatcher, et al. vs. Ronald J. Ferguson, et al.  
2018-000985

Dear Sir or Madam:

Enclosed herein please find the original and 6 copies of the Respondents' Motion for Costs and Attorney Fees on the above-referenced case. By Certificate of Service, I am forwarding a copy to the Appellants.

As always, your time and cooperation is appreciated.

Sincerely,

  
Rodney M. Brown

aml

Enclosures

cc: Ronald J. Ferguson, Ronald E. Ferguson and  
Susan M. Ferguson

RODNEY M. BROWN PA

ATTORNEY AT LAW

210 S. Main Street • Fountain Inn, South Carolina 29644

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