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STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

L. Casey Manning, CIRCUIT COURT JUDGE

Case No. 2016-CP-40-06320  
Appellate Case No. 2019-000324

RECEIVED  
MAR 29 2019  
SC Court of Appeals

Stephen D. Kelly .....Appellant,

vs.

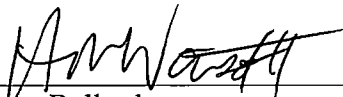
Nancy Jones, Robert J. Kelly, Patricia Murphy and  
Donald Kelly, Defendants,

Of Whom Donald Kelly is the .....Respondent.

**MOTION FOR COSTS**

This Court dismissed the above-reverenced appeal in favor of the Respondent, Donald Kelly, by order dated March 14, 2019. Therefore, pursuant to Rules 222(a), (b), and (d), Respondent hereby moves this Honorable Court for an order taxing attorney's fees and costs in the amount of Two Thousand Five-Hundred dollars (\$2,500.00) (see Itemized Statement of Costs attached).

A copy of this statement has been mailed to opposing counsel.

  
\_\_\_\_\_  
Desa Ballard  
Harvey M. Watson III

**BALLARD & WATSON**  
Post Office Box 6338  
West Columbia, South Carolina 29171  
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March 28, 2019

ATTORNEYS FOR RESPONDENT  
DONALD KELLY

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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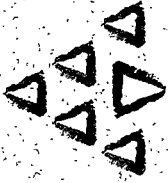
**PROOF OF SERVICE**

I, Beth Cogan, an employee with Ballard & Watson, do hereby certify that on March 28, 2019, I served a copy of the **Motion for Costs**, in the above-captioned case on the following individuals by United States Mail, with sufficient first-class postage affixed, addressed as follows:

**Stephen Hucks, Sr., Esquire  
Hucks & Felker, LLC  
9610 Two Notch Road, Suite 5  
Columbia, South Carolina 29223**

  
Beth Cogan, Paralegal

March 28, 2019



**Ballard & Watson**  
Attorneys at Law  
PERSISTENT. UNWAVERING.

Desa Ballard  
Harvey M. Watson III

Post Office Box 6338 | West Columbia, SC 29171  
226 State Street | West Columbia, SC 29169  
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March 28, 2019

Via U.S. Mail

The Honorable Jenny Abbot Kitchings  
Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: *Stephen D. Kelly v. Donald Kelly*  
Case No.: 2019-000324

Dear Ms. Kitchings:

Enclosed for filing please find seven copies of the **Motion for Costs** in the above-referenced matter. Also enclosed is our check for the filing fee. Please clock and return a stamped copy in the self-addressed, stamped envelope enclosed. Thank you for your time in this matter. If you have any questions, please do not hesitate to contact our office.

With warm personal regards, I am,

Sincerely yours,

Harvey M. Watson III  
[harvey@desaballard.com](mailto:harvey@desaballard.com)

cc: Via U.S. Mail  
Stephen Hucks, Sr., Esquire

**RECEIVED**  
MAR 29 2019  
SC Court of Appeals

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MAR 29 2019

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BALLARD & WATSON, ATTORNEYS AT LAW  
226 STATE STREET  
WEST COLUMBIA, SC 29169

To:

The Honorable Jenny Abbot Kitchings  
Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**

MAR 29 2019

SC Court of Appeals