

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APR 04 2019

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

S.C. SUPREME COURT

Alison R. Lee, Circuit Court Judge

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2017-UP-040 (S.C. Ct. App. filed January 25, 2017)  
Case No. 2013-CP-40-1460  
Appellate Case No. 2015-000613

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Jeffrey Kennedy..... Petitioner,

v.

Richland County School District Two, Eric Barnes and Chuck Earles..... Respondents.

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**MOTION FOR AWARD OF ATTORNEY'S FEES AND COSTS**

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Pursuant to Rule 222, SCACR, the Petitioner moves the Court to tax the costs of this appeal against the Respondents and in support of its motion shows the Court the following:

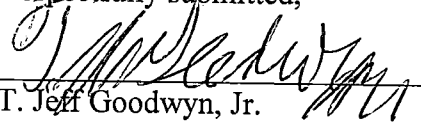
1. This Court filed an Order dated March 22 reversing the decision of the Court of Appeals that there was no evidence to send the case to the jury.

2. Pursuant to Rule 222(a), SCACR, costs shall be taxed against the respondent when the decision is reversed.

3. As shown in the attached Petitioner's Itemized Statement of Costs, Petitioner has incurred allowed costs and attorney's fees in the amount of \$3,049.68.

WHEREFORE, Petitioner hereby requests that the Court grant its Motion for Attorney's fees and Costs in the amount of \$3,0419.68 as shown in the attached sworn itemization of costs.

Respectfully submitted,



T. Jeff Goodwyn, Jr.  
Goodwyn Law Firm, LLC  
2519 Devine Street  
Suite A  
Columbia, SC 29205  
(803) 251-4517  
(803) 251-4527 facsimile  
Attorney for Petitioner

Columbia, South Carolina  
April 4, 2019

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Jeffrey Kennedy..... Petitioner,

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**PETITIONER'S ITEMIZED STATEMENT OF COSTS**

The Appellate Court is requested to tax the following costs against:

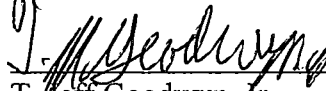
<b>Richland County School District Two, Eric Barnes and Chuck Earles</b>				
<b>Costs Taxable under Rule 222, SCACR</b>	<b>No. of Pages</b>	<b>Rate</b>	<b>Requested</b>	<b>Allowed (for court use only)</b>
Cost of Printing or Copying Final Brief	49		\$431.68	
Cost of Printing or Copying Final Reply Brief	12		\$63.00	
Cost of Printing or Copying Record on Appeal	1041		\$1,812.13	
Filing Fee Paid Under Rule 203(d), SCACR			\$100.00	
Cost of Court Reporter's Transcript				
Attorney's Fee Provided by Rule 222(b), SCACR	\$7,097.39		\$2,500.00	
Other (specify and explain):				
<b>Costs Taxable Under Rule 242(j), SCACR</b>				

Costs of Printing or Copying of Brief				
Cost of Printing or Copying Reply Brief				
Cost of Printing or Copying Appendix				
Filing fee Paid under Rule 242(c), SCACR				
Attorney's fee paid provided by Rule 242(j)(2), SCACR				
Other (specify and explain):				
		Total	\$3,094.68	

I, T. Jeff Goodwyn, Jr., do swear or affirm that the foregoing costs are correct and we necessarily incurred in this action. A copy of this statement was mailed to and served upon opposing counsel on this 4<sup>th</sup> day of April, 2019.


Respectfully submitted,

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr.  
 2519 Devine Street  
 Suite A  
 Columbia, SC 29205  
 (803) 251-4517  
 Attorney for Petitioner

SWORN to before me  
 this 4 day of April, 2019.

  
 NOTARY PUBLIC FOR SOUTH CAROLINA  
 My Commission Expires: 10-19-2019

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S.C. SUPREME COURT

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Alison R. Lee, Circuit Court Judge

2017-UP-040 (S.C. Ct. App. Filed January 25, 2017)  
Appellate Case No. 2017-001160  
Lower Court Case No. 2013-CP-40-1460

Jeffrey Kennedy.....Petitioner,

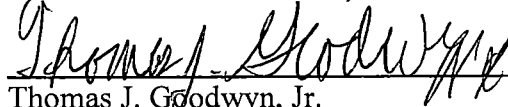
v.

Richland County School District Two, Eric Barnes and Chuck Earles..... Respondents.

**PROOF OF SERVICE**

I certify that I have served the **Petitioner's Motion for Attorney's Fees and Costs** and **Petitioners' Itemized Statement of Costs**, by depositing a copy of same in the United States Mail, postage prepaid, on **April 4, 2019**, addressed to counsel for Respondents, Thomas K. Barlow, Esquire at the Law Firm of Halligan, Mahoney & Williams, PA to P.O. Box 11367, Columbia, SC 29211.

GOODWYN LAW FIRM, LLC



Thomas J. Goodwyn, Jr.  
2519 Devine Street  
Suite A  
Columbia, SC 29205  
Attorney for Petitioner

April 4, 2019