

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas
Carl A. Saleeby, Special Referee

Appellate Case No.: 2017-000966

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APR 02 2019
SC Court of Appeals

In the Matter of Thomas E. Goodson, et al v. Debra J. Freeman, et al.

In re:

Thomas E. Goodson, as Trustee of the Residuary Beneficiaries Trust of the Estate of Margaret S. Goodson and the Estate of Helen S. Goodson,
..... Respondent,

v.

Harriet E. Wilmeth, Debra J. Freeman, Bank of America, N.A., Lumber Yard, Inc. St. Bartholomew's Episcopal Church, Canal Wood, LLC, Alexander C. West, Alexander C. West, Jr., Airport Technologies, LLC, Mutual Savings Bank, State of South Carolina Department of Revenue, United States of America acting through the Department of Treasury/International Revenue Service, Ford Motor Credit Company, LLC, James Gandy, Estate of Amelia H. Anthony, Estate of Betty C. Wiggins, Portfolio Recovery Association, South Carolina Department of Probation, Parole, and Pardon Services, Norwood C. Bizzell, Robert "B.W." Bizzell, William E. Bizzell, Mary Lathan Steele, and Vicki Eaddy, Defendants

Of whom Debra J. Freeman is the Appellant.

MOTION FOR COSTS UNDER RULE 222, SCACR

Appellant Debra J. Freeman moves, pursuant to Rule 222, SCACR, for an award of costs and attorney's fees incurred in bringing an appeal. Rule 222(a) provides that unless otherwise ordered or agreed upon by the

parties, costs shall be taxed against the Respondent when the lower court's judgement is reversed. Rule 222(b), SCACR, entitles the prevailing party on appeal to recover costs actually incurred in bringing an appeal including an attorney's fee award of Two Thousand Five Hundred and NO/100 (\$2,500.00) Dollars. Accordingly, Respondent asks the Court to award it Two Thousand Five Hundred and NO/100 (\$2,500.00) Dollars in costs and attorney's fees under Rule 222(b), SCACR. In support of our motion, we have attached an Itemized Statement of Costs, pursuant to Rule 222(b), SCACR. This award should be taxed against the Respondent, as the judgement in this case was affirmed by the South Carolina Court of Appeals on January 1, 2019.

Respectfully submitted,

By: 

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March 28, 2019
Marion, South Carolina

Attorney for the Appellant

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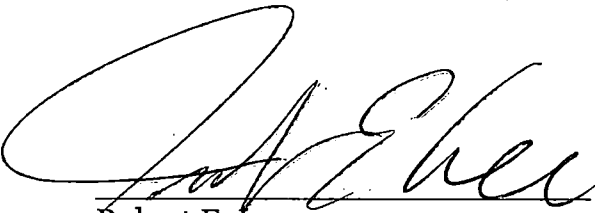
Harriet E. Wilmeth, Debra J. Freeman, Bank of America, N.A., Lumber Yard, Inc. St. Bartholomew's Episcopal Church, Canal Wood, LLC, Alexander C. West, Alexander C. West, Jr., Airport Technologies, LLC, Mutual Savings Bank, State of South Carolina Department of Revenue, United States of America acting through the Department of Treasury/International Revenue Service, Ford Motor Credit Company, LLC, James Gandy, Estate of Amelia H. Anthony, Estate of Betty C. Wiggins, Portfolio Recovery Association, South Carolina Department of Probation, Parole, and Pardon Services, Norwood C. Bizzell, Robert "B.W." Bizzell, William E. Bizzell, Mary Lathan Steele, and Vicki Eaddy, Defendants

Of whom Debra J. Freeman is the Appellant.

PROOF OF SERVICE

I certify that I have served a copy of the Appellant Debra J. Freeman's Motion of Costs and Itemized Statement of Costs on all counsel of record by depositing these copies in the United States Mail, postage prepaid on March 28, 2019, addressed to all counsel of record:

James A. Stanton IV, Esquire
Stanton Law Firm
P.O. Box 70
Hartsville, SC 29551



Robert E. Lee

March 28, 2019
Marion, South Carolina



ROBERT E. LEE
ATTORNEY - AT - LAW

March 28, 2019

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Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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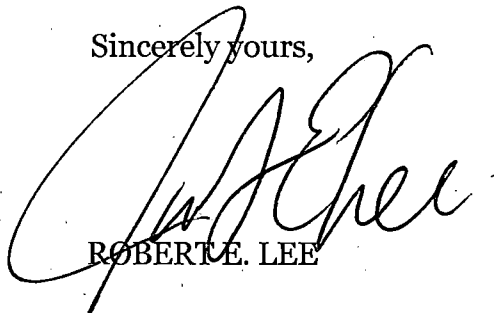
Re: Thomas E. Goodson, at al v. Debra J. Freeman, et al.
Appellate Case No.: 2017-000966

Dear Ms. Kitchings:

On behalf of the Appellant Debra J. Freeman, please find the original and seven copies each of our Motion for Costs, Itemized Statement of Costs, and Proof of Service of the same on all counsel. We have also enclosed our firm's check in the amount of \$25.00 in payment of the filing fee for the Motion. We would appreciate your returning a filed copy of each document to us in the envelope provided. Thank you for your assistance in this matter.

By copy of this letter to counsel for the Respondent, James A. Stanton IV, Esquire, we are herewith serving them with copies of all these items as well. If you have any questions, please give me a call.

Sincerely yours,



ROBERT E. LEE

REL:meg
Enclosures

Cc: James A. Stanton IV, Esquire (w/enclosures)

ROBERT E. LEE, LLC
ATTORNEY - AT - LAW

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TO:

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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