

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 No.: 2018-001279

RECEIVED  
APR 08 2019  
SC Court of Appeals

Michael Stehney, Jr.....Respondent,

v.

Ronald E. Ferguson, Susan M. Ferguson  
and Ronald J. Ferguson, Defendants  
OF WHOM Ronald J. Ferguson is .....Appellant.

**RESPONDENT'S MOTION FOR COSTS  
TO BE PAID BY APPELLANT**

Respondent, Michael Stehney, Jr., by and through his undersigned counsel, moves, pursuant to Rule 224, South Carolina Appellate Court Rules, for Appellant to pay the costs of the Respondent as provided for in Rule 222 of the South Carolina Appellate Court Rules.

This Motion is based on the fact that the Appellants' appeal was dismissed by the Court's decision filed March 11, 2019 with Remittitur issued on March 27, 2019. Respondent is asking for additional fees – above the \$2,500 provided by the Court rules – because he was forced to deal with a number of frivolous motions set forth in the attached excel spreadsheet that unnecessarily drove up the costs on this appeal.

Respectfully submitted this 3 day of April, 2019.

**CHACELAW LIMITED COMPANY**

  
Chace D. Campbell  
12 East Stone Avenue

Greenville, SC 29609  
(864) 268-8244  
Attorney for Respondent Michael Stehney, Jr

Other parties of record:

Ronald E. Ferguson, Pro Se  
Susan M. Ferguson, Pro Se  
103 Mill Creek Road  
Piedmont, SC 29673

Chace Campbell, P.A.					
12 East Stone Avenue					
Greenville, SC 29609					
<b>History Bill</b>				Date:	4/3/2019
Date	Staff	T/E	Description	Dur/Qty	Amount
10/25/2018	DCL	T	Call with Michael re updates	0.33	\$57.75
10/25/2018	JC	T	Call with Darlene re staus of appeal.	0.3	\$60.00
10/25/2018	DCL	T	Discuss with John re status of appeal	0.4	\$70.00
11/15/2018	LAR	T	Revise letter to Court re not being copied by Ferguson and send out with copy of cert of mailing to court and send copy to Ferugson	0.2	\$30.00
12/4/2018	DCL	T	Pull and review Motion to Hold in Abeyance* and Court's letter to Ronald J. Ferguson; discuss steps with John	0.33	\$57.75
12/4/2018	DCL	T	Draft Return to Motion and fax to Court of Appeals	1.42	\$248.50
12/5/2018	DCL	T	Call to Michael with update and follow up email with copy of Ron J's recent Motion and our Return	0.25	\$43.75
12/14/2018	DCL	T	Call to Jessica Lucas requesting if Ron J paid his motion fee	0.15	\$26.25
12/18/2018	DCL	T	Draft our Reply to Appellant's Reply to our Return tohis Motion for Extension	0.5	\$87.50
12/28/2018	DCL	T	Draft Return to Motion to Vacate	2.47	\$432.25
12/28/2018	JC	T	Consult with Darlene re return to motion.	0.8	\$160.00
12/31/2018	DCL	T	Draft cover letter to Court, cover letter to the Fergusons, draft Certificate of Service, fax cover sheet, leave message for Jessica Lucas in Clerk of Court of Appeals; Fax to Court of Appeals with cover letter to Court, Return to Motion to Vacate, copy of Motion to Vacate, Certificate of Mailing.	1.2	\$210.00
1/2/2019	LAR	T	Scan and link Filed Reply to Return to Motion	0.14	\$21.00
1/14/2019	DCL	T	Follow up call to Caitlyn regarding the Ferguson's Motions and our Returns/Replies	0.1	\$17.50
11/15/2018	LAR	E	Postage for mailing letter to Court of Appeals and Ferguson	0	\$1.15
			Subtotal	0.00	\$1.15
			<b>Total</b>	8.59	<b>\$1,524.55</b>

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas  
Charles B. Simmons, Jr. Master-In-Equity

Appeal No. 2018-001279

Case No. 2013-CP-23-01715

Michael Stehney, Jr.....Respondent,

v.

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

CERTIFICATE OF SERVICE


I certify that I have served a copy of the Respondent's Motion for Costs to be Paid by Appellant dated April 3, 2019 on Ronald E. Ferguson, Susan M. Ferguson and Ronald J. Ferguson, by depositing a copy of it in the United States Mail, postage prepaid, on April 3, 2019, addressed to each of them as follows:

Ronald J. Ferguson  
103 Mill Creek Road  
Piedmont, SC 29673

Ronald E. Ferguson  
103 Mill Creek Road  
Piedmont, SC 29673

Susan M. Ferguson  
103 Mill Creek Road  
Piedmont, SC 29673

Date: April 3, 2019

  
\_\_\_\_\_  
Lauren A. Rentz  
12 East Stone Avenue  
Greenville, SC 29609  
(864) 268-8244  
Paralegal for Attorney for Respondent

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**ChaceLaw Limited Company**

April 3, 2019

**VIA FIRST CLASS MAIL**

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

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**RE: Michael Stehney, Jr., Respondent v. Ronald E. Ferguson et al**  
**Appeal No.: 2018-001279**

Dear Clerk Kitchings:

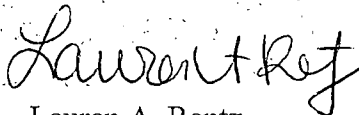
Please find enclosed the Respondent's Motion for Costs to be Paid by Appellant and an original with a copy of the Certificate of Service in the referenced matter.

Please file the original and copies accordingly and return a court clocked copy to us in the envelope provided.

If you have any questions, please do not hesitate to call our office.

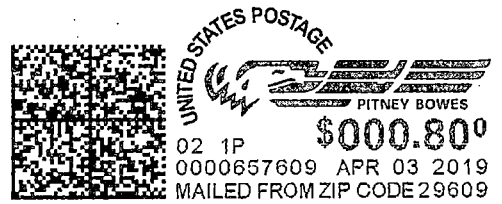
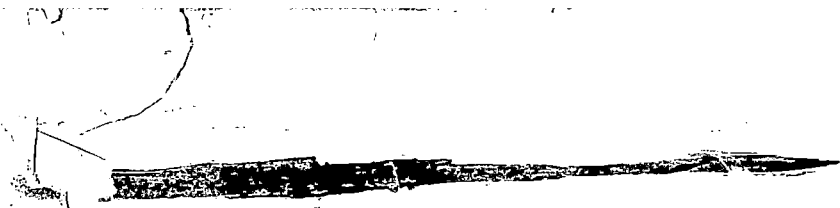
Sincerely,

CHACE CAMPBELL, P.A.



Lauren A. Rentz  
Paralegal

ChaceLaw Limited Company  
12 East Stone Avenue  
Greenville, SC 29609



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Jenny Abbott Kitchings  
Clerk of Court  
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P.O. Box 11629

