

## Matthews, Lindsey

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**From:** Matthews, Lindsey  
**Sent:** Tuesday, April 30, 2019 11:15 AM  
**To:** 'bmowensby@gmail.com'  
**Cc:** 'rvarnado@brown-varnado.com'; 'awimberly@brown-varnado.com'  
**Subject:** 2018-000784 Angela Cartmel v. Edward Taylor: Motion for Costs  
**Attachments:** Motion for Costs - 2018-000784.pdf; SCACRIIFORM17.pdf

**Importance:** High

The attached Motion for Costs was received by this office on April 11, 2019. Please see Rules 222 and 240 of the South Carolina Appellate Court Rules regarding required content of the motion.

Also attached you will find Form 17, Itemized Statement of Costs. A word version of Form 17 is available on the Judicial Branch website at <https://www.sccourts.org/courtReg/Part2AppendixC.cfm>.

Please be sure any motion for costs is properly made, in accordance with the South Carolina Appellate Court Rules.

Thank you.

Sincerely,  
Lindsey M. Matthews  
South Carolina Supreme Court  
PO Box 11330  
Columbia, SC 29201  
803-734-1080  
803-734-1499 (fax)

**Matthews, Lindsey**

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**From:** Microsoft Outlook  
**To:** bmowensby@gmail.com; rvarnado@brown-varnado.com; awimberly@brown-varnado.com  
**Sent:** Tuesday, April 30, 2019 11:15 AM  
**Subject:** Relayed: 2018-000784 Angela Cartmel v. Edward Taylor: Motion for Costs

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[bmowensby@gmail.com](mailto:bmowensby@gmail.com) ([bmowensby@gmail.com](mailto:bmowensby@gmail.com))

[rvarnado@brown-varnado.com](mailto:rvarnado@brown-varnado.com) ([rvarnado@brown-varnado.com](mailto:rvarnado@brown-varnado.com))

[awimberly@brown-varnado.com](mailto:awimberly@brown-varnado.com) ([awimberly@brown-varnado.com](mailto:awimberly@brown-varnado.com))

Subject: 2018-000784 Angela Cartmel v. Edward Taylor: Motion for Costs

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

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Appellate Case No. 2018-000784

ANGELA CARTMEL

Respondent

Vs.

EDWARD BRICE TAYLOR

Appellant

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NOTICE OF MOTION FOR COSTS ON APPEAL  
(Appellate Rule 242(j))

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TO: Robert B. Varnado (SC Bar#0007085)  
Alexis M. Wimberly (SC Bar#101611)  
Brown and Varnado, LLC  
P.O. Box 1127  
Mt. Pleasant, South Carolina 29465  
843.737.7300  
Attorney's for Petitioner

TAKE NOTICE that the Respondent has caused to be filed with the Supreme Court a Motion for Costs on Appeal as proscribed under Rules 222 and 242(j) of the South Carolina Rules of Appellate Court. Respondent seeks allowable costs and attorney's fees for the above captioned case for the action decided in the South Carolina Court of Appeals as well as the decision by the Supreme Court.

Respectfully,  
*BMO 4/8/2019*  
Bradford M. Owensby (S.C. Bar #0077636)  
Brad Owensby Law Firm, LLC (803.648.5777)  
319 Park Ave. SE., Aiken, SC 29801

**RECEIVED**

APR 11 2019

S.C. SUPREME COURT

IN THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

The Honorable L. Casey Manning  
Circuit Court Judge

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Appellate Case No.: 2018-000784  
Opinion No. 2018-UP-0416 (S.C. Ct. App. Filed January 31, 2018)

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Angela Cartmel.....Respondent

v.

Edward Brice Taylor.....Appellant

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**CERTIFICATE OF SERVICE**

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I certify that I have served the *Notice of Motion, Motion for Costs and Form 17* upon Appellant's Counsel via United States Postal Service, addressed to:

Robert B. Varnado  
Alexis M. Wimberly  
BROWN & VARNADO LLC  
P.O. Box 1127  
Mount Pleasant, South Carolina 29465  
(843) 737-7300

April 9, 2019

  
\_\_\_\_\_  
Brad M. Owensby (SC Bar No. 007636)  
BRAD OWENSBY LAW FIRM, LLC  
319 Park Avenue SE  
Aiken, South Carolina 29801  
(803) 648-5777  
*Attorney for Respondent*

**RECEIVED**

APR 11 2019

S.C. SUPREME COURT

**FORM 17**  
**ITEMIZED STATEMENT OF COSTS**

THE STATE OF SOUTH CAROLINA  
 In The Court of Appeals  
 [In The Supreme Court]

v. )  
 )  
 )  
 )  
 )  
 )  
 )

The Appellate Court is requested to tax the following costs against

\_\_\_\_\_  
 (Name of Party)

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief				
Cost of Printing or Copying Final Reply Brief				
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript				
Attorney's Fee Provided By Rule 222(b), SCACR				
Other (specify and explain):				

COSTS TAXABLE UNDER RULE 242(j), SCACR				
Cost of Printing or Copying 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 provided by Rule 242(j)(2), SCACR				
Other (specify and explain):				
		TOTAL		

I, \_\_\_\_\_, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was (mailed to/served upon) opposing counsel.

\_\_\_\_\_  
(Signature)  
Attorney for \_\_\_\_\_

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public for \_\_\_\_\_

My Commission Expires: \_\_\_\_\_

(Seal)