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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY COURT OF COMMON PLEAS

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2018-001353

Bouchelle Incorporated,

Appellant,

v.

Canopus US Insurance, Inc.,  
Seneca Specialty Ins. Co.,  
the Brinson Agency and  
John Brinson, of whom

The Brinson Agency and  
John Brinson are the,

Respondents.

**RECEIVED**  
AUG 26 2019  
SC Court of Appeals

**RESPONDENTS' RULE 222 MOTION FOR COSTS**

COUNTRYMAN LAW FIRM  
Andrew W. Countryman  
State Bar No.: 72700  
321 Wingo Way, Ste. 102  
Mt. Pleasant, SC 29464  
843-253-4477  
**Attorney for Respondents**

**MOTION**

Appellant filed this Appeal of the trial court's grant of Respondents' Motion for Summary Judgment. Respondents expended costs and time responding to the appeal and prevailed. *See* Order affirming trial court's Order (Aug. 21, 2019). Counsel for the Respondent therefore asks this Court to award costs and attorney's fees pursuant to SCRAP 222. Counsel attaches an Itemization of Costs as Exhibit A.



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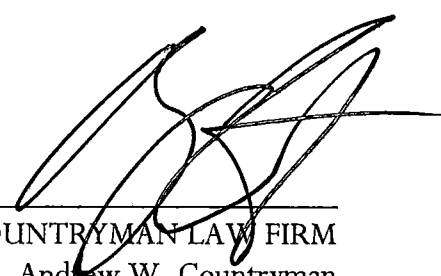
**PROOF OF SERVICE**

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I certify that I have served Respondents' Motion for Costs on Appellant by depositing a copy in the United States Mail, postage prepaid addressed as follows:

Karen M. DeJong  
222 West Coleman Blvd., Ste. 110  
Mt. Pleasant, SC 29464-5652

This 21<sup>st</sup> day of August, 2019



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COUNTRYMAN LAW FIRM  
Andrew W. Countryman  
321 Wingo Way, Ste. 102  
Mt. Pleasant, SC 29464  
**Attorney for Respondents**

# COUNTRYMAN LAW FIRM

Andrew W. Countryman      Litigation ♦ Mediation  
321 Wingo Way, Suite 102  
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\*Certified S.C. Circuit Court Mediator

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843-253-4477 office  
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August 21, 2019

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

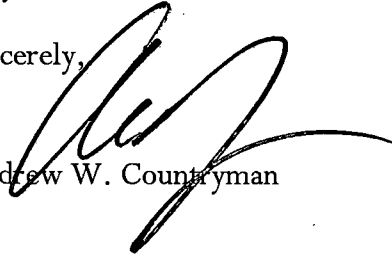
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Re:                    *Bouchelle v. Brinson, et al.*  
Appeal No.:      2018-001353  
CLF:                00008 – 00012

Dear Jenny:

I represent the Respondents in this case. I enclose an original and six copies of Respondents' Motion for Costs under Rule 222 (with Proof of Service), along with a check for the filing fee. Please file the original Motion, and I will pull a filed copy from the C-Track website.

Sincerely,

  
Andrew W. Countryman

AWC/sgc  
Enclosures  
cc: Karen DeJong (via U.S. mail w/enclosures)

**F**

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Andrew Countryman  
Countryman Law Firm  
321 Wingo Way, Suite 102  
Mount Pleasant SC 29464-2989

**B012**

SHIP TO: South Carolina Court of Appeals  
Jenny Abbott Kitchings, Clerk  
P.O. Box 11629  
Columbia SC 29211-1629



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