

STATE OF SOUTH CAROLINA

In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

The Honorable Kristi L. Harrington, Circuit Court Judge

Case Number: 2015-CP-10-06615

(Appellate Case Number: 2017-001532)

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SEP 20 2019  
SC Court of Appeals

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BOUCHELLE INCORPORATED,.....APPELLANT,

vs:

CHARLESTON WRECKING, INC. and MICHAEL C. GOLEMIS.....RESPONDENTS.

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**MOTION FOR COSTS ON APPEAL**

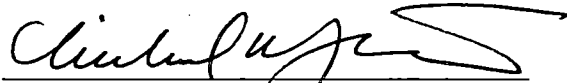
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By Unpublished Opinion No., 2019-UP-301, filed August 21, 2019, this Court affirmed the grant of summary judgment to respondent Michael C. Golemis. On September 13, 2019, this Court remitted the underlying action, Case No.: 2015-CP-10-06615, back to the trial court pursuant to Rule 221, SCACR.

Respondent Michael C. Golemis hereby moves for Costs on Appeal to be taxed against Appellant Bouchelle Incorporated pursuant to Rule 222, SCACR for the following:

1. The costs of the court reporter's transcript of the lower court hearing of May 17, 2017, in the amount of \$ 56.25, and
2. Attorney fees in the amount of \$ 2,500.00 per order of the Supreme Court dated January 17, 2018.

WHEREFORE Respondent Michael Golemis moves that Costs on Appeal be taxed against Appellant Bouchelle Incorporated in the total amount of \$ 2,556.25 as set forth in the itemized statement of costs attached hereto.



Michael W. Sautter, Esquire  
Query Sautter & Associates, LLC  
147 Wappoo Creek Drive, Suite 202  
Charleston, SC 29412  
(843) 795-9500  
Attorney for Respondent Michael C. Golemis

This 17<sup>th</sup> day of September, 2019

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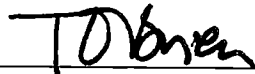
vs.

CHARLESTON WRECKING, INC. and MICHAEL C. GOLEMIS.....RESPONDENTS.

**PROOF OF SERVICE**

I, the undersigned, hereby certify that I have served a copy of the Motion for Costs on Appeal in connection with the above-referenced case on September 17, 2019, by sending copies of the same via United States Mail and addressed as follows:

Karen M. Dejong, Esquire  
DeJong Law Firm, LLC  
222 West Coleman Boulevard, Suite 110  
Mt. Pleasant, SC 29464



Tracey O'Brien

Charleston, South Carolina  
September 17, 2019

O. Grady Query\*

\*Certified Circuit Court  
Arbitrator & Mediator

\*Certified National Trial  
Advocacy Civil Trial Specialist



Michael W. Sautter  
Managing Partner

Michael H. Ellis, Jr.  
Attorney

Query Sautter & Associates  
Attorneys and Counselors at Law

September 17, 2019

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

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RE: Bouchelle v. Charleston Wrecking, Inc. & Michael C. Golemis  
Appellate Case No.: 2017-001532

Dear Ms. Kitchings:

Enclosed please find the original and one copy of a Motion for Costs on Appeal regarding the referenced matter. Please file the original and return a clocked copy to me in the enclosed envelope. By copy of this letter, I am serving Karen M. Dejong, Esquire, counsel for the Appellant, with the same.

Thank you.

Sincerely,

Tracey O'Brien  
Assistant to Michael W. Sautter

Enclosures

cc: Karen M. Dejong, Esquire

147 Wappoo Creek Drive | Suite 202 | Charleston, South Carolina 29412 | Telephone: 843.795.9500 | Fax:  
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