

90933

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

APPEAL FROM GEORGETOWN COUNTY  
COURT OF COMMON PLEAS  
THE HONORABLE STEVEN H. JOHN  
CIRCUIT COURT JUDGE

**RECEIVED**

APPELLATE CASE NO. 2017-001364  
CIVIL ACTION NO. 2015-CP-22-00483

SEP 23 2019

SC Court of Appeals

Willie Singleton,

**APPELLANT,**

versus

City of Georgetown; Janet Grant, Individually and as  
an employee of the City; Ricky Martin, individually and  
as an employee of the City; Robert O' Donnell, Individually  
and as Magistrate for the City of Georgetown,

**RESPONDENTS,**

**MOTION FOR COSTS**

The Respondents in the above-captioned appeal move to be awarded costs against the Appellant, Willie Singleton, under Rule 222, SCACR. The Respondents' Motion is based on this Court's affirmance of the judgment on appeal by Opinion No. 2019-UP-300 filed August 21, 2019. The Remittitur was issued on September 9, 2019.

The Respondents incurred \$2,620.34 in taxable attorney's fees and costs in this matter. A sworn, itemized statement of these costs is attached. Accordingly, the Respondents respectfully request that the Court award them \$2,620.34 in fees and costs pursuant to Rule 222, SCACR.

Respectfully submitted,



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Douglas C. Baxter  
RICHARDSON, PLOWDEN & ROBINSON, PA  
2103 Farlow Street (29577)  
Post Office Drawer 3646  
Myrtle Beach, South Carolina 29578  
(843) 448-1008

Carmen V. Ganjehsani  
RICHARDSON, PLOWDEN & ROBINSON, PA  
1900 Barnwell Street (29201)  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400  
**ATTORNEYS FOR RESPONDENTS**

September 20, 2019.



# Invoice

|          |           |
|----------|-----------|
| Date     | Invoice # |
| 3/9/2018 | 4123923   |

**Bill To**

RICHARDSON PLOWDEN  
ATTORNEYS AT LAW  
1900 BARNWELL STREET  
PO DRAWER 7788  
COLUMBIA, SC 29201

**Ship To**

RICHARDSON PLOWDEN  
ATTORNEYS AT LAW  
1900 BARNWELL STREET  
PO DRAWER 7788  
COLUMBIA, SC 29201

| Job Number                            | Client/Matter Number | Contact     | Terms  | Due Date | Due Time |
|---------------------------------------|----------------------|-------------|--------|----------|----------|
| C5325                                 | 2047-2/3 342         | LAURA IVORY | Net 30 | 4/8/2018 | 03/09    |
| Description                           |                      | Quantity    | Rate   | Amount   |          |
| COPY(IES) OF B/W 8.5 x 11 ORIGINAL(S) |                      | 432         | 0.10   | 43.20T   |          |
| Coll Binding - 7MM - 38MM             |                      | 18          | 3.25   | 58.50T   |          |

Remit Payment To:  
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Fax # 704.347.3421  
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|                         |          |
|-------------------------|----------|
| <b>Subtotal</b>         | \$101.70 |
| <b>Sales Tax (8.0%)</b> | \$8.14   |
| <b>Total</b>            | \$109.84 |

Federal Tax ID# 56-2120639

**KAY H. RICHARDSON**  
**Post Office Box 282**  
**Aynor, South Carolina 29511**

**INVOICE NUMBER:** 1056A  
**DATE OF HEARING:** June 1, 2017  
**DATE OF BILLING:** October 30, 2017

**RE:**

Willie Singleton v City of Georgetown, et al.  
Case Number: 2015-CP-22-0483

**TO:**

Carmen Ganjehsani, Esquire  
Richardson Plowden & Robinson, PA  
1900 Barnwell Street  
Columbia, SC 29201

**THE HEARING HELD BEFORE THE HONORABLE STEVEN H. JOHN:**

|                         |            |                |
|-------------------------|------------|----------------|
| Copy of Transcript      | (14 PAGES) | \$ 10.50       |
| <b>TOTAL AMOUNT DUE</b> |            | <b>\$10.50</b> |

**CERTIFICATE OF SERVICE**

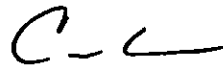
I, the undersigned, attorney for the Respondents do hereby certify that I have this date served the foregoing Motion for Costs, dated September 20, 2019, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Willie Singleton  
501 North Condon Street  
Georgetown, SC 29440  
**Appellant *Pro Se***

**RECEIVED**

**SEP 23 2019**

**SC Court of Appeals**



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Carmen V. Ganjehsani  
RICHARDSON, PLOWDEN & ROBINSON, PA  
1900 Barnwell Street (29201)  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400  
**ATTORNEYS FOR RESPONDENTS**

Dated: September 20, 2019.

September 20, 2019

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

**Re: Willie Singleton v. City of Georgetown (2)**  
**Appellate Case No. 2017-001364**  
**Case No.: 2015-CP-22-00483**  
**RPR File No.: 2047-342**

**RECEIVED**  
**SEP 23 2019**  
**SC Court of Appeals**

Dear Ms. Kitchings:

I am enclosing for filing the original and six copies of Respondents' Motion for Costs pursuant to Rule 222, SCACR, together with our attached sworn Itemized Statement of Costs (Form 17). Also enclosed is our check in the amount of \$50.00 to cover the filing fee for this Motion.

By copy of this letter, we are serving Appellant *pro se* with a copy of this Motion and attached sworn Itemized Statement of Costs.

Sincerely,



Carmen V. Ganjehsani

CVG

Enclosures

cc: Willie Singleton  
Douglas C. Baxter (FYI)

SEP 23 2019  
USPS  
\$002.20  
ZIP 29201  
011E11670150

2047-342

**RICHARDSON  
PLOWDEN**  
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 7701 • Columbia, SC 29202

**RECEIVED**  
SEP 23 2019  
SC Court of Appeals

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

