

91013

**ITEMIZED STATEMENT OF COSTS**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

Appellate Case No. 2019-001224

**RECEIVED**  
OCT 01 2019  
SC Court of Appeals

Ronald I. Paul,		)
	Appellant,	)
		)
	v.	)
South Carolina Department of		)
Transportation, et al.		)
	Respondents.	)
		)
		)

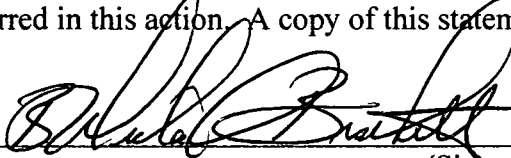
The Appellate Court is requested to tax the following costs against

Appellant Ronald I. Paul

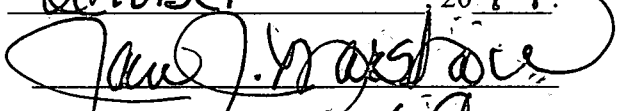
COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Motion to Dismiss Appeal (six copies)	360	\$0.235/pg	\$84.63 (Ex A)	
Cost of Printing or Copying Reply to Appellant's Return (six copies)	30	\$0.27	\$8.10 (Ex. B)	
Cost of Printing or Copying Record on Appeal				
Filing Fee (motion) Paid Under Rule 240(d), SCACR			\$50.00 (Ex C)	
Cost of Court Reporter's Transcript				

Attorney's Fee Provided By Rule 222(b), SCACR			\$2,040.00 (Ex D)	
Other (specify and explain): Postage to serve Motion on 8.2.19 and Reply on 8.13.19			\$10.60 (Ex E)	
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	\$2,193.33	

I, B. Michael Brackett, 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 Respondent Moses + Brackett, PC

Subscribed and sworn to before me this 1st day of October, 2019.

  
 Notary Public for S.C.

My Commission Expires: 12/31/21

# EXHIBIT A

Office DEPOT  
OfficeMax

COLUMBIA (803) 462-0085  
08/02/2019 9:31 AM



2TVT59XP63Q4BE66H  
SALE 2127-4-1887-871388-19.7.2

Order Management Invoice # 3548814430018

Approval Code: 322946

114318 JDA GMILL ORDE 84.63 E  
Total: 84.63  
Visa 6862: 84.63

AUTH CODE 002446  
TDS Chip Read  
AID A0000000031010 VISA CREDIT  
TVR 8000008000  
CVS No Signature Required of processing

Shop online at [www.officedepot.com](http://www.officedepot.com)  
\*\*\*\*\*  
WE WANT TO HEAR FROM YOU!  
Visit [survey.officedepot.com](http://survey.officedepot.com)  
and enter the survey code below:  
15ER,29KN,3AZH  
\*\*\*\*\*

OfficeMax Brand

## EXHIBIT B

Office DEPOT  
OfficeMax

COLUMBIA - (803) 462-0085

08/13/2019 11:04 AM



2TVT79XPA3344EMRH

SALE 2127-4-3003-871388-19.7.2

167060 50 e 0.15

50 e 0.15

7.50

You Pay

7.50SS

Subtotal

7.50

Sales Tax

0.60

Total

8.10

Debit Card 9074

8.10

TDS Chip Read

AID:A0000000980840

US DEBIT

TVR 8000048000

CVS PIN Verified

Shop online at [www.officedepot.com](http://www.officedepot.com)

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and enter the survey code below:

X5EV 8QVT QDVO

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# EXHIBIT C



# The South Carolina Court of Appeals

Moses & Brackett, PC

08/02/2019

## RECEIPT #90453

**Case No:** 2019-001224  
**Case Short Title:** Ronald I. Paul v. SCDOT  
**Event:**  
**Fee Type:** Motion Fee Filed After 10-15-18  
**Amount:** \$50.00  
**Payment Type:** Cash  
**Reference No:**  
**Check/Money Order Date:** 08/02/2019  
**Comments:**

# EXHIBIT D

MOSES & BRACKETT, PC  
133 Brookspring Road  
Columbia, SC 291223

INVOICE

September 30, 2019

Ron Paul v. SCDOT et al.

For services related to Ron Paul appeal from order dismissing Moses & Brackett, PC

7.24.19	Receive and study Notice of Appeal and attached orders; tc to atty Quinn;	.4
7.29-30.19	research; drafting Motion to Dismiss Appeal	2.5
8.1.19	revising and finalizing Motion to Dismiss Appeal	.8
8.2.19	filing (by hand delivery) and serving Motion	.6
8.10.19	receive and review Appellant's Return to Motion	.2
8.12.19	drafting and revising Reply to Appellant's Return	.6
8.13.19	filing and serving Reply to Appellant's Return	.4
9.11.19	receive and review Appellant's Motion to Hold Appeal in Abeyance	.4
9.12.19	drafting and revising Return to Appellant's Motion to Hold Appeal in Abeyance	.5
9.13	filing and serving Return; receive and review Court's Order granting Motion to Dismiss Appeal	.4

Total Hours: 6.8    Fee Rate: \$300/hr    Total Fees: \$2,040

# EXHIBIT E

NORTHEAST  
 8505 TWO NOTCH RD  
 COLUMBIA, SC 29223-9998  
 451816-0223  
 (800)275-8777  
 08/13/2019 11:35 AM

Product	Qty	Unit Price	Price
First-Class Mail® Letter (Domestic) (COLUMBIA, SC 29260) (Weight: 0 Lb 0.90 Oz) (Estimated Delivery Date) (Thursday 08/15/2019)	1	\$0.55	\$0.55
First-Class Mail® Letter (Domestic) (COLUMBIA, SC 29260) (Weight: 0 Lb 1.00 Oz) (Estimated Delivery Date) (Thursday 08/15/2019)	1	\$0.55	\$0.55
First-Class Mail® Letter (Domestic) (COLUMBIA, SC 29240) (Weight: 0 Lb 10.40 Oz) (Estimated Delivery Date) (Monday 08/05/2019)	1	\$2.50	\$2.50
First-Class Mail® Large Envelope (Domestic) (COLUMBIA, SC 29260) (Weight: 0 Lb 10.50 Oz) (Estimated Delivery Date) (Monday 08/05/2019)	1	\$2.50	\$2.50
First-Class Mail® Large Envelope (Domestic) (COLUMBIA, SC 29240) (Weight: 0 Lb 10.40 Oz) (Estimated Delivery Date) (Monday 08/05/2019)	1	\$2.50	\$2.50
First-Class Mail® Large Envelope (Domestic) (COLUMBIA, SC 29260) (Weight: 0 Lb 10.50 Oz) (Estimated Delivery Date) (Monday 08/05/2019)	1	\$2.50	\$2.50
First-Class Mail® Large Envelope (Domestic) (COLUMBIA, SC 29211) (Weight: 0 Lb 3.80 Oz) (Estimated Delivery Date) (Thursday 08/15/2019)	1	\$1.45	\$1.45

Total: \$3.10

Debit Card Remit'd \$3.10  
 (Card Name: VISA)  
 (Account #: XXXXXXXXXXXX9074)  
 (Approval #)  
 (Transaction #: 777)  
 (Receipt #: 014459)  
 (Debit Card Purchase: \$3.10)  
 (Cash Back: \$0.00)  
 (AID: A0000000980840 Chip)  
 (AL: US DEBIT)  
 (PIN: Verified)

In a hurry? Self-service kiosks offer quick and easy check-out. Any Retail Associate can show you how.

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 Track your Packages  
 Sign up for EBFF @

NORTHEAST  
 8505 TWO NOTCH RD  
 COLUMBIA, SC 29223-9998  
 451816-0223  
 (800)275-8777  
 08/02/2019 11:09 AM

Product	Qty	Unit Price	Price
First-Class Mail® Large Envelope (Domestic) (COLUMBIA, SC 29260) (Weight: 0 Lb 10.50 Oz) (Estimated Delivery Date) (Monday 08/05/2019)	1	\$2.50	\$2.50
First-Class Mail® Large Envelope (Domestic) (COLUMBIA, SC 29240) (Weight: 0 Lb 10.40 Oz) (Estimated Delivery Date) (Monday 08/05/2019)	1	\$2.50	\$2.50
First-Class Mail® Large Envelope (Domestic) (COLUMBIA, SC 29260) (Weight: 0 Lb 10.50 Oz) (Estimated Delivery Date) (Monday 08/05/2019)	1	\$2.50	\$2.50

Total: \$7.50

Debit Card Remit'd \$7.50  
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 (Account #: XXXXXXXXXXXX9074)  
 (Approval #)  
 (Transaction #: 607)  
 (Receipt #: 014281)  
 (Debit Card Purchase: \$7.50)  
 (Cash Back: \$0.00)  
 (AID: A0000000980840 Chip)  
 (AL: US DEBIT)  
 (PIN: Verified)

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

OCT 01 2019

SC Court of Appeals

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Appeal from Richland County  
Court of Common Pleas  
L. Casey Manning, Circuit Court Judge

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2018-CP-40-5641

Appellate Case No. 2019-001224

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Ronald I. Paul ..... Appellant,

v:

South Carolina Department of Transportation; Paul D. de Holczer, individually and as a partner of the law firm of Moses, Koon & Brackett, PC; Michael H. Quinn, individually and as senior lawyer of Quinn Law Firm, LLC; J. Charles Ormand, Jr., individually and as partner of the law Firm of Holler, Dennis, Corbett, Ormand, Plant & Garner; Oscar K. Rucker, in his individual capacity as Director Rights of Way South Carolina Department of Transportation; Macie M. Gresham, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; Natalie J. Moore, in her individual capacity as assistant chief counsel South Carolina Department of Transportation; ..... Respondents.

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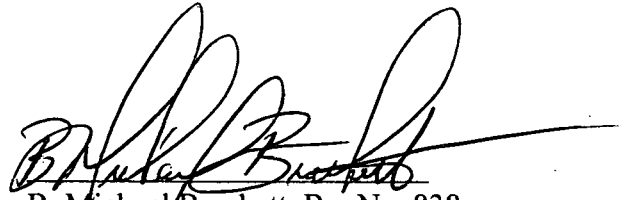
Certificate of Service

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The undersigned, as attorney for Moses & Brackett, PC, formerly known as Moses, Koon & Brackett, PC, hereby certifies that I have served the Appellant by mail with a copy of the foregoing Motion for Costs, postage prepaid and return address clearly indicated on said envelope, on this 1st day of October, 2019, at the following address:

Ronald I. Paul  
P.O. Box 4353  
Columbia, SC 29240

10-1-19

A handwritten signature in black ink, appearing to read "B. Michael Brackett", with a long horizontal flourish extending to the right.

B. Michael Brackett, Bar No. 838  
133 Brookspring Road  
Columbia, SC 29223  
Attorney for Moses & Brackett, PC

Moses & Brackett, PC  
133 Brookspring Road  
Columbia, SC 29223

RECEIVED

October 1, 2019

OCT 01 2019

SC Court of Appeals

HAND DELIVERY

The Honorable Jenny Abbot Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1220 Senate St.  
Columbia, SC 29201

Re: Paul v. SCDOT, et al.  
Appellate Case No. 2019-001224

Dear Ms. Kitchings:

Enclosed for filing please find the original and six copies of Respondent Moses & Brackett, PC's (formerly known as Moses, Koon & Brackett, PC) Motion for Appeal Costs. By copy of this letter, a copy of the enclosed Motion has been served on Appellant at the address shown on the Certificate of Service.

Very truly yours,



E. Michael Brackett

cc. Ronald I. Paul