

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

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OCT 02 2019

SC Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
THE HONORABLE L. CASEY MANNING  
Circuit Court Judge  
Fifth Judicial Circuit

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CASE NO: 2018-CP-400-5641

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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 ORMOND, JR., individually and as a partner of the Law Firm of Holler, Dennis, Corbett, Ormond, 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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**RETURN OR REPLY THAT OPPOSE ANY REQUEST FOR ANY COSTS**

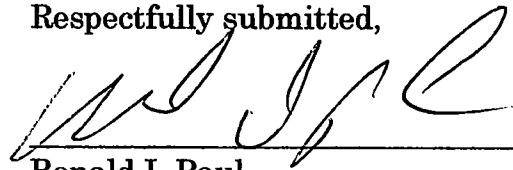
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Pursuant to Rule 222(b) SCACR the cost of printing, copying and postage fees / costs requested by B. Michael Brackett (Mr. Brackett) in his Motion for costs are not allowed under Rule 222(b). And the allowance of

additional costs will generally not be allowed except in the most extraordinary of circumstances. Mr. Brackett did not state, list or argue any extraordinary of circumstances. Therefore, request the costs be denied. In additional, Mr. Brackett represented his law Firm (Moses, Koon & Brackett) himself, and therefore did not actually incur any attorney fees, did not submit prove of payment, in other words to whom he paid or owe \$ 2040.00. Therefore, request the cost be denied. Lastly, the appeal was dismissed on a procedure error made by Appellant, therefore, request any costs whatsoever be denied.

Accordingly, appellant respectfully request any request for costs whatsoever be denied.

Respectfully submitted,



Ronald I. Paul  
Post Office Box 4353  
Columbia, S.C. 29240  
Appellant, *Pro Se* litigant  
(803) 414-2305

Other Counsel of Record:

ANDREW F. LINDEMANN  
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Attorney for Defendants South Carolina Department of Transportation,  
Oscar K. Rucker, Macie M. Gresham, Natalie J. Moore and Paul D. de Holczer.

**MICHAEL H. QUINN  
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Attorney for Michael H. Quinn, individually, and as senior lawyer of Quinn  
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Attorney for J. Charles Ormond, Jr., individually, and as a partner of the  
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**B. MICHAEL BRACKETT  
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133 Brooksprings Rd.  
Columbia, South Carolina 29223  
Attorney the law Firm of Moses, Koon & Brackett, P.C.**

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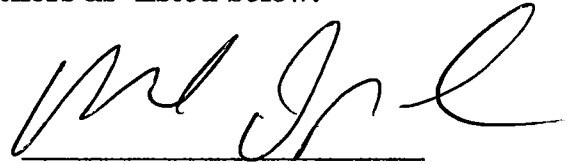
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**PROOF OF SERVICE**

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I, Ronald I. Paul hereby certify that I have served the Appellant **Return or reply that oppose any request for any costs on all Respondents South Carolina Department of Transportation; Paul D. de Holczer individually, and as a partner of the law Firm of Moses, Koon & Brackett, P.C; Michael H. Quinn, individually and as senior lawyer of Quinn Law Firm, LLC; J. Charles Ormond, Jr., individually and as a partner of the**

Law Firm of Holler, Dennis, Corbett, Ormond, 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; B. Michael Brackett by depositing a copy of it in the United State Mail, postage prepaid, on this date, October 2, 2019, addressed to the attorney of record or *Pro Se* Litigants and others as listed below.



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Appellant, *Pro Se* Litigant

**RESPONDENTS COUNSEL OF RECORD**

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Oscar K. Rucker, Macie M. Gresham, Natalie J. Moore and Paul D. de Holczer.

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