

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County  
Court of Common Pleas  
J.C. Nicholson, Jr., Circuit Court Judge

**RECEIVED**  
NOV 25 2019  
SC Court of Appeals

Appellate Case No.: 2016-000419  
Common Pleas Case No.: 2013-CP-10-3251

Rosemary Connelly,.....Respondent,

v.

Winsor Custom Homes, LLC, .....Appellant.

**RESPONDENT'S MOTION FOR COSTS**

Respondent, Rosemary Connelly, hereby moves pursuant to Rule 222 of the South Carolina Appellate Court Rules, for the taxation of costs on appeal against Appellant, Winsor Custom Homes, LLC.

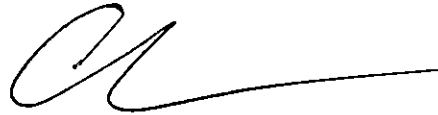
Rule 222 provides that "costs shall be taxed against the appellant when the appeal is dismissed or judgment on appeal is affirmed" Rule 222(a), SCACR. By Order filed August 7, 2019, judgment on appeal was affirmed, and on November 15, 2019, Appellant's Petition for Rehearing was denied.

As evidenced by the attached Itemized Statement of Costs, the respondent has incurred taxable costs in the amount of \$143.86. Additionally, the respondent is entitled to recover attorney's fees in the amount of \$2,500.00 as authorized by Order of the South Carolina Supreme Court dated January 17, 2018.

Accordingly, the respondent respectfully requests that this Court issue an Order taxing

costs and attorney's fees in the amount of \$2,643.86 against Appellant, Winsor Custom Homes, LLC.

The undersigned hereby certifies that she consulted with counsel for Appellant prior to filing this motion and attempted in good faith to resolve the matters contained herein. However, the parties could not reach an agreement.



---

Christy Ford Allen (SC Bar #15649)  
John A. Massalon (SC Bar #10279)  
WILLS MASSALON & ALLEN LLC  
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Charleston, South Carolina 29402  
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[jmassalon@wmalawfirm.net](mailto:jmassalon@wmalawfirm.net)

ATTORNEYS FOR RESPONDENT

CHARLESTON, SOUTH CAROLINA

November 22, 2019

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No.: 2016-000419  
Common Pleas Case No.: 2013-CP-10-3251

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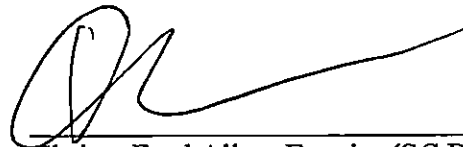
Winsor Custom Homes, LLC, .....Appellant.

**PROOF OF SERVICE**

I certify that I have served Respondent’s Motion for Costs and Itemized Statement of Costs by depositing a copy of it in the United States Mail, postage prepaid, on November 22, 2019 addressed to:

Stephen L. Brown, Esquire (SC Bar #66468)  
Russell G. Hines, Esquire (SC Bar #72100)  
Young Clement Rivers, LLP  
Post Office Box 99  
Charleston, South Carolina 29402  
(843) 720-5488  
**ATTORNEYS FOR APPELLANT**

November 22, 2019



Christy Ford Allen, Esquire (SC Bar #15649)  
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**ATTORNEYS FOR RESPONDENT**

# WMA

WILLS MASSALON & ALLEN LLC

97 Broad Street • Charleston, SC 29401 • Post Office Box 859 • Charleston, SC 29402  
Phone: 843-727-1144 • Fax: 843-727-7696 • [www.wmalawfirm.net](http://www.wmalawfirm.net)

November 22, 2019

Direct Dial: (843) 793-6040

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

RE: Rosemary Connelly v. Winsor Custom Homes, LLC  
Appellate Case No.: 2016-000419  
Our File No.: 1088-1

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SC Court of Appeals

Dear Ms. Kitchings:

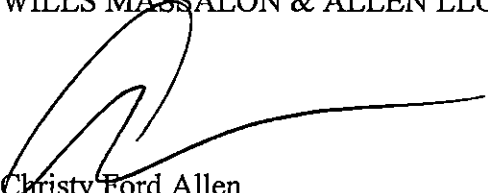
Enclosed please find the original and seven (7) copies of Respondent's Motion for Costs, Itemized Statement of Costs, and Proof of Service in regard to the above-referenced matter. In addition, please find my firm's Check #10640 in the amount of \$50.00 representing the filing fee. Please return one (1) file-stamped copy to me in the self-addressed, stamped envelope provided.

By copy of this correspondence, I am serving the same upon counsel for Appellant. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC

  
Christy Ford Allen  
[callen@wmalawfirm.net](mailto:callen@wmalawfirm.net)

CFA/cb  
Enclosures

cc: Ms. Rosemary Connelly (c/o William Connelly, Esquire via e-mail)  
Stephen L. Brown, Esquire  
Russell G. Hines, Esquire



**WMA**  
WILLS MASSAION & ALLEN LLC  
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