

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

The Honorable Carmen T. Mullen, Circuit Court  
Case No.: 2015-CP-07-00913

**RECEIVED**

JAN 09 2020

**SC Court of Appeals**

Appellate Case No. 2017-002019

In the Matter of the Estate of John Joseph Manning, Jr.

Deanna Bushman, as Holder of Durable Power of Attorney for Sally Manning and as Trustee of the Trust Agreement of Sally Manning Dated December 6, 2004.... Respondent

-vs.-

The Estate of John J. Manning, Jr.; John J. Manning, III; Christopher Manning; and Linda Manning..... Appellants

**RESPONDENT'S  
MOTION FOR COSTS ON APPEAL**

J. Ashley Twombly  
TWENGE + TWOMBLY LAW FIRM  
311 Carteret Street  
Beaufort, SC 29902  
Telephone: (843) 982-0100  
Facsimile: (843) 982-0103  
twombly@twlawfirm.com  
ATTORNEY FOR RESPONDENT

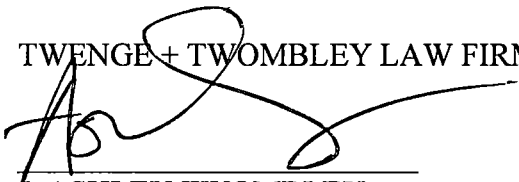
Pursuant to Rule 222 of the Appellate Court Rules of Civil Procedure, Respondent hereby motions the Court for costs and fees to be taxed against Appellants, which shall be taxed when an appeal is dismissed or judgment on the appeal is affirmed. The South Carolina Court of Appeals affirmed the judgment on appeal on January 3, 2020. The Appellants did not file a Petition for Rehearing and, accordingly, the remittitur was issued by the South Carolina Court of Appeals on January 3, 2020.

Respondent incurred costs in the amount of \$37.02, as detailed in the Itemized Statement of Costs. Respondent is also entitled to \$2,500.00 in attorney's fees pursuant to Rule 222, SCACR, for a total of \$2,537.02.

Respectfully submitted,

TWENGE + TWOMBLEY LAW FIRM

BY:



J. ASHLEY TWOMBLEY  
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311 Carteret Street  
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www.twlawfirm.com  
Attorneys for Respondent

Beaufort, South Carolina

January 7, 2020

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Court of Common Pleas

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-vs.-

The Estate of John J. Manning, Jr.; John J. Manning, III; Christopher Manning; and Linda Manning..... Appellants

CERTIFICATE OF SERVICE

The undersigned, Andrea Smith, hereby avers that she is a Paralegal with TWENGE + TWOMBLEY LAW FIRM, Attorneys for Respondent, and that on the 7th day of January 2020 a true and accurate copy of the attached of Respondent's Motion for Costs on Appeal was placed in an envelope with first class postage thereon prepaid through the United States Postal Service and mailed to the following:

R. Bruce Wallace, Esquire  
Stephen P. Groves, Sr., Esquire  
205 King Street, Ste 400  
Charleston, SC 29401  
(843) 720-1725  
bwallace@nexsenpruet.com  
sgroves@nexsenpruet.com  
Attorneys for Appellants

BY: Andrea Smith  
Andrea Smith, Paralegal to  
TWENGE + TWOMBLEY LAW FIRM

TWENGE + TWOMBLEY LAW FIRM LLC

311 CARTERET STREET  
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J. ASHLEY TWOMBLEY  
KARL D. TWENGE  
KEVIN C. JOHNSON  
\*: LICENSED IN SC + GA

January 7, 2020

Via U.S. Mail

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

RECEIVED  
JAN 09 2020  
SC Court of Appeals

**Re: In the Matter of the Estate of John Joseph Manning, Jr.  
Deanna Bushman, as Holder of Durable Power of Attorney for Sally  
Manning and as Trustee of the Trust Agreement of Sally Manning Dated  
December 6, 2004 v. The Estate of John J. Manning, Jr., John J. Manning,  
III, Christopher Manning and Linda Manning  
Appellate Case No. 2017-002019**

Dear Ms. Kitchings:

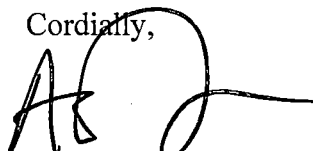
Please find enclosed an unbound original and seven (7) copies of Respondent's Motion for Costs on Appeal, Itemized Statement of Costs and Certificate of Service regarding the referenced matter. I would appreciate it if you would file the original and six copies and return one clocked copy to me in the enclosed self-addressed, stamped envelope. Enclosed is my firm's check in the amount of \$25.00, which represents the required filing fee.

By copy of this letter, I am serving the same upon counsel for Appellants.

Thank you for your consideration in this matter. If you have any questions, please do not hesitate to contact me.

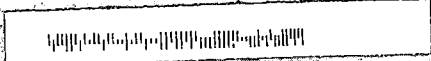
With kindest regards, I remain,

Cordially,



J. Ashley Twombley

cc: Ms. Deanna Bushman  
R. Bruce Wallace, Esquire  
Stephen Peterson Groves, Sr., Esquire



**Twenge + Twombly Law Firm**  
311 Carteret Street  
Beaufort, SC 29902

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The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
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