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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals  
APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas  
The Honorable R. Scott Sprouse; Circuit Court Judge

Appellate Case No.: 2016-002302

NHC HealthCare/Mauldin, LLC,.....Respondent,

v.

Wade Thompson and Sheila Thompson,

Of whom Wade Thompson is the .....Appellant.

RECEIVED  
JAN 13 2020  
SC Court of Appeals

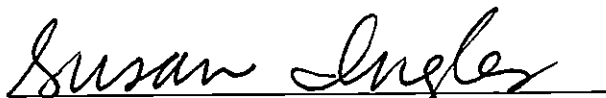
MOTION FOR COSTS

Counsel for Appellant hereby moves the Court for an order granting costs to Appellant as described in the attached Itemized Statement of Costs. This motion is made pursuant to Rule 222 of the South Carolina Appellate Court Rules. It is based upon the December 11, 2019 opinion of this Court which found for Appellant and reversed the decision of the Trial Court based on the equitable doctrine of unclean hands. The Court stated, "Here, NHC is estopped from seeking recovery from Thompson because it acted with unclean hands by admitting Thompson to its care under the assumption of Medicare coverage and then failing to notify Thompson of its own corporate email response stating no benefit days were available to Thompson."

The case sounded in equity and was therefore fact intensive, requiring substantial time as a result. Counsel for Appellant therefore respectfully requests the Court consider granting this request.

I SO MOVE:

SOUTH CAROLINA LEGAL SERVICES

A handwritten signature in cursive script that reads "Susan Ingles". The signature is written in black ink and is positioned above a horizontal line.

Susan Ingles, S.C. Bar No. 0004577

South Carolina Legal Services

864-679-3244

701 South Main Street

Greenville, SC 29601

January 10, 2020

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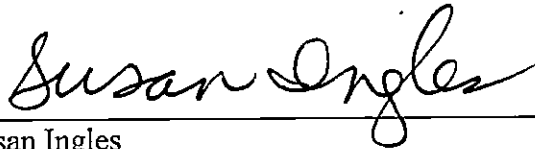
**PROOF OF SERVICE**

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I certify that I have served the Motion for Costs and Itemized Statement of Costs on all parties in this action by depositing a copy of same in the United States Mail, first class, postage prepaid, on January 10, 2020, to the following:

Mr. Craig Horger Allen, Esquire  
P.O. Box 10854  
Greenville, SC 29603

Mr. Erick Matthew Barbare, Esquire  
120 Halton Road, Ste 3  
Greenville, SC 29607



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Susan Ingles  
South Carolina Legal Services  
701 South Main Street  
Greenville, SC 29601  
(864) 679-3244  
Fax: (864) 679-3260  
ATTORNEY FOR APPELLANT WADE THOMPSON

Columbia, South Carolina  
January 10, 2020

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JAN 13 2020

SC Court of Appeals



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[www.sclegal.org](http://www.sclegal.org) | [www.lawhelp.org/sc](http://www.lawhelp.org/sc) | [www.probono.net/sc](http://www.probono.net/sc)

January 10, 2020

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201-3726

In Re: NHC Healthcare/Mauldin, LLC vs. Wade Thompson and Sheila Thompson of whom  
Wade Thompson is the Appellant  
C/A 2016-002302

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JAN 13 2020  
SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for the Court's consideration pursuant to Rule 222 are the following:

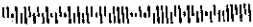
- 1) Motion for Costs on Appeal with Itemization of Costs (original and 6 copies)
- 2) Proof of Service on Respondent's Counsel
- 3) Check for filing fee of \$50.00

Thank you for your consideration in this submission.

Sincerely,

Susan Ingles  
Attorney for the Appellant





Susan Ingles  
South Carolina  
Legal Services  
701 South Main Street  
Greenville, SC 29601

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JAN 13 2020  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211