

92024

THE STATE OF SOUTH CAROLINA
In The Court of Common Pleas

APPEAL FROM EDGEFIELD COUNTY
Circuit Court
Eleventh Judicial Circuit

John F. Byrd, Jr., Special Referee

RECEIVED

JAN 29 2020

SC Court of Appeals

Case No. 2014-CP-19-00097
Appellate Case No. 2017-000997

Odell Glover,

Respondent,

v.

Beverly Ann Gilchrist,

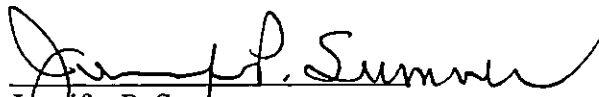
Appellant.

**Notice of Motion and
Motion To Grant Attorney's Fees & Costs**

Please take notice that on January 27, 2020 the undersigned will move before the Court for the granting of the relief requested herein. Respondent moves the Court as follows:

1. To grant Respondent attorney's fees and costs as stated in the attached Itemized Statement of Costs and as provided for in SCACR Rule 222 based on that Remittitur of the Court dated January 13, 2020 which affirms the opinion of the lower court.

And for such other and further relief as this Court may deem just and proper.



Jennifer P. Sumner
Post Office Box 502
Edgefield, South Carolina 29824
(803) 637-7034
Attorney for Respondent

January 27, 2020
Edgefield, SC

**PROOF OF SERVICE OF RESPONDENT'S MOTION TO GRANT
ATTORNEY'S FEES AND COSTS**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM EDGEFIELD COUNTY
Special Referee for Common Pleas

John F. Byrd, Jr., Special Referee

Case No. 2014-CP-19-00097
Appellate Case # 2017-000997

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SC Court of Appeals

Beverly Ann Gilchrist,

Appellant,

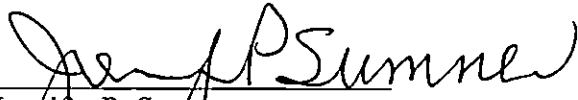
v.

Odell Glover,

Respondent.

PROOF OF SERVICE

I certify that I have served the Respondent Odell Glover's Motion To Grant Attorney's Fees and Costs dated January 27, 2020 on Appellant Beverly Ann Gilchrist by depositing a copy of it in the United States Mail, postage prepaid, on January 27, 2020 addressed to Beverly Ann Gilchrist at



Jennifer P. Sumner

Post Office Box 502

Edgefield, South Carolina 29824

(803) 637-7034

Attorney for Respondent Odell Glover

January 27, 2020
Edgefield, SC

SUMNER LAW FIRM, LLC
ATTORNEY AT LAW

300 Main Street
Post Office Box 502
Edgefield, South Carolina 29824

Jennifer P. Sumner
jennifer@sumnerlawfirm.us

Telephone (803) 637-7034
Facsimile (803) 637-7117

January 27, 2020

Jenny Abbott Kitchings
Clerk
SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Beverly Gilchrist V. Florence Miles, Et al.
Appellate Case No. 2017-000997

RECEIVED

JAN 29 2020

SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed on behalf of Respondent Odell Glover the following:
-Notice of Motion and Motion to Grant Attorney's Fees & Cost (Original with 6 copies),
Proof of Service thereof, filing fee in the amount of \$50.00.

Sincerely,

Sumner Law Firm, LLC



Jennifer P. Sumner

/hpk
enclosures: as stated
cc: Odell Glover
Beverly Gilchrist



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 EDGEFIELD, SC
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Summer Law Firm, LLC
 Post Office Box 502
 Edgefield, SC 29824



To: Jenny Abbott Kitchings
 Clerk
 SC Court of Appeals
 1220 Senate Street
 Columbia, SC 29201

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 SC Court of Appeals

