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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

SEP 03 2020

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

**SC Court of Appeals**

The Honorable Larry B. Hyman, Jr., Circuit Court Judge

Case No. 2016-CP-26-05916

Appellate Case No. 2020-000852

**Green Lotus Sports, LLC, Respondent,**

**v.**

**Black Bear Global, LLC, Appellant.**

\_\_\_\_\_  
MOTION FOR COSTS  
\_\_\_\_\_

Green Lotus Sports, LLC, the Respondent in the above-referenced matter, hereby moves for an award of costs and attorney's fees pursuant to Rule 222, SCACR. This motion is based upon the Appellant withdrawing with prejudice its appeal as reflected in the Appellate Court's Order filed August 11, 2020. The Clerk of the Court of Appeals is requested to tax costs and fees in the amount of \$1,840.00 representing the cost of requesting and receiving the trial transcript and attorney's fees provided by Rule 222(b), SCACR, against the Appellant Black Bear Global, LLC. The aforementioned costs and fees are stated more particularly in the attached Itemized Statement of Costs.

The Respondent, Green Lotus Sports, LLC, further requests such other relief against the Appellant as this Honorable Court may deem just and proper.

September 1, 2020



Nate Fata S.C. Bar #9868

Nate Fata, P.A.

Post Office Box 16620

Surfside Beach, SC 29587

(843) 238-2676

Attorney for Green Lotus Sports, LLC

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v.

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PROOF OF SERVICE

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I certify that I have served the Motion for Costs and Itemized Statement for Costs on Black Bear Global, LLC, by depositing a copy of same in the United States Mail, postage prepaid, on September 1, 2020, addressed to attorney of record Gene M. Connell, Jr., Kelaher, Connell & Connor, P.C., P.O. Drawer 14547, Surfside Beach, South Carolina 29587.

September 1, 2020

  
Nate Fata S.C. Bar #9866

Nate Fata, P.A.  
Post Office Box 16620  
Surfside Beach, SC 29587  
(843) 238-2676  
Attorney for Respondent

**NATE FATA, P.A.**  
ATTORNEY AT LAW  
P.O. Box 16620  
THE COURTYARD, SUITE 215  
SURFSIDE BEACH, SOUTH CAROLINA 29587  
TELEPHONE (843) 238-2676  
TELECOPIER (843) 238-0240  
NFATA@FATALAW.COM

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**SC Court of Appeals**

VIA U.S. MAIL

September 1, 2020

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
P.O. Box 11629  
Columbia, SC 29211

Re: Green Lotus Sports vs. Black Bear Global  
Appellate Case No.: 2020-000852

Dear Ms. Kitchings:

Enclosed for filing are the original and one (1) copy of our Motion for Costs, Itemized Statement for Costs and original Proof of Service of the same along with a postage paid stamp for the return of the file stamped copy in the above-referenced matter. By a copy of this correspondence, I am serving the other counsel of record with a copy of our Motion. Also enclosed, please find our check in the amount of \$50.00 for the filing of this Motion.

Thank you.

Very truly yours,  
NATE FATA, P.A.



Nate Fata  
NF/sh  
Enclosures

cc:  
Gene M. Connell, Jr.  
KELAHER, CONNELL & CONNOR, P.C.  
1500 U.S. Highway 17 North  
The Courtyard, Suite 209  
P.O. Drawer 14547  
Surfside Beach, SC 29587

Nate Fata, P.A.  
P.O. Box 16620  
Surfside Beach, SC 29587

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
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