

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Common Pleas Case No. 2018-CP-23-00513

Appellate Case No. 2019-002040

DAVID ROSEN,

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Oct 20 2020

SC Court of Appeals

Appellant,

v.

JOSEPHINE MIDDLETON,

Respondent.

Motion for Costs

Howard W. Anderson III (#100329)
LAW OFFICE OF HOWARD W.
ANDERSON III, LLC
P.O. Box 661
Pendleton, SC 29670
howard@hwalawfirm.com
864-643-5790 (p)
Lead Counsel for Respondent

Comes now Respondent and, pursuant to R. 222, SCACR, respectfully moves this Court to award her \$2,5000 in costs and would show the Court as follows:

1. Appellant filed a notice of appeal from the Court of Common Pleas.
2. Upon motion from Respondent, this Court dismissed the appeal for lack of subject-matter jurisdiction on March 19, 2020, via an unpublished order.
3. Appellant petitioned the South Carolina Supreme Court for certiorari, which Respondent opposed.
4. On October 16, 2020, the Supreme Court denied certiorari.
5. The remittitur issued on October 19, 2020.
6. The bill of costs is attached.

Dated this 20th day of October 2020.

JOSEPHINE MIDDLETON

s/Howard W. Anderson III
Howard W. Anderson III
SC Bar No. 100329
Lead Counsel for Respondent

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HOWARD W. ANDERSON III, LLC
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Proof of Service

I, the undersigned, served a copy of the Motion for Costs (with the attached Bill of Costs) on the following counsel of record this 20th day of October, 2020, by email to their address of record in the AIS:

Joshua T. Hawkins
josh@hjllcsc.com

Kimberly Thomason
kim@truluckthomason.com

Helena L. Jedziniak
helena@hjllcsc.com

Devon Puriefoy
devon@truluckthomason.com

“I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by contempt.” Dated this 20th day of October, 2020.

s/Howard W. Anderson III
Howard W. Anderson III
SC Bar No. 100329
Counsel for Respondent

Rosen v. Middleton, Appellate Case No. 2019-002040, Motion for Costs

Howard Anderson <howard@hwalawfirm.com>

Tue, Oct 20, 2020 at 1:20 PM

To: Josh Hawkins <josh@hjlsc.com>, Helena Jedziniak <helena@hjlsc.com>, Kimberly Thomason <kim@truluckthomason.com>, Devon Puriefey <devon@truluckthomason.com>

Counsel:

Please see the attached motion for costs, with attached bill of costs, which I am filing with the Court of Appeals today, along with a copy of this email and the required motion fee check.

Best,
Howard

--
Howard W. Anderson III
*Licensed in AK, GA, IL, IN, NC, SC, & TN

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 **Motion for Costs.pdf**
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