

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

**RECEIVED**

NOV 19 2020

Mikell R. Scarborough, Master in Equity

**SC Court of Appeals**

Case No. 2015-CP-10-3389  
Appellate Case No. 2018-000084

Peter Miller, Mary Alice Miller, Mary Alice Miller, as Trustee  
of Mary Alice Miller Living Trust, Miller Group Properties, LLC,  
and C-Miller Properties, LLC, ..... Plaintiffs,

Of whom C-Miller Properties, LLC is the ..... Appellant,

v.

Marilyn L. Dillon and JLJ, LLC, ..... Respondents,

and

Marilyn L. Dillon, Third-Party Plaintiff, ..... Respondent,

v.

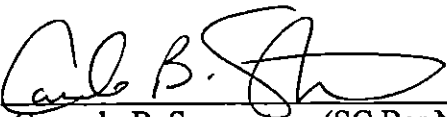
PMC, LLC, ..... Third-Party Defendant.

**RESPONDENTS' MOTION FOR COSTS**

Pursuant to Rule 222(b) and (d), SCACR, Respondents Marilyn L. Dillon and JLJ, LLC (collectively referred to herein as "Respondents") move the Court to tax fees and costs against Appellant C-Miller Properties, LLC ("Appellant"). After full briefing, this Court affirmed the judgment on appeal via Order filed October 21, 2020. *See* Opinion No. 5777. The Court issued the Remittitur on November 18, 2020. As the judgment below was affirmed in its entirety,

Respondents hereby move the Court for fees and costs as permitted by Rule 222(b) and (d) of the Appellate Court Rules. Respondents' motion is accompanied by the sworn itemized statement of costs required pursuant to Rule 222(d).

November 19, 2020

By:   
Carmelo B. Sammataro (SC Bar No. 69746)  
Ian D. McVey (SC Bar No. 71196)  
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ATTORNEYS FOR RESPONDENTS

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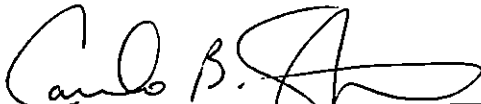
PMC, LLC, ..... Third-Party Defendant.

**PROOF OF SERVICE**

I certify this 19th day of November 2020 that I have served copies of RESPONDENTS' MOTION FOR COSTS and RESPONDENTS' STATEMENT OF FEES AND COSTS upon other counsel of record, by mailing same, postage prepaid in the United States mail, addressed to the following:

Beth Burke Richardson, Esquire  
Jasmine D. Smith, Esquire  
Sowell Gray Robinson Stepp & Laffitte, LLC  
P. O. Box 11449  
Columbia, SC 29211  
*Attorneys for Appellant*

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ATTORNEYS FOR RESPONDENTS

# Turner Padget

**Carmelo B. Sammataro**

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SC Court of Appeals

**VIA HAND DELIVERY:**

The Honorable Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: Peter Miller, et al. v. Marilyn L. Dillon, et al.  
Appellate Case No.: 2018-000084  
File No.: 13698.101

Dear Ms. Kitchings:

Enclosed please find the originals and seven (7) copies each of the Motion for Fees and Costs and the Statement of Fees and Costs of Respondents regarding the above-referenced matter. Also enclosed are the original and one (1) copy of the Proof of Service and our check for the \$50.00 filing fee. Please file the original documents and return clocked copies to me via enclosed self-addressed, stamped envelope. Thank you for your assistance with this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Carmelo B. Sammataro

CBS/tj

Enclosures

cc: Beth Burke Richardson, Esquire  
Jasmine D. Smith, Esquire  
(w/enc.)

**Turner | Padgett**  
PO Box 1473, Columbia, SC 29202

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