

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

SC Court of Appeals

Alex Kinlaw, Jr., Circuit Court Judge

Appellate Case No. 2020-001529

Nicholas Puleo, Attorney-in-Fact for Toni Puleo
Sperry and as Attorney-in-Fact for John William
Puleo Appellant

v.

Stephen Owen Jacobs, individually and as
Personal Representative of the Estate of Terry
Lyn Puleo Respondent

**RESPONDENT’S MOTION FOR FEES
TO BE PAID BY APPELLANT**

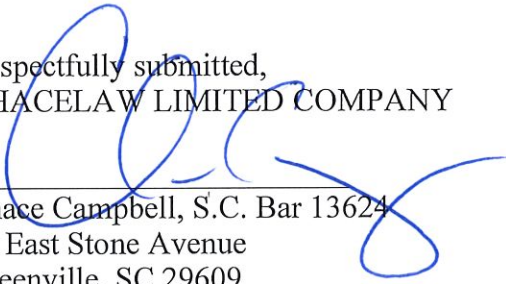
Respondent, Stephen Owen Jacobs, individually and as Personal Representative of the Estate of Terry Lyn Puleo, by and through his undersigned counsel, moves, pursuant to Rule 222(b), South Carolina Appellate Court Rules, for Appellant to pay \$2,500.00 in attorneys’ fees to Respondent.

This Motion is based on the fact that the Appellant’s appeal was dismissed by the Court’s decision filed on December 8, 2020 with remittitur issued on January 6, 2021. Respondent is seeking attorneys’ fees as the case was dismissed as the underlying order of protection over discovery is not immediately appealable. This was done in response to Respondent’s Motion to Dismiss the appeal as interlocutory. Further, Appellant also filed a Notice of Appeal with the

Greenville County Court of Common Pleas while a motion to reconsider the underlying order was pending. However, Appellant never filed the first notice of appeal with this Court and withdrew it he “inadvertently and prematurely filed with [the Greenville County Court of Common Pleas].” Order, Sept. 2, 2020, attached as Ex. A.

Counsel for Respondent is filing the Itemized Statement of Costs, which is attached to this Motion.

Respectfully submitted,
CHACELAW LIMITED COMPANY



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Attorney for Respondent

January 8th, 2020
Greenville, SC