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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

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**

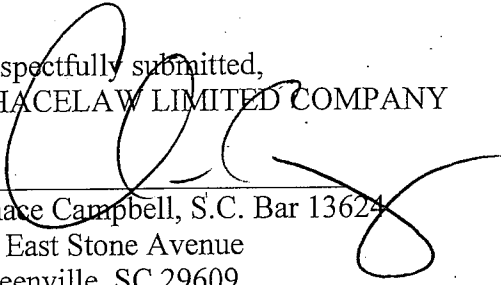
Respondent, Stephen Owen Jacobs, individually and as Personal Representative of the Estate of Terry Lyn Puleo, by and through his undersigned counsel, moves, pursuant to Rule 222(b), South Carolina Appellate Court Rules, for Appellant to pay \$2,500.00 in attorneys' fees to Respondent.

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



Chace Campbell, S.C. Bar 13624
12 East Stone Avenue
Greenville, SC 29609
(864)-268-8244
Chace@chacelaw.com
Attorney for Respondent

January 8th, 2021
Greenville, SC

ChaceLaw Limited Company

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SC Court of Appeals

January 8, 2021

VIA FIRST CLASS MAIL & EMAIL

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

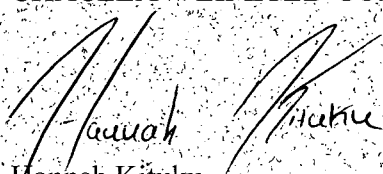
***Re: Nicholas Puleo, Attorney-in-Fact for Toni Puleo Sperry and as Attorney-in-Fact
for John William Puleo vs. Stephen Owen Jacobs, individually and as Personal
Representative of the Estate of Terry Lyn Puleo
CA No: 2020-001529***

Dear Clerk of Court,

Enclosed with the hard copy of this letter is a check in the amount of \$50.00 for the motion filing fee associated with Respondent's Motion for Attorneys' Fees ("Motion") in the above-referenced matter.

The enclosed copy of the Motion is for your convenience. The Motion is being submitted for filing via the Court's email address designated for submittal of filings.

CHACELAW LIMITED COMPANY



Hannah Kituku
Legal Assistant

cc: Joseph Plaxco

12 East Stone Avenue Greenville, SC 29609

Phone: 864.268.8244 Fax: 864.239.3815

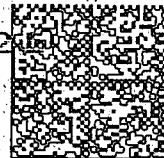
www.chacelaw.com

ChaceLaw Limited Company

**12 East Stone Avenue
Greenville, SC 29609**

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