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Mar 12 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CLARENDON COUNTY  
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Appellate Case No. 2018-000092

Stokes-Craven Holding Corp. d/b/a Stokes-Craven Ford ..... Appellant,

v.

Scott L. Robinson and Johnson McKenzie & Robinson, LLC..... Respondents.

**RESPONDENT SCOTT L. ROBINSON’S MOTION FOR FEES**

Respondent Scott L. Robinson hereby respectfully moves the Court, through counsel, for an award of fees in the amount of \$2,500 pursuant to Rules 222 and 240, SCACR, the Court having affirmed the Order of the trial court in its Unpublished Opinion dated January 20, 2021, and having issued the Remittitur on February 26, 2021. The Affidavit of Counsel, dated March 12, 2021, is attached hereto.

*s/Susan Taylor Wall*  
Susan Taylor Wall  
Email: [swall@grsm.com](mailto:swall@grsm.com)  
Henry W. Frampton, IV  
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Phone: (843) 714-2506  
*Attorneys for Respondent  
Scott L. Robinson*

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**AFFIDAVIT OF COUNSEL FOR ATTORNEY FEES ON APPEAL**

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I, Susan Taylor Wall, having been duly sworn, do hereby attest:

1. I am over the age of 18 years and competent to testify to the matters set forth herein.
2. I am licensed as an attorney in the State of South Carolina, and I am a member in good standing of the South Carolina Bar.
3. I am a partner at Gordon Rees Scully Mansukhani, LLP.
4. Gordon Rees Scully Mansukhani represents Respondent Scott L. Robinson in this appeal.
5. During this appeal, Scott L. Robinson incurred attorneys' fees in excess of \$2,500 for the preparation and filing of Respondents' Joint Initial Brief, Respondents' Joint Designation of Matter, Respondents' Joint Final Brief, and for counsel's preparation and argument at oral argument before the Court of Appeals.


6. The Court of Appeals issued its Order in favor of Respondents on January 20, 2021 and issued the Remittitur on February 26, 2021.

7. Counsel respectfully requests the statutory fee of \$2,500 as allowed under Rules 222 and 242, SCACR.

FURTHER AFFIANT SAYETH NOT.

  
Susan Taylor Wall

SWORN BEFORE ME THIS  
12<sup>th</sup> day of March, 2021

 (L.S.)  
Notary Public for South Carolina  
Printed Name: Robin C. Moberly  
My Commission Expires: 2-26-30

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**PROOF OF SERVICE**

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The undersigned hereby certify that on March 12, 2021, the foregoing **RESPONDENT SCOTT L. ROBINSON'S MOTION FOR FEES and AFFIDAVIT OF COUNSEL FOR ATTORNEY FEES ON APPEAL** were served on all counsel of record via Electronic Mail, addressed as follows:

Robert B. Ranson, Esq.  
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Post Office Box 11067  
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[bertcone@aol.com](mailto:bertcone@aol.com)

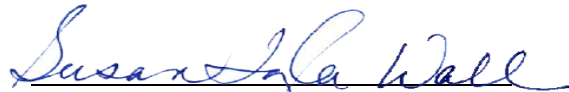
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*Attorneys for Respondent Johnson McKenzie  
& Robinson, LLC*

A handwritten signature in blue ink that reads "Susan Taylor Wall". The signature is written in a cursive style with a horizontal line drawn across the bottom of the name.

Susan Taylor Wall  
*Attorneys for Respondent  
Scott L. Robinson*