

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**  
**Apr 09 2021**  
SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

The Honorable James E. Chellis, Master-In-Equity

Case No. 2013-CP-18-00074  
Appellate Case No. 2017-001393

Stephen Dudek, Doreen Cross, Respondents,

v.

Thomas M. Ferro and Lorraine B. Ferro, Respondents,

And

Molly M. Morpew, Appellant,

v.

Stephen Dudek, Doreen Cross, Thomas Ferro and  
Lorraine Ferro, Respondents

**RESPONDENTS STEPHEN DUDEK AND DOREEN CROSS' MOTION  
FOR COSTS ON APPEAL, INCLUDING ATTORNEY'S FEES**

Pursuant to Rules 222 and 242, SCACR, Respondents Stephen Dudek and Doreen Cross  
(the "Respondents") respectfully submit this motion for costs to be taxed against the Appellant.

The Respondents' costs are supported by a statement of costs, which is attached hereto as Exhibit

A.

SMITH | CLOSSER | WHEELER, P.A.

s/Samuel M. Wheeler

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Steven L. Smith (SC Bar No.: 05173)  
Samuel M. Wheeler (SC Bar No.: 101008)  
7455 Cross County Road, Suite 1  
P.O. Box 40578  
Charleston, SC 29423-0578  
843-760-0220

April 9, 2021

*Attorneys for Stephen Dudek and Doreen Cross*

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**CERTIFICATE OF SERVICE**

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I certify that, on the date indicated below, I served the Respondents' Motion for Costs on Appeal by United States Mail, postage prepaid, on the following:

Molly M. Morpew  
121 Sterling Drive  
Rincon, GA 31326  
*Appellant*

Thomas M. Ferro  
Lorraine B. Ferro  
76 Elk Range Dr.  
Snowmass, CO 81654  
*Respondents*

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s/Samuel M. Wheeler

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