

The Supreme Court of South Carolina

John Kirkman Moorhead
2203 North Main Street
Anderson SC 29621

06/07/2021

RECEIPT #94275

Case No:	2019-001596
Case Short Title:	Nationwide v. Sharmin Walls
Event:	Motion - Costs
Fee Type:	Motion Fee Filed After 10-15-18
Amount:	\$50.00
Payment Type:	Check
Reference No:	1615
Check/Money Order Date:	06/04/2021
Comments:	Motion for Costs

J. Kirkman Moorhead



Steven B. LeFevre

Moorhead LeFevre, PA

June 4, 2021

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JUN 07 2021

S.C. SUPREME COURT

Mr. Daniel Shearouse
Clerk, South Carolina Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

Via Electronic Mail: supctfilings@sccourts.org

**Re: Nationwide Mutual Fire Insurance Company, Respondent
v. Sharmin Christine Walls, Randi Harper, Wendy Timms in
her capacity as Personal Representative of the Estate of Christopher
Adam Timms, Deborah Timms, Defendants
Of Whom, Sharmin Christine Walls and Randi Harper are the, Petitioners
Appellate Case No.: 2019-001596
Lower Court Case No.: 2009-CP-04-00907**

Dear Mr. Shearouse:

I am attaching my Motion for costs and attorney's fees in the above captioned matter, pursuant to Rule 242, and Rule 222 S.C. Appellate Court Rules. My firm check in the amount of \$50.00 for filing fees will be enclosed with this letter in the U.S. mail.

I am also attaching my Proof of Service on the Counsel for Nationwide, both by electronic mail and U.S. Mail.

Should there be any questions or additional matters, please contact my office.

With kind regards,

Sincerely,
Moorhead LeFevre, PA

A handwritten signature in black ink, appearing to read 'J. Kirkman Moorhead', written over a horizontal line.

J. Kirkman Moorhead

JKM:tdc
Enclosures as Noted

cc: Brenda Shealy, Deputy Clerk (via email: bshealy@sccourts.org)
J.R. Murphy (via U.S. Mail and email: jrmurphy@murphygrantland.com)
Wesley B. Sawyer (via US. Mail and email: wsawyer@murphygrantland.com)
Michael Mullinax (via email: mikemullinax@charer.net)

IN THE STATE OF SOUTH CAROLINA
In The Supreme Court

Nationwide Mutual Fire Insurance Company Respondent

Vs

Sharmin Christine Walls, Randi Harper, Wendy Timms, in her
Capacity as Personal Representative of the Estate of Christopher
Adam Timms, Deborah Timms, Defendants,


Of whom, Sharmin Christine Walls and Randi Harper are the
Petitioners

Appellate Case No.: 2019-001596

PROOF OF SERVICE

I certify that I have served a copy of Petitioner's Motion for Taxation of
Costs and Attorney's Fees on behalf of the Petitioner, Randi Harper on the
Respondent, Nationwide Mutual Fire Insurance Company, via electronic mail to
their counsel of record, and by depositing a copy of my request in the United States
Mail, postage prepaid, on June 4, 2021, addressed as follows:

J.R. Murphy, Esquire
Wesley B. Sawyer, Esquire
Murphy & Grantland, P.A.
Post Office Box 6648
Columbia, SC 29260
jrmurphy@murphygrantland.com
wsawyer@murphygrantland.com
Attorney for Respondent



J. Kirkman Moorhead
(S.C. Bar No.: 07039)
Moorhead LeFevre, PA
2203 N. Main Street
Anderson, SC 29621
(864)225-9155; Fax (864)225-9151
Attorney for Petitioner Harper

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June 4, 2021

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S.C. SUPREME COURT

**IN THE STATE OF SOUTH CAROLINA
In the Supreme Court**

Appeal From Anderson County
Court of Common Pleas

J. Cordell Maddox, Jr., Circuit Court Judge

Appellate (Court of Appeals) Case No. 2016-000679

Nationwide Mutual Fire Insurance Company, Respondent

v.

Sharmin Christine Walls, Randi Harper, Wendy Timms in
her capacity as Personal Representative of the Estate of
Christopher Adam Timms, Deborah Timms, Defendants

Of whom, Sharmin Christine Walls, Randi Harper, are the Petitioners.

Appellate Case No.: 2019-001569

PETITIONERS' MOTION FOR TAXATION OF COSTS AND ATTORNEY'S FEES

Michael F. Mullinax
(S.C. Bar No. 4133)
Mullinax Law Firm, P.A.
Post Office Box 2665
Anderson, SC 29622
(864) 261-6242
(864) 261-6680 (fax)
Attorney for Petitioner Walls

J. Kirkman Moorhead
(S.C. Bar No. 7039)
Krause, Moorhead and Draisen, P.A.
207 E. Calhoun Street
Anderson, SC 29621
(864) 225-4000
(864) 964-0788 (fax)
Attorney for Petitioner Harper

Other Counsel of Record:

J. R. Murphy, Esquire
Wesley B. Sawyer, Esquire
Murphy & Grantland, P.A.
Post Office Box 6648
Columbia, SC 29260
Attorney for Respondent,
Nationwide Mutual Fire Insurance Co.

Milford O. Howard, III, Esquire
Howard Law Firm, P.A.
Post Office Box 9754
Greenville, SC 29604
Attorney for Est of Christopher Timms
(Not participating)

The Petitioner, Randi Harper, hereby petitions the Court for taxation of costs and attorney's fees against the Respondent, Nationwide Mutual Fire Insurance Company, pursuant to Rules 242(j) and 222(b) SCACR.

The Petitioner contends that she is entitled to costs as the decision of the Supreme Court reversed the decision of the Court of Appeals, thus cost shall be assessed against the respondent before the Court of Appeals, Nationwide Mutual Fire Insurance Company. Rule 242(j)(1) SCACR.¹

The Petitioner, Randi Harper, respectfully claims the following costs under Rule 222(b) SCACR:

Attorney's Fee provided for by Rule\$2,500.00

The Petitioner, Randi Harper, respectfully claims the following costs under Rule 242(j)(2) SCACR:

Copies of the Appendix under Rule 242(e) and (i)..... \$255.27

Attorney's Fee provided for by Rule\$2,500.00

TOTAL FEES AND COSTS CLAIMED \$5,255.27

¹ The Petitioner notes that costs were reduced significantly due to the Parties being allowed to file electronically during the COVID-19 pandemic,

s/ J. Kirkman Moorhead
J. Kirkman Moorhead (S.C. Bar No. 7039)
Moorhead LeFevre, PA
2203 North Main Street
Anderson, South Carolina 29621
(864)225-9155
(864) 225-9151 (fax)
Attorney for the Respondent Randi Harper

ITEMIZED STATEMENT OF COSTS
 THE STATE OF SOUTH CAROLINA
 In The Supreme Court
 Supreme Court Case No. 2019-001596

Nationwide Mutual Fire Insurance Company, Respondent

v.

Sharmin Christine Walls, Randi Harper, Wendy Timms in
 her capacity as Personal Representative of the Estate of
 Christopher Adam Timms, Deborah Timms, Defendants

Of whom, Sharmin Christine Walls and Randi Harper are the Petitioners.

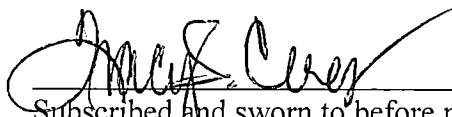
The Appellate Court is requested to tax the following costs against
 Nationwide Mutual Fire Insurance Company

Costs Taxable Under Rule 222, SCACR	No. of Pages	Rate	Requested	Allowed (for court use only)
Cost of Printing or Copying Final Brief				
Cost of Printing or Copying Final Reply Brief				
Filing Fee Paid under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript				
Attorney's Fee Provided by Rule 222(b) SCACR		\$2,500.00	\$2,500.00	
Other (specify and explain)				

Costs Taxable Under Rule 242(j), SCACR	No. of Pages	Rate	Requested	Allowed (for court use only)
Cost of Printing or Copying Brief				
Cost of Printing or Copying Reply Brief				
Costs of Printing and Copying Appendix	379	\$255.27	\$255.27	
Filing Fee Paid under Rule 242(c), SCACR				
Attorney's Fee Provided by Rule 242(j) SCACR		\$2,500.00	\$2,500.00	
Other (specify and explain)				
TOTAL		\$5,255.27	\$5,255.27	

I, J. Kirkman Moorhead, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was (mailed to/served upon) opposing counsel.


 _____ (Signature)
 Attorney for Randi Harper, Petitioner



 Subscribed and sworn to before me this 3d day of June, 2021.
 Tracy D. Ceres, Notary Public for South Carolina
 My Commission Expires: September 19, 2024 (Seal)

TRACY D. CERES
 Notary Public, State of South Carolina
 My Commission Expires 9/19/2024

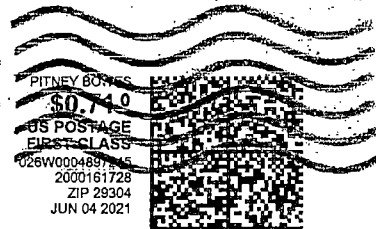
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Clerk, South Carolina Supreme Court
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S.C. SUPREME COURT

29211-133030

