

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

Monica Murphy,)	Appellate Case No.: 2018-001526
)	
Employee,)	
)	
Appellant,)	
)	MEMORANDUM IN SUPPORT
vs.)	OF MOTION FOR COSTS
)	
Halocarbon Products Corporation,)	
)	
Employer, and)	
)	
Commerce & Industry Insurance)	
Company c/o AIG Claims, Inc.,)	
)	
Carrier,)	
)	
Respondents.)	

RECEIVED
JUN 29 2021
SC Court of Appeals

The Appellant, Monica Murphy, has filed a Motion for Costs as the prevailing party in this Appellate case. Rule 222 of the Appellate Court Rules provides that when a judgment is reversed, costs shall be taxed against the Respondent unless the court orders otherwise. Costs should be awarded in this case because it was a complex case, involving lengthy briefing, and an extensive Record on Appeal. Rule 222(b) of the Appellate Court Rules of South Carolina provides that a party may recover actually incurred costs, including but not limited to the following: filing fee paid under Rule 203(d); the cost of the court reporter's transcript; for the costs of printing the Record on Appeal under Rule 209, and the cost of printing the party's final briefs under Rule 210. In addition, the Rule provides that the party shall be entitled to recover attorney's fees in an amount which shall be set by the Order of the Supreme Court.

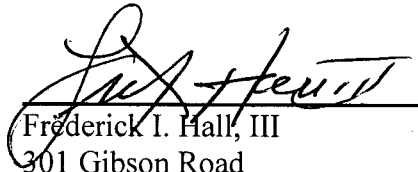
Because the Appellant was the prevailing party in this case, the Appellant is informed and believes that the costs allowed by Rule 222(b) should be awarded to the Appellant as the prevailing party.

Wherefore, having fully set forth her Motion and Memorandum for Costs, Appellant prays that the South Carolina Court of Appeals award costs as reflected in the Appellant's itemized statement of costs being filed herewith.

Respectfully Submitted,

THE RICK HALL LAW FIRM, LLC

By:



Frederick I. Hall, III

301 Gibson Road

Post Office Box 1898

Lexington, South Carolina 29071

(803) 957-5333

(803) 957-7717 facsimile

rick@sctrilattorneys.com

S.C. Bar No. 2591

Attorney for Appellant, Monica Murphy

Lexington, South Carolina
June 28, 2021

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

Monica Murphy,)
)
 Employee,)
)
 Appellant,)
)
 vs.)
)
 Halocarbon Products Corporation,)
)
 Employer, and)
)
 Commerce & Industry Insurance)
 Company c/o AIG Claims, Inc.,)
)
 Carrier,)
)
 Respondents.)

Appellate Case No.: 2018-001526

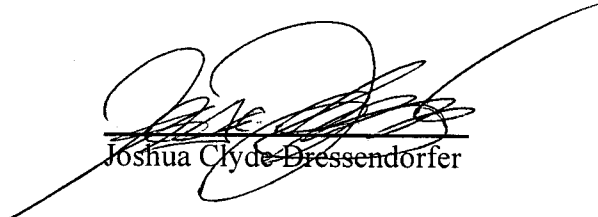
CERTIFICATE OF SERVICE

RECEIVED
 JUN 29 2021
 SC Court of Appeals

The undersigned law clerk to The Rick Hall Law Firm, LLC does hereby certify that he has served a copy of Appellant's Notice of Motion and Motion For Costs and Memorandum in Support of Motion For Costs in the above matter upon the individuals(s) at the address(s) listed below by delivering a copy of the same via the U.S. mail, postage prepaid, and hand delivery to:

Helen F. Hiser, Esquire
 PO Box 650007
 Mount Pleasant, SC 29465
Via U. S. Mail

James Lichty, Esquire
 McAngus, Goudelock & Courie, LLC
 1320 Main Street
 Meridian, 10th Floor
 Columbia, SC 29201
Via Hand Delivery



Joshua Clyde Dressendorfer

Dated this 29 day of June, 2021
 Lexington, South Carolina



THE RICK HALL LAW FIRM, LLC
301 Gibson Road • P.O. Box 1898 • Lexington, South Carolina 29071
PHONE 803.957.5333 • FAX 803.957.7717

Rick Hall
rick@sctrialattorneys.com

Vic Harrelson
vic@fihall-ltc.com

June 29, 2021
VIA HAND DELIVERY

RECEIVED

JUN 29 2021

SC Court of Appeals

Jenny Abbott Kitchings
Clerk of Court
Court of Appeals
1220 Senate Street
Columbia, SC 29201

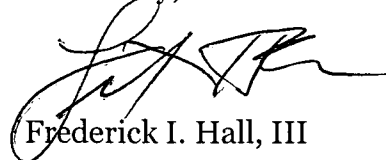
RE: Monica Murphy, Employee, Appellant, vs. Halocarbon Products Corporation,
Employer, and Commerce & Industry Insurance Company, c/o AIG Claims, Inc.,
Carrier, Respondents.
Appellate Case No.: 2018-001526

Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of the Notice of Motion and Motion for Costs and the original and one (1) copy of the Memorandum in Support of Motion For Costs in the above referenced matter, together with a Certificate of Service. Please file the originals with your office and return the clocked-in copies to my law clerk. I have also enclosed a check in the amount of \$50.00 to cover the filing fee.

By copy of this letter, I am also serving a copy of the same upon opposing counsel Helen F. Hiser, Esquire and James Lichty, Esquire.

Yours truly,



Frederick I. Hall, III

FIH,III/gmt
Enclosures

cc: James Lichty, Esquire
Helen F. Hiser, Esquire
Monica Murphy