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JUL 12 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Joseph M. Strickland, Master in Equity

Case Nos. 2011-CP-40-6317 and 2011-CP-40-6318
Appellate Case No. 2018-000251

South State Bank.....Respondent,

v.

Sand Dollar 31, LLC; and Rhonda Meisner Defendants,

Of whom Rhonda Meisner is the Appellant.

RESPONDENT'S MOTION FOR COSTS ON APPEAL

Sean M. Foerster (SC Bar # 77466)
ROGERS TOWNSEND, LLC
1221 Main Street, 14th Floor (29201)
Post Office Box 100200
Columbia, South Carolina 29202-3200
(803)771-7900
sean.foerster@rogerstownsend.com

Attorneys for Respondent South State Bank

July 12, 2021

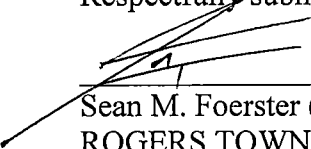
Respondent South State Bank (“Respondent”) hereby moves for the mandatory taxation of attorney’s fees and costs against Appellant Rhonda Meisner. Rule 222(a), SCACR (“Unless otherwise ordered by the appellate court or agreed by the parties, costs shall be taxed against the appellant when the appeal is dismissed or judgment on appeal is affirmed.”)(emphasis added); Rule 222(b), SCACR (“[T]he party shall be entitled to recover an attorney’s fee in an amount which shall be set by order of the Supreme Court.”)(emphasis added); Rule 222(b), SCACR fn. 1 (“By order dated January 17, 2018, the amount of attorney’s fee was set at \$2,500.”).

On June 9, 2021, the Court filed its opinion that affirmed all of the appealed orders in both civil action # 2011-CP-40-6317 and civil action # 2011-CP-40-6318. On June 28, 2021, the Court issued the remittitur to the lower court for both civil actions. This Motion for Costs is timely filed and supported by an Itemized Statement of Costs filed herewith. Rule 222(d), SCACR (“A party desiring costs to be taxed shall, within fifteen (15) days of the issuance of the remittitur, serve and file a motion requesting that costs be assessed under this Rule. If costs are being sought under (b) above, the motion shall be accompanied by a sworn, itemized statement of costs incurred in the form prescribed in the Appendix to these rules.”).

Therefore, Respondent is entitled to the taxation of \$2,500 in attorney’s fees for the appeal from the orders in C/A # 2011-CP-40-6317, \$2,500 in attorney’s fees for the appeal from the orders in C/A # 2011-CP-40-6318, and \$481.80 in costs against Appellant Rhonda Meisner, and Respondent respectfully requests an Order of the Court to that effect.

[signature on the following page]

Respectfully submitted,



Sean M. Foerster (SC Bar # 77466)
ROGERS TOWNSEND, LLC
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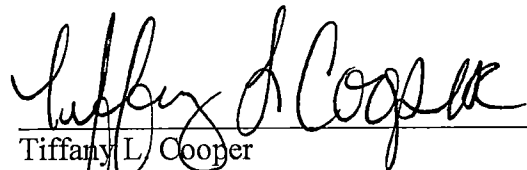
Of whom Rhonda Meisner is the Appellant.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Respondent’s Motion for Costs on Appeal on July 12, 2021, by depositing a copy in the United States Mail, postage pre-paid, addressed to the following party of record:

Rhonda Meisner
P.O. Box 689
Blythewood, SC 29016

Rhonda Meisner
1012 Chester Road
Blythewood, SC 29016



Tiffany L. Cooper
Legal Assistant to Sean M. Foerster, Esquire
Rogers Townsend LLC

ROGERS TOWNSEND LLC
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COLUMBIA, SOUTH CAROLINA 29201
P 803.771.7900 F 803.343.7017
W ROGERSTOWNSEND.COM

SEAN M. FOERSTER, ESQUIRE
MEMBER
SEAN.FOERSTER@ROGERSTOWNSEND.COM
D 803.744-1855
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July 12, 2021

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court for the South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RE: *South State Bank vs. Sand Dollar 31, LLC; Rhonda Meisner*
Appellate Case #: 2018-000251
Our File #: 016555.00079

Dear Ms. Kitchens:

Enclosed are the originals and seven copies of Respondent's Motion for Costs on Appeal, an Itemized Statement of Costs, and Proof of Service of both documents in reference to the above matter, along with a check in the amount of \$50.00 for the filing fee.

By copy of this correspondence, I am serving a copy of these documents on the Appellant.

At your convenience, please return filed copies of these documents to me in the enclosed prepaid envelope.

Very truly yours,



Sean M. Foerster

/SMF
Enclosures

cc:
Rhonda Meisner
1012 Chester Road
Blythewood, SC 29016

Rhonda Lewis Meisner
P.O. Box 689
Blythewood, SC 29016