

**RECEIVED**  
**Aug 13 2021**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Perry H. Gravely, Circuit Judge

---

Appellate Case No.: 2018-002070

---

Wells Fargo Bank, N.A. ....Respondent  
D. Bruce Wolff.....Appellant.

---

**RETURN TO MOTION FOR COSTS**

---

Respondent, pursuant to Rules 222 and 263, SCACR, and all other applicable law, files the following Return to Appellant's Motion for Costs. Respondent opposes the request for costs, fees and attorney's fees set forth in Respondents Itemized Statement of Costs as the lower court's grant of summary judgment as to liability was affirmed and the case was remanded to the Circuit Court for hearing on damages. Respondent, therefore, did not prevail in the appeal, but only delayed the final entry of a damages award. Respondent's grounds in support of the opposition to the Motion for Costs are more fully set forth in the memorandum filed herein in compliance with Rule 240 (c)(2), SCACR.

WHEREFORE, Respondent prays for an order denying the award of said costs, fees and attorney's fees.

Respectfully submitted,  
  
s/Theodore von Keller  
Theodore von Keller  
S.C. Bar No. 5718  
Crawford & von Keller, LLC  
Post Office Box 4216  
Columbia, South Carolina 29250  
(803) 764-7444  
[ted@crawfordvk.com](mailto:ted@crawfordvk.com)  
Attorney for Respondent

August 13, 2021