

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Sep 22 2021

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Joseph M. Strickland, Master-in-Equity Judge

Appellate Case No. 2018-001156  
Civil Action No. 2016-CP-40-00642

Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co.....Appellant,

v.

Coogler Construction Company, Inc.....Respondent.

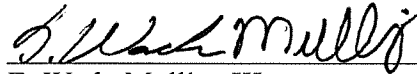
RESPONDENT'S MOTION FOR COST PURSUANT TO RULE 222 SCACR

Respondent, Coogler Construction Company, Inc., by and through its undersigned attorney, hereby moves this Honorable Court to tax the following costs against the Appellant in this matter.

<b>Costs Taxable Under Rule 222, SCACR</b>	<b>No. of Pages</b>	<b>Rate</b>	<b>Requested</b>	<b>Allowed (For Court use only)</b>
Cost of Printing Party's Final Brief			\$79.87	_____
Attorney's Fee			\$2,500	_____

I, E. Wade Mullins III, 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.

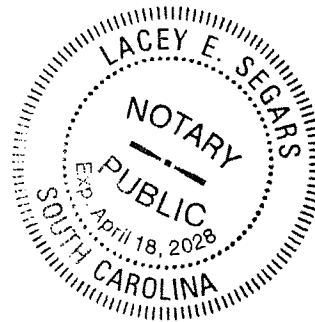
Respectfully submitted,



E. Wade Mullins III  
BRUNER, POWELL, WALL & MULLINS, LLC  
P.O. Box 61110  
Columbia, South Carolina 29260  
(803) 252-7693  
*Attorney for Respondent*

Columbia, South Carolina  
September 21, 2021

SWORN TO and subscribed before me  
This 21 day of September, 2021  
Lacey E. Segar (L.S.)  
*Notary Public for South Carolina*  
Printed Name: Lacey E. Segar  
My Commission Expires: 4 / 18 / 28



THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Joseph M. Strickland, Special Circuit Court Judge

Unpublished Opinion No. 2021-UP-191  
Appellate Case No. 2018-001156  
Civil Action No. 2016-CP-40-00642

Quality Lawn Care and Landscaping, d/b/a Design South Landscape Co.....Appellant,

v.

Coogler Construction Company, Inc.....Respondent.

**PROOF OF SERVICE**

I, Lacey E. Segars, a paralegal of Bruner, Powell, Wall & Mullins, LLC, certify that I have served Appellant's counsel, T. Jeff Goodwyn, Jr., Esquire with a copy of *Respondent's Motion for Cost Pursuant to Rule 222 SCACR* by mailing a copy, postage paid to:

T. Jeff Goodwyn, Jr., S.C. Bar No. 73789  
Goodwyn Law Firm, LLC  
2519 Devine Street, Suite A  
Columbia, SC 29205  
(803) 251-4517  
*Attorney for the Appellant*

*Lacey Segars*  
\_\_\_\_\_  
Lacey E. Segars

September 22, 2021

# BRUNER, POWELL, WALL & MULLINS, LLC

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WESLEY D. PEEL, P.A.  
JOEY R. FLOYD, P.A.  
BENJAMIN C. BRUNER, P.A.

JAMES L. BRUNER (RETIRED)

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CHELSEA J. CLARK  
J. COLE HANCOCK

\* ALSO ADMITTED IN DISTRICT OF COLUMBIA

AUTHOR'S E-MAIL: LSEGARS@BRUNERPOWELL.COM

September 22, 2021

**VIA ELECTRONIC & U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk of Court -The South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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**Sep 22 2021**

**SC Court of Appeals**

**Re: Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co.  
vs. Coogler Construction Company, Inc.  
Appellate Case No. 2018-001156  
Our File No. 7-617.127**

Dear Ms. Kitchings:

Enclosed for filing please find the **Respondent's Motion for Cost Pursuant to Rule 222 SCACR** regarding the above referenced matter. I am mailing a hard copy of the same along with a check for \$50.00 to cover the filing fee, as well as serving all other parties in this matter by copy of this letter and email. Please let me know if the Court requires anything further.

With my warmest regards, I am

Very truly yours,

*Lacey Segars*

Lacey E. Segars  
Paralegal to E. Wade Mullins, III

Enclosures

cc: T. Jeff Goodwyn, Jr., Esquire (Via Han Delivery)