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Dec 06 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

Appellate Case No. 2018-001885

Glenn P. Howell, Appellant,

v.

Covalent Chemical LLC and Matthew W. Rowe, Respondents.

APPELLANT’S MOTION FOR COSTS ON APPEAL

Appellant, Glenn P. Howell, hereby files this Motion for Costs on Appeal pursuant to Rule 222, SCACR. As set forth in the sworn, itemized statement of costs attached hereto, Appellant seeks costs to be taxed against Respondents, Covalent Chemical LLC and Matthew W. Rowe, in the amount of \$3,291.75, which includes attorney’s fees in the amount of \$2,500.00, in connection with the successful appeal in this matter. The opinion reversing the order of the Circuit Court was filed on November 3, 2021 (Opinion No. 5869), and the remittitur was entered on November 22, 2021. This motion is being filed within 15 days of the date of the remittitur.

* * *

Respectfully submitted,

s/ David E. Rothstein

David E. Rothstein
Rothstein Law Firm, PA
1312 Augusta Street
Greenville, SC 29605
(864) 232-5870
Attorney for Appellant

December 6, 2021

Greenville, SC.

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PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Costs on Appeal upon Respondents, Covalent Chemical LLC and Matthew W. Rowe, by email and by depositing a copy of this document in the United States Mail, postage prepaid, on December 6, 2021, addressed to their attorney of record, Joseph O. ("Josh") Smith, Smith Hudson Law, LLC, 200 North Main Street, Suite 301-C, Greenville, SC 29601.

December 6, 2021

s/ David E. Rothstein
David E. Rothstein
Rothstein Law Firm, PA
1312 Augusta Street
Greenville, SC 29605
(864) 232-5870
Attorney for Appellant



ROTHSTEIN LAW FIRM, PA Dec 06 2021

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SC Court of Appeals

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December 6, 2021

VIA EMAIL ONLY (ctappfilings@sccourts.org)

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Glenn P. Howell v. Covalent Chemical LLC et al.,
Appellate Case No. 2018-001885

Dear Ms. Kitchings:

Enclosed please find Appellant's Motion for Costs on Appeal, along with Appellant's Itemized Statement of Costs in the above-referenced case. Please file this document and return a clocked copy to my via email. I neglected to file the motion last week, but only filed the Itemized Statement of Costs.

By copy of this letter, I am hereby serving a copy of the Itemized Statement of Costs on Respondents' counsel.

Thank you in advance for your attention to this matter. If you have any questions or need anything else, please do not hesitate to call me or email me.

Sincerely yours,

David E. Rothstein

Enclosures

cc: Joseph O. "Josh" Smith, Esq. (via email and U.S. mail)