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Dec 08 2021

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM CHARLESTON COUNTY
Mikell R. Scarborough, Master In Equity**

Case No. 2019-000205

The Savannah Homeowners Association, Inc.,Respondent,

v.

Denise H. Jones and LVNV Funding, LLC,Defendants,

Of Whom Denise H. Jones is the Appellant.

**RESPONDENT'S MOTION FOR
COSTS**

Derek F. Dean
SIMONS & DEAN
147 Wappoo Creek Drive, Suite 604
Charleston, SC 29412
843-762-9132
Attorneys for Respondent

Pursuant to the South Carolina Appellate Court Rules ("SCACR"), Rule 222, Respondent respectfully moves for an Order awarding costs and fees in accordance with the attached Itemized Statement of Costs.

Respectfully submitted,



Derek F. Dean
SIMONS & DEAN
147 Wappoo Creek Drive, Suite 604
Charleston, SC 29412
(843) 762-9132
Attorneys for Respondent

12/8, 2021

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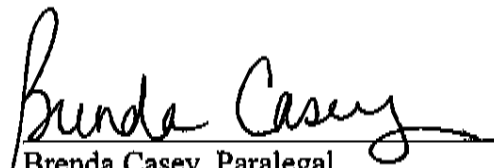
v.

Denise H. Jones and LVNV Funding, LLC,Defendants,

Of Whom Denise H. Jones is the Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Motion for Cost and Itemized Statement of Costs on Appellant Denise H. Jones by depositing a copy of it in the United States Mail, postage prepaid on December 8, 2021, addressed to her at 506-D Arlington Drive, Charleston, SC 29414.



Brenda Casey, Paralegal
Simons & Dean
147 Wappoo Creek Road, Suite 604
Charleston, South Carolina 29412
(843) 762-9132
Attorneys for Respondent

12/8, 2021
Charleston, South Carolina

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SIMONS & DEAN
ATTORNEYS AT LAW

147 WAPPOO CREEK DRIVE, SUITE 604 | CHARLESTON, SC 29412 | 843.762.9132 | FAX: 843.406.9913

Keating L. Simons, III klsimons@simonsanddean.com

Derek F. Dean dfdean@simonsanddean.com

I. Sonja Taylor istaylor@simonsanddean.com

December 8, 2021

VIA E-MAIL & FACSIMILE (803-734-1839)

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: *The Savannah Homeowners Association, Inc. v. Jones, et al.*
Appellate Case No.: 2019-000205

Dear Ms. Kitchings:

Enclosed is Respondent's Motion for Costs and Itemized Statement of Costs and Proof of Service of Respondent's Motion for Costs and Itemized Statement of Costs and a check in the amount of \$50.00 for the filing fee in connection with the above case.

By copy of this letter, I am serving Appellant with a copy of the aforementioned Respondent's Motion for Costs and Itemized Statement of Costs and Proof of Service of Respondent's Motion for Costs and Itemized Statement of Costs.

With kind regards, I remain

Yours very truly,



Derek F. Dean

DFD/

Enclosures

cc: Ms. Denise H. Jones (w/enc.)

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SIMONS & DEAN
ATTORNEYS AT LAW

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Keating L. Simons, III klsimons@simonsanddean.comDerek F. Dean dfdean@simonsanddean.comI. Sonja Taylor lstaylor@simonsanddean.com**Date:** December 8, 2021**To:** The Honorable Jenny Abbott Kitchings**Fax #:** 803-734-1839**Re:** Respondent's Motion for Costs and Itemized Statement of Costs and Proof of Service of
Respondent's Motion for Costs and Itemized Statement of Costs**Pgs.:** 8 (includes fax cover sheet)

Please see the attached from Derek F. Dean, Esquire.

Thank you,
Brenda Casey**Brenda Casey**
Paralegal
SIMONS & DEAN
147 WAPPOO CREEK DRIVE
SUITE 604
CHARLESTON, SC 29412
843-762-9132/843-406-9913 *FACSIMILE*
BRENDA@SIMONSANDDEAN.COM

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