

68260

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Special Circuit Judge

Case No. 2009-CP-07-03289

RECEIVED

MAY 02 2013

SC Court of Appeals

Peter W. Justini and Linda Justini,

*Pro Se* Petitioners,

v.

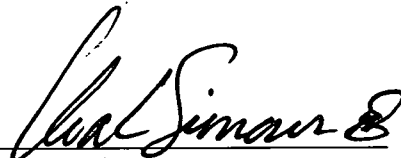
Berkeley Hall Club, Inc.,  
John P. Reed, Individually, Director  
and Developer of Berkeley Hall Club, Inc.,  
Tammy Dureya, Former Controller of  
Berkeley Hall Club, Inc., and  
Jerome J. Selke, Former General Manager  
of Berkeley Hall Club, Inc.,

Respondents.

NOTICE OF MOTION AND MOTION FOR COSTS

Respondent John P. Reed moves to be awarded costs pursuant to Rule 222, SCACR.

Costs are as outlined in the attached Itemized Statement of Costs in accordance with Rule 222(b), SCACR.



Keating L. Simons, III  
Derek F. Dean  
LAW OFFICES OF SIMONS & DEAN  
147 Wappoo Creek Drive, Suite 604  
Charleston, SC 29412  
Attorneys for Respondent John P. Reed

April 30, 2013  
Charleston, SC

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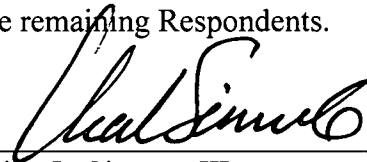
Respondents.

The Court of Appeals is requested to tax the following costs against *Pro Se*  
Petitioners Peter W. Justini and Linda J. Justini.

<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 or Copying Final Brief	27 pp		\$129.58	
Cost of Printing or Copying Final Reply Brief				

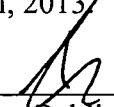
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript				
Attorney's Fees Provided By Rule 222(b), SCACR			\$1,000.00	
Other (specify and explain)  Filing Fee: Notice of Motion and Motion for Costs			\$25.00	
		<b>TOTAL</b>	\$1,154.58	

I, Keating L. Simons, 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 and served upon *Pro Se* Petitioners and counsel for the remaining Respondents.



Keating L. Simons, III  
Derek F. Dean  
LAW OFFICES OF SIMONS & DEAN  
147 Wappoo Creek Drive, Suite 604  
Charleston, SC 29412  
Attorneys for Respondent John P. Reed

SWORN to before me this 30<sup>th</sup> day of  
April, 2013

  
Notary Public for South Carolina

My Commission Expires: 12-1-18

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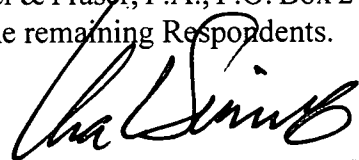
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**PROOF OF SERVICE**

I certify that I have served the Notice of Motion and Motion for Costs by depositing a copy in the United States Mail, postage prepaid, on April 30, 2013, addressed to *Pro Se* Petitioners Peter W. Justini and Linda Justini, 10 Canterbury Lane, Bluffton, South Carolina 29910-7832, and to Terry A. Finger, Esquire, Finger & Fraser, P.A., P.O. Box 24005, Hilton Head Island, South Carolina 29925, counsel for the remaining Respondents.



Keating L. Simons, III.  
SIMONS & DEAN  
147 Wappoo Creek Drive, Suite 604  
Charleston, SC 29412  
Attorneys for Respondent John P. Reed

April 30, 2013  
Charleston, SC