

**RECEIVED**

**Feb 03 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Deborah Brooks Durden, Administrative Law Judge

Docket No.: 18-ALJ-22-0409-AP

---

Appellate Case No. 2019-001033

---

Cortez M. Jiles .....Respondent.

v.

South Carolina Department of Employment and Workforce and House of Raeford  
Farms, Inc

Of which South Carolina  
Department of Employment  
and Workforce is..... Appellants.

---

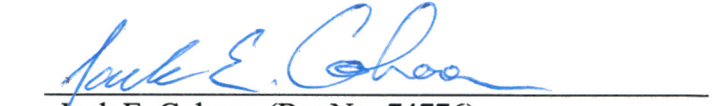
**MOTION FOR COSTS**

---

Counsel for Respondent Cortez M. Jiles move this Court for an order granting costs to Respondent as described in the attached itemized Statement of Costs. This Motion is made pursuant to Rule 222 of the South Carolina Appellate Court Rules and it is based upon the November 10, 2021, opinion of this Court which found for Respondent and affirmed the decision of the Administrative Law Court.

WE SO MOVE:

BURNETTE SHUTT & MCDANIEL, PA



---

Jack E. Cohoon (Bar No. 74776)  
Post Office Box 1929  
Columbia, South Carolina 29202  
Office: (803) 904-7914 / Fax: (803) 904-7910  
jcohoon@burnetteshutt.law

SOUTH CAROLINA LEGAL SERVICES  
Rick Faulks (SC Bar No. 103628)  
316 West Cambridge Rd.  
Greenwood, SC 29646  
Office: (864) 223-4879 / Fax: (864) 223-7629  
rickfaulks@sclegal.org

Columbia, South Carolina

February 3, 2022

**RECEIVED**

**Feb 03 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Deborah Brooks Durden, Administrative Law Judge

Docket No.: 18-ALJ-22-0409-AP

---

Appellate Case No. 2019-001033

---

Cortez M. Jiles .....Respondent.

v.

South Carolina Department of Employment and Workforce and House of Raeford Farms, Inc

Of which South Carolina Department of Employment and Workforce is..... Appellants.

---

**PROOF OF SERVICE**

---

I certify that I have served the Motion for Costs and Itemized Statement of Costs on the parties in this case by depositing a copy of these in the United States Mail, postage prepaid, on February 3, 2022, addressed to the parties at their addresses of record:

Benjamin T. Cook, Esq.  
Paul Famolari, Esq.  
S.C. Department of Employment and Workforce  
Post Office Box 8597  
Columbia, SC 29202

House of Raeford Farms  
P.O. Box 21456  
Columbia, SC 29221

*Traci B. Wolfe, P.P.*

---

Traci B. Wolfe, PP  
Paralegal

February 3, 2022  
Columbia, South Carolina



**BURNETTE SHUTT MCDANIEL**

Moving law forward.

BURNETTE SHUTT & MCDANIEL, PA  
912 Lady Street | PO Box 1929 | Columbia, SC 29202  
O: 803.850.0912 F: 803:904.7910  
burnetteshutt.law

**Traci B Wolfe, PP**  
803.904.7921  
[twolfe@burnetteshutt.law](mailto:twolfe@burnetteshutt.law)

February 3, 2022

Via Electronic Mail [Ctappfilings@sccourts.org](mailto:Ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchens  
Clerk, S.C. Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: Cortez M. Jiles vs. South Carolina Department of Employment  
Appellate Case No. 2019-001033

Dear Madam Clerk,

Enclosed please find to the court, pursuant to and in accordance with the court's opinion dated November 10, 2021, a Motion for Costs for the above referenced matter. I am providing all parties of record a copy of this correspondence.

Should you need anything additional from our office regarding this matter, please do not hesitate to let me know

Sincerely yours,

Traci B. Wolfe, PP

/tbw

Enclosures

cc: Cortez Jiles (via email) (w/ encl.)  
Rick Faulks, Esq. (via us mail) (w/ encl.)  
Jack E. Cohoon, Esq. (via email) (w/ encl.)  
Benjamin T. Cook, Esq. (via us mail) (w/ encl.)  
Paul Famolari, Esq. (via us mail) (w/ encl.)  
House of Raeford Farms (via us mail) (w/ encl.)

**RECEIVED**

**Feb 03 2022**

**SC Court of Appeals**