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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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MAR 14 2022

SC Court of Appeals

Isabelle MacKenzie, Appellant/Respondent,

v.

C&B Logging and Charles Brandon Barr,
Respondents/Appellants.

Appellate Case No. 2018-001016

Appeal From Florence County
D. Craig Brown, Circuit Court Judge

Opinion No. 5893
Heard December 8, 2020 – Filed February 9, 2022

MOTION FOR TAXABLE COSTS

J. Camden Hodge, Eric M. Poulin, and Roy T. Willey,
IV, all of Anastopoulo Law Firm, LLC, of Charleston,
for Appellant/Respondent.

Robert D. Moseley, Jr., and Megan M. Early-Soppa, both
of Moseley Marcinak Law Group LLP, of Greenville, for
Respondents/Appellants.

Pursuant to Rules 54(d), (e), and 68 of the South Carolina Rules of Civil Procedure, and Rule 222 of the South Carolina Appellate Court Rules, Defendants respectfully move for taxation of costs.

Defendants are the prevailing party and is entitled to recover their taxable costs. Rule 54(d), of the South Carolina Rules of Civil Procedure states as follows:

Except when express provision therefor is made either in a statute or in these rules, costs shall be allowed as of course to the prevailing party unless the court otherwise directs.

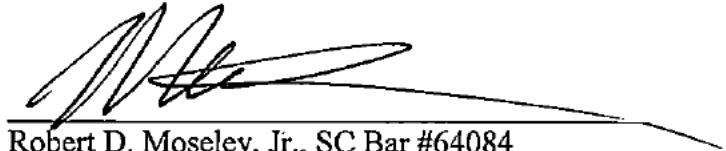
Considering the above authorities, the following taxable costs must be assessed against the Plaintiff:

1. Filing Fees;
\$ 100.00
2. Fees and costs associated with compilation and mailing of final appellate briefs
\$ 206.90
3. Motion Fees
\$ 50.00
4. Witnesses' Fees
\$111.84
5. Fees for Exemplification and Copies of Papers Necessarily Obtained for Trial
\$461.70
6. Attorney's Fees As Allowed under Rule 222 of the SC Appellate Court Rules
\$2,500.00

TOTAL: \$ 3,430.44

By my oath, I state that the above costs listed above were incurred during the defense of this case.

[SIGNATURE ON FOLLOWING PAGE]



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Megan.Early@momarlaw.com

Attorneys for Respondents/Appellants

SWORN to before me this

2nd day of March, 2022

Hannah Buidges

Notary Public for South Carolina

My Commission Expires: March 25, 2029

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PROOF OF SERVICE

I certify that I have served the MOTION FOR TAXABLE COSTS AND ITEMIZED STATEMENT OF COSTS by electronic mail AND by depositing one copy of it in the United States Mail, first-class mail, postage prepaid, on March 2, 2022, addressed to:

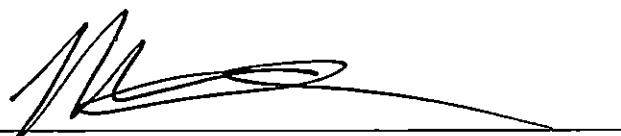
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March 2, 2022

VIA U.S. MAIL

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

Re: *Isabelle MacKenzie v. C&B Logging and Charles Brandon Barr*
Case No. 2016-CP-21-01831
Appellate Case No. 2018-001016

Dear Ms. Kitchings:

Enclosed for filing is the original and one copy of a Motion for Taxable Costs, Itemized Statement of Costs, and a Proof of Service for the same. Also enclosed is our firm check in the amount of \$50.00 representing the filing fee for the Motion.

Once filed, we would appreciate the return of a file-stamped copy of the documents to our office. A self-addressed, stamped envelope has been enclosed for your convenience. Should you have any questions, please do not hesitate to contact me.

Sincerely,

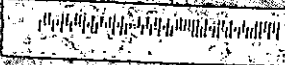
Megan M. Early-Soppa

MME/heb 763384
Enclosures

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
March 2, 2022
Page 2

cc: Roy T. Willey, IV
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