

ITEMIZED STATEMENT OF COSTS
THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Mar 18 2022

SC Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Case No. 2017-CP-42-02072

Donald and Carlee Simmons, Respondents,

v.

Benson Hyundai, LLC, Appellant.

The Appellate Court is requested to tax the following
attorney's fee against

Appellant

(Name of Party)

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief				
Cost of Printing or Copying Final Reply Brief				

Exhibit A

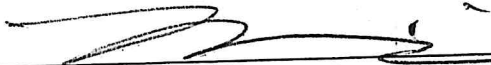
Cost of Printing or Copying Record on Appeal				
Filing Fee Paid Under Rule 203(d), SCACR				
Cost of Court Reporter's Transcript				
Attorney's Fee Provided By Rule 222(b), SCACR		\$350.00 per hour	\$2,500.00 ¹ (A portion of itemized attorney time is attached as Exhibit B)	
Other (specify and explain):				

COSTS TAXABLE UNDER RULE 242(j), SCACR				
Cost of Printing or Copying Brief				

¹Though the attorney's fees are over \$2,500, I understand that we may not recover more than that amount. The additional hours are just to show the total work done by Respondents.


Cost of Printing or Copying Reply Brief				
Cost of Printing or Copying Appendix				
Filing fee paid under Rule 242(c), SCACR				
Attorney's fee provided by Rule 242(j)(2), SCACR				
Other (specify and explain):				
		TOTAL		\$2,500.00

I, E. Warren Moise, 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/served upon) opposing counsel.

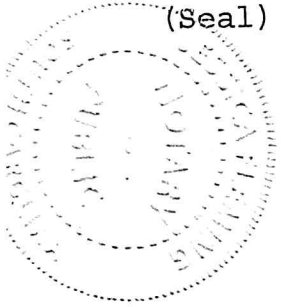


 Attorney for Respondents

Subscribed and sworn to before me this 17th day of March, 2022.



 Notary Public for South Carolina
 My Commission Expires: 11-9-28
 (Seal)



Itemization of Attorney Work and Time

Date	Description	Time	Cost
2/28/2019	Reviewed Notice of Appeal with exhibits	0.30	\$105.00
3/5/2019	Reviewed correspondence from Defendant's attorney to court of appeals with notice of appeal, etc.	0.10	\$35.00
3/5/2019	Reviewed correspondence from Defendant's attorney to court of appeals regarding need case number	0.10	\$35.00
4/3/2019	E-mail from client with questions and replied	0.20	\$70.00
10/31/2019	Conference with clients last night; numerous emails regarding settlement; reviewed difficult question of damages; more emails with client	1.30	\$455.00
12/2/2019	Read damages, emails, notes, charts, and other claim information. Typed updated charts and email to clients (8:30 - 3:00)	7.00	\$2,450.00
12/4/2019	Telephone conference with Plaintiffs to go over damages	1.10	\$385.00
5/1/2020	Received and reviewed correspondence from Bradford Martin regarding settlement demand	0.10	\$35.00

Exhibit B

5/11/2020	Drafted letter to Donald and Carlee Simmons regarding additional checks and correspondence from Defendant's counsel	0.10	\$35.00
8/19/2021	Drafted correspondence to South Carolina Court of Appeals Email to the South Carolina	0.10	\$35.00
8/19/2021	Email and correspondence from Martin regarding Court of Appeal date	0.10	\$35.00
8/19/2021	Correspondence to Court of Appeal regarding oral arguments	0.30	\$105.00
8/19/2021	Email to Defendants	0.20	\$70.00
8/20/2021	Received and reviewed "received" copy of correspondence from Court of Appeals Clerk	0.10	\$35.00
9/28/2021	Email to and from Brad; to and from client	0.10	\$35.00
11/22/2021	Emails from and to the Defendant regarding misfiled page of Judge's Order	0.10	\$35.00
12/6/2021	Began reading voluminous file in preparation for appeal this week	4.00	\$1,400.00
12/7/2021	Continued working on appeal	6.00	\$2,100.00
12/8/2021	Completed work on oral argument and drove to Columbia	2.00	\$700.00
12/9/2021	Attended oral argument	3.00	\$1,050.00
TOTAL			\$9,205.00