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Mar 14 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
L. Casey Manning, Circuit Court Judge

Appellate Case No. 2019-001224
Opinion No. 2022-UP-061
(filed February 9, 2022)

Ronald I. Paul,..... Appellant,

v.

South Carolina Department of Transportation; Paul D. de Holczer, individually and as a partner of the law firm of Moses, Koon & Brackett, PC; Michael H. Quinn, individually and as senior lawyer of Quinn Law Firm, LLC; J. Charles Ormond, Jr., individually and as a partner of the Law Firm of Holler, Dennis, Corbett, Ormond, Plante & Garner; Oscar K. Rucker, in his individual capacity as Director, Rights of Way South Carolina Department of Transportation; Macie M. Gresham, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; Natalie J. Moore, in her individual capacity as Assistant Chief Counsel, South Carolina Department of Transportation, Respondents.

MOTION FOR COSTS ON APPEAL

The Respondents Oscar K. Rucker and Macie M. Gresham move this Court, pursuant to Rule 222(d), SCACR, to tax costs on appeal in the amount of \$2,615.73 against the Appellant Ronald I. Paul.

The requested costs on appeal are set forth in the Statement of Costs on Appeal which is filed herewith.

LINDEMANN & DAVIS, P.A.

BY: s/ Andrew F. Lindemann

ANDREW F. LINDEMANN #13030

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Columbia, South Carolina 29260

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*Counsel for Respondents South Carolina
Department of Transportation, Paul D. de Holczer,
Oscar K. Rucker, Macie M. Gresham, and Natalie
J. Moore*

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Respondents.

**MEMORANDUM IN SUPPORT OF
MOTION FOR COSTS ON APPEAL**

By unpublished opinion filed February 9, 2022, the South Carolina Court of Appeals affirmed the circuit court's denial of his motion for default judgment and the grant of the Respondents Oscar Rucker and Macie Gresham's motion to dismiss for lack of personal jurisdiction. The Court ruled in favor of the Respondents Rucker and Gresham on all issues decided in this appeal.

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MOTION FOR COSTS ON APPEAL

Pursuant to Section (d)(1) of the Supreme Court's Order re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (dated August 25, 2021), the undersigned employee of Lindemann & Davis, P.A., counsel for the Respondents South Carolina Department of Transportation, Paul D. de Holczer, Oscar K. Rucker, Macie M. Gresham, and Natalie J. Moore, does hereby certify that service of the **Motion for Costs on Appeal, Memorandum in Support of Motion for Costs on Appeal, and the Statement of Costs on Appeal** in the above-captioned matter was made upon the *pro se* Appellant and all other counsel of record by email only this the 14th day of March 2022:

Mr. Ronald I. Paul
Email: ronaldipaul@att.net

Michael H. Quinn, Esquire
Quinn Law Firm, LLC
Email: mquinn@quinnlawfirmllc.com

J. Charles Ormond, Jr., Esquire
Ormond - Dunn
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s/ Andrew F. Lindemann



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*Also Admitted in North Carolina
†Certified Mediator

March 14, 2022

Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

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RE: Ronald I. Paul v. South Carolina Department of Transportations; Paul D. de Holczer, individually and as a partner of the law firm of Moses, Koon & Brackett, PC; Michael H. Quinn, individually and as senior lawyer of Quinn Law Firm, LLC; J. Charles Ormond, Jr. individually and as partner of the Law Firm of Holler, Dennis, Corbett, Ormond, Plante & Garner; Oscar K. Rucker, in his individual capacity as Director, Rights of Way South Carolina Department of Transportation; Macie M. Gresham, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; Natalie J. Moore, in her individual capacity as Assistant Chief Counsel, South Carolina Department of Transportation
Court of Appeals Case Number: 2019-001224
Civil Action Number: 2018-CP-40-5641
Our File Number: 79.20087

Dear Ms. Kitchings:

Pursuant to Section (b)(2) of the Supreme Court's Amended Order Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, please find enclosed for filing the **Motion for Costs on Appeal, Memorandum in Support of Motion for Costs on Appeal**, and the **Statement of Costs on Appeal** in the above referenced matter. By copy of this letter, I am serving copies on the *pro se* Appellant and all other counsel by email only pursuant to Section (d)(1) of the same Order. The \$50.00 check for the filing fee will be mailed to the Court via U.S. Mail today.

Thank you for your assistance in this matter. If you have any questions, please advise.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosures

The Honorable Jenny Abbott Kitchings
March 14, 2022
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cc: Mr. Ronald I. Paul (*w/ Enclosures, Via Email Only*)
Michael H. Quinn, Esquire (*w/ Enclosures, Via Email Only*)
J. Charles Ormond, Jr., Esquire (*w/ Enclosures, Via Email Only*)