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MAR 22 2022

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
THE HONORABLE L. CASEY MANNING
Circuit Court Judge
Fifth Judicial Circuit**

Appellate Case No. 2019-001224
Opinion No. 2022-UP-061
(filed February 9, 2022)
Case No: 2018-CP-400-5641

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, Plant & 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.....Defendants.

Of whom Oscar K. Rucker, in his individual capacity as Director, Rights of Way South Carolina Department of Transportation, and Macie M. Gresham, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation are the Respondents.

RETURN THAT OPPOSES ANY REQUEST FOR COSTS

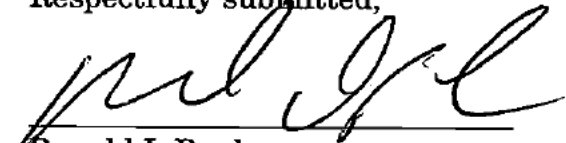
The Respondents Oscar K. Rucker and Macie M. Gresham in their individual capacity move this Court, pursuant to Rule 222(d), SCACR, to tax costs against the Appellant. The Respondents Rucker and Gresham claim they paid attorneys' fees in the amount of \$2,500.00 which is an amount set by order of the Supreme Court. However, in this appeal Rucker and Gresham would have to had actually incurred \$2,500.00 in attorney fees. ((Rule 222 (b).....to the extent the party actually incurred these costs))

The Record on Appeals shows Gresham new nothing about the lawsuit or this Appeal (R 253 lines 11-18) and no evidence was submitted showing she actually incurred or paid any attorney fees.

Rucker submitted no evidence showing he actually incurred or paid any attorney fees and the Record on Appeals in this specific appeal, suggest it's a stretch to believe he incurred or paid any attorney fees.

Accordingly, appellant respectfully request any request for costs whatsoever be denied.

Respectfully submitted,



Ronald I. Paul
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Columbia, S.C. 29240
Appellant, *Pro Se* litigant
(803) 414-2305

Columbia South Carolina

March 22, 2022

Other Counsel of Record:

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Oscar K. Rucker, Macie M. Gresham, Natalie J. Moore and Paul D. de Holczer.

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RONALD I. PAUL.....Appellant,

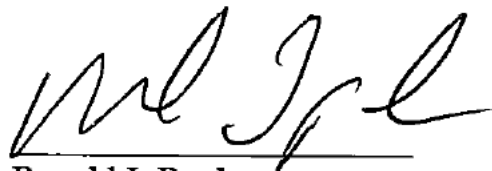
V.

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, Plant & 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.....Defendants.

Of whom Oscar K. Rucker, in his individual capacity as Director, Rights of Way South Carolina Department of Transportation, and Macie M. Gresham, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation are the Respondents.

PROOF OF SERVICE

I, Ronald I. Paul hereby certify that I have served the Appellant Return that opposes any request for costs on all Respondents South Carolina Department of Transportation; Paul D. de Holczer individually, and as a partner of the law Firm of Moses, Koon & Brackett, P.C; 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, Plant& 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 by depositing a copy of it in the United State Mail, postage prepaid, on this date, March 22, 2022, addressed to the attorney of record or *Pro Se* Litigants and others as listed below.



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Appellant, *Pro Se* Litigant

Columbia, South Carolina

March 22, 2022

RESPONDENTS COUNSEL OF RECORD

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SC Court of Appeals

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