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APR 21 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY
Court of Common Pleas

Lower Court Case No. 2013-CP-28-00876
Appellate Case No. 2019-001508

Jimmy Boykin, Respondent,

v.

Zady R. Burton, Individually and as Personal Representative
of the Estate of Helen L. Burton, and Sandy Boykin a/k/a
Sandy H. Boykin, Jr., Defendants

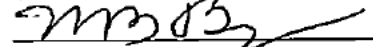
Of Whom Zady R. Burton is the Appellant.

MOTION TO RECOVER COSTS AND ATTORNEYS FEES

The Respondent, Jimmy Boykin, respectfully moves pursuant to Rule 222(b), SCACR, for an Order allowing the Respondents to recover costs and attorney fees. The motion is based upon the following:

- 1) This motion is timely, as the remittitur was issued April 1, 2022 and within the ten (10) days allowed to correct deficiencies.
- 2) Rule 222(b), SCACR, allows for the recovery of attorney fees in the amount of Two Thousand Five Hundred and no/100 (\$2,500.00) Dollars.
- 3) Filing fee for Motion to Recover Costs and Attorney's Fees in the amount of Fifty and no/100 (\$50.00) Dollars.

WE SO MOVE:



Moultrie B. Burns, Jr.
Attorney for Respondent
1111 Church Street
Camden, SC 29020
Telephone: (803) 432-4391
Facsimile: (803) 425-4816

April 19, 2022

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY
Court of Common Pleas

Case No. 2013-CP-28-00876
Appellate Case No. 2015-001556

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SC Court of Appeals

Jimmy Boykin, Sammy Boykin a/k/a Sandy H. Boykin, Sr. and Kenny Boykin, Plaintiffs

v.

Zady Burton, Individually and as Personal Representative of the Estate of Helen L. Burton, and Sandy Boykin, a/k/a Sandy H. Boykin, Jr. Defendants


Of whom Zady R. Burton, Individually and as Personal Representative of the Estate of Helen L. Burton is the Appellant and Jimmy Boykin is the Respondent.

CERTIFICATE OF SERVICE

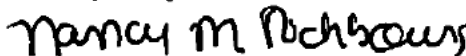
I, the undersigned, an employee of Savage, Royall & Sheheen, L.L.P., do hereby certify that I have served the Respondents' Motion to Recover Costs and Attorney Fees and Affidavit of Costs by depositing a copy of same in a United States Postal Mailbox, first class mail, postage prepaid, addressed to the attorney below on the 19th day of April, 2022

Spencer Andrew Syrett
P.O. Box 7403
Columbia, SC 29202

SAVAGE, ROYALL & SHEHEEN, L.L.P.


Moultrie B. Burns, Jr., SC Bar 1042
Attorney for the Respondent
Post Office Drawer 10
Camden, South Carolina 29021
(803) 432-4391

SWORN TO and subscribed before me this
19th day of April, 2022.



Notary Public for South Carolina

My Commission expires: 8/22/24

SAVAGE ROYALL & SHEHEEN L.L.P.
ATTORNEYS AND COUNSELORS AT LAW

WILLIAM B. COX, JR.
VINCENT A. SHEHEEN*
STEPHEN R. SMOAK
MICHAEL D. WRIGHT
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HENRY SAVAGE, JR., 1903-1990
EDWARD M. ROYALL - OF COUNSEL
ROBERT J. SHEHEEN - OF COUNSEL
MOULTRIE B. BURNS, JR. - OF COUNSEL

April 19, 2022

*CERTIFIED MEDIATOR & ARBITRATOR

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SC Court of Appeals

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

RE: Jimmy Boykin v. Zady Burton
Lower Case No. 2013CP2800876
Appellate Case No. 2019-001508

Dear Ms. Kitchings:

This is in response to your letter dated April 14, 2022 to cure the motion deficiencies. Enclosed for filing please find another original and one copy of the Respondents' Motion to Recover Costs and Attorney's Fees and Affidavit of Costs, along with my Certificate of Service on the above referenced matter.

I have enclosed a check for \$50.00 representing the filing fee.

Please return the copy to me in the self-addressed, stamped envelope I have provided. By copy of this letter, copies of the same are being served upon opposing attorney.

Very truly,


Moultrie B. Burns, Jr.

MBBjr/nmr
enclosures

cc: Spencer Andrew Syrett, Esquire
P.O. Box 7403
Columbia, SC 29202

LAW OFFICES
SAVAGE, ROYALL & SHEHEEN L.L.P.
DRAWER 10
CAMDEN, SC 29021

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SC Court of Appeals

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



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