

97652
RECEIVED

NOV 28 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM APPELLATE PANEL OF THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

WCC FILE NO. 1320600

Kevin M. Todd, Employee/Claimant Respondent

vs.

Mike Roberts d/b/a Mike Roberts Home Repair, Employer
and S.C. Uninsured Employers' Fund, Carrier/Defendants

OF WHICH
S.C. Uninsured Employers Fund is the..... Appellant

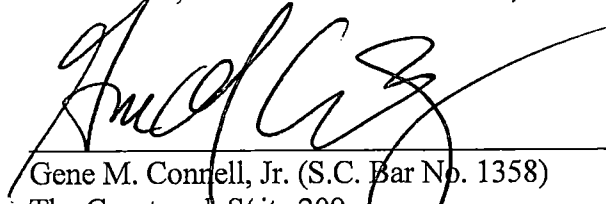
RESPONDENT'S MOTION TO TAX COSTS

YOU WILL PLEASE TAKE NOTICE that the Respondent, Kevin M. Todd, by and through his undersigned counsel, does hereby move, pursuant to Rule 222, SCACR, for an Order taxing costs against the Appellant, S.C. Uninsured Employers Fund, as set forth in the Itemized Statement of Costs which is attached hereto.

WHEREFORE, Respondent requests that costs be taxed, and for such other and further relief as the Court may deem just, necessary and proper.

(Signature on following page)

KELAHER, CONNELL & CONNOR, P.A.



Gene M. Connell, Jr. (S.C. Bar No. 1358)
The Courtyard, Suite 209
1500 U. S. Highway 17 North
Post Office Drawer 14547
Surfside Beach, South Carolina 29587-4547
(843) 238-5648 (phone)
(843) 238-5050 (facsimile)
gconnell@classactlaw.net
Attorney for Respondent

November 22, 2022
Surfside Beach, South Carolina

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

NOV 28 2022

SC Court of Appeals

APPEAL FROM APPELLATE PANEL OF THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

WCC FILE NO. 1320600

APPELLATE CASE NO. 2020-000923

Kevin M. Todd, Employee/Claimant Respondent

vs.

Mike Roberts d/b/a Mike Roberts Home Repair, Employer
and S.C. Uninsured Employers' Fund, Carrier/Defendants

OF WHICH

S.C. Uninsured Employers Fund is the..... Appellant

PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of the **Respondent's Motion to Tax Costs and Itemized Statement of Costs** on the 22nd day of November, 2022, by depositing a copy of same in the United States Mail, postage prepaid, to:

Samuel T. Brunson, Esquire.
Brunson Law Firm
P.O. Box 431
Florence, SC 29503

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 22nd day of November, 2022.

Barbara A. Smith
Notary Public for South Carolina
My Commission Expires: 3/2/24

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
GENE M. CONNELL, JR.
L. SIDNEY CONNOR, IV
LISA POE DAVIS
*OF COUNSEL

AREA CODE 843
238-5648
FAX: 238-5050

November 22, 2022

RECEIVED

NOV 28 2022

SC Court of Appeals

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Appellate Case No. 2020-000923
*Kevin M. Todd v. Michael Roberts d/b/a Michael Roberts Home Repair and
S.C. Uninsured Employers' Fund*
W.C.C. File No. 1320600
Our File No. 2014-0046C


Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Respondent's Motion to Tax Costs, Itemized Statement of Costs and Proof of Service in the above-captioned case. I also enclose a check for \$50.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,


Gene M. Connell, Jr.

GMC,Jr:sm
Enclosures

cc: Samuel T. Brunson, Esquire.

KELAHER, CONNELL & CONNOR, PC
ATTORNEYS AT LAW
PO DRAWER 14547
SURFSIDE BEACH, SC 29587

FIRST CLASS



US POSTAGE PERMIT NO. 5000 SURFSIDE BEACH, SC

ZIP 29575 \$ 002.88⁰⁰
02 74
0001268182 NOV 22 2022

KELAHER CONNELL & CONNOR, PC
Attorneys at Law
P. O. Drawer 14547
Surfside Beach, SC 29587-4547

RECEIVED

NOV 28 2022

SC Court of Appeals

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

