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Apr 26 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Thomas A. Russo, Circuit Court Judge
Case No. 2014-CP-26-7790

APPELLATE CASE NO. 2018-002270

Richard CiampanellaRespondent

vs.

City of Myrtle BeachAppellant

RESPONDENT’S MOTION TO TAX COSTS

YOU WILL PLEASE TAKE NOTICE that the Respondent, Richard Ciampanella, by and through his undersigned counsel, does hereby move, pursuant to Rule 222, SCACR, for an Order taxing costs against the Appellant, City of Myrtle Beach, 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)

Respectfully submitted,

KELAHER, CONNELL & CONNOR, P.C.



Gene M. Conriell, Jr. (S.C. Bar No. 1358)
The Courtyard, Suite 209
1500 U.S. Highway 17 North
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Julian Z. Hanna (S.C. Bar No. 2667)
Julian Z. Hanna and Associates, P.A.
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April 26, 2023

Attorneys for Respondent

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM Horry COUNTY
Court of Common Pleas
The Honorable Thomas A. Russo, Circuit Court Judge
Case No. 2014-CP-26-07790

Opinion No. 2022-UP-085 (filed March 2, 2022)

Appellate Case No. 2022-000693

Richard CiampanellaRespondent

vs.

City of Myrtle Beach Petitioner

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/Itemized Statement of Costs** on the 26th day of April 2023, by depositing a copy of same in the United States Mail, postage prepaid, to:

Kelsey J. Brudvig, Esquire
Molly Flynn, Esquire
Collins & Lacy, P.C.
P. O. Box 12487
Columbia, SC 29211

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 26th day of April 2023.

Donna H. Hand
Notary Public for South Carolina
My Commission Expires: 3-28-26

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

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April 26, 2023

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

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SC Court of Appeals

Re: Appellate Case No. 2018-002270
Richard Ciampanella v. City of Myrtle Beach
C/A No. 2014-CP-26-07790
Our File No. 2014-0324C

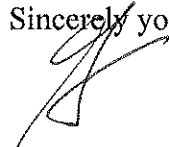
Dear Ms. Kitchings:

Enclosed please find Respondent's Motion to Tax Costs, Itemized Statement of Costs and Proof of Service in the above-captioned case. Our check for the \$50.00 filing fee is being mailed this date.

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.

GM CJr:sm
Enclosures

cc w/enc.: Kelsy J. Brudvig, Esquire
Molly Flynn, Esquire
Julian Z. Hanna, Esquire