

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable R. Keith Kelly, Circuit Court Judge  
Case No. 2017-CP-10-01324

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APPELLATE CASE NO. 2023-000898

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Steven McLemore and Bonnie Jean Eagle as Natural Parents for the Estate of D. M.,

Plaintiffs,

vs.

Charleston County Parks and Recreation Commission d/b/a James Island County Park;  
Yearround Pool Co., Inc.; SGA Architecture; South Carolina Department of Health and  
Environmental Control; and John Doe and/or John Doe Corporation,

Defendants.

OF WHOM:

Bonnie Jean Eagle is..... Appellant

and

Charleston County Parks and Recreation Commission  
d/b/a James Island County Park is ..... Respondent

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PROOF OF SERVICE

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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 **Final Brief of Appellant** on the 15<sup>th</sup> day of February, 2024, by depositing a copy of same in the United States Mail, postage prepaid, to:

Jonathan J. Anderson, Esquire  
Jonathan L. Anderson, Esquire  
Anderson Law Group, LLC  
PO Box 87  
Charleston, SC 29402

Shelia Y. McCumbee  
Shelia Y. McCumbee

**SWORN AND SUBSCRIBED** before me,  
this 15<sup>th</sup> day of February, 2024.

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

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

AREA CODE 843  
238-5648  
FAX: 238-5050

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SC Court of Appeals

February 15, 2024

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

Re: Appellate Case No. 2023-000898  
*Steven McLemore, Individually and as Personal Representative of the Estate of D.M. and Bonnie Jean Eagle, Individually and as natural parent of deceased minor, D.M. v. Charleston County Parks & Recreation Commission ("CCPRC") d/b/a James Island County Park; et al.*; Case No: 2017-CP-10-01324  
Our File No. 2020-0393C

Dear Ms. Kitchings:

I enclose for filing an original (unbound) and one copy (bound) of the following documents in the above-captioned:

- Record on Appeal with Certificate of Counsel;
- Final Brief of Appellant with Certificate of Counsel and Proof of Service;
- Final Reply Brief of Appellant with Certificate of Counsel and Proof of Service.

Please return a filed copy of the Proof of Service of each brief in the self-addressed, stamped envelope provided.

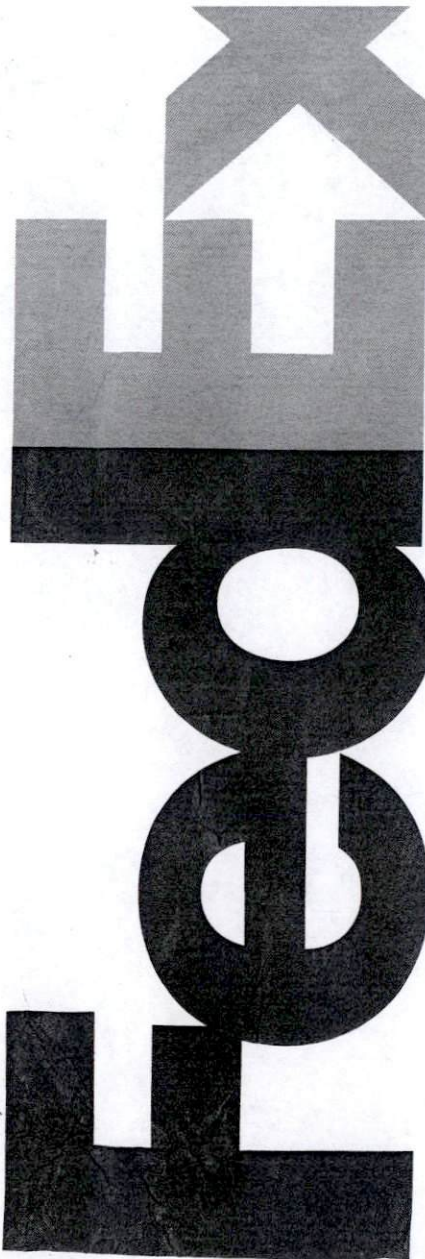
By copy of this letter, we hereby serve the Final Brief of Appellant and the Final Reply Brief of Appellant on Respondent by delivery to Jonathan J. Anderson and Jonathan L. Anderson as attorneys of record. The Record on Appeal was previously served on the Respondent on January 18, 2024 and Proof of Service provided to the Court pursuant to Rule 210(a).

Sincerely yours,

  
Gene M. Connell, Jr.

GMC,Jr.:sm  
Enclosures  
cc w/enc.:

Jonathan J. Anderson, Esquire  
Jonathan L. Anderson, Esquire  
Michael H. Wells, Esquire



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