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May 21 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Robert E. Hood., Circuit Court Judge
Case No. 2018-CP-26-06033

Appellate Case No. 2022-000031

Royal Garden Resort Regime Homeowners Association, Inc.. Respondent

vs.

Sea Breeze Property Management & Contract Services, Inc.; Calvin Donaldson;
and Phoenix of the Strand, Inc..... Appellants

RESPONDENT'S MOTION TO TAX COSTS

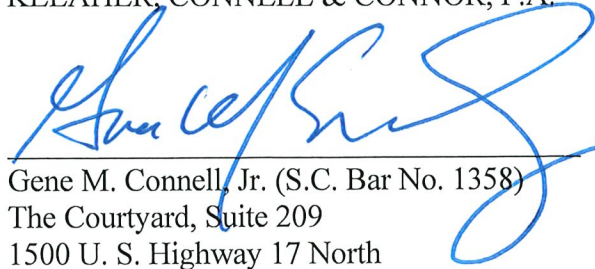
YOU WILL PLEASE TAKE NOTICE that the Respondent, Royal Garden Resort Regime Homeowners Association, Inc., by and through its undersigned counsel, does hereby move, pursuant to Rule 222, SCACR, for an Order taxing costs against the Appellants, Sea Breeze Property Management & Contract Services, Inc., Calvin Donaldson and Phoenix of the Strand, Inc, 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.A.



Gene M. Connell, Jr. (S.C. Bar No. 1358)
The Courtyard, Suite 209
1500 U. S. Highway 17 North
Post Office Drawer 14547
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Attorney for Respondents

May 21, 2024
Surfside Beach, South Carolina

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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 21st day of May, 2024 by depositing a copy of same in the United States Mail, postage prepaid, to:

Douglas M. Zayicek, Esquire
Holly M. Lusk, Esquire
Bellamy, Rutenberg, Copeland, Epps,
Gravelly & Bowers, P.A.
P.O. Box 357
Myrtle Beach, SC 29578

Kirby D. Shealy III, Esquire
Adams and Reese LLP
PO Box 2285
Columbia, SC 29202

Luke M. Allen, Esquire
S.C. Department of Labor, Licensing and Regulation
110 Centerview Drive, Kingstree Bldg.
Columbia, SC 29210

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 21st day of May, 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

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SC Court of Appeals

EDWARD T. KELAHER*
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*OF COUNSEL

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FAX: 238-5050

May 21, 2024

ctappfilings@sccourts.org

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

Re: Appellate Case No. 2022-000031
Royal Garden Resort Regime Homeowners Association, Inc. v. Sea Breeze Property Management & Contract Services, Inc.; Calvin Donaldson; and Phoenix of the Strand, Inc.
C/A No. 2018-CP-26-06033
Our File No. 2018-0334C

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.

Sincerely yours,



Gene M. Connell, Jr.

GMCJr:sm
Enclosures
cc w/enc:

Douglas M. Zayicek, Esquire
Holly M. Lusk, Esquire
Kirby D. Shealy III, Esquire
Luke M. Allen, Esquire