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Apr 21 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

G.D. Morgan, Jr., Circuit Court Judge

Appellate Case No. 2024-000200

Anthony Beasley, Individually and on behalf of the minor child, LB
born 2014,Appellant

v.

South Carolina Department of Social Services, South Carolina
Department of Children Advocacy, Children’s Advocacy Center of
Spartanburg, Cherokee and Union Counties, Inc.,Defendants

of whom South Carolina Department of Social Services and South
Carolina Department of Children Advocacy are.....Respondents

MOTION FOR COSTS AND ATTORNEY’S FEES

Respondents South Carolina Department of Social Services and South Carolina
Department of Children's Advocacy move the Court, pursuant to Rule 222(a) of the South Carolina
Appellate Court Rules, for an order taxing costs and attorney’s fees against Appellant Anthony
Beasley. This motion is made upon the following grounds:

1. Appellant filed Notice of Appeal on February 13, 2024, appealing the Trial Court’s
dismissal of Appellant’s cause of action for outrage and his claim for punitive damages.
2. On April 2, 2025, the Court affirmed the Trial Court’s findings that the South Carolina
Tort Claims Act bars Appellant’s cause of action for outrage and his claim for punitive
damages.

3. Respondents South Carolina Department of Social Services and South Carolina Department of Children's Advocacy are entitled to recover costs and attorney's fees pursuant to Rule 222(b) of the South Carolina Appellate Court Rules.

This motion is based upon the filings with this Court, the applicable common and statutory law, and the itemized statement of costs filed herewith.

s/Stephanie H. Burton
Stephanie H. Burton (#13089)
GIBBES BURTON, LLC
308 East Saint John Street
Spartanburg, SC 29302
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*Attorneys for Respondents South Carolina
Department of Social Services and South Carolina
Department of Children's Advocacy*

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of whom South Carolina Department of Social Services and South
Carolina Department of Children Advocacy are.....Respondents

PROOF OF SERVICE

The undersigned, Stephanie H. Burton certifies that she is a member of Gibbes Burton,
LLC and on the 21st day of April 2025, she served copies of the following:

- 1. Motion for Costs and Attorney’s Fees of Respondents South Carolina Department of Social Services and South Carolina Department of Children's Advocacy; and
- 2. Itemized Statement of Costs.

upon all parties by email and by depositing in the United States mail, with due and proper postage
affixed thereto, addressed to all counsel of record as follows:

Ms. Melinda Butler
Butler Law Firm
211 E. Main Street
Union, SC 29379
melinda@butlerservingjustice.com

Attorneys for Appellant Anthony Beasley

Mr. W. McElhaney White
Holcombe Bomar, P.A.
101 W. St. John Street, Suite 200
Spartanburg, SC 29306
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*Attorneys for Defendant the Children's
Advocacy Center of Spartanburg,
Cherokee and Union Counties, Inc.*

s/Stephanie H. Burton
Stephanie H. Burton
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Carolina Department of Children's Advocacy*

Stephanie H. Burton
sburton@gibbesburton.com



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April 21, 2025
By E-Mail and U.S. Mail

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

Re: Re: Anthony Beasley, individually and on behalf of the minor child, LB born 2014, v. South Carolina Department of Social Services, South Carolina Department of Children's Advocacy, and Children's Advocacy Center of Spartanburg, Cherokee, and Union Counties, Inc.
Appellate Case No. 2024-000200
C.A. No.: 2023-CP-23-05153

Dear Ms. Kitchings:

We are enclosing for filing the following:

1. Motion for Costs and Attorney's Fees of Respondents South Carolina Department of Social Services and South Carolina Department of Children's Advocacy;
2. Itemized Statement of Costs; and
3. Proof of Service.

Also enclosed is a check in the amount of \$50.00 for the motion filing fee.

With kind regards,

Yours very truly,

GIBBES BURTON, LLC

A handwritten signature in blue ink that reads "Stephanie H. Burton". The signature is written in a cursive style with a large initial "S".

Stephanie H. Burton

SHB/leg
Enclosures

cc: Ms. Melinda Butler (w/enclosures)(by email)
Mr. W. McElhaney White (w/enclosures)(by email)

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