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**May 02 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas  
Honorable Dale E. Van Slambrook, Circuit Court Judge

\_\_\_\_\_  
Circuit Court Case No.: 2023-CP-26-02424  
\_\_\_\_\_

Mother Doe and Father Doe, Individually and as the Parents and Natural Guardians of Jane Doe,  
a minor ..... Respondents,

v.

Palmetto Preschool & Learning Center, LLC.....Appellants.

\_\_\_\_\_  
**NOTICE OF APPEAL**  
\_\_\_\_\_

The Appellants hereby appeal the Honorable Dale E. Van Slambrook’s March 14, 2025 Order Granting Plaintiff’s Request for Protective Order and April 3, 2025 Form 4 Order Denying Defendant’s timely Motion to Reconsider pursuant to Rule 59(e), SCRPC. The Appellants received written notice of the Orders on March 14, 2025 and April 3, 2025, respectively. Copies of the two Orders, which grant and uphold Respondents’ Request for Protective Order, are attached.

Respectfully submitted,

/s/ Robert E. Kneece III

Robert E. Kneece III

Turner Padget Graham & Laney, P.A.

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Charleston, South Carolina 29413

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ATTORNEYS FOR APPELLANTS

May 2, 2025

Other Counsel of Record:

Daniel W. Luginbill

Julia M. Flumian

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Attorneys for Respondent

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\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

The undersigned, attorney of record for the Appellants, certifies that on **May 2, 2025** a copy of the **Notice of Appeal** was served on Daniel W. Luginbill and Julia Flumian, attorneys for Respondent via email to [dluginbill@mcgowanhood.com](mailto:dluginbill@mcgowanhood.com) and [jflumian@mcgowanhood.com](mailto:jflumian@mcgowanhood.com).

/s/ Robert E. Kneece III  
Robert E. Kneece III  
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May 2, 2025

ATTORNEYS FOR APPELLANTS

# Turner Padget

REPLY TO:

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May 2, 2025

Via Regular U.S. Mail and  
E-mail: ctappfilings@sccourts.org

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

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SC Court of Appeals

Re: Mother Doe and Father Doe, individually and as the Parents and  
Natural Guardians of Jane Doe, a minor v. Palmetto Preschool &  
Learning Center, LLC

Docket No.: 2023-CP-26-02424

Claim No: 22475282

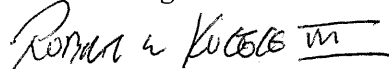
TP File No.: 00309.00177

Dear Ms. Kitchings:

I enclose the following: (1) Notice of Appeal; (2) Proof of Service; and (3) a check for the filing fee. These documents have been submitted by e-mail for filing, with the filing fee being sent by regular mail. By copy of this letter, I am serving counsel of record with the documents. If you have any questions or need additional information, please let me know.

With kind regards,

Turner Padget Graham & Laney, P.A.



Robert E. Kneece III

RK:GGB

Enclosures

Cc: Daniel W. Luginbill (w/encl. via email)

Julia Flumian (w/encl. via email)