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Jun 18 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

Case No. 2023-CP-26-02424
Appellate Case No. 2025-000881

Mother Doe and Father Doe, Individually and as the
Parents and Natural Guardians of Jane Doe

Respondents,

v.

Palmetto Preschool & Learning Center, LLC

Appellant.

Motion for Costs

Pursuant to Rule 222, SCACR, Respondents Mother Doe and Father Doe request the costs of this appeal be taxed against Appellant Palmetto Preschool & Learning, Center LLC. Rule 222(a) provides that, unless the Court orders otherwise, “costs shall be taxed against the appellant when the judgment on appeal is affirmed.” Rule 222(a), SCACR. This Court dismissed the appeal on May 30, 2025. In the order of dismissal, the Court noted “Appellant filed a return, arguing that although the granting of a protective order ‘by itself’ is not immediately appealable, the order contained factual findings Thus, Appellant argued the orders were immediately appealable” Practically, Respondent knowingly filed an interlocutory appeal. The Remittitur

was issued on June 17, 2025. Because the Court has not ordered otherwise and because the parties have not agreed otherwise, Rule 222 provides the Court should award costs to Respondent.

In accordance with the instructions of Rule 222(d) an itemized statement of costs is attached to this motion.

Respectfully submitted,

June 17, 2025
Columbia, SC

s/Whitney B. Harrison
Whitney B. Harrison
McGowan, Hood & Felder, LLC
1517 Hampton Street
Columbia, SC 29201

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Respondents,

v.

Palmetto Preschool & Learning Center, LLC

Appellant.

Proof of Service

The undersigned herby certifies Respondents' Motion for Costs was served by email on
June 18, 2025, to the following:

Robert E. Kneece, III: rkneece@turnerpadget.com

Respectfully submitted,

s/Whitney B. Harrison

McGowan, Hood, Felder, & Phillips, LLC

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Attorneys for Respondents

June 18, 2025
Columbia, South Carolina



McGOWAN HOOD
FELDER & PHILLIPS LLC

WWW.MCGOWANHOOD.COM

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SC Court of Appeals

June 18, 2025

Via: Electronic Mail

The Honorable Jenny Abott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: *Mother Doe & Father Doe v. Palmetto Preschool & Learning Center*
Appellate No.: 2025-000881

Dear Ms. Kitchings:

Enclosed please find Respondents' Motion for Costs and the corresponding proof of service. A check for the \$50.00 filing fee is also enclosed.

Please let me know if you have any questions. Thank you for your assistance.

Sincerely,

s/Whitney B. Harrison

Whitney B. Harrison, Esquire

cc: Robert E. Kneece, III, Esquire (via E-Mail)
Daniel W. Luginbill, Esquire (via E-Mail)
Julia M. Flumian, Esquire (via E-Mail)