

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

105018

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JUN 20 2025

SC Court of Appeals

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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Appellant.

Proof of Service

The undersigned hereby 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

Whitney B. Harrison
S.C. Bar Number: 100111
1517 Hampton St.
Columbia, SC 29201
Phone: (803) 779-0100
Fax: (803) 787-0750
wharrison@mcgowanhood.com

Daniel W. Luginbill
SC Bar No. 68525
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SC Bar No. 77617
10 Shem Dr., Suite 300
Mt. Pleasant, SC 29464
Phone: (843) 268-4623
Fax: (843) 388-3194
dluginbill@mcgowanhood.com
jflumian@mcgowanhood.com

Attorneys for Respondents

June 18, 2025
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA
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Appellant.

This Court is requested to tax the following costs against Appellant Palmetto Preschool &
Learning Center, LLC.

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court use Only)
Costs of printing or copying final brief				
Costs of printing or copying reply brief				
Cost of printing or copying record on appeal				
Filing fee paid under Rule 203(d), SCACR				
Cost of court reporter's transcript				
Attorney's fee provided by Rule 222(b), SCACR			\$2,500	
Other (specify and explain)				
TOTAL:			\$2,500	

I, Whitney B. Harrison, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was served on opposing counsel.

Respectfully submitted,

June 17, 2025
Columbia, SC

Whitney B. Harrison

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

ATTORNEY FOR RESPONDENT

Subscribed and sworn before me this 17th day of June, 2025

Amy E. Starr

Notary Public for South Carolina

My Commission Expires 12-30-2031





**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)

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MCGOWAN HOOD
FELDER & PHILLIPS LLC

1517 HAMPTON STREET
COLUMBIA, SOUTH CAROLINA 29201

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The Honorable Jenny Abbott Kitchings
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