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**Sep 04 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable R. Keith Kelly, Circuit Court Judge  
Case No. 2017-CP-10-01324

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APPELLATE CASE NO. 2023-000898

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Steven McLemore and Bonnie Jean Eagle as Natural Parents for the Estate of D. M.,  
Plaintiffs,

vs.

Charleston County Parks and Recreation Commission d/b/a James Island County Park;  
Yearround Pool Co., Inc.; SGA Architecture; South Carolina Department of Health and  
Environmental Control; and John Doe and/or John Doe Corporation,  
Defendants.

OF WHOM:  
Bonnie Jean Eagle is ..... Appellant

and

Charleston County Parks and Recreation Commission  
d/b/a James Island County Park is ..... Respondent

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**APPELLANT’S MOTION TO TAX COSTS**

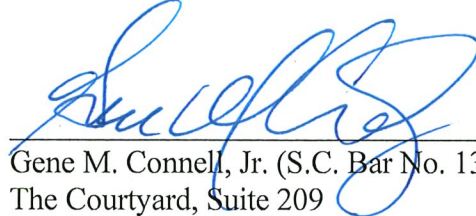
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YOU WILL PLEASE TAKE NOTICE that the Appellant Bonnie Jean Eagle, by and through her undersigned counsel, does hereby move, pursuant to Rule 222, SCACR, for an Order taxing costs against the Respondent, Charleston County Parks and Recreation Commission d/b/a James Island County Park, as set forth in the Itemized Statement of Costs which is attached hereto.

**WHEREFORE**, Appellant requests that costs be taxed against the Respondent, Charleston County Parks and Recreation Commission d/b/a James Island County Park, and for such other and further relief as the Court may deem just, necessary and proper.

Respectfully submitted,

KELAHER, CONNELL & CONNOR, P.C.



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Gene M. Connell, Jr. (S.C. Bar No. 1358)  
The Courtyard, Suite 209  
1500 U. S. Highway 17 North  
Post Office Drawer 14547  
Surfside Beach, South Carolina 29587-4547  
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September 4, 2025

**Attorneys for Appellant Bonnie Jean Eagle**

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Defendants.

OF WHOM:

Bonnie Jean Eagle is..... Appellant

and

Charleston County Parks and Recreation Commission  
d/b/a James Island County Park is .....

Respondent

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 Appellant’s Motion to Tax Costs and Itemized Statement of Costs on the 4<sup>th</sup> day of September 2025, via email using counsel’s individual email address listed in the Attorney Information System (AIS), to:

janderson@algsc.com

landerson@algsc.com

Jonathan J. Anderson, Esquire

Jonathan L. Anderson, Esquire

Anderson Law Group, LLC

P. O. Box 87

Charleston, SC 29402

Shelia Y. McCumbee

Shelia Y. McCumbee

**SWORN AND SUBSCRIBED** before me,  
this 4th day of September, 2025.

Barbara A. Smith

Notary Public for South Carolina

My Commission Expires: 1-24-34

## Shelia Mccumbee

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**From:** Gene Connell  
**Sent:** Thursday, September 4, 2025 10:23 AM  
**To:** 'janderson@algsc.com'; 'landerson@algsc.com'  
**Cc:** mwells@coastal-law.com  
**Subject:** Appellate Case No. 2023-000898; McLemore v. Charleston County Parks and Recreation Commission  
**Attachments:** MOTION TO TAX COSTS.pdf; ITEMIZED STATEMENT OF COSTS.pdf; POS - Motion to Tax Costs.pdf

Attached please find Appellant's Motion to Tax Costs, Itemized Statement of Costs and Proof of Service in the above-referenced case.

Gene M. Connell, Jr., Esquire  
Kelaher, Connell & Connor, P.C.  
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KELAHER, CONNELL & CONNOR, P.C.  
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**SC Court of Appeals**

EDWARD T. KELAHER\*  
GENE M. CONNELL, JR.  
L. SIDNEY CONNOR, IV  
LISA POE DAVIS  
\*OF COUNSEL

AREA CODE 843  
238-5648  
FAX: 238-5050

September 4, 2025

[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

The Honorable Jenny Abbot Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: Appellate Case No. 2023-000898  
*Steven McLemore, Individually and as Personal Representative of the Estate of D.M. and  
Bonnie Jean Eagle, Individually and as natural parent of deceased minor, D.M. v.  
Charleston County Parks & Recreation Commission ("CCPRC") d/b/a James Island  
County Park; et al.*; Case No: 2017-CP-10-01324  
Our File No. 2020-0393C

Dear Ms. Kitchings:

Enclosed please find Appellant'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.

The above-stated documents have been served on Respondent through counsel of record as evidenced by the Proof of Service.

Should you have any question or need anything further, please do not hesitate to contact me.

Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr.:sm

Enclosures

cc w/enc.: Jonathan J. Anderson, Esquire  
Jonathan L. Anderson, Esquire  
Michael H. Wells, Esquire