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**Mar 23 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM BEAUFORT COUNTY  
The Honorable Donald B. Hocker, Circuit Court Judge  
Beaufort County  
Trial Court Case No. 2020-CP-07-1064

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APPELLATE CASE NO. 2022-001547

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Turner's Marina, LLC,

Respondent-Appellant,

vs.

Paige Lorberbaum, Jeffrey Klapper, and Diane L. Klapper,

Defendants,

Of whom Paige Lorberbaum is the Appellant-Respondent and Jeffrey A. Klapper and Diane L. Klapper are Respondents.

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MOTION FOR COSTS

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Respondent-Appellant Turner's Marina, LLC, pursuant to Rule 222, SCACR, respectfully moves for entry of an Order taxing costs against Defendant Paige Lorberbaum.

In support of this motion, Respondent-Appellant would show as follows:

1. On October 27, 2022, Defendant Lorberbaum appealed Orders of the Circuit Court holding a right of repurchase held by the Plaintiff Turner's Marina, LLC valid and properly exercised.

2. Following briefing and oral argument, the Court of Appeals issued an unpublished opinion on February 25, 2026, affirming.

3. Accordingly, Respondent-Appellant is the prevailing party on appeal and is entitled to recovery of costs and attorneys' fees. See Rule 222(a), SCACR.

4. Respondent-Appellant incurred appellate costs for printing six bound copies of its Final Brief and Reply Brief of Respondent-Appellant.

5. A sworn, itemized statement of costs is attached hereto as Exhibit A to this motion.

6. The Circuit Court's Orders having been affirmed, Respondent Turner's Marina, LLC respectfully requests that this Court tax costs against Defendant Lorberbaum as set forth in Exhibit A.

s/Thomas C. Taylor  
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ATTORNEY FOR RESPONDENT-APPELLANT  
TURNER'S MARINA LLC

March 23, 2026  
Bluffton, South Carolina

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PROOF OF SERVICE

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I hereby certify that this law firm represents the Respondent-Appellant Turner's Marina, LLC in the above-captioned matter and that on the date below, in Bluffton, South Carolina, a copy of the foregoing was served on the following persons via electronic mail to their AIS E-mail address:

**Documents Served: RESPONDENT-APPELLANT'S MOTION FOR COSTS and EXHIBIT A, ITEMIZED STATEMENT OF COSTS**

**Parties Served:**

**Russell P. Patterson, Esq.**  
**Russell P. Patterson, P.A.**  
**SC Bar No.: 4375**  
**Post Office Box 8047**  
**Hilton Head Island, SC 29938**  
**russell@russellpattersonlaw.com**

**ATTORNEY FOR APPELLANT-RESPONDENT**  
**PAIGE N. LORBERBAUM**

**James S. Murray, Esq.**  
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**ATTORNEY FOR RESPONDENTS**  
**JEFFREY A. KLAPPER AND DIANE L. KLAPPER**



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**ATTORNEY FOR RESPONDENT-APPELLANT**  
**TURNER'S MARINA LLC**

Bluffton, South Carolina  
March 23, 2026

ADMITTED TO THE UNITED STATES  
SUPREME COURT BAR

ADMITTED IN SOUTH CAROLINA,  
COLORADO AND GEORGIA

CERTIFIED SC CIRCUIT  
COURT MEDIATOR

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March 23, 2026

Via E-Mail Attachment to: ctappfilings@sccourts.org + US Mail

Hon. Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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**SC Court of Appeals**

**Re: Turner's Marina, LLC, Respondent-Appellant, v. Paige Lorberbaum, Jeffrey A. Klapper, and Diane L. Klapper, of whom Paige Lorberbaum is the Appellant-Respondent and Jeffrey Klapper and Diane L. Klapper are Respondents; Appellate Case Number: 2022-001547; Respondent-Appellant's Motion For Costs, Rule 222 SCACR**

Dear Clerk Kitchings:

I represent the Respondent-Appellant Turner's Marina, LLC in this matter.

Enclosed for filing, please find Respondent-Appellant Turner's Marina, LLC's Motion For Costs. By copy of this letter, as reflected on the attached Proof of Service, I am serving all Defendants' Counsel with the same.

Enclosed with our mailed copy of this letter is a check in the amount of \$50.00 representing the filing fee for our Motion For Costs. Please let me know if you need any additional information.

Thank you as always for your professionalism and assistance.

Cordially yours,  
**LAW OFFICE OF THOMAS C. TAYLOR, LLC**

  
Thomas C. Taylor

TCT/dpt

cc: Russell P. Patterson, Esq., via e-mail transmittal  
James S. Murray, Esq., via e-mail transmittal