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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

G.D. Morgan, Jr., Circuit Court Judge

Appellate Case No.: 2024-000678
Trial Court Case No.: 2022-CP-23-00564

Camille Bird,

Appellant,

v.

PetSmart, LLC and FreshPet, Inc.,

Defendants,

Of which PetSmart, LLC is the Respondent.

MOTION FOR TAXATION OF COSTS

Pursuant to Rule 222 of the South Carolina Appellate Court Rules, Appellant Camille Bird, by and through her counsel Thomas M. Creech Jr. hereby moves the Court to tax allowed costs against Respondent PetSmart, LLC, as outlined in Form 17 – Itemized Statement of Costs, attached as Exhibit A to this motion.

March 30, 2026

s/Thomas M. Creech, Jr.

Thomas M. Creech, Jr. #137897
15 Brendan Way, Suite 215 29615
PO Box 10411
Greenville, SC 29603
(864) 235 – 4999
Attorney for Appellant

Other Counsel of Record:
Mr. Matthew C. LaFave

P O Box 1149
Columbia, SC 29202
Attorney for Respondent
803-724-5727

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PROOF OF SERVICE

I, Elyse Hartzog, legal assistant to Thomas M. Creech Jr., hereby certify that I have served the following:

- **Motion for Taxation of Costs**
- **Exhibit A (Form 17 – Itemization of Costs)**

on all parties to this matter via email to their respective counsel of record, on this 28th day of October, 2024, containing the above-referenced document as an attachment in .pdf, sent to the addresses shown below.

Mr. Matthew C. LaFave
Crowe LaFave Garfield & Bagley

PO Box 1149
Columbia, SC 29202
(803) 724 – 5727
matt@lafavebagley.com
Attorney for the Respondent

April 2, 2026

S/Elyse Hartzog
Elyse Hartzog
Legal Assistant to Thomas M. Creech, Jr.

Bird v. PetSmart - 2024-000678 - Motion for Taxation of Costs

1 message

Elyse Hartzog <ehadmncreech@gmail.com>

Thu, Apr 2, 2026 at 11:26 AM

To: matt@lafavebagley.com

Cc: rikka@lafavebagley.com, Thomas Creech <tmcreech@bellsouth.net>

Good morning,

Please see the attached Motion for Taxation of Costs, Exhibit A (Form 17 - Itemization of Costs), and a proof of service.

Please confirm receipt.

Thank you,
Elyse Hartzog
Legal Assistant | Thomas Creech Law Offices
Phone: (864) 235 - 4999
Fax: (864) 235 - 4991

3 attachments **Form 17 Bird Appeal.pdf**
979K **Motion for Taxation Bird Appeal.pdf**
36K **POS Motion for Taxation Bird Appeal.pdf**
38K**RECEIVED****Apr 02 2026****SC Court of Appeals**