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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM APPELLATE PANEL OF THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

**RECEIVED**  
JUN 12 2018  
SC Court of Appeals

WCC NO. 1320600

Kevin M. Todd ..... Appellant

vs.

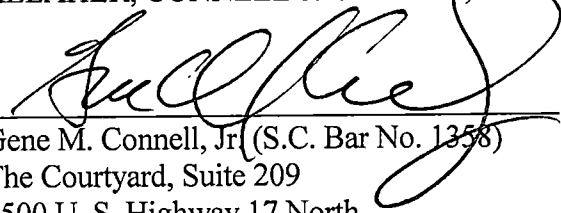
Michael Roberts d/b/a Michael Roberts Home Repair  
and S.C. Uninsured Employers' Fund ..... Respondents

MOTION FOR COSTS

YOU WILL PLEASE TAKE NOTICE that the Appellant, by and through his undersigned counsel, do hereby move, pursuant to the provisions of Rule 222, South Carolina Appellate Court Rules, for an Order taxing costs as set forth in the Itemized Statement of Costs which is attached hereto.

**WHEREFORE**, Appellant requests the costs be taxed and for such other and further relief as the Court may deem just, necessary and proper.

KELAHER, CONNELL & CONNOR, P.A.



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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  
(843) 238-5648 (phone)  
(843) 238-5050 (facsimile)  
[gconnell@classactlaw.net](mailto:gconnell@classactlaw.net)  
**Attorney for Appellant**

June 11, 2018  
Surfside Beach, South Carolina

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vs.

Michael Roberts d/b/a Michael Roberts Home Repair  
and S.C. Uninsured Employers' Fund ..... Respondents

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 **Motion for Costs and Itemized Statement of Costs** on the Respondents, through counsel of record, and on the South Carolina Workers' Compensation Commission, by depositing a copy of same in the United States Mail, postage prepaid, to:

Lisa C. Glover, Esquire  
S. C. State Accident Fund  
S. C. Uninsured Employers' Fund  
Post Office Box 210039  
Columbia, SC 29221

DATE OF MAILING: June 11, 2018

*Shelia Y. McCumbee*  
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,  
this 11<sup>th</sup> day of June, 2018.

*Barbara C. Smith*  
Notary Public for South Carolina  
My Commission Expires: 3-12-24

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER\*

GENE M. CONNELL, JR.

L. SIDNEY CONNOR, IV

LISA POE DAVIS

\* OF COUNSEL

AREA CODE 843

238-5648

FAX: 238-5050

June 11, 2018

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SC Court of Appeals

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

Re: *Kevin M. Todd v. Michael Roberts d/b/a Michael Roberts Home Repair and  
S.C. Uninsured Employers' Fund*  
Appellate Case No. 2016-000181  
W.C.C. File No. 1320600  
Our File No. 2014-0046C

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of a Motion for Costs, Itemized Statement of Costs and Proof of Service in the above-captioned matter. I also enclose a check for \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, I hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr.:sm

Enclosures

cc w/enc.: Lisa C. Glover, Esquire



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JUN 12 2018

SC Court of Appeals

*Kelaker, Connell & Connor, PC*

1500 US HIGHWAY 17 NORTH, SUITE 209

POST OFFICE DRAWER 14547

SURFSIDE BEACH, SC 29587

**To**

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

