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MAR 10 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM Horry COUNTY  
Court of Common Pleas

The Honorable Thomas A. Russo, Circuit Court Judge  
Case No. 2014-CP-26-7790

APPELLATE CASE NO. 2018-002270

Richard Ciampanella .....Respondent

vs.

City of Myrtle Beach .....Appellant

**RESPONDENT'S MOTION TO TAX COSTS**

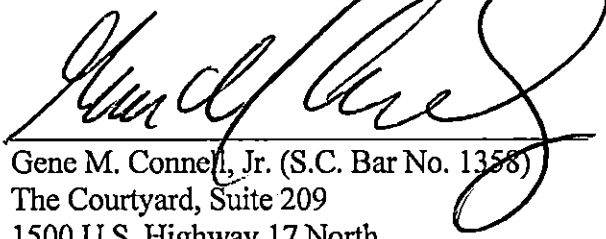
YOU WILL PLEASE TAKE NOTICE that the Respondent, Richard Ciampanella, by and through his undersigned counsel, does hereby move, pursuant to Rule 222, SCACR, for an Order taxing costs against the Appellant, City of Myrtle Beach, as set forth in the Itemized Statement of Costs which is attached hereto.

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

(Signature on following page)

Respectfully submitted,

KELAHER, CONNELL & CONNOR, P.C.



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)  
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Julian Z. Hanna (S.C. Bar No. 2667)  
Julian Z. Hanna and Associates, P.A.  
14323 Ocean Highway, Suite 4105  
Pawleys Island, S.C. 29585  
(843) 237-3431 (phone)  
(843) 237-4659 (facsimile)

March 8, 2022

**Attorneys for Respondent**

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IN THE COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Thomas A. Russo, Circuit Court Judge  
Case No. 2014-CP-26-7790

APPELLATE CASE NO. 2018-002270

Richard Ciampanella ..... Respondent

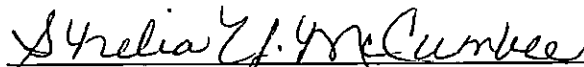
vs.

City of Myrtle Beach ..... Appellant

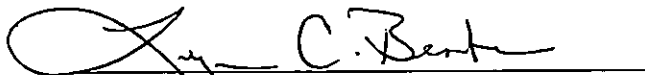
PROOF OF SERVICE

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 the **Respondent's Motion to Tax Costs/Itemized Statement of Costs** on the 8<sup>th</sup> day of March, 2022, by depositing a copy of same in the United States Mail, postage prepaid, to:

Amy L. Neuschafer, Esquire  
COLLINS & LACY, P.C.  
11945 Grandhaven Drive, Suite D  
Murrells Inlet, SC 29576

  
Shelia Y. McCumbee

**SWORN AND SUBSCRIBED** before me,  
this 8<sup>th</sup> day of March, 2022.

  
Notary Public for South Carolina  
My Commission Expires: 1-22-29

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

March 8, 2022

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
MAR 10 2022  
SC Court of Appeals

Re: Appellate Case No. 2018-002270  
*Richard Ciampanella v. City of Myrtle Beach*  
C/A No. 2014-CP-26-07790  
Our File No. 2014-0324C

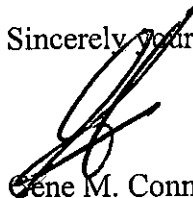
Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Respondent's Motion to Tax Costs, Itemized Statement of Costs and Proof of Service in the above-captioned case. I also enclose a check for \$50.00 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, we hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,



Gene M. Connell, Jr.

GMCJr:sm  
Enclosures

cc w/enc.: Amy L. Neuschafer, Esquire  
Julian Z. Hanna, Esquire



PO DRAWER 14547  
SURFSIDE BEACH, SC 29587



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MAR 10 2022

SC Court of Appeals

<p><i>Kelaker, Connell &amp; Connor, PC</i> 1500 US HIGHWAY 17 NORTH, SUITE 209 POST OFFICE DRAWER 14547 SURFSIDE BEACH, SC 29587</p>
<p><b>To</b> The Honorable Jenny Abbott Kitchings South Carolina Court of Appeals P.O. Box 11629 Columbia, SC 29211</p>