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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APR 19 2023

SC Court of Appeals

APPEAL FROM THE CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Civil Action No.: 2023-CP-10-00665

Frank Holtham, as Trustee of the Holtham  
SC Realty Trust, dated April 12, 2022 ..... Appellant,

v.

Glenn F. Keyes and Glenn Keyes Architects LLC. .... Respondents.

NOTICE OF APPEAL

Frank Holtham, as Trustee of the Holtham SC Realty Trust, dated April 12, 2022,  
hereby appeals the Order of Mikell R. Scarborough, Master-in-Equity for Charleston  
County, issued in the above-referenced matter on March 29, 2023, and his Order filed April  
17, 2023, copies of which are attached hereto. Undersigned counsel received written notice  
of entry of the latter order on April 17, 2023.

Bruner, Powell, Wall & Mullins, LLC



Benjamin C. Bruner  
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803-252-7693

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*Attorney for the Appellant*

Columbia, SC  
April 17, 2023

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v.

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PROOF OF SERVICE

I, Bridget Steele, an employee of Bruner, Powell, Wall & Mullins, LLC, attorneys for the Appellant, certify that I served a copy of the attached *Notice of Appeal and attached orders* by depositing a copy of it in the U.S. Mail, postage prepaid, on April 19, 2023, addressed to John A. Massalon, Esquire and Carissa Steichen Land, Esquire, Wills Massalon & Allen, LLC, P.O. Box 859, Charleston, SC 29402 and by e-mail to [jmassalon@wmalawfirm.net](mailto:jmassalon@wmalawfirm.net) and [csteichen@wmalawfirm.net](mailto:csteichen@wmalawfirm.net).

April 19, 2023

  
\_\_\_\_\_  
Bridget Steele

# BRUNER, POWELL, WALL & MULLINS, LLC

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CHELSEA J. CLARK, P.A.

JAMES L. BRUNER (RETIRED)

J. COLE HANCOCK

J. KEANE MOSSMAN\*

\* ALSO ADMITTED IN DISTRICT OF COLUMBIA

AUTHOR'S E-MAIL: [BBRUNER@BRUNERPOWELL.COM](mailto:BBRUNER@BRUNERPOWELL.COM)

April 19, 2023

## VIA HAND DELIVERY

Honorable Jenny Abbott Kitchings

South Carolina Court of Appeals

1120 Senate Street

Columbia, SC 29201

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SC Court of Appeals

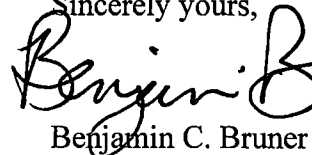
**Re: *Frank Holtham, as Trustee of the Holtham SC Realty Trust, dated April 12, 2022 v. Glenn F. Keyes and Glenn Keyes Architects, LLC***  
**C/A No.: 2023-CP-10-00665**  
**BPWM File No. 113527.100**

Dear Ms. Kitchings:

Enclosed for filing with your office, please find the original and one copy of the Appellant's **Notice of Appeal** and **Proof of Service** in the above referenced matter. Please have your office file the original and return the filed stamped copy to our courier. Also included is a check in the amount of \$250.00 to cover the filing fees.

With my highest regards, I remain

Sincerely yours,

  
Benjamin C. Bruner

BCB/gh

Encl.

cc: John A. Massalon, Esquire  
Carissa Steichen Land, Esquire  
Mr. Frank Holtham