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Jun 26 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Appellate Case No.: 2023-000649  
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.

**PROOF OF SERVICE**

I certify that the Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal were served upon Appellant via e-mail to counsel of record listed below on June 26, 2023. A copy of the service e-mail is attached hereto as Exhibit A.

Benjamin C. Bruner, Esquire  
Bruner, Powell, Wall & Mullins, LLC  
Post Office Box 61110  
Columbia, SC 29260  
(803) 252-7693  
[bbruner@BrunerPowell.com](mailto:bbruner@BrunerPowell.com)  
*Attorneys for Appellant*

s/John A. Massalon  
John A. Massalon, Esquire (SC Bar #10279)  
Carissa Steichen Land, Esquire (SC Bar #104264)  
WILLS MASSALON & ALLEN LLC  
Post Office Box 859  
Charleston, South Carolina 29402  
(843) 727-1144  
[jmassalon@wmalawfirm.net](mailto:jmassalon@wmalawfirm.net)  
[csteichen@wmalawfirm.net](mailto:csteichen@wmalawfirm.net)  
*Attorneys for Respondents*

**Charline Barrasso**

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**From:** Charline Barrasso  
**Sent:** Monday, June 26, 2023 3:52 PM  
**To:** Benjamin C. Bruner, Esquire (bbruner@BrunerPowell.com)  
**Cc:** John A. Massalon; Bridget Steele  
**Subject:** 2023-000649; Frank Holtham, et al. v. Glenn F. Keyes, et al.  
**Attachments:** 20230626 Initial Brief of Respondents.pdf; 20230626 Respondents' Designation of Matter.pdf

Mr. Bruner,

Good afternoon. Attached please find the Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal. Service is being provided via email only. If you would like hard copies, please let me know and I will be happy to mail them to you.

Thank you,

**Charline L. Barrasso, Paralegal**  
**Wills Massalon & Allen LLC**  
[cbarrasso@wmalawfirm.net](mailto:cbarrasso@wmalawfirm.net)  
**Post Office Box 859 97 Broad Street**  
**Charleston, SC 29402 Charleston, SC 29401**  
**(843) 727-1144 Main Telephone**  
**(843) 727-7696 Facsimile**  
<http://www.wmalawfirm.net>

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97 Broad Street • Charleston, SC 29401 • Post Office Box 859 • Charleston, SC 29402  
Phone: 843-727-1144 • Fax: 843-727-7696 • [www.wmalawfirm.net](http://www.wmalawfirm.net)

June 26, 2023

Direct Dial: (843) 793-6042

**VIA EMAIL ONLY**

The Honorable Jenny Abbott Kitchings- [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
Clerk of Court, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: Frank Holtham, as Trustee of the Holtham SC Realty Trust, dated April 12, 2022  
v. Glenn F. Keyes and Glenn Keyes Architects LLC  
Appellate Case No.: 2023-000649  
Our File No.: 2239-2

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find Respondents' Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service. If you have any questions, please do not hesitate to contact us.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC

*Charline Barrasso*

Charline L. Barrasso, Paralegal to  
John A. Massalon  
[cbarrasso@wmalawfirm.net](mailto:cbarrasso@wmalawfirm.net)

Enclosures

cc: Mr. Glenn Keyes  
Benjamin C. Bruner, Esquire

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