

RECEIVED

Mar 08 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Kristi F. Curtis, Circuit Court Judge

Case No. 2019-CP-10-4503

Appellate Case No. 2023-001844

Deutsche Bank Trust Company Americas, as Trustee for Residential
Accredit Loans Inc., Pass-Through Certificates 2007 QH2.....Respondent,

v.

Ashley Johnson Beshara as Trustee of the Revocable Trust Agreement for
2235 Shoreline Drive originally dated the 3rd day of March 2010; Shoreline
Farms Community Association, Inc.; Wells Fargo Bank, N.A.; Cadle
Rock Joint Venture, L. P. an Ohio Limited Partnership, Curtis Rogers and
Julie Rogers, Defendants,

Of whom Curtis Rogers, Julie Rogers and Ashley Johnson Beshara as
Trustee of the Revocable Trust Agreement for 2235 Shoreline Drive originally
dated 3rd day of March 2010 are.....Appellants,

AND

Ashley Johnson Beshara as Trustee of the Revocable Trust Agreement for 2235
Shoreline Drive originally dated 3rd day of March 2010, Third-Party Plaintiff,

v.

Nationstar Mortgage, LLC, Curtis Rogers, and Julie Rogers.....Third-Party Defendant.

**NOTICE OF CONSENT MOTION AND CONSENT MOTION
FOR EXTENSION OF TIME TO
FILE THE INITIAL BRIEF AND DESIGNATION
OF MATTER OF APPELLANT**

Appellant, Ashley Johnson Beshara as Trustee of the Revocable Trust Agreement for 2235 Shoreline Drive originally dated the 3rd day of March 2010, by and through its undersigned counsel, respectfully moves before this Court for an order granting, Appellant a seven (7) day extension of time or until March 18, 2024, in which to file Appellant's Initial Brief and Designation of Matter to be included in the Record of Appeal. The grounds for the motion are that Respondent's counsel has had appellate case deadlines noticed court appearances in other matters scheduled, as well as having had to remain home to care for sick children in the past week, all of which have required counsel's attention.

Prior to filing this motion counsel for Appellant communicated with all parties counsel of record gave there consent to Appellant's requested motion.

March 8, 2024.

THE LAW OFFICE OF
DAVID CONOR KEYS, LLC
s/ D. Conor Keys
D. Conor Keys (100148)
P.O. Box 14225
Charleston, SC 29422
Phone: 843-906-3998
conor@dconorkeyslaw.com
Attorney for Ashley Johnson Beshara

Other Counsel of Record:

I CONSENT:

MARY LEIGH ARNOLD, PA
s/ Mary Leigh Arnold (419) (signed with consent)
749 Johnnie Dodds Blvd., Suite B
Mt. Pleasant, SC 29464
Phone: 843-971-6053
Sammie@maryarnoldlaw.com
Attorney for Curtis and Julie Rogers

I CONSENT:

MCGUIRE WOODS, LLP
s/ Jasmine K. Gardner (signed with consent)
Thomas Richmond McPherson, III (80432)
Jasmine K. Gardner (102168)
201 North Tryon St., Suite 3000
Charlotte, NC 28202-2146
Phone: 704-343-2038

rmcpherson@mcguirewoods.com

jgardner@mcguirewoods.com

*Attorneys for Deutsche Bank Trust Company
Americas, as Trustee for Residential Accredited
Loans, Inc., Pass-Through Certificates 2007-QH2
and Nationstar Mortgage LLC*

RECEIVED

Mar 08 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Kristi F. Curtis, Circuit Court Judge

Case No. 2019-CP-10-4503

Appellate Case No. 2023-001844

Deutsche Bank Trust Company Americas, as Trustee for Residential
Accredit Loans Inc., Pass-Through Certificates 2007 QH2.....Respondent,

v.

Ashley Johnson Beshara as Trustee of the Revocable Trust Agreement for
2235 Shoreline Drive originally dated the 3rd day of March 2010; Shoreline
Farms Community Association, Inc.; Wells Fargo Bank, N.A.; Cadle
Rock Joint Venture, L. P. an Ohio Limited Partnership, Curtis Rogers and
Julie Rogers, Defendants,

Of whom Curtis Rogers, Julie Rogers and Ashley Johnson Beshara as
Trustee of the Revocable Trust Agreement for 2235 Shoreline Drive originally
dated 3rd day of March 2010 are.....Appellants,

AND

Ashley Johnson Beshera as Trustee of the Revocable Trust Agreement for 2235
Shoreline Drive originally dated 3rd day of March 2010, Third-Party Plaintiff,

v.

Nationstar Mortgage, LLC, Curtis Rogers, and Julie Rogers.....Third-Party Defendant.

CERTIFICATE OF SERVICE

I certify that on this 8th day of March 2024, I have served Appellant’s Consent Motion for
Extension of Time to File upon all other counsel of record at the email address listed for said
counsel on AIS as follows:

MARY LEIGH ARNOLD, PA
Mary Leigh Arnold (419)
749 Johnnie Dodds Blvd., Suite B
Mt. Pleasant, SC 29464
Phone: 843-971-6053
Sammie@maryarnoldlaw.com
Attorney for Curtis and Julie Rogers

MCGUIRE WOODS, LLP
Thomas Richmond McPherson, III (80432)
Jasmine K. Gardner (102168)
201 North Tryon St., Suite 3000
Charlotte, NC 28202-2146
Phone: 704-343-2038
rmcpherson@mcguirewoods.com
jgardner@mcguirewoods.com
*Attorneys for Deutsche Bank Trust Company
Americas, as Trustee for Residential Accredited
Loans, Inc., Pass-Through Certificates 2007-QH2
and Nationstar Mortgage LLC*

THE LAW OFFICE OF
DAVID CONOR KEYS, LLC
s/ D. Conor Keys
D. Conor Keys (100148)
P.O. Box 14225
Charleston, SC 29422
Phone: 843-906-3998
conor@dconorkeyslaw.com
Attorney for Ashley Johnson Beshara

THE LAW OFFICE OF
DAVID CONOR KEYS LLC
PO Box 14225 CHARLESTON, SC 29422
CONOR@DCONORKEYSLAW.COM
843-906-3998

March 8, 2024

Jenny Abbott Kitchings
Clerk of Court, Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org.

RECEIVED
Mar 08 2024
SC Court of Appeals

**RE: Deutsche Bank Trust Company Americas, as Trustee for Residential
Accredit Loans Inc., Pass-Through Certificates 2007 QH2 v. Ashley
Johnson Beshara, et al.
Appellate Case No. 2023-001844**

Madam Clerk:

Enclosed please find in regard to the above referenced matter the following:

- 1) Appellant, Ashley Johnson Beshara's Consent Motion for a seven day extension of time to file Appellant's Initial Brief and Designation of Matter;
- 2) Proof of Service for the Motion;
- 3) A corresponding check for the same.

I kindly request that you file the same.

With kind regards,

RESPECTUFLLY SUBMITTED,

THE LAW OFFICE OF
DAVID CONOR KEYS, LLC



D. Conor Keys (100148)

P.O. Box 14225

Charleston, SC 29422

Phone: 843-906-3998

conor@dconorkeyslaw.com

Attorney for Appellant Ashley Johnson Beshara

Enclosures:
(as stated)

CC: Sammie Arnold; Thomas Richmond McPherson; and Jasmine K. Gardner.