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May 02 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 3<sup>rd</sup> day of March 2010, Third-Party Plaintiff,  
v.

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

**NOTICE OF MOTION AND MOTION FOR AN EXTENSION  
OF TIME TO FILE THE INITIAL REPLY BRIEF 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 ten (10) day  
extension of time or until May 14, 2024, in which to file Appellant’s Initial Reply Brief. Prior to  
filing this motion counsel for Appellant communicated with all parties counsel of record and said  
counsel gave their consent to Appellant’s requested motion.

[SIGNATURE BLOCK TO FOLLOW]

May 2, 2024.

THE LAW OFFICE OF  
DAVID CONOR KEYS, LLC  
s/ D. Conor Keys  
D. Conor Keys (100148)  
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*Attorney for Ashley Johnson Beshara*

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Of whom Curtis Rogers, Julie Rogers and Ashley Johnson Beshara as  
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AND

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Shoreline Drive originally dated 3<sup>rd</sup> 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 2<sup>th</sup> day of May 2024, I have served Appellant’s 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:

[ADDRESSES TO FOLLOW]

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

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May 2, 2024

Jenny Abbott Kitchings  
Clerk of Court, Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
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**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 ten day extension of time to file Appellant's Initial Reply Brief;
- 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



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*Attorney for Appellant Ashley Johnson Beshara*

Enclosures:

(as stated)

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