



Wall Templeton
ATTORNEYS

Neil S. Haldrup
Neil.Haldrup@WallTempleton.com
Telephone: 843.329.9500 Ext. 201
Facsimile: 843.329.9501

September 26, 2024

RECEIVED

OCT 07 2024

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: *Joseph R. Davis and Jennifer Davis vs. River Oaks Homeowners Association, et al*
Case No: 2020-CP-18-01856
Appellate Case No.: 2024-001547

Dear Ms. Kitchings:

Please find enclosed a copy of the Notice of Appeal and NEF Confirmation filed in the lower court relative to the above referenced matter.

By copy of this letter to all counsel of record, I am filing the same and serving them with the enclosed Notice of Appeal and NEF Certification.

Thank you for your time and attention to this matter.

Sincerely,

WALL TEMPLETON & HALDRUP, P.A.

Neil S. Haldrup

NSH/sjs
enclosures

cc: D. Conor Keys, Esquire (w/ encl, via electronic mail only)
Mary Leigh Arnold, Esquire (w/ encl, via electronic mail only)
Kevin W. Mims, Esquire (w/ encl, via electronic mail only)
Andrew T. Shepherd, Esquire (w/ encl, via electronic mail only)
The Honorable Cheryl L. Graham, Dorchester County (w/ encl)

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

IN THE COURT OF COMMON PLEAS
FOR THE FIRST JUDICIAL CIRCUIT
CASE NO.: 2020-CP-18-01856

JOSEPH R. DAVIS AND JENNIFER
DAVIS, individually and as representative of
all those similarly situated,

Plaintiffs,

vs.

RIVER OAKS HOMEOWNERS
ASSOCIATION, INC., HALCYON REAL
ESTATE SERVICES, LLC, and
DORCHESTER REAL ESTATE SERVICES,
INC.,

Defendants.

**DEFENDANT RIVER OAKS
HOMEOWNERS ASSOCIATION, INC.'S
NOTICE OF APPEAL**

RECEIVED

OCT 07 2024

SC Court of Appeals

TO: ALL COUNSEL OF RECORD:

PLEASE take notice that River Oaks Homeowners Association, Inc., hereby appeals the Honorable Diane S. Goodstein's Order Granting Class Certification, dated August 16, 2022 and Order Denying Reconsideration, dated December 6, 2022 per the attached letter filing and serving the Notice of Appeal with the South Carolina Court of Appeals on September 16, 2024.

Dated this 16th day of September, 2024.

WALL TEMPLETON & HALDRUP, PA

s/Neil S. Haldrup

Neil S. Haldrup, Esq. (13017)

Ford H. Thrift (103294)

Post Office Box 1200

Charleston, SC 29402

843-329-9500

Neil.Haldrup@WallTempleton.com

Ford.Thrift@WallTempleton.com

**Attorneys for Defendant River Oaks
Homeowners Association, Inc.**

Certificate of Electronic Notification

Recipients

Mary Arnold - Notification transmitted on 09-16-2024 03:42:34 PM.

William McNair - Notification transmitted on 09-16-2024 03:42:33 PM.

David Keys - Notification transmitted on 09-16-2024 03:42:35 PM.

Neil Haldrup - Notification transmitted on 09-16-2024 03:42:34 PM.

Andrew Shepherd - Notification transmitted on 09-16-2024 03:42:33 PM.

Thomas Boger - Notification transmitted on 09-16-2024 03:42:34 PM.

Ford Thrift - Notification transmitted on 09-16-2024 03:42:34 PM.

Kevin Mims - Notification transmitted on 09-16-2024 03:42:34 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2020CP1801856

Official File Stamp: 09-16-2024 03:42:23 PM

Court: CIRCUIT COURT

Common Pleas

Dorchester

Case Caption: Joseph R Davis , plaintiff, et al VS River Oaks Homeowners Association Inc , defendant, et al

Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals

- Exhibit/Filing of Exhibits

Filed by or on behalf of: Neil S. Haldrup

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Ford Hamby Thrift for River Oaks Homeowners Association Inc

William Chase McNair for Halcyon Real Estate Services LLC

Kevin W. Mims for Halcyon Real Estate Services LLC

Andrew T. Shepherd for Dorchester Real Estate Services Inc

Mary Leigh Arnold for Joseph R Davis, Jennifer Davis

Thomas B Boger for River Oaks Homeowners Association Inc

David Conor Keys for Joseph R Davis, Jennifer Davis

ELECTRONICALLY FILED - 2024 Sep 17 9:30 AM - DORCHESTER - COMMON PLEAS - CASE#2020CP1801856

Neil S. Haldrup for River Oaks Homeowners
Association Inc

**The following people have not been served electronically by the Court. Therefore, they must
be served by traditional means:**

Rutherford Smith PA

River Oaks Homeowners Association Inc for
River Oaks Homeowners Association Inc

River Oaks Homeowners Association Inc for
River Oaks Homeowners Association Inc

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

IN THE COURT OF COMMON PLEAS
FOR THE FIRST JUDICIAL CIRCUIT
CASE NO.: 2020-CP-18-01856

JOSEPH R. DAVIS AND JENNIFER
DAVIS, individually and as representative of
all those similarly situated,

Plaintiffs,

vs.

RIVER OAKS HOMEOWNERS
ASSOCIATION, INC., HALCYON REAL
ESTATE SERVICES, LLC, and
DORCHESTER REAL ESTATE SERVICES,
INC.,

Defendants.

**DEFENDANT RIVER OAKS
HOMEOWNERS ASSOCIATION, INC.'S
NOTICE OF APPEAL**

RECEIVED

OCT 07 2024

SC Court of Appeals

TO: ALL COUNSEL OF RECORD:

PLEASE take notice that River Oaks Homeowners Association, Inc., hereby appeals the Honorable Diane S. Goodstein's Order Granting Class Certification, dated August 16, 2022 and Order Denying Reconsideration, dated December 6, 2022 per the attached letter filing and serving the Notice of Appeal with the South Carolina Court of Appeals on September 16, 2024.

Dated this 16th day of September, 2024.

WALL TEMPLETON & HALDRUP, PA

s/Neil S. Haldrup

Neil S. Haldrup, Esq. (13017)

Ford H. Thrift (103294)

Post Office Box 1200

Charleston, SC 29402

843-329-9500

Neil.Haldrup@WallTempleton.com

Ford.Thrift@WallTempleton.com

Attorneys for Defendant River Oaks

Homeowners Association, Inc.

Certificate of Electronic Notification

Recipients

Mary Arnold - Notification transmitted on 09-16-2024 03:42:34 PM.

William McNair - Notification transmitted on 09-16-2024 03:42:33 PM.

David Keys - Notification transmitted on 09-16-2024 03:42:35 PM.

Neil Haldrup - Notification transmitted on 09-16-2024 03:42:34 PM.

Andrew Shepherd - Notification transmitted on 09-16-2024 03:42:33 PM.

Thomas Boger - Notification transmitted on 09-16-2024 03:42:34 PM.

Ford Thrift - Notification transmitted on 09-16-2024 03:42:34 PM.

Kevin Mims - Notification transmitted on 09-16-2024 03:42:34 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2020CP1801856

Official File Stamp: 09-16-2024 03:42:23 PM

Court: CIRCUIT COURT

Common Pleas

Dorchester

Case Caption: Joseph R Davis , plaintiff, et al VS River Oaks Homeowners Association Inc , defendant, et al

Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals

- Exhibit/Filing of Exhibits

Filed by or on behalf of: Neil S. Haldrup

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Ford Hamby Thrift for River Oaks Homeowners Association Inc

William Chase McNair for Halcyon Real Estate Services LLC

Kevin W. Mims for Halcyon Real Estate Services LLC

Andrew T. Shepherd for Dorchester Real Estate Services Inc

Mary Leigh Arnold for Joseph R Davis, Jennifer Davis

Thomas B Boger for River Oaks Homeowners Association Inc

David Conor Keys for Joseph R Davis, Jennifer Davis

Neil S. Haldrup for River Oaks Homeowners
Association Inc

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Rutherford Smith PA

River Oaks Homeowners Association Inc for
River Oaks Homeowners Association Inc

River Oaks Homeowners Association Inc for
River Oaks Homeowners Association Inc



Wall Templeton
ATTORNEYS

145 King Street, Suite 300 (29401)
Post Office Box 1200
Charleston, South Carolina 29402

RECEIVED

OCT 07 2024

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

FIRST-CLASS



US POSTAGETM PITNEY BOWES



ZIP 29401
02 7H
0006182333

\$ 000.97⁰

SEP 26 2024

2921181629 8012

