

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas  
The Honorable Thomas L. Hughston, Jr.

---

Case No.: 2024-001547

---

Joseph R. Davis and Jennifer Davis, individually  
and as representative of all those similarly situated.....Appellants-Respondents,

v.

River Oaks Homeowners Association, Inc.....Respondent-Appellant

Halcyon Real Estate Services, LLC, and  
Dorchester Real Estate Services, Inc.....Respondents.

---

**JOINT MOTION  
FOR EXTENSIONS OF TIME TO FILE INITIAL BRIEFS**

---

The Office of David Conor Keys, LLC

D. Conor Keys, Esq.  
843 Robert E Lee Blvd.  
Charleston, SC 29412  
conor@dconorkeyslaw.com  
**Attorney for Appellants-Respondents**

Mary Leigh Arnold, PA

Mary Leigh Arnold, Esq.  
749 Johnnie Dodds Blvd., Suite B  
Mt. Pleasant, SC 29464  
[sammie@maryarnoldlaw.com](mailto:sammie@maryarnoldlaw.com)  
**Attorney for Appellants-Respondents**

WALL TEMPLETON & HALDRUP, P.A.

Neil S. Haldrup, Esq.

Ford H. Thrift, Esq.

145 King Street, Suite 300

Post Office Box 1200

Charleston, South Carolina 29402

Telephone: 843.329.9500

Facsimile: 843.329.9501

**Attorneys for Respondent-Appellant River Oaks  
Homeowners Association, Inc.**

NOW COMES Appellant-Respondent Joseph R. Davis and Jennifer Davis (hereinafter “Davis”) and Respondent-Appellant River Oaks Homeowners Association, Inc. (hereinafter “ROHOA”) by and through undersigned counsel and hereby files their Joint Motion for an Extension of Time for the parties to have thirty (30) days to file Initial Briefs. ROHOA requested and has received, consent of counsel for Appellants-Respondents, for an extension to file its Initial Appellant’s Brief and in turn consents to the Davises’ request for a thirty (30) day extension to file their Respondents Initial Brief (See **Exhibit A** attached hereto). The Court previously provided the Davises and ROHOA each thirty (30) days from the filing of Respondent/Appellant’s initial brief that was filed on March 10, 2025. Accordingly, the parties respectfully request this Court for an Order granting a thirty (30) day extension from April 9, 2025, to and including May 9, 2025, in which to file the Initial Briefs. This Joint Motion is for good cause and not for purposes of delay.

**WE CONSENT,**

By: *s/ D. Conor Keys (by permission)*  
D. Conor Keys, Esq.  
The Law Office of David Conor Keys, LLC  
843 Robert E Lee Blvd.  
Charleston, SC 29412  
[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)  
**Attorney for Appellants-Respondents**

Mary Leigh Arnold, Esq.  
Mary Leigh Arnold, PA  
749 Johnnie Dodds Blvd., Suite B  
Mt. Pleasant, SC 29464  
[sammie@maryarnoldlaw.com](mailto:sammie@maryarnoldlaw.com)  
**Attorney for Appellants-Respondents**

By: *s/ Neil S. Haldrup*  
Neil S. Haldrup (SC Bar #13017)  
Ford H. Thrift (SC Bar #103294)  
145 King Street  
Post Office Box 1200  
Charleston, South Carolina 29402  
Telephone: 843.329.9500/  
Facsimile: 843.329.9501  
**Attorneys for Respondent-Appellant  
River Oaks Homeowners Association, Inc.**

Dated: April 7, 2025  
Charleston, South Carolina

**Elizabeth Jones**

---

**Subject:** FW: CASE NO. 2024-001547 - Davis v. River Oaks Homeowners Assoc.

---

**From:** David Conor keys <conor@dconorkeysllp.com>  
**Sent:** Monday, April 7, 2025 5:24 PM  
**To:** Neil S. Haldrup <Neil.Haldrup@WallTempleton.com>; Ford Thrift <Ford.Thrift@WallTempleton.com>; sammie@maryarnoldlaw.com  
**Cc:** Elizabeth Jones <Elizabeth.Jones@WallTempleton.com>; Sarah Schrodetzki <Sarah.Schrodetzki@WallTempleton.com>; andrew@sheplawfirm.com; KMims@lmlawllp.com; Chase McNair <cmcnair@lmlawllp.com>  
**Subject:** Re: CASE NO. 2024-001547 - Davis v. River Oaks Homeowners Assoc.

Neil

You have our consent to file the proposed joint motion. Thanks.

[Get Outlook for iOS](#)

---

**From:** Neil S. Haldrup <Neil.Haldrup@WallTempleton.com>  
**Sent:** Monday, April 7, 2025 5:20:36 PM  
**To:** David Conor keys <conor@dconorkeysllp.com>; Ford Thrift <Ford.Thrift@WallTempleton.com>; sammie@maryarnoldlaw.com <sammie@maryarnoldlaw.com>  
**Cc:** Elizabeth Jones <Elizabeth.Jones@WallTempleton.com>; Sarah Schrodetzki <Sarah.Schrodetzki@WallTempleton.com>; andrew@sheplawfirm.com <andrew@sheplawfirm.com>; KMims@lmlawllp.com <KMims@lmlawllp.com>; Chase McNair <cmcnair@lmlawllp.com>  
**Subject:** RE: CASE NO. 2024-001547 - Davis v. River Oaks Homeowners Assoc.

Conor,

We consent to your request for 30 days and propose the attached joint motion. Please suggest any edits for consideration. Thanks.

**Neil Sigurd Haldrup**  
**Attorney**

---

Telephone: (843) 329-9500 (Ext. 207)  
Facsimile: (843) 329-9501



**Wall Templeton**  
ATTORNEYS

Wall Templeton & Haldrup, P.A.  
145 King Street, Suite 300 (29401)  
Post Office Box 1200  
Charleston, South Carolina 29402  
[www.WallTempleton.com](http://www.WallTempleton.com)

---

CONFIDENTIAL & PRIVILEGED Unless otherwise indicated or obvious from the nature of this communication, the information contained herein is attorney-client privileged and confidential information/work product. The communication is intended for the use of the individual or entity named above. If the reader of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication

is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies, electronic, paper or otherwise, which you may have of this communication.

---

**From:** David Conor keys <[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)>  
**Sent:** Monday, April 7, 2025 4:57 PM  
**To:** Neil S. Haldrup <[Neil.Haldrup@WallTempleton.com](mailto:Neil.Haldrup@WallTempleton.com)>; Ford Thrift <[Ford.Thrift@WallTempleton.com](mailto:Ford.Thrift@WallTempleton.com)>; [sammie@maryarnoldlaw.com](mailto:sammie@maryarnoldlaw.com)  
**Cc:** Elizabeth Jones <[Elizabeth.Jones@WallTempleton.com](mailto:Elizabeth.Jones@WallTempleton.com)>; Sarah Schrodetzki <[Sarah.Schrodetzki@WallTempleton.com](mailto:Sarah.Schrodetzki@WallTempleton.com)>; [andrew@sheplawfirm.com](mailto:andrew@sheplawfirm.com); [KMims@lmlawllp.com](mailto:KMims@lmlawllp.com); Chase McNair <[cmcnair@lmlawllp.com](mailto:cmcnair@lmlawllp.com)>  
**Subject:** Re: CASE NO. 2024-001547 - Davis v. River Oaks Homeowners Assoc.

Neil and Ford

First of all congratulations Ford! Neil If you would agree to grant us the same 30 day extension on our respondent's brief we would be glad to reciprocate and consent to your extension request as well.

D. Conor Keys  
*The Law Office of*  
*David Conor Keys, LLC*  
PO Box 14225  
Charleston, SC 29422  
843-906-3998  
[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)

CONFIDENTIALITY NOTICE: This message and any file transmitted with it is intended exclusively for the individual or entity to which it is addressed. This message may contain information that is proprietary, privileged, confidential, or otherwise legally exempt from disclosure. The information contained in this message and any file transmitted with it is transmitted in this form based on a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, disclosure, distribution, copying or use of the information by anyone other than the intended recipient, regardless of address or routing, is strictly prohibited. All attachments are believed to be free of viruses, but any attachment should be checked for viruses before being opened. If you have received this message in error, please notify the sender immediately by electronic mail, and delete this message and all copies and backups thereof.

---

**From:** Neil S. Haldrup <[Neil.Haldrup@WallTempleton.com](mailto:Neil.Haldrup@WallTempleton.com)>  
**Sent:** Monday, April 7, 2025 3:57 PM  
**To:** David Conor keys <[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)>; Ford Thrift <[Ford.Thrift@WallTempleton.com](mailto:Ford.Thrift@WallTempleton.com)>; [sammie@maryarnoldlaw.com](mailto:sammie@maryarnoldlaw.com) <[sammie@maryarnoldlaw.com](mailto:sammie@maryarnoldlaw.com)>  
**Cc:** Elizabeth Jones <[Elizabeth.Jones@WallTempleton.com](mailto:Elizabeth.Jones@WallTempleton.com)>; Sarah Schrodetzki <[Sarah.Schrodetzki@WallTempleton.com](mailto:Sarah.Schrodetzki@WallTempleton.com)>; [andrew@sheplawfirm.com](mailto:andrew@sheplawfirm.com) <[andrew@sheplawfirm.com](mailto:andrew@sheplawfirm.com)>; [KMims@lmlawllp.com](mailto:KMims@lmlawllp.com) <[KMims@lmlawllp.com](mailto:KMims@lmlawllp.com)>; Chase McNair <[cmcnair@lmlawllp.com](mailto:cmcnair@lmlawllp.com)>  
**Subject:** RE: CASE NO. 2024-001547 - Davis v. River Oaks Homeowners Assoc.

Conor and Sammie,

I am emailing you to see if you will consent to another extension. I am pleased to announce that Ford's wife gave birth to a healthy boy on March 28. Ford is taking some leave and will be back at it soon, but your consent to the requested 30-day extension will be appreciated.

Please let me know if you have any questions.

**Neil Sigurd Haldrup**  
Attorney

Telephone: (843) 329-9500 (Ext. 207)  
Facsimile: (843) 329-9501



**Wall Templeton**  
ATTORNEYS

Wall Templeton & Haldrup, P.A.  
145 King Street, Suite 300 (29401)  
Post Office Box 1200  
Charleston, South Carolina 29402  
[www.WallTempleton.com](http://www.WallTempleton.com)

CONFIDENTIAL & PRIVILEGED Unless otherwise indicated or obvious from the nature of this communication, the information contained herein is attorney-client privileged and confidential information/work product. The communication is intended for the use of the individual or entity named above. If the reader of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies, electronic, paper or otherwise, which you may have of this communication.

**From:** David Conor keys <[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)>  
**Sent:** Tuesday, February 4, 2025 10:00 AM  
**To:** Ford Thrift <[Ford.Thrift@WallTempleton.com](mailto:Ford.Thrift@WallTempleton.com)>; Neil S. Haldrup <[Neil.Haldrup@WallTempleton.com](mailto:Neil.Haldrup@WallTempleton.com)>; [sammie@maryarnoldlaw.com](mailto:sammie@maryarnoldlaw.com)  
**Cc:** Elizabeth Jones <[Elizabeth.Jones@WallTempleton.com](mailto:Elizabeth.Jones@WallTempleton.com)>; Sarah Schrodetzki <[Sarah.Schrodetzki@WallTempleton.com](mailto:Sarah.Schrodetzki@WallTempleton.com)>; [andrew@sheplawfirm.com](mailto:andrew@sheplawfirm.com); [KMims@lmlawllp.com](mailto:KMims@lmlawllp.com); Chase McNair <[cmcnair@lmlawllp.com](mailto:cmcnair@lmlawllp.com)>  
**Subject:** Re: CASE NO. 2024-001547 - Davis v. River Oaks Homeowners Assoc.

We will consent to the extension Ford.

D. Conor Keys  
*The Law Office of*  
*David Conor Keys, LLC*  
PO Box 14225  
Charleston, SC 29422  
843-906-3998  
[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)

CONFIDENTIALITY NOTICE: This message and any file transmitted with it is intended exclusively for the individual or entity to which it is addressed. This message may contain information that is proprietary, privileged, confidential, or otherwise legally exempt from disclosure. The information contained in this message and any file transmitted with it is transmitted in this form based on a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, disclosure, distribution, copying or use of the

information by anyone other than the intended recipient, regardless of address or routing, is strictly prohibited. All attachments are believed to be free of viruses, but any attachment should be checked for viruses before being opened. If you have received this message in error, please notify the sender immediately by electronic mail, and delete this message and all copies and backups thereof.

---

**From:** Ford Thrift <[Ford.Thrift@WallTempleton.com](mailto:Ford.Thrift@WallTempleton.com)>  
**Sent:** Tuesday, February 4, 2025 9:59 AM  
**To:** David Conor keys <[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)>; Neil S. Haldrup <[Neil.Haldrup@WallTempleton.com](mailto:Neil.Haldrup@WallTempleton.com)>; sammie@maryarnoldlaw.com <[sammie@maryarnoldlaw.com](mailto:sammie@maryarnoldlaw.com)>  
**Cc:** Elizabeth Jones <[Elizabeth.Jones@WallTempleton.com](mailto:Elizabeth.Jones@WallTempleton.com)>; Sarah Schrodetzki <[Sarah.Schrodetzki@WallTempleton.com](mailto:Sarah.Schrodetzki@WallTempleton.com)>; [andrew@sheplawfirm.com](mailto:andrew@sheplawfirm.com) <[andrew@sheplawfirm.com](mailto:andrew@sheplawfirm.com)>; [KMims@lmlawllp.com](mailto:KMims@lmlawllp.com) <[KMims@lmlawllp.com](mailto:KMims@lmlawllp.com)>; Chase McNair <[cmcnair@lmlawllp.com](mailto:cmcnair@lmlawllp.com)>  
**Subject:** RE: CASE NO. 2024-001547 - Davis v. River Oaks Homeowners Assoc.

Conor,

I received a letter from the Court of Appeals last week regarding our cross-appeal. We had been operating on the idea that the because the appeals were consolidated only one brief would be necessary. My takeaway from the Court's letter is that they see it differently. I think we need to submit a second motion for an extension of time to address that brief in addition to the Respondent's brief. Please let me know if you will consent to that so that we can get it filed prior to the deadline.

Thanks,  
Ford

**Ford Thrift  
Attorney**

---

Telephone: (843) 329-9500  
Facsimile: (843) 329-9501



Wall Templeton & Haldrup, P.A.  
145 King Street, Suite 300 (29401)  
Post Office Box 1200  
Charleston, South Carolina 29402  
[www.WallTempleton.com](http://www.WallTempleton.com)

---

CONFIDENTIAL & PRIVILEGED Unless otherwise indicated or obvious from the nature of this communication, the information contained herein is attorney-client privileged and confidential information/work product. The communication is intended for the use of the individual or entity named above. If the reader of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies, electronic, paper or otherwise, which you may have of this communication.

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas  
The Honorable Thomas L. Hughston, Jr.

---

Case No.: 2020-CP-18-01856

---

Joseph R. Davis and Jennifer Davis, individually  
and as representative of all those similarly situated.....Appellants-Respondents,

v.

River Oaks Homeowners Association, Inc.....Respondent-Appellant

Haylcyon Real Estate Services, LLC, and  
Dorchester Real Estate Services, Inc.....Respondents.

---

**CERTIFICATE OF SERVICE**

---

I certify that on this 7<sup>th</sup> day of April 25, a copy of Respondents-Appellants' and Respondent-Appellant's Joint Motion for Extension of Time to File Initial Briefs was served via electronic transmission upon all counsel of record listed as follows:

D. Conor Keys, Esq.  
The Law Office of David Conor Keys, LLC  
843 Robert E Lee Blvd.  
Charleston, SC 29412  
[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)  
**Attorney for Appellants-Respondents**

Mary Leigh Arnold, Esq.  
Mary Leigh Arnold, PA  
749 Johnnie Dodds Blvd., Suite B  
Mt. Pleasant, SC 29464  
[sammie@maryarnoldlaw.com](mailto:sammie@maryarnoldlaw.com)  
**Attorney for Appellants-Respondents**

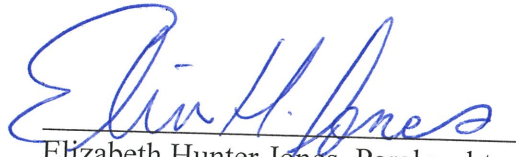
Andrew T. Shepherd, Esq.  
Shepherd Law Firm, LLC  
204 Brighton park Blvd., Ste. B  
Summerville, S.C. 2986  
[andrew@sheplawfirm.com](mailto:andrew@sheplawfirm.com)

**Attorneys for Respondent Dorchester Real  
Estate Services, Inc.**

Kevin W. Mims, Esq.  
Chase McNair, Esq.  
Luzuriaga Mims, LLP  
50 Immigration Street, Suite 200  
Charleston, SC 29403

[kmims@lmlawllp.com](mailto:kmims@lmlawllp.com)  
[cmcnair@lmlawllp.com](mailto:cmcnair@lmlawllp.com)

**Attorneys for Respondent Halcyon Real  
Estate Services, LLC**



Elizabeth Hunter Jones, Paralegal to  
Neil S. Haldrup and Ford H. Thrift

Dated: April 7, 2025  
Charleston, South Carolina