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May 08 2025

SC Court of Appeals

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

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

**CONSENT MOTION FOR EXTENSION OF TIME
FOR RESPONDENT-APPELLANT TO FILE ITS INITIAL RESPONDENT BRIEF**

NOW COMES Respondent-Appellant River Oaks Homeowners Association, Inc. (hereinafter "ROHOA") by and through undersigned counsel whereby ROHOA files a Consent Motion for an Extension of Time for ROHOA to have thirty (30) additional days to file its Initial Respondent Brief. ROHOA requested and has received, consent of counsel for Appellants-Respondents, for an extension to file its Initial Respondent's Brief (See **Exhibit A** attached hereto). The Court previously provided the Appellant-Respondent and ROHOA each thirty (30) days to run to and include May 12, 2025. Accordingly, ROHOA, by this consent motion, respectfully requests this Court for an Order granting a thirty (30) day extension from May 12, 2025, to and

including June 11, 2025, in which ROHOA has to file its Initial Respondent's Brief. This Consent 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
PO Box 14225
Charleston, SC 29422
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
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: May 8, 2025

Charleston, South Carolina

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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 8th day of May, 2025, I have served the Consent Motion for Extension of Time for Respondent-Appellant to File its Initial Respondent Brief on all parties via U.S. Regular Mail and via electronic transmission addressed to 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
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
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
**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
cmcnair@lmlawllp.com
**Attorneys for Respondent Halcyon Real
Estate Services, LLC**

s/Neil S. Haldrup
Neil S. Haldrup

Dated: May 8, 2025

Charleston, South Carolina

Exhibit A

From: David Conor keys <conor@dconorkeyslaw.com>
Sent: Thursday, May 8, 2025 10:35 AM
To: Neil S. Haldrup; sammie@maryarnoldlaw.com
Cc: Elizabeth Jones; Sarah Schrodetzki; andrew@sheplawfirm.com; KMims@lmlawllp.com; Chase McNair; Ford Thrift
Subject: Re: CASE NO. 2024-001547 - Davis v. River Oaks Homeowners Assoc.

Neil

We will consent to your request for a 30-day extension.

D. Conor Keys
The Law Office of
David Conor Keys, LLC
PO Box 14225
Charleston, SC 29422
843-906-3998
conor@dconorkeyslaw.com

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Wall Templeton
ATTORNEYS

Neil S. Haldrup
Neil.Haldrup@WallTempleton.com
Telephone: 843.329.9500, ext. 207
Facsimile: 843.329.9501

May 8, 2025

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SC Court of Appeals

VIA ELECTRONIC TRANSMISSION & U.S. REGULAR MAIL:

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:

Enclosed please find Respondent-Appellant River Oaks Homeowners Association, Inc.'s Motion for Extension of Time to File Initial Respondent Brief in the above matter. I am also enclosing the requisite \$50 filing fee. Please file the Motion in your usual manner and return a time-stamped copy.

By copy of this letter to all counsel of record, I am advising them of our communication with the Court, via electronic mail.

Thank you for your time and assistance with this request.

Sincerely,

WALL TEMPLETON & HALDRUP, P.A.

Neil S. Haldrup

NSH/sjs

Attachment

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*)