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Charlotte, NC
Columbia, SC
Greenville, SC
Raleigh, NC
Spartanburg, SC
Washington, DC

May 9, 2025

Via E-mail [ctappfilings@sccourts.org]

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED
May 12 2025
SC Court of Appeals

Re: **Wedgewood Condominium Association vs. Centex Homes (2)**
Appellate Case No. 2023-001132
Wedgewood Condominium Association vs. Centex Homes (3)
Appellate Case No. 2023-001150

Dear Mrs. Kitchings:

We represent Centex Homes in the above-referenced appeals that are scheduled for oral argument on June 10, 2025. As stated in Respondent's counsels' letters to the Court, Stephanie Douglas has been admitted *pro hac vice* in the above-referenced appeals and will be arguing both appeals.

Mr. Tom Hildebrand is the local attorney of record for Centex Homes and has secured leave (see attached Secure Leave Confirmation) for dates which include June 10, 2025. Please see the attached letters of February 19, 2025 to the Court from Ms. Douglas advising the Court of Mr. Hildebrand's conflict. Pursuant to Rule 404(i), SCACR, the local attorney of record is required to attend all proceedings unless the Court specifically excuses his attendance. Therefore, we respectfully request the Court excuse Mr. Hildebrand from attending the oral argument scheduled for June 10, 2025, and request the Court's permission for Mr. Will DesChamps to appear before the Court as a substitute local counsel of record for Centex Homes.

Mr. DesChamps is qualified and able to appear as a substitute local counsel of record for Centex Homes. Mr. DesChamps is member of the South Carolina Bar and is in good standing. Furthermore, Mr. DesChamps was co-counsel with Mr. Hildebrand in the underlying trial and is familiar with the issues to be heard by the Court. Therefore, excusing Mr. Hildebrand's attendance at oral argument and permitting Mr. DesChamps to appear in his place will not prejudice any party to these appeals.

PPAB 12347019v1

May 9, 2025
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Please let us know if the Court would like for us to provide it with any additional information to facilitate its consideration of this request.

Sincerely,

s/Katon E. Dawson, Jr.

Katon E. Dawson, Jr.

KED/kjg
Enclosures

The Supreme Court of South Carolina



Secure Leave Confirmation

Thomas C. Hildebrand Jr., Bar No. 2501, has requested secure leave for the following weeks:

Secure Leave Date	Request Date
June 23, 2025 - June 27, 2025	12/16/2024 10:34 AM
June 16, 2025 - June 20, 2025	12/16/2024 10:34 AM
June 09, 2025 - June 13, 2025	12/16/2024 10:34 AM
June 02, 2025 - June 06, 2025	12/16/2024 10:34 AM

Print or save your Secure Leave Confirmation. In the event a court proceeding is scheduled in error, you will need to transmit this form to the clerk of the relevant court and all other parties in the case.



Stephanie A. Douglas
douglas@bsplaw.com
T/F: 248.822.7806

February 19, 2025

RECEIVED
Feb 19 2025
SC Court of Appeals

Via E-mail [ctappfilings@sccourts.org]

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: Wedgewood Condominium Association vs. Centex Homes (2)
Appellate Case No. 2023-001132

Dear Mrs. Kitchings:

I am in receipt of your letter dated February 11, 2025, regarding oral argument in this matter. I do not have any current conflicts on June 2, 3, 4, 5, 10, 11, or 12, 2025.

However, I have been admitted to appear before the Court, *pro hac vice*, in the above-referenced appeal, and my co-counsel and the local attorney of record for Centex Homes, Mr. Hildebrand, has court protection pursuant to the attached Secure Leave Confirmation and is unavailable June 5, 10-12. Mr. Hildebrand is available on June 2, 3, and 4, 2025.

Pursuant to Rule 404(i), SCACR, the local attorney of record is required to attend all proceedings unless the Court specifically excuses his attendance. Therefore, if the Court chooses to proceed with scheduling oral argument on the dates during which Mr. Hildebrand has court protection, then we respectfully request that Mr. Hildebrand be excused from attending oral argument and either Mr. Dawson or Mr. DesChamps appear as the local counsel of record for Centex Homes.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Steph Douglas', written in a cursive style.

Stephanie A. Douglas

SAD/tdk

cc: Thomas C. Hildbrand, Jr., Esq.
Gene M. Connell, Jr., Esq.
William G. DesChamps, IV, Esq.
Katon E. Dawson, Jr., Esq.
Stacy L. Stanley, Esq.



Stephanie A. Douglas
douglas@bsplaw.com
T/F: 248.822.7806

February 19, 2025

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SC Court of Appeals

Via E-mail [ctappfilings@sccourts.org]

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

**RE: Wedgewood Condominium Association vs. Centex Homes (3)
Appellate Case No. 2023-001150**

Dear Mrs. Kitchings:

I am in receipt of your letter dated February 11, 2025, regarding oral argument in this matter. I do not have any current conflicts on June 2, 3, 4, 5, 10, 11, or 12, 2025.

However, I have been admitted to appear before the Court, *pro hac vice*, in the above-referenced appeal, and my co-counsel and the local attorney of record for Centex Homes, Mr. Hildebrand, has court protection pursuant to the attached Secure Leave Confirmation and is unavailable June 5, 10-12. Mr. Hildebrand is available on June 2, 3, and 4, 2025.

Pursuant to Rule 404(i), SCACR, the local attorney of record is required to attend all proceedings unless the Court specifically excuses his attendance. Therefore, if the Court chooses to proceed with scheduling oral argument on the dates during which Mr. Hildebrand has court protection, then we respectfully request that Mr. Hildebrand be excused from attending oral argument and either Mr. Dawson or Mr. DesChamps appear as the local counsel of record for Centex Homes.

Very truly yours,

Stephanie A. Douglas

SAD/tdk

cc: Thomas C. Hildbrand, Jr., Esq.
Gene M. Connell, Jr., Esq.
William G. DesChamps, IV, Esq.
Katon E. Dawson, Jr., Esq.
Stacy L. Stanley, Esq.