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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
In the Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Marvin H. Dukes, III

Case No. 2017-CP-07-02110
Appellate Case No. 2024-001053

Charles Willis Gardner,.....Respondent,

v.

Taylor Reuben Adams, and Beaufort County, South Carolina, Defendants,
of which Taylor Reuben Adams is the.....Appellant,

AND

Beaufort County, South Carolina is a.....Respondent.

RESPONDENT’S CONSENT MOTION TO
AMEND DESIGNATION OF MATTER

The Respondent, Mr. Charles Willis Gardner, (the “Respondent”), by and through his undersigned counsel, and with the consent of all counsel as shown in the email attached hereto, hereby moves the Court for an order granting the Respondent to amend his Designation of Matter and to supplement the amendments to the Record on Appeal as follows:

1. Consent Order of Reference, March 15, 2023;
2. Order Denying Motion for a Temporary Injunction, May 23, 2023;

3. Affidavit of Default as to Taylor Reuben Adams, June 8, 2023;
4. Affidavit of Non-Military Service as to Taylor Reuben Adams, June 8, 2023;
5. Adams Motion to Reopen Default with Exhibit Answer June 13, 2023;
6. Beaufort County's Motion for Summary Judgment, June 26, 2023;
7. Notice of Hearing, September 15, 2023; and
8. Notice of Trial Hearing, September 18, 2023.

Counsel requests that all timelines be held in abeyance while the Court considers this request.

Mt. Pleasant, South Carolina

June 3, 2025

BUIST BYARS & TAYLOR, LLC

P.P. William Taylor for Hamlin O'Kelley

G. Hamlin O'Kelley, III,
SC Bar No. 15491
652 Coleman Blvd., Suite 200
Mt. Pleasant, SC 29464
T: (843) 856-4488
F: (843) 856-0613
Hamlin.okelley@buistbyars.com
Attorney for the Respondent
Charles Willis Gardner

From: [Robert W Achurch, III](#)
To: [Amanda Dowd](#); [Amy Ostrom](#)
Cc: [Hamlin O'Kelley](#); [Nathan Akers](#); [Finger, Terry A.](#); [Wendy M. Hair](#); [Sydney Seay](#)
Subject: RE: Appellate Case No. 2024-001053 - Gardner/Adams
Date: Thursday, May 29, 2025 12:34:55 PM
Attachments: [image001.png](#)

Beaufort County consents. Robert

From: Amanda Dowd <amanda.dowd@buistbyars.com>
Sent: Thursday, May 29, 2025 11:27 AM
To: Amy Ostrom <aostrom@fingerlaw.com>
Cc: Hamlin O'Kelley <hamlin.okelley@buistbyars.com>; Nathan Akers <NAkers@hgpha.com>; Finger, Terry A. <tfinger@fingerlaw.com>; Robert W Achurch, III <RAchurch@hgpha.com>; Wendy M. Hair <WHair@hgpha.com>; Amanda Dowd <amanda.dowd@buistbyars.com>; Sydney Seay <sydney.seay@buistbyars.com>
Subject: RE: Appellate Case No. 2024-001053 - Gardner/Adams

Good morning. We were having document software issues around the time we submitted the initial brief and designation of matter, thus resulting in several items documented in our brief that were not included in our designation of matter. We need to draft a motion to amend our designation for items to be supplemented in the ROA. Please advise at your earliest convenience as to whether you consent.

Kind regards,

Amanda

From: Court Of Appeals Filings <ctappfilings@sccourts.org>
Sent: Tuesday, May 20, 2025 4:14 PM
To: Amy Ostrom <aostrom@fingerlaw.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: Hamlin O'Kelley <hamlin.okelley@buistbyars.com>; Nathan Akers <nakers@hgpha.com>; Amanda Dowd <amanda.dowd@buistbyars.com>; Finger, Terry A. <tfinger@fingerlaw.com>
Subject: RE: Appellate Case No. 2024-001053 - Gardner/Adams

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

From: Amy Ostrom <aostrom@fingerlaw.com>
Sent: Tuesday, May 20, 2025 3:39 PM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: G. Hamlin O'Kelley <hamlin.okelley@buistbyars.com>; Nathan Akers <nakers@hgpha.com>;
Amanda Dowd <amanda.dowd@buistbyars.com>; Finger, Terry A. <tfinger@fingerlaw.com>
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Good Afternoon – Attached please find Volume 2 of 2 of the Record on Appeal.

Thank you.



Amy Ostrom | Paralegal to Terry A. Finger
FINGER, MELNICK, BROOKS & LABRUCE, P.A.

[35 Hospital Center Common, Suite 200 | Post Office Box 24005](#)

Hilton Head Island, South Carolina 29925-4005

D: [\(843\) 681-7024](tel:8436817024) | F: [\(843\) 681-8802](tel:8436818802)

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**From:** [Amy Ostrom](#)  
**To:** [Amanda Dowd](#)  
**Subject:** RE: Appellate Case No. 2024-001053 - Gardner/Adams  
**Date:** Tuesday, June 3, 2025 1:38:52 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Terry consents.



**Amy Ostrom** | Paralegal to Terry A. Finger  
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**Sent:** Tuesday, June 3, 2025 1:21 PM  
**To:** Amy Ostrom <[aostrom@fingerlaw.com](mailto:aostrom@fingerlaw.com)>; Terry Finger <[tfinger@Fingerlaw.com](mailto:tfinger@Fingerlaw.com)>  
**Cc:** Hamlin O'Kelley <[hamlin.okelley@buistbyars.com](mailto:hamlin.okelley@buistbyars.com)>; Nathan Akers <[nakers@ghgpa.com](mailto:nakers@ghgpa.com)>; Robert W Achurch, III <[rachurch@ghgpa.com](mailto:rachurch@ghgpa.com)>; Wendy M. Hair <[whair@ghgpa.com](mailto:whair@ghgpa.com)>; Sydney Seay <[sydney.seay@buistbyars.com](mailto:sydney.seay@buistbyars.com)>; Amanda Dowd <[amanda.dowd@buistbyars.com](mailto:amanda.dowd@buistbyars.com)>  
**Subject:** RE: Appellate Case No. 2024-001053 - Gardner/Adams  
**Importance:** High

Good afternoon. Please advise as to whether or not you consent to our motion at your earliest convenience.

Kind regards,

Amanda

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Terry A. <[tfinger@fingerlaw.com](mailto:tfinger@fingerlaw.com)>; Robert W Achurch, III <[rachurch@hgpha.com](mailto:rachurch@hgpha.com)>; Wendy M. Hair <[whair@hgpha.com](mailto:whair@hgpha.com)>; Amanda Dowd <[amanda.dowd@buistbyars.com](mailto:amanda.dowd@buistbyars.com)>; Sydney Seay <[sydney.seay@buistbyars.com](mailto:sydney.seay@buistbyars.com)>

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Amanda Dowd <[amanda.dowd@buistbyars.com](mailto:amanda.dowd@buistbyars.com)>; Finger, Terry A. <[tfinger@fingerlaw.com](mailto:tfinger@fingerlaw.com)>

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v.

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of which Taylor Reuben Adams is the.....Appellant,

AND

Beaufort County, South Carolina is a.....Respondent.

PROOF OF SERVICE

I certify that I have served the Respondent, Mr. Charles Willis Gardner’s Motion to Amend by depositing a copy of same Via Email tfinger@Fingerlaw.com, RAchurch@hgpha.com, and NAkers@hgpha.com.

Mt. Pleasant, South Carolina
June 3, 2025

BUIST BYARS & TAYLOR, LLC

p.p. Willard Ogil for Hamlin O'Kelley

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G. Hamlin O'Kelley, III
Attorney At Law
Hamlin.okelley@buistbyars.com

June 3, 2025

VIA EMAIL: ctappfilings@sccourts.org
AND VIA US MAIL
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29211

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Jun 03 2025
SC Court of Appeals

*RE: Charles Willis Gardner v Taylor Reuben Adams et al.,
C/A No.: 2017-CP-07-02110 Appellate Case No. 2024-001053
Client File No.: 9961.0001*

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the Respondent's, Charles Willis Gardner, Consent Motion to Amend Designation of Matter and Proof of Service in the above-referenced matter along with a check for the filing fee in the amount of \$50.00.

By copy of this letter, I am serving same upon all counsel. Should you have any questions, please feel free to contact me.

With kindest regards, I remain

Yours very truly,

A handwritten signature in blue ink, appearing to read 'G. Hamlin O'Kelley, III'.

G. Hamlin O'Kelley, III

GHOIII/atd
Enclosures (Via Email Only)

Terry A. Finger, Esq. tfinger@fingerlaw.com
Robert W. Achurch, III, Esq. RAchurch@ghpa.com
Nathan E. Akers, Esq. NAkers@ghpa.com