

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

104947

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

JUN 12 2025

The Honorable Marvin H. Dukes, III

SC Court of Appeals

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;

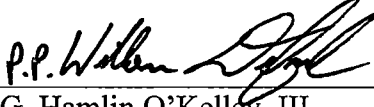
3. Affidavit of Default as to Taylor Reuben Adams, June 8, 2023;
4. Affidavit of Non-Military Service as to Taylor Reuben Adams, June 8, 2023;
5. Adams Motion to Reopen Default with Exhibit Answer June 13, 2023;
6. Beaufort County's Motion for Summary Judgment, June 26, 2023;
7. Notice of Hearing, September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

 for Hamlin O'Kelley
G. Hamlin O'Kelley, III,
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Mt. Pleasant, SC 29464
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Hamlin.okelley@buistbyars.com
Attorney for the Respondent
Charles Willis Gardner

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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

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p.p. William O'Kelley for Hamlin O'Kelley

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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

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Kind regards,

Amanda

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Good Afternoon – Attached please find Volume 2 of 2 of the Record on Appeal.

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**To:** [Amanda Dowd](#)  
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**Date:** Tuesday, June 3, 2025 1:38:52 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Terry consents.



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**Importance:** High

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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

RECEIVED

JUN 12 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

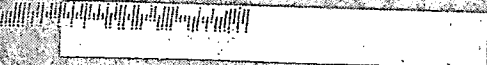
Yours very truly,

A handwritten signature in black 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@ghgpa.com
Nathan E. Akers, Esq. NAkers@ghhpa.com



**BUIST
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