

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

RECEIVED

JUN 16 2025

SC Court of Appeals

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, by and through his undersigned counsel, hereby moves the Court for an order granting the Respondent to amend 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 Non-Military Service and Default, June 8, 2023

4. Motion to Reopen Default, June 13, 2023
5. Adam's Answer to Gardner's Amended Complaint, June 13, 2023
6. Beaufort County's Motion for Summary Judgment, June 26, 2023
7. Notice of Hearing, September 15, 2023
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

May 19, 2025

BUIST BYARS & TAYLOR, LLC



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 Respondent

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

RECEIVED
JUN 16 2025
SC Court of Appeals

Charles Willis Gardner,.....Respondent,

v.

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

AND

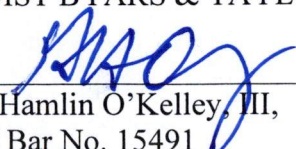
Beaufort County, South Carolina is a.....Respondent.

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
May 29, 2025

BUIST BYARS & TAYLOR, LLC


G. Hamlin O'Kelley, III,
SC Bar No. 15491
652 Coleman Blvd., Suite 200
Mt. Pleasant, SC 29464
(843) 856-4488
Hamlin.okelley@buistbyars.com
Attorney for Respondent



652 Coleman Blvd., Suite 200
Mount Pleasant, SC 29464
Direct Dial 843.284.1408
Main 843.856.4488

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

June 11, 2025

VIA US MAIL
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29211

RECEIVED
JUN 16 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 of the Respondent's, Charles Willis Amended Designation of Matter and Proof of Service in the above-referenced matter.

These items have already been served to the Court via E-mail and upon all counsel also via E-mail.

Yours very truly,

Amanda T. Dowd
Paralegal to G. Hamlin O'Kelley, III

GHOIII/atd
Enclosures

**BUIST
BYARS &
TAYLOR** LLC

ATTORNEYS AT LAW

652 Coleman Blvd., Suite 200
Mount Pleasant, SC 29464



RECEIVED

JUN 16 2025

SC Court of Appeals

CHARLESTON SC 294

12 JUN 2025 PM 1 L



The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29211

29201-376999

