

**STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS**

RECEIVED
Oct 03 2025
SC Court of Appeals

Appeal from the Court of Common Pleas
For Charleston County
Honorable Michael R. Scarborough, Master-In-Equity
Civil Action No.: 2023-CP-10-02281
Appellate Case No. 2025-001775

GRAND OAKS BOULEVARD ASSOCIATION, INC.,

Appellant,

v.

PROXIMITY NEIGHBORHOODS MASTER ASSOCIATION, INC.,

Respondent.

**MOTION FOR EXTENSION OF TIME IN WHICH
TO FILE APPELLANT'S INITIAL BRIEF AND
DESIGNATION OF MATTERS TO BE INCLUDED
IN THE RECORD ON APPEAL**

Stephen P. Groves, Sr., Esquire
S.C. Bar No. 7854
BUTLER SNOW LLP
25 Calhoun Street, Suite 250
Charleston, South Carolina 29401
Telephone: 843.277.3704
E-Mail: Stephen.Groves@butlersnow.com

John J. Dodds, III, Esquire
S.C. Bar No. 1707
JOHN J. DODDS, III, LLC
858 Lowcountry Boulevard, Suite 101
Mount Pleasant, South Carolina 29464
Telephone: 843.881.6530
E-Mail: john@cisadodds.com

*Attorneys for the Appellant,
Grand Oaks Boulevard Association, Inc*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

COMES NOW the Appellant, Grand Oaks Boulevard Association, Inc. ("Grand Oaks"), pursuant to Rule 240 of the South Carolina Appellate Court Rules, and respectfully requests this Court of Appeals to grant Grand Oaks a thirty (30) day extension of time in which to serve Grand Oaks' *Appellant's Initial Brief* and the *Designation of Matters to be Included in the Record On Appeal* ("DOM") in this appellate matter. The basis for this motion is that Grand Oaks' appellate counsel are both involved in other appellate and trial matters at this time and need the additional time in which to complete Grand Oak's Appellant's Initial Brief Initial Brief and DOM.

Based upon the current briefing schedule Grand Oak's Appellant's Initial Brief and DOM are currently due to be served on or before **Friday, 3 October 2025**. Consequently, Grand Oaks in anticipation of a favorable reception and subsequent grant of this extension motion, Grand Oaks would then be required to serve Lincoln & South's Respondent's Initial Brief and DOM on or before **Monday, 3 November 2025** (30th day fell on Sunday, 2 November 2025)..

Finally, Grand Oaks respectfully requests this Court of Appeals to hold the briefing time in abeyance until such time as this joint motion may be considered and ruled upon.

Respectfully submitted:

BUTLER SNOW LLP

By: *Stephen P. Groves, Sr.*

Stephen P. Groves, Sr., Esquire
S.C. Bar No.: 007854
25 Calhoun Street, Suite 250
Charleston, South Carolina 29401
Telephone: 843.277.3704
Telecopier: 843.277.3701
E-Mail: Stephen.Groves@butlersnow.com

John J. Dodds, III, Esquire
S.C. Bar No. 1707
JOHN J. DODDS, III, LLC
858 Lowcountry Boulevard, Suite 101
Mount Pleasant, South Carolina 29464
Telephone: 843.881.6530
E-Mail: john@cisadodds.com

*Attorneys for the Appellant,
Grand Oaks Boulevard Association, Inc.*

Charleston, South Carolina

3 October 2025

OTHER COUNSEL OF RECORD

Douglas W. MacKelcan, Esquire
S.C. Bar No. 76332
Taylor L. Cary, Esquire
S.C. Bar No. 105136
COPELAND, STAIR, VALZ & LOVELL, LLP
40 Calhoun Street, Suite 400
Charleston, South Carolina 29401
Telephone: 843.727.0307
E-Mail: dmackelcan@csvl.com
tcary@csvl.com

*Attorneys for the Respondent,
Proximity Neighborhoods Master Association, Inc.*

**STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS**

Appeal from the Court of Common Pleas
For Charleston County
Honorable Michael R. Scarborough, Master-In-Equity
Civil Action No.: 2023-CP-10-02281
Appellate Case No. 2025-001775

GRAND OAKS BOULEVARD ASSOCIATION, INC.,

Appellant,

v.

PROXIMITY NEIGHBORHOODS MASTER ASSOCIATION, INC.,

Respondent.

**PROOF OF SERVICE FOR MOTION FOR EXTENSION
OF TIME IN WHICH TO FILE APPELLANT'S INITIAL BRIEF AND
DESIGNATION OF MATTERS TO BE INCLUDED
IN THE RECORD ON APPEAL**

Stephen P. Groves, Sr., Esquire
S.C. Bar No. 7854
BUTLER SNOW LLP
25 Calhoun Street, Suite 250
Charleston, South Carolina 29401
Telephone: 843.277.3704
E-Mail: Stephen.Groves@butlersnow.com

John J. Dodds, III, Esquire
S.C. Bar No. 1707
JOHN J. DODDS, III, LLC
858 Lowcountry Boulevard, Suite 101
Mount Pleasant, South Carolina 29464
Telephone: 843.881.6530
E-Mail: john@cisadodds.com

*Attorneys for the Appellant,
Grand Oaks Boulevard Association, Inc*

I, Stephen P. Groves, Sr., Esquire, hereby certify that on 3 October 2025, I served a copy of the **Motion for Extension of Time in Which to File Appellant's Initial Brief and Designation of Matters to be Included in the Record on Appeal** submitted by the Appellant, Grand Oaks Boulevard Association, Inc., on counsel for the Respondent via e-mail at the address noted:

Douglas W. MacKelcan, Esquire
S.C. Bar No. 76332
Taylor L. Cary, Esquire
S.C. Bar No. 105136
COPELAND, STAIR, VALZ & LOVELL, LLP
40 Calhoun Street, Suite 400
Charleston, South Carolina 29401
Telephone: 843.727.0307
E-Mail: dmackelcan@csvl.com
tcary@csvl.com

*Attorneys for the Respondent,
Proximity Neighborhoods Master Association, Inc.*

Signed: **Stephen P. Groves, Sr.**
Stephen P. Groves, Sr.

Charleston, South Carolina

3 October 2025

97748789.v1