

**RECEIVED**

**Nov 10 2025**

**SC Court of Appeals**

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

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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***

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GRAND OAKS BOULEVARD ASSOCIATION, INC.,

Appellant,

v.

PROXIMITY NEIGHBORHOODS MASTER ASSOCIATION, INC.,

Respondent.

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**MOTION FOR EXTENSION OF TIME (2<sup>nd</sup>) IN WHICH  
TO FILE APPELLANT'S INITIAL BRIEF AND  
DESIGNATION OF MATTERS TO BE INCLUDED  
IN THE RECORD ON APPEAL**

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*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 an additional 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 one had a family illness which required his attention. Consequently, appellate counsel need the additional time in which to complete Grand Oak’s Appellant’s Initial Brief Initial Brief and DOM. Absent an emergency, no additional extensions will be sought.

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, 21 November 2025**. Consequently, Grand Oaks in anticipation of a favorable reception and subsequent grant of this second extension motion, Grand Oaks would then be required to serve Grand Oak’s Initial Appellant’s Brief and DOM on or before **Monday, 22 December 2025** (30th day fell on Sunday, 21 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.*

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Charleston, South Carolina

10 November 2025

## **OTHER COUNSEL OF RECORD**

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**PROOF OF SERVICE FOR MOTION FOR EXTENSION  
OF TIME (2<sup>nd</sup>) IN WHICH TO FILE APPELLANT'S INITIAL BRIEF AND  
DESIGNATION OF MATTERS TO BE INCLUDED  
IN THE RECORD ON APPEAL**

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

I, Stephen P. Groves, Sr., Esquire, hereby certify that on 10 November 2025, I served a copy of the **Motion for Extension of Time (2<sup>nd</sup>) 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:

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*Attorneys for the Respondent,  
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Signed: **Stephen P. Groves, Sr.**  
Stephen P. Groves, Sr.

Charleston, South Carolina

10 November 2025

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