

RECEIVED
Dec 02 2025
SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CLARENDON COUNTY
CIRCUIT COURT

Kristi F. Curtis, Circuit Court Judge

Case No. 2017-CP-14-00127
Appellate Case No. 2024-001875

Kim E. Bevier.....Appellant,

v.

Palmetto Air Plantation Homeowners Association, Inc.,Respondent.

CONSENT MOTION TO AMEND RECORD ON APPEAL AND EXTENSION

Appellant hereby moves to amend the Record on Appeal due to missing pleadings leading to pages being indexed and numbered incorrectly, as well as an extension of time for all remaining filings for the parties. The grounds for this motion are as follows:

1. Appellant’s counsel filed their Record on Appeal on or about November 12, 2025.
2. Respondent’s counsel brought this error to Appellant counsels’ attention via email on November 22, 2025.

For the reasons stated above, Appellant respectfully moves this Court for an order allowing them to amend their previously filed Record on Appeal and an extension of time for all future remaining filings with the CONSENT OF RESPONDENT’S COUNSEL.

SIGNATURE TO FOLLOW ON NEXT PAGE

Respectfully submitted,

GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr. (73789)

2309 Devine Street

Columbia, South Carolina 29205

(803) 251-4517

(803) 251-4527 Facsimile

jgoodwyn@goodwynlaw.com

Attorney for Appellant

Columbia, South Carolina

December 2, 2025

WE CONSENT:

COFFEY & MCKENZIE, PA

/s/STEVEN S. MCKENZIE

Steven S. McKenzie (6919)

2 North Brooks Street

Manning, South Carolina 29102

(803) 435-8847

(803) 435-8915 Facsimile

smckenzie@ccmlawsc.com

Attorney for Respondent

RECEIVED

Dec 02 2025

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CLARENDON COUNTY
CIRCUIT COURT

Kristi F. Curtis, Circuit Court Judge

Case No. 2017-CP-14-00127
Appellate Case No. 2024-001875

Kim E. Bevier.....Appellant,

v.

Palmetto Air Plantation Homeowners Association, Inc.,Respondent.

PROOF OF SERVICE

I certify that I have served a copy of the **CONSENT MOTION TO AMEND RECORD ON APPEAL AND EXTENSION** on the following via EMAIL at the address below, on December 2, 2025.

Steven S. McKenzie
Coffey & McKenzie, P.A.
smckenzie@ccmlawsc.com

GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.
T. Jeff Goodwyn, Jr. (73789)
2309 Devine Street
Columbia, SC 29205
(803) 251-4517
(803) 251-4527 Facsimile
jgoodwyn@goodwynlaw.com
Attorney for Appellant

T. Jeff Goodwyn, Jr.*†
Jefferson D. Turnipseed**

GOODWYN LAW FIRM, LLC

Tel. (803) 251-4517
Fax (803) 251-4527

2309 Devine Street
Columbia, South Carolina 29205

Email: JGoodwyn@Goodwynlaw.com
Web: www.GoodwynLaw.com

*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

December 2, 2025

VIA E-FILING AND MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: ***Kim E. Bevier v. Palmetto Air Plantation Homeowners Association, Inc.***
Circuit Court Case No.: 2017-CP-14-00127
Appellate Case No.: 2024-001875
Our File No.: 3000-0929

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the Consent Motion to Amend Record on Appeal and Extension, along with a Proof of Service, for filing in connection with the above-referenced matter. A check in the amount of \$50.00 is being placed in today's mail.

As evidenced by the Proof of Service, I have served all interested parties, with a copy.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG:cnc

Enclosures

cc: Steven S. McKenzie, Esquire (via email)