

THE LAW OFFICE OF
DAVID CONOR KEYS LLC
PO Box 14225 CHARLESTON, SC 29422
CONOR@DCONORKEYSLAW.COM
843-906-3998

December 23, 2025
Jenny Abbott Kitchings
Clerk of Court, Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

RECEIVED
Dec 23 2025
SC Court of Appeals

**RE: Joseph R. Davis and Jennifer Davis individually and as representative of all those similarly situated, v. River Oaks Homeowners Association, Inc., Halcyon Real Estate Services, LLC, and Dorchester Real Estate Services, Inc.
Case No. 2020-CP-18-1856
Appellate Case No. 2024-001547**

Madam Clerk:

Enclosed please find in regard to the above referenced matter the following:

- 1) Appellants Joseph R. Davis and Jennifer Davis' Motion requesting an Order of the Court allowing Appellants to file a reduced number of copies of the Record on Appeal and an extension of time for Appellants to file additional copies of Appellants' final briefs and record on appeal;
- 2) Certificate of Service for the Motion, and
- 3) Corresponding Motion filing fee (Placed in the Mail)

I kindly request that you file the same.

RESPECTUFLLY SUBMITTED,

THE LAW OFFICE OF
DAVID CONOR KEYS, LLC



D. Conor Keys (100148)
P.O. Box 14225
Charleston, SC 29422
Phone: 843-906-3998
conor@dconorkeyslaw.com

Enclosures: (as stated)
CC: Mary Leigh Arnold
Niel S. Haldrup
Ford Hamby Thrift

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable Thomas L. Hughston Jr.

Case No. 2020-CP-18-1856

Joseph R. Davis and Jennifer Davis, individually
and as representative of all those similarly situated,.....Appellants-Respondents,
v.

River Oaks Homeowners Association, Inc.,.....Respondent-Appellant,

And

Halcyon Real Estate Services, LLC, and Dorchester Real Estate Services, Inc.Respondents.

**APPELLANTS’ MOTION FOR AN EXTENSION OF TIME TO FILE ADDITIONAL
COPIES OF THE RECORD ON APPEAL AND APPELLANTS FINAL BRIEFS
AND A REQUEST FOR AN ORDER ALLOWING APPELLANTS TO FILE
LESS THAN SIX ADDITIONAL COPIES OF THE RECORD ON APPEAL.**

Appellants-Respondents Joseph and Jennifer Davis (“Appellants”) by and through their undersigned counsel, hereby move before this Court for an order permitting Appellants to file less than six (6) additional copies of the record on appeal and an extension of time for Appellants to file additional copies of Appellants final briefs and records on appeal. Appellants moves pursuant to Rules 240, 242 and 267 SCACR.

By correspondence dated December 17, 2025, this Court states: “The Court of Appeals has determined a need exists for six (6) additional bound copies of the record on appeal and all final briefs... The bound copies must be filed within 10 days of the date of this letter.”

Appellants would respectfully state that the record on appeal in this matter consists of 10 volumes including over 4,000 pages of records. Appellants counsel, using previous invoices of service providers for copying and binding, estimates that including shipping, six additional copies of the record on appeal in this matter along with additional copies of Appellants’ final briefs would cost over \$5,000.00 and fill 6 banker boxes. Therefore, Appellants’ respectfully request an order from this Court permitting Appellants to file a reduced number of copies of the record on appeal, based upon the size of the record and the cost anticipated to be associated with producing and filing six additional copies of the record.

Additionally, pursuant to the rules of is Court the additional copies are due to be filed on the Monday December 29, 2025, after the Christmas Holiday. Given the holiday business hours of most companies, Appellants anticipate difficulty in producing the copies requested in time, and therefore request an extension of time to file the additional copies requested until 10 days after this Court rules upon this Motion.

RESPECTFULLY SUBMITTED,

THE LAW OFFICE OF
DAVID CONOR KEYS, LLC
s/ D. Conor Keys
D. Conor Keys (100148)
P.O. Box 14225
Charleston, SC 29422
Phone: 843-906-3998
conor@dconorkeyslaw.com
*Attorney for Appellants-Respondents
Joseph and Jennifer Davis.*

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable Thomas L. Hughston Jr.

Appellate Case No. 2024-001547

Case No. 2020-CP-18-1856

Joseph R. Davis and Jennifer Davis, individually
and as representative of all those similarly situated,.....Appellants-Respondents,

v.

River Oaks Homeowners Association, Inc.,.....Respondent-Appellant,

and

Halcyon Real Estate Services, LLC, and
Dorchester Real Estate Services, Inc.Respondents.

CERTIFICATE OF SERVICE

I certify that on this 23rd day of December 2025, I have served a copy of the Motion to file a reduced number of copies of the Record on Appeal upon all other counsel of record at the email address listed for said counsel on AIS as follows:

MARY LEIGH ARNOLD, PA
Mary Leigh Arnold
749 Johnnie Dodds Blvd., Suite B
Mt. Pleasant, SC 29464
Phone: 843-971-6053
sammie@maryarnoldlaw.com
Attorneys for Appellants
Joseph R. Davis and Jennifer Davis

WALL TEMPLETON & HALDRUP, PA

Neil S. Haldrup

Ford Hamby Thrift

PO Box 1200

Charleston, SC 29402

P. 843-329-9500

Neil.Haldrup@Walltempleton.com

Ford.Thrift@WallTempleton.com

Attorneys for River Oaks, Inc.

THE LAW OFFICE OF
DAVID CONOR KEYS, LLC

s/ D. Conor Keys

D. Conor Keys (100148)

P.O. Box 14225

Charleston, SC 29422

Phone: 843-906-3998

conor@dconorkeyslaw.com

Attorneys for Appellants

Joseph R. Davis and Jennifer Davis