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**Jan 02 2026**

**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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**CONSENT MOTION FOR EXTENSION OF TIME (3rd) IN WHICH  
TO FILE APPELLANT'S INITIAL BRIEF AND  
DESIGNATION OF MATTERS TO BE INCLUDED  
IN THE RECORD ON APPEAL**

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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](mailto: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](mailto: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 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 (*wife with four cracked ribs and a pneumothorax*) which required his extensive 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. Counsel for the Respondent, Proximity Neighborhoods Master Association, Inc. ("Proximity"), have kindly consented to this additional extension.

Based upon the current briefing schedule Grand Oak's Appellant's Initial Brief and DOM are currently due to be served on or before **Tuesday, 6 January 2026**. Consequently, Grand Oaks in anticipation of a favorable reception and subsequent grant of this regrettably requested third extension motion, Grand Oaks would then be required to serve Grand Oak's Initial Appellant's Brief and DOM on or before **Thursday, 5 February 2026**.

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

2 January 2026

## **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.*

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**PROOF OF SERVICE FOR MOTION FOR EXTENSION  
OF TIME (3rd) IN WHICH TO FILE APPELLANT'S INITIAL BRIEF AND  
DESIGNATION OF MATTERS TO BE INCLUDED  
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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](mailto: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](mailto:john@cisadodds.com)

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

I, Stephen P. Groves, Sr., Esquire, hereby certify that on 2 January 2026, I served a copy of the **Motion for Extension of Time (3rd) 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](mailto:dmackelcan@csvl.com)  
[tcary@csvl.com](mailto:tcary@csvl.com)

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

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

Charleston, South Carolina

2 January 2026

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