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January 23, 2026
Jenny Abbott Kitchings
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RECEIVED
Jan 30 2026
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**

To Whom it may concern:

I write in response to the Court's correspondence dated January 20, 2026, requesting that all copies of the record on appeal be redacted to remove any home addresses. I write seeking the Court's clarification on how I should proceed with redacting the record. This case is a residential property class action regarding whether lots in different neighborhoods were subject to alleged restrictive covenants and/or declarations. Many of the principal documents relevant to the issues in this appeal are publicly recorded documents including numerous deeds, restrictive covenants and declarations which are replete with citation to addresses of lot owners. For example, the three publicly recorded documents which are at the heart of the issues in this case are the River Oaks Declaration, the River Oaks Declaration Supplement and the River Oaks Declaration Supplement II. These documents identify lot owners by address, and sometimes corresponding lot numbers. Some of the issues in dispute involve whether those addresses constitute sufficient property descriptions, and who signed those documents at what time. Issues raised by the parties in this appeal, include whether the documents reference the correct address, plat lot number, and lot owner, when they were signed if at all, which requires comparing all three identifiers on a declaration document to see if they are correctly identified by referencing the Declaration document to corresponding deeds and plats. Additionally, the parties over the course of numerous oral arguments before the lower court reference particular lots and/or lot owner owners by referencing a property address, therefore the transcripts of hearing on this appeal are also replete with references to home addresses.

My concern is that if all home addresses are redacted from the record the court will not be able to properly assess the various arguments before the court on appeal which require reference to said addresses. Additionally, if all the record pages containing a home address are removed from the record and are filed in an appendix, the appendix will likely constitute nearly half the size or more of the over four thousand page unredacted record. I am concerned given that fact review of the record with a redacted appendix will make analysis by the court disorganized and difficult. I can certainly provide a fully redacted electronic copy of the record to the Court for public availability regarding the case, but write for further guidance of whether it would better serve

the Court, in this particular case if I provided the additional hard copies of the record in unredacted form so that the Court may better utilize those copies to analyze the issues raised, given the nature of the this particular case. I would further request that I not have to produce additional copies of the record until I have received clarification from the Court in response to this correspondence directing me on how the Court wishes me to proceed. Thank you for your time and consideration.

I kindly request that you file the same.

RESPECTUFLLY SUBMITTED,

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Enclosures: (as stated)

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