

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

R. Paul Benik, Jr., Anton F. B. R. Poster, Sr., Johann M. McCrackin, Timothy J. Wentzel and Lisa D. Abrams, Nellie B. Poster, Sherry S. Weatherly, Paula W. Benik, John D. Diehl, Lisa R. Diehl, Paul H. Errickson and Linda D. Errickson, Sandra Pridgen, Jerry Steven Wilson and Dana Pridgen Wilson, Ronald K. Reynolds, Rasario Reynolds, Gene W. Euchler and Cecelia L. Euchler, Sara F. Miles, V. Scott Miles, Deanna VanNostrand, Vernon G. Miles, Sharon E. Miles, Deborah Floyd, Douglas M. Mason, Barbara A. Mason, Brooks M. Safrit, Woodrow S. Safrit, Steven Alan Spears, Sylvia McCall Spears, Natalie D. Amaradasa, Darryl C. Williams, Mary Williams, Steven P. Lombardi, Lisa A. Lombardi, Davud G. Laureles, Tracey N. Laureles, Austin Whitesell, Jessica Whitesell, Jaqueline Ann Petrisko, Robert Palmer, Linda Palmer, Charles B. Hall, Virginia G. Hall, Paige Bird, Michael C. Smith, Edwina Sekhri, Vinod Sekhri, Sonia Heydt, Vicky Jackson, Douglas R. Keefe, Ashton Lackey, William Lackey, Timothy Beauford Hudson, Victoria Ester Hudson, Matthew G. Pivarnik, Joye S. Bull, Tumpie B. Bull, Maxine Williams, Kim Ritchie, Van Raye Ritchie, William B. Burch, Sharon Burch, Ann M. Dozier, T. Guy Martin, Joshua Damon, Miriam R. Cromer and Arcadian Shores Single-Family Residential Homeowners Association, Inc.,

Plaintiffs,

Vs.

The Arcadian Incorporated of Myrtle Beach,

Defendant.

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT
CIVIL ACTION NO: 2023-CP-26-03615

RECEIVED

Apr 22 2026

SC Court of Appeals

AFFIDAVIT OF
KAYLEIGH RHODES
PARALEGAL OF HOWELL V.
BELLAMY, III, ESQUIRE

PERSONALLY APPEARED BEFORE ME, the undersigned, who being duly sworn, deposes and states:

1. My name is Kayleigh Rhodes, and I am over the age of eighteen (18) years and competent to make this Affidavit based on my personal knowledge and experience of these matters as alleged in this lawsuit.

2. I am currently the owner of a home located at 287 Gilman Road, Pawleys Island, SC 29585.

3. I became an employee of Bellamy, Rutenberg, Copeland, Epps, Gravely & Bowers, P.A. and paralegal of Howell V. Bellamy, III, Esquire &, officially on March 20, 2026.

RELEVANT FACTUAL INFORMATION

4. This Affidavit is in support of the fact that during the time frame between March 14th and March 20th, 2026, Howell V. Bellamy, III, Esquire, lacked the appropriate paralegal aid in managing his case load and subsequent case proceedings.

5. In the last 4 (four) months, Mr. Bellamy has unfortunately been dealing with severe heart issues and related neurological issues, to include: multiple visits to cardiologists and neurologists at MUSC, who have ordered multiple labs to follow up on Mr. Bellamy's ongoing health-related issues, to which I have had to take over in regard to scheduling. Dr. Rosenblum & Dr. Silbiger, who have been overseeing Mr. Bellamy's ongoing treatment for his heart and other related issues, can attest to other related medical treatment he has had to undergo in the previous months. I can attest to the fact that Mr. Bellamy's neurologists, cardiologists and internists were all requesting blood work but for all different reasons. Further, Mr. Bellamy had to undergo a procedure to have a heart monitor put in by Dr. Goebel through Grand Strand Medical Center. Admittedly, I can also attest that he has been under a great deal of stress due to these matters.

Upon the Court's request, Mr. Bellamy would be happy to provide sufficient receipt of said doctor's appointments and health-related absences.

6. Upon my recent employment, I wasn't given access to his previous paralegal's email until our office's IT department granted me said access and I had to balance Mr. Bellamy's previous paralegal's emails, as well as my own.

7. Upon my recent employment as Mr. Bellamy's new paralegal, I have had to not only manage the undeniable stress of having to take on his case load in the middle of their proceedings, but also make up for the necessary tasks that were not able to be seen through by his previous paralegal due to the transition of employment. For example, the March 17th, 2026 Notice of Defect that was sent by the Court of Appeals, took place between the time in which Miss Ales left the firm and the transition period of me starting at the firm as Mr. Bellamy's paralegal.

8. With that being said, between Mr. Bellamy's pressing health issues, his previous paralegals departure, and my recent employment, resulted in my delayed receipt of important correspondence from the Office of the South Carolina Court of Appeals.

9. Upon my recent employment, I wasn't given access to his previous paralegal's email until our office's IT department granted me said access. I am still, to this day, catching up on. During the transitional time in which I was taking over, I had to balance Mr. Bellamy's previous paralegal's emails, as well as my own.

10. The first interaction and correspondence I had with The South Carolina Court of Appeals regarding this case matter was today, April 21, 2026. On March 31st, 2026, I reached out to the court reporters who were responsible for reporting this hearing, to which they indicated that the previous paralegal of Mr. Bellamy was never able to officially confirm the request of delivery

of the transcript of the appeal hearing dated September 15, 2025. It was upon my official request that they sent the official transcript of said hearing.

11. Today, April 22, 2026, is when Howell V. Bellamy, III, Esquire, alongside myself, were able to adequately review this case matter in the present happenings by and through the Court.

12. I, Kayleigh Rhodes, am asking the Court to consider these circumstantial circumstances as reason for this case matter to be re-considered.

FURTHER AFFIDAVIT SAYETH NOT.

Kayleigh Rhodes
Kayleigh Rhodes

SWORN to and subscribed before me this
22nd day of April, 2026.

Alicia Crawford
Notary Public for South Carolina
My Commission Expires: 02/20/2036
Alicia Crawford

