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**Apr 24 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Robert J. Bonds, Circuit Court Judge  
Case No. 2011-CP-10-07166

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Appellate Case No. 2026-000866

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Otha M. Delaney, Octavia D. Watson, Alicia S. Alston, and Paul D. McGuiggan, Jr.,  
individually and on behalf of all others similarly situated as Co-Class Representatives,  
..... Appellant's,

First Financial of Charleston, Inc., .....Respondent.

v.

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**RESPONDENT'S RETURN TO APPELLANT'S MOTION TO CONSOLIDATE<sup>1</sup>**

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First Financial of Charleston, Inc. ("FFC"), by and through its undersigned counsel, files this Return to Otha Delaney's, Octavia Watson's, Alicia Alston's, and Paul McGuiggan's (collectively "Delaney") Motion to Consolidate Appellate Case No. 2026-000866 ("Delaney 4") and Appellate Case No. 2026-000244 ("Delaney 3").

FFC does not object to the consolidation of the Appellate Case No. 2026-000244 and Appellate Case No. 2026-000866. FFC only requests the Court clarify the briefing schedule following the consolidation of the appeals and wants to bring to the Court's attention that Delaney's counsel has consented to a 30-day extension for FFC's deadline to file and serve its initial brief and designation of matter in Appellate Case No. 2026-000244. FFC will file a formal

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<sup>1</sup> As Delaney has filed this Motion in Delaney 3 and Delaney 4, FFC will likewise file its return in both matters.

motion for extension of time should this Court so require. However, FFC believes that both Delaney's motion to consolidate and the extension of time for FFC to file and serve its initial brief and designation of matter in Delaney 3 can be addressed simultaneously within the motion to consolidate, and requests the Court use this opportunity to set the briefing schedule following consolidation in line with the agreement among FFC and Delaney.<sup>2</sup>

COPELAND, STAIR, VALZ & LOVELL, LLP

This 24<sup>th</sup> day of April, 2026.

*s/Skyler C. Wilson*

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***Attorneys for Respondent***

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<sup>2</sup> It is FFC's understanding that the initial briefing deadline for FFC in Delaney 3 is May 7, 2026. Thus, FFC would request its briefing deadline be extended to June 8, 2026, given that the thirtieth day falls on a weekend.

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..... Appellant's,

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**PROOF OF SERVICE**

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I certify that on April 24, 2026, I have served ***Respondent's Return to Appellant's Motion to Consolidate*** upon the parties below by electronic mail, addressed as follows:

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**Subject:** Otha M. Delaney, et al. v. First Financial of Charleston, Inc.; Appellate Case No. 2026-000866; CSVL File No.: 70041  
**Date:** Friday, April 24, 2026 12:03:00 PM  
**Attachments:** [image001.png](#)  
[Respondent's Return to Appellant's Motion to Consolidate.pdf](#)

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Good afternoon,

We will be filing the attached Respondent's Return to the Motion to Consolidate in this case with the Court of Appeals today.



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