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Jun 26 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge
Case No. 2025-CP-10-02946

Appellate Case No. 2025-002543

Delores Walker,

Respondent,

v.

RE Carroll Management
Company, Harborstone LLC,
and Harborstone Apartments,

Appellants.

MOTION FOR EXTENSION OF TIME

Matthew A. Hughes
FOX ROTHSCHILD LLP
2 West Washington Street
Suite 1100
Greenville, SC 29601

Attorney for Appellants

MOTION FOR EXTENSION OF TIME

Appellants RE Carroll Management Company, Harborstone LLC, and Harborstone Apartments move for an extension of time to file the Record on Appeal. In support whereof, Appellants state as follows:

1. Appellants have parted ways with current counsel for this appeal and desire new counsel to handle this appeal moving forward.

2. Current counsel filed a motion to be relieved as counsel in the trial court. **See Exhibit A: Motion to Be Relieved as Counsel.** This motion has been overtaken by events.

3. The current deadline for filing the Record on Appeal is today, June 26, 2026.

4. A 30-day extension would extend the deadline to July 26, 2026.

5. A prior motion for an extension was filed on June 24, 2026. **See Exhibit B: Prior Motion for Extension.** Undersigned counsel has been unable to verify whether or not the prior motion has been granted, as neither the motion nor any ruling thereon is posted on the appellate docket for this case.

6. This motion is being filed out of an abundance of caution.

7. Undersigned counsel Matthew Hughes of Fox Rothschild, LLP has agreed to appear in this appeal for the limited purpose of attempting to comply with the deadline for filing the Record on Appeal.

8. He reasonably requires additional time to ensure that all designated materials are included in the Record and that it is properly prepared and formatted.

9. This motion is not being filed for any improper purpose or purely to delay.

10. Pursuant to South Carolina Appellate Rule 263(b), the Court may extend the time to file the Record on Appeal.

11. Counsel for Respondent Delores Walker consents to a 30-day extension.

Respectfully submitted,

/s/ Matthew Hughess

Matthew A. Hughes

S.C. Bar No. 105292

FOX ROTHSCHILD LLP

2 West Washington Street

Suite 1100

Greenville, SC 29601

Telephone: (864) 751-7600

matthewhughes@foxrothschild.com

Counsel for Appellants

June 26, 2026

CERTIFICATE OF SERVICE

I certify that I have served the foregoing on Respondent Delores Walker by emailing a copy to her attorneys, Dominick J. Callela (dominick@mdswlegal.com), Jeffrey W. Ward, Jr. (ward@mdswlegal.com), and Amy E. McLaren (amy@mdswlegal.com).

June 26, 2026

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/s/ Matthew Hughes

Matthew A. Hughes

S.C. Bar No. #105292

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Attorney for Appellants

EXHIBIT A

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

CASE NO.: 2025-CP-10-02946

Delores Walker,

Plaintiff,

vs.

RE Carroll Management Company,
Harborstone LLC, d/b/a Harborstone
Apartments,

Defendants.

**MOTION TO
BE RELIEVED AS COUNSEL**

PLEASE TAKE NOTICE that Amanda M. Gaston of Clawson and Staubes, LLC, counsel of record for RE Carroll Management Company, Harborstone LLC d/b/a Harborstone Apartments ("Defendants"), respectfully moves this Court for an Order relieving her and her law firm as counsel of record in the above-captioned matter.

In support of this Motion, counsel would show the Court as follows:

1. Amanda M. Gaston of Clawson and Staubes, LLC currently represents Defendants in the above-referenced action.
2. Professional considerations warrant counsel's withdrawal pursuant to Rule 1.16, RPC, Rule 407, SCACR.
3. Defendants have been advised of counsel's intent to withdraw from representation.
4. Defendants have been advised of their obligation to retain substitute counsel, as necessary, and to comply with all applicable court orders, deadlines, and procedural requirements following counsel's withdrawal.
5. Counsel's withdrawal will not unduly prejudice any party or materially delay the proceedings.

WHEREFORE, counsel respectfully requests that the Court enter the attached Order relieving Amanda M. Gaston, and Clawson and Staubes, LLC as counsel of record for Defendants and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

s/Amanda M. Gaston

Amanda M. Gaston, Esq.
S.C. Bar No.: 104135
126 Seven Farms Drive, Suite 200
Charleston, South Carolina 29492-8144
Phone: (843) 577-2026
Fax: (843) 722-2867
Email: agaston@cslaw.com
Attorney for Defendants

Charleston, South Carolina

June 10, 2026

EXHIBIT B



CLAWSON & STAUBES

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Jun 24 2026

SC Court of Appeals

AMANDA M. GASTON
LICENSED IN SC
AGASTON@CSLAW.COM

June 24, 2026

File No.: 20254006.000

VIA EMAIL- ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *Delores Walker v. RE Carroll Management Company, Harborstone LLC d/b/a Harborstone Apartments*
Appellate Case No.: 2025-002543

Dear Ms. Kitchings:

Appellant respectfully requests a thirty (30) day extension of time to file a Record on Appeal in this matter. This request is made to allow the pending Order Relieving Counsel time to be reviewed and signed by the Administrative Judge in Circuit Court.

Appellant's Record on Appeal is currently due on June 26, 2026. We spoke with Respondent's Counsel who consents to the extension of thirty days. If the Court grants Appellant's request, the new deadline for Appellant's Record on Appeal will be July 26, 2026. We will be sending the required \$50.00 filing fee for requesting an extension under separate cover.

Appellant requests that the current deadline be held in abeyance until this Court issues an order. Thank you in advance for your consideration of this extension.

Thank you very much for your attention to the above.

Very truly yours,

CLAWSON and STAUBES, LLC

A handwritten signature in blue ink that reads 'Amanda M. Gaston'.

Amanda M. Gaston, Esq.

Cc: All Counsel of Record (via email only)

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SC Court of Appeals

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MATTHEW HUGHES
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June 26, 2026

VIA E-MAIL AND FIRST-CLASS MAIL

The Honorable Jenny Abbot Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

**Re: Delores Walker v. RE Carroll Management Company, Harborstone LLC,
and Harborstone Apartments
Appellate Case No. 2025-002543**

Dear Ms. Kitchings:

For filing attached please find a Notice of Limited Appearance and Motion for Extension of Time to File Record on Appeal in the referenced matter. Also attached is a copy of this firm's check in the amount of \$50.00 for the filing fee. We will be placing the firm's check in the mail to you today.

Thank you in advance for your assistance with this matter, and please know that I am available to provide any additional information, should it be required.

Sincerely,

Matthew Hughes
William B. Swent
Fox Rothschild LLP
P.O. Box 87
Greenville, SC 29602
(864)751-7600

Attorneys for Appellants

MAH/ss
Enclosure

A Pennsylvania Limited Liability Partnership

California Nevada Colorado New Jersey Delaware New York District of Columbia North Carolina Florida Oklahoma Georgia Pennsylvania Illinois South Carolina Massachusetts Texas Minnesota Washington Missouri