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SC Court of Appeals

**STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS**

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

GRANDE OAKS BOULEVARD ASSOCIATION, INC.,

Appellant,

v.

PROXIMITY NEIGHBORHOODS MASTER ASSOCIATION, INC.,

Respondent.

**PROOF OF SERVICE
FOR
APPELLANT'S FINAL REPLY BRIEF**

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*Attorneys for the Appellant,
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I, Stephen P. Groves, Sr., Esquire, hereby certify that on **Wednesday, 1 July 2026**, I served an electronic copy the **Appellant's FINAL REPLY BRIEF** submitted by the Appellant, Grande Oaks Boulevard Association, Inc., on counsel for the Respondent via e-mail at the address noted:

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

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

Charleston, South Carolina

22 May 2026

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SC Court of Appeals

1 July 2026

The Hon. Jenny Abbott Kitchings
Clerk of Court
SOUTH CAROLINA COURT OF APPEALS
1220 Senate Street
Columbia, South Carolina 29201

ctappfilings@sccourts.org

**Re: Grande Oaks Boulevard Association, Inc. v. Proximity
Neighborhoods Master Association, Inc.**

Appeal for the Charleston County Court of Common Pleas

Civil Action No.: 2023-CP-10-02281

Appellate Case No.: 2025-001775

B/S File No.: 064944-261897

Dear Clerk Kitchings:

Please find attached the following appellate briefs and documents being submitted on behalf of the Appellant, Grande Oaks Boulevard Association, Inc., in the above-referenced appellate matter:

- A. One **unbound** copy of the ***Final Brief*** of the Appellant, Grande Oaks Boulevard Association, Inc.;
- B. One copy of the ***Proof of Service*** for the ***Final Brief*** of the Appellant, Grande Oaks Boulevard Association, Inc.;
- C. One copy of the ***Rule 211(b), SCACR, Certification*** for the ***Final Brief*** of the Appellant, Grande Oaks Boulevard Association, Inc.;

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- D. One unbound copy of the ***Final Reply Brief*** of the Appellant, Grande Oaks Boulevard Association, Inc.;
- E. One copy of the ***Proof of Service*** for the ***Final Reply Brief*** of the Appellant, Grande Oaks Boulevard Association, Inc.; and
- F. One copy of the ***Rule 211(b), SCACR, Certification*** for the ***Final Reply Brief*** of the Appellant, Grande Oaks Boulevard Association, Inc..

I would appreciate your filing these documents with the Court of Appeals and returning ***one stamped copy of each*** to my attention via e-mail. By copy of this letter and e-mail, I am providing copies of the same appellate briefs and documentation to Douglas W. MacKelcan, Esquire and Taylor L. Cary, Esquire, as appellate counsel for the Respondent, Proximity Master Neighborhoods Master Association, Inc.

Should the Court of Appeals require submission of spiral bound copies of the ***Final Brief*** and the ***Final Reply Brief***, please advise and I will submit them without delay and in compliance with the requirements contained in Rule 267, SCACR.

As you are aware, I have previously provided the Court of Appeals with unbound (via e-mail) and bound copies of the ***Record on Appeal (Volumes I and II)***, as well as providing similar copies to Messrs. MacKelcan and Cary.

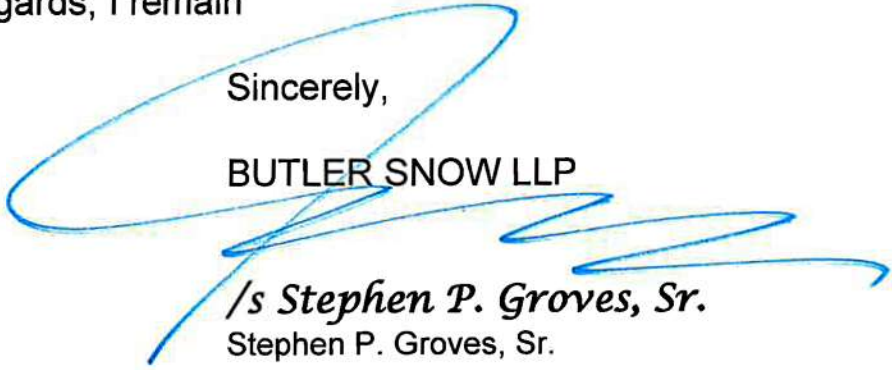
If you need anything else or I otherwise may be of any assistance to you or to the Court of Appeals regarding this matter, please feel free to contact me at your convenience. My direct telephone number is 843.277.3704, office telecopier is 843.277.3701, and the e-mail is Stephen.Groves@butlersnow.com.

Best wishes to you, your family, your staff, and the Court of Appeals for a happy 250th Fourth of July.

With kindest regards, I remain

Sincerely,

BUTLER SNOW LLP



/s Stephen P. Groves, Sr.

Stephen P. Groves, Sr.

C: Douglas W. MacKelcan
Taylor L. Cary, Esquire
John J. Dodds, III, Esquire

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