

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

Robert J. Bonds, Circuit Court Judge
Deadre L. Jefferson, Circuit Court Judge
R. Kirk Griffin, Circuit Court Judge

Appellate Case No. 2026-000244

Case No. 2011-CP-10-07166

RECEIVED
Jul 13 2026
SC Court of Appeals

Otha M. Delaney, individually and on behalf of all others similarly situated.....
Respondent/Appellant,

v.

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

AND

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

v.

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

CONSENT MOTION TO AMEND APPELLATE CAPTION

Otha M. Delaney, Octavia D. Watson, Alicia S. Alston, and Paul McGuiggan, Jr.
(individually and as Co-Class Representatives), hereby move the Court to amend the caption of
this consolidated appeal to reflect the addition of Octavia D. Watson, Alicia S. Alston, and Paul
McGuiggan, Jr. (individually and as Co-Class Representatives). First Financial of Charleston, Inc.
consents to the amended caption as provided below, without waiving any arguments and reserving

all rights to challenge intervention in this consolidated appeal.

On July 16, 2025, Octavia D. Watson, Alicia S. Alston, and Paul McGuiggan, Jr. moved to intervene in this action individually and as Co-Class Representatives. On January 22, 2026, the circuit court granted the Motion to Intervene. First Financial of Charleston, Inc. filed a Motion to Reconsider that order, which was denied on February 26, 2026. This made the Intervenors formal parties to the case, individually and as Co-Class Representatives.

When the Court consolidated these appeals by order on May 20, 2026, it listed only Otha M. Delaney as the Respondent to First Financial of Charleston, Inc.'s appeal. Because the Intervenors have been allowed to intervene, the caption in these consolidated appeals should reflect the same. Therefore, the caption of this consolidated appeal should appear as:

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

v.

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

AND

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

v.

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

First Financial of Charleston, Inc. consents to this Motion, noting that its consent does not constitute a waiver of its rights to appeal and argue in opposition to the orders allowing intervention.

TWENGE + TWOMBLEY LAW FIRM

BY: s/J. Ashley Twombley
J. ASHLEY TWOMBLEY
S.C. Bar #72916
THOMAS BLASE IANDOLI
S.C. Bar #105294
311 Carteret Street
Beaufort, SC 29902
Telephone: (843) 982-0100
Facsimile: (843) 982-0103
twombley@twlawfirm.com
iandoli@twlawfirm.com

and

C. Mitchell Brown, Esquire (S.C. Bar #12872)
Nelson Mullins Riley & Scarborough, LLP
P.O. Box 110770
Columbia, SC 29211
(803) 255-9595
mitch.brown@nelsonmullins.com

Beaufort, South Carolina

July 13, 2026

RECEIVED

Jul 13 2026

SC Court of Appeals

Robert J. Bonds, Circuit Court Judge
Deadre L. Jefferson, Circuit Court Judge
R. Kirk Griffin, Circuit Court Judge

Appellate Case No. 2026-000244
Case No. 2011-CP-10-07166

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

v.

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

AND

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

v.

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

PROOF OF SERVICE

I certify that on the 13th day of July 2026 I have caused the service of the **CONSENT MOTION TO AMEND APPELLATE CAPTION** by electronic mail using the email address listed in the Attorney Information System (AIS), to the attorney of record at the address listed below:

Stephen L. Brown, Esquire
S.C. Bar #66468
Russell G. Hines, Esquire
S.C. Bar #72100
Clement Rivers, LLP
P.O. Box 993
Charleston, SC 29402
(843) 720-5488
sbrown@ycrlaw.com
rhines@ycrklaw.com
Attorneys for Respondent

Skyler C. Wilson, Esquire
S.C. Bar #102865
Brenten H. DeShields, Esquire
S.C. Bar #105199
Copeland, Stair, Valz & Lovell, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401
swilson@csvg.law
bdesields@csvg.law
Ph: (843) 727-0307
Attorneys for Respondent

Amanda K. Dudgeon, Esquire
S.C. Bar #72516
MD Law Group, LLC
102 Wappoo Creek, Unit 9
Charleston, SC 29412
(843) 577-5410
mandi@mdlawsc.com
Attorneys for Respondent

TWENGE + TWOMBLEY LAW FIRM

BY: s/J. Ashley Twombley
J. ASHLEY TWOMBLEY
S.C. Bar #72916
THOMAS BLASE IANDOLI
S.C. Bar #105294
311 Carteret Street
Beaufort, SC 29902
(843) 982-0100
twombley@twlawfirm.com
iandoli@twlawfirm.com

and

C. MITCHELL BROWN
S.C. Bar #12872
Nelson Mullins Riley & Scarborough, LLP
P.O. Box 110770
Columbia, SC 29211
(803) 255-9595
mitch.brown@nelsonmullins.com

TWENGE + TWOMBLEY LAW FIRM, LLC
311 Carteret Street
Beaufort, South Carolina 29902

Ph.: 843.982.0100 Fax:: 843.982.0103
Web:: Twlawfirm.com

J. Ashley Twombley*
Karl D. Twenge+
Thomas Blase Iandoli

*Licensed in SC + GA
+Certified SC Circuit Court Mediator

July 13, 2026

Via Electronic Mail

The Honorable Jenny Abbott Kitchings
Clerk of Court, Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

RE: Appellate Case No. 2026-000244

Dear Ms. Kitchings:

I, along with Thomas Iandoli and Mitch Brown, represent Otha Delaney, Octavia Watson, Alicia Alston, and Paul McGuiggan, Jr., the Respondents/Appellants and Appellants in the above-captioned consolidated appeal.

We, with the consent of counsel for Appellant/Respondent, have agreed to amend the appellate caption in this matter to include the Intervenor who have been allowed to intervene, Octavia D. Watson, Alicia S. Alston and Paul MCGuiggan, Jr.. Accordingly, please find enclosed a Consent Motion to Amend Appellate Caption. Additionally, enclosed please find my firm's check in the amount of \$50.00, which represents the requisite filing fee.

Thank you for your consideration. If you need anything further from us, please do not hesitate to let us know.

With kindest regards, I remain,

Cordially,

J. Ashley Twombley

cc: Russell G. Hines, Esquire (rhines@ycrlaw.com)
Stephen L. Brown, Esquire (sbrown@ycrlaw.com)
Amanda K. Dudgeon, Esquire (mandi@mdlawsc.com)
Skyler Wilson, Esquire (swilson@csvg.law)
Brenten Deshields, Esquire (bdeshields@csvg.law)

RECEIVED
Jul 13 2026
SC Court of Appeals

C. Mitchell Brown, Esquire (mitch.brown@nelsonmullins.com)

TWENGE & TWOMBLEY, LLC
OPERATING ACCOUNT
311 CARTERET STREET
BEAUFORT, SC 29902

67-604/539

300

CHECK ARMOR

Jul 13, 2025

PAY TO THE
ORDER OF

South Carolina Court of Appeals

\$

\$50.00

*** Fifty

00/100

DOLLARS

South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

MEMO Filing Motion for AMend Appellate Caption / #2413 / als

AUTHORIZED SIGNATURE

⑈013374⑈ ⑆05390604⑆ ⑆290004⑆ ⑆2601⑈

TWENGE & TWOMBLEY, LLC

OPERATING ACCOUNT

13374

DATE : July 13, 2026
CHE # : 13374
AMOUNT : \$50.00
ACCOUNT : 1
PAID TO : South Carolina Court of Appeals
PO Box 11629
Columbia, SC
29211

EXPLANATION : Filing Motion for AMend Appellate Caption / #2413 / als

CLIENT : DeLaney, Otha
MATTER : 2413