

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Mikell R. Scarborough, Master in Equity

Appellate Case No. 2026-001033

Joseph W. Keating,

Appellant,

v.

Harrison Wilder, Jr., Hope Wilder Brown,
and Estate of Harrison Wilder, Defendants/
Counterclaim Plaintiffs and Third-Party
Plaintiffs,

Respondents,

v.

Joseph W. Keating d/b/a Keating Tree Service
and James Island Preservation Trust, Joseph W.
Keating, as Trustee,

Third-Party Defendants.

**RESPONDENTS' MOTION FOR FIRST EXTENSION OF TIME
TO SERVE AND FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules and the Clerk's letter dated August 14, 2026, Respondents Harrison Wilder, Jr., Hope Wilder Brown, and the Estate of Harrison Wilder respectfully move this Court for permission to serve and file their initial brief outside the deadlines set by Rules 208 and 240, SCACR, and for an extension of thirty (30) days, until September 16, 2026, within which to serve and file the brief. In support of this Motion, Respondents would show the following:

1. This appeal arises from the December 3, 2025 Order of the Master in Equity granting summary judgment against Appellant's claim for adverse possession and the March 23, 2026 denial of Appellant's motion for reconsideration. Appellant, proceeding *pro se*, served a Notice of Appeal dated April 21, 2026.

2. Since the Notice of Appeal was filed, the Clerk has issued a series of notices concerning deficiencies in Appellant's filings. On May 15, 2026, the Clerk advised Appellant that the time for ordering the transcript had expired and that the appeal would be dismissed absent action within ten (10) days. On May 29, 2026, the Clerk issued a deficiency letter concerning Appellant's motion to order the transcript outside the filing deadlines, noting that the required filing fee had not been submitted and that the matter would be dismissed if the deficiency was not corrected within ten (10) days. On July 6, 2026, the Clerk issued a deficiency letter stating that Appellant's initial brief was not accompanied by a designation of matter to be included in the record on appeal and that the matter would be dismissed if the deficiency was not corrected within ten (10) days. Also on July 6, 2026, the Clerk advised that Appellant's bound record on appeal, transcripts, and flash drive were being returned because the record had been filed prematurely, the transcripts were designated materials, and the Court could not accept flash drives.

3. Counsel for Respondents received copies of these notices. Counsel did not, however, receive any notice that Appellant had cured the deficiencies or that the appeal had progressed beyond them. Based on this series of notices, each of which warned that the matter would be dismissed, counsel for Respondents understood in good faith that Appellant's initial brief remained deficient and that the time for Respondents' initial brief had not begun to run. Respondents' failure to timely serve and file their initial brief was inadvertent and was not the product of any neglect of the appeal or any intent to delay these proceedings.

4. On August 14, 2026, the Clerk advised that the time for serving and filing Respondents' initial brief had expired and directed that the brief be served and filed within ten (10) days, along with a motion requesting permission to serve outside the deadlines set by Rules 208 and 240, SCACR. This Motion is served and filed within that ten (10) day period.

5. Undersigned counsel was thereafter retained as appellate counsel for Respondents on or about August 17, 2026 and has filed a Notice of Appearance contemporaneously with this Motion. Undersigned counsel did not represent Respondents in the proceedings below and requires a reasonable period of time to obtain and review the record, the orders on appeal, and the proceedings before the Master in Equity in order to prepare a brief that will be of assistance to the Court.

6. Undersigned counsel must also balance the preparation of Respondents' initial brief with other imminent deadlines.

7. The requested extension is brief and will not prejudice Appellant or materially delay the appeal. The record on appeal has not been accepted for filing, and the appeal is not yet ready for disposition. This Motion is made in good faith and not for purposes of delay.

WHEREFORE, Respondents respectfully request that this Court grant them permission to serve and file their initial brief outside the deadlines set by Rules 208 and 240, SCACR, extend the time for Respondents to serve and file their initial brief by thirty (30) days from the date of this Motion, September 16, 2026, and grant such other and further relief as the Court deems just and proper.

[Signature on following page]

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esq. (SC Bar No. 101906)

751 Johnnie Dodds Boulevard, Suite 200

Mount Pleasant, SC 29464

(843) 814-8181 (Phone)

(843) 284-3953 (Fax)

jesse@jessesanchezlaw.com

Attorney for Respondents

August 18, 2026

Mount Pleasant, South Carolina

RECEIVED

Aug 18 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Mikell R. Scarborough, Master in Equity

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Joseph W. Keating d/b/a Keating Tree Service
and James Island Preservation Trust, Joseph W.
Keating, as Trustee,

Third-Party Defendants.

PROOF OF SERVICE

I, the undersigned, certify that I have served *Respondents' Motion for First Extension of Time to Serve and File Initial Brief and Designation of Matter and Notice of Appearance* for the undersigned on Appellant by depositing a copy of it in the United States Mail, first-class postage prepaid, on August 18, 2026, addressed to:

Joseph W. Keating, pro se
1355 River Road
Johns Island, SC 29455

And courtesy email to: keatingjoew@gmail.com

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esq. (SC Bar No. 101906)

751 Johnnie Dodds Boulevard, Suite 200

Mount Pleasant, SC 29464

(843) 814-8181 (Phone)

(843) 284-3953 (Fax)

jesse@jessesanchezlaw.com

Attorney for Respondents

August 18, 2026

Mount Pleasant, South Carolina

August 18, 2026



VIA EMAIL AND U.S. FIRST CLASS MAIL

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

RECEIVED

Aug 18 2026

SC Court of Appeals

Re: Joseph W. Keating, Appellant, v. Harrison Wilder, Jr., Hope Wilder Brown, and Estate of Harrison Wilder, Respondents; Appellate Case No. 2026-001033; Respondents' Motion for First Extension of Time and Notice of Appearance

Dear Ms. Kitchings:

On behalf of Respondents Harrison Wilder, Jr., Hope Wilder Brown, and the Estate of Harrison Wilder, and in response to the Court's letter dated August 14, 2026, enclosed for filing please find:

1. Respondents' Motion for First Extension of Time to Serve and File Initial Brief and Designation of Matter,
2. Notice of Appearance for the undersigned as appellate counsel for Respondents, and
3. Proof of Service.

A check from The Law Office of Jesse Sanchez, LLC in the amount of \$50.00 for the filing fee is enclosed with the mailed copy of this letter. All counsel of record and Appellant, who is proceeding pro se, are copied on this correspondence. Should the Court have any questions or require anything further, please do not hesitate to contact me directly.

Sincerely,

s/Jesse Sanchez

Jesse Sanchez, Esq. (SC Bar No. 101906)
Attorney for Respondents

Enclosure: As stated.

cc: Joseph W. Keating, pro se (via U.S. Mail and Email)
Brent S. Halversen, Esq. (via Email)
Daniel S. Slotchiver, Esq. (via Email)

THE LAW OFFICE OF JESSE SANCHEZ, LLC

751 Johnnie Dodds Blvd., Suite 200, Mount Pleasant, SC 29464 P: 843.814.8181 F: 843.284.3953
jesse@jessesanchezlaw.com jessesanchezlaw.com