

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

**RECEIVED**

**Sep 14 2026**

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

---

**SC Court of Appeals**

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 EXTENSION OF TIME  
TO SERVE AND FILE INITIAL BRIEF AND DESIGNATION OF MATTER

---

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Respondents Harrison Wilder, Jr., Hope Wilder Brown, and the Estate of Harrison Wilder respectfully move this Court for a second extension of thirty (30) days, until October 16, 2026, within which to serve and file their initial brief and designation of matter. In support of this Motion, Respondents would show the following:

1. By order dated August 28, 2026, the Court granted Respondents' Motion for First Extension of Time and extended the time for Respondents to serve and file their initial brief and designation of matter through September 16, 2026.

2. Undersigned counsel was retained as appellate counsel for Respondents on or about August 16, 2026 and did not represent Respondents in the proceedings below. Since his retention, counsel has been working diligently 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. Additional time is required to complete that review and the brief.

3. This extension is also requested due to hearings and deadlines in other matters, including matters currently before this Court.

4. The requested extension is brief and will not prejudice Appellant or materially delay the appeal. Respondent's request is made in good faith and not for purposes of delay.

5. Respondents further request that all deadlines applicable to Respondents, including the deadline to serve and file their initial brief and designation of matter, be held in abeyance while the Court considers this Motion.

WHEREFORE, Respondents respectfully request that this Court grant them a extension of time to serve and file their initial brief and designation of matter, through and including October 16, 2026, hold all deadlines applicable to Respondents in abeyance while this Motion is under consideration, 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

September 14, 2026

Mount Pleasant, South Carolina

**RECEIVED**

**Sep 14 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

---

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.

---

PROOF OF SERVICE

---

I, the undersigned, certify that I have served Respondents' Motion for Second Extension of Time to Serve and File Initial Brief and Designation of Matter on Appellant by depositing a copy of it in the United States Mail, first-class postage prepaid, on September 14, 2026, addressed to:

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

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

September 14, 2026  
Mount Pleasant, South Carolina

September 14, 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



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 Second Extension of Time

Dear Ms. Kitchings:

On behalf of Respondents Harrison Wilder, Jr., Hope Wilder Brown, and the Estate of Harrison Wilder, enclosed for filing please find:

1. Respondents' Motion for Extension of Time to Serve and File Initial Brief and Designation of Matter, and
2. 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)  
Brent S. Halversen, Esq. (via Email)  
Daniel S. Slotchiver, Esq. (via Email)