

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master in Equity

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JAN 12 2015

Case No. 2013-CP-10-4248

SC Court of Appeals

Belle Hall Plantation Homeowner's Association, Inc.;
John A. Murray, Trustee of the John E. Murray and
Gloria C. Murray Family Trust Respondents,

v.

David Conor Keys & Karen Keys.....Appellants.

NOTICE OF MOTION AND MOTION
FOR A SECOND EXTENSION OF TIME TO
FILE INITIAL BRIEF OF THE APPELLANTS

The Appellants, David Conor Keys & Karen Keys by and through their undersigned counsel, hereby move before this Court for an Order granting Appellants a thirty (30) day extension of time, or until February 10, 2015, in which to file the Appellant's Initial Brief. The grounds for the motion are as follows:

1. The Respondent Trust sent this Court a letter on December 8, 2014, which asserted that the Master in Equity is still reviewing a proposed formal order (as referenced by an August 20, 2014, Form 4 Order) submitted to the Master on November 3, 2014 by the Respondent Trust. Therefore the Respondent asserted this appeal was premature (Appellants would note that this letter was not in the form of a motion to dismiss).

2. Thereafter by a letter dated December 23, 2014, this Court requested that Appellants respond to the Respondent Trust's letter.

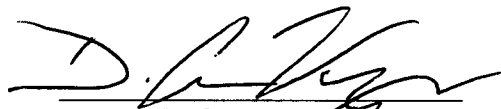
3. On December 23, 2014, Appellants sent this Court a response letter wherein Appellants' asserted that they did not believe that the Master was still reviewing the proposed formal order submitted to him on November 3, 2014, but that Appellants' believed the appropriate course of action to resolve that matter was ask the Master if he intended to execute the proposed order.

4. On December 29, 2014, the Respondent Trust's Counsel sent the Master's Law Clerk and email inquiring whether or not the Master would be issuing the formal order. To

which the Master's Clerk responded acknowledging receipt of that email and stated that he would follow up with the Master on the matter.

5. To date the parties to this appeal have not yet heard the Master's response to the inquiry.

6. Appellants would assert that that it would be in the interest of judicial economy to hear the Master's response to this matter prior to the Appellants filing their initial brief. Therefore Appellants request a thirty day extension of time in which to file Appellant's initial brief.



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*Individually and as
Attorney for Appellant.*

January 7, 20115
Charleston, SC

Other Counsel of Record:

Amanda Reece
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871 Low Country Blvd. #200
Mt. Pleasant, SC 29464
*Attorney for John A. Murray,
Trustee of the John E. Murray and
Gloria C. Murray Family Trust*

Stephanie C. Trotter
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*Attorney for Belle Hall Plantation
Homeowner's Association, Inc.*

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John A. Murray, Trustee of the John E. Murray and
Gloria C. Murray Family Trust Respondents,

v.

David Conor Keys & Karen Keys..... Appellants.

PROOF OF SERVICE

I certify that on this 7th day of January 2015, I have served the Motion for an Extension to File Appellants Initial Brief upon the Clerk of Court and all counsel of record by depositing a copy in the United States Mail, postage prepaid addressed as follows:

Amanda Reece
Reece Law Firm, LLC
871 Low Country Blvd., Suite 200
Mt. Pleasant, SC 29464
*Attorney for John A. Murray,
Trustee of the John E. Murray and
Gloria C. Murray Family Trust*

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January 7, 2015

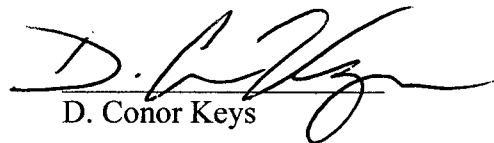
The Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211

**RE: Belle Hall Plantation Homeowner's Association, Inc. v. John A. Murray, Trustee of John E. Murray Gloria C. Murray Family Trust
Case: 2013-CP-10-4248**

Ms. Kitchings:

Please find enclosed, with regard to the above referenced matter, the Appellants, David Conor Keys and Karen Keys' Second Notice of Motion and Motion for an Extension of Time to File Appellants Initial Brief, along with a corresponding check for the same.

With kind regards,


D. Conor Keys

Enclosures:
(as stated)
CC:
Amanda Reece
Stephanie Trotter

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SC Court of Appeals

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SC Court of Appeals

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