

77429

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master in Equity

Case Number: 2013-CP-10-04248
Appellate Case Number: 2014-002018

RECEIVED
SEP 30 2015
SC Court of Appeals

Belle Hall Plantation Homeowner's Association, Inc. Plaintiff,

v.

John A. Murray, Trustee of the John E. Murray &
Gloria C. Murray Family Trust, Respondent,

David Conor Keys and Karen Keys
are Third Party Plaintiffs, Appellants.

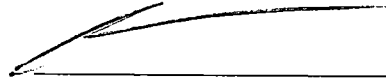
RESPONDENT'S MOTION TO CHANGE CAPTION

Respondent hereby moves before this Court to change the caption to read for ease of reference as follows: *Belle Hall Plantation Homeowner's Association, Inc.* shall be referred to herein as Plaintiff; and *John A. Murray, Trustee of the John D. Murray & Gloria C. Murray Family Trust*, shall be referred to herein as Respondent; and *David Conor Keys and Karen Keys* shall be referred to as Third- Party Plaintiffs, Appellants.

(Signature page to follow)

September 26, 2015

RESPECTFULLY SUBMITTED,



Amanda Reece, SC Bar # 81252
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Attorney for Respondent

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David Conor Keys & Karen Keys are the Third Party Plaintiffs, Appellants


PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellants and the counsel for the Plaintiff, with a copy of the *Motion to Change Caption* by mailing copies of the same by United States Mail with first class postage pre-paid to the following addresses:

David Conor Keys, Esq.
843 Robert E. Lee Boulevard
Charleston, SC 29412
Third Party Plaintiffs, Appellants

Stephanie Trotter, Esq.
McCabe Trotter & Beverly, PC
P.O. Box 212069
Columbia, SC 29221-3200
Attorney for Belle Hall Plantation Homeowners Association, Inc.

September 26, 2015
Mt. Pleasant, South Carolina



Amanda Reece, Esq.
Reece Law Firm, LLC
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AMANDA REECE
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SEP 30 2015
SC Court of Appeals

September 26, 2015

VIA USPS First Class Mail

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

Re: *Belle Hall Plantation Homeowner's Association, Plaintiff v. John A. Murray, Trustee of the John E. Murray and Gloria C. Murray Family Trust, Respondent and David Conor Keys & Karen Keys, are Third Party Plaintiffs and Appellants*

Appellate Case Number: 2014-002018

Dear Ms. Kitchings:

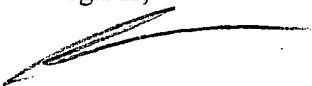
Enclosed for service please find the original and seven (7) copies of a *Motion Out of Time*, together with the conditionally filed *Initial Brief of Respondent*, (original and one (1) copy) and *Respondent's Designation of Record* (original and one (1) copy) in reference to the above matter. I have also enclosed the required Proof of Service for each document.

Further to this, I have enclosed an original and seven (7) copies of a *Motion to Change Caption*, and Proof of Service.

Please also accept a check in the amount of \$50 representing the two (2) filing fees for the above referenced motions. I have provided a self-addressed pre-paid envelope for the return of the copies.

If you should require anything further, please do not hesitate to contact me.

Warm Regards,



Amanda M. Reece, Esq.

Cc: Stephanie C. Trotter, Esq.
David Conor Keys, Esq.

AMANDA REECE
217 LUCAS STREET, UNIT J
MT PLEASANT, SC 29464

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