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SEP 30 2015

SC Court of Appeals

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

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

**MOTION FOR THE COURT TO ACCEPT THE DEFENDANTS'  
INITIAL BRIEF AND DESIGNATION OF RECORD OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL OUT OF TIME**

Pursuant to Rule 240 and 263 (b), SCACR, Defendants hereby moves this Court to accept for filing out of time the initial brief of respondent and designation of matter to be included in the record on appeal. The initial brief of respondent and designation of matter to be included in the record on appeal were due to be filed on September 21, 2015. Counsel for the Respondent has been working diligently to prepare the initial brief of respondent and designation of matter in the record in a timely matter and would ask that the initial brief of respondent and designation of matter to be included in the record on appeal are conditionally filed with this motion and served on all other parties.

September 26, 2015

Respectfully Submitted,



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Amanda Reece, SC Bar # 81252  
REECE LAW FIRM, LLC  
217 Lucas Street, Unit J  
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(843)209-9830  
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Attorney for Respondent

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

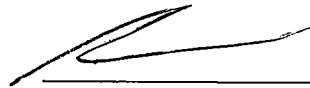
**PROOF OF SERVICE**

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 for the Court to Accept the Initial Brief of Respondents and Respondent's Designation of Matter to be Included in the Record on Appeal Out of Time* and the conditionally filed *Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal* 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 and 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



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Amanda Reece, Esq.  
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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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