

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master in Equity

Case No. 2013-CP-10-4248

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

v.

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

David Conor Keys & Karen Keys, Third-Party Plaintiffs,.....Appellants.

NOTICE OF MOTION AND MOTION
FOR A FIRST EXENTION OF TIME TO FILE
APPELLANT'S INITIAL REPLY BRIEF

The Appellants, David Conor Keys and Karen Keys by individually and by and through the undersigned counsel, hereby move before this Court for an Order granting Appellants a ten (10) day extension of time in which to file Appellant's Initial Reply Brief, which was received by Appellants, via email, on Sunday, September 27, 2015, and thereafter a hard copy of which was received by first class mail on September 30, 2015. The grounds for the motion are as follows:

1. On September 29, 2015, Appellants delivered their second child.
2. Shortly thereafter historic weather and flooding, which has gripped this State occurred. The combination of these two events occurring shortly after Appellant's received Respondent's initial brief has delayed Appellants in timely completing their Reply to Respondent's initial brief. Therefore, Appellants request a ten day extension of time in which to file Appellant's initial brief.

[SIGNATURE BLOCK TO FOLLOW]

October 7, 2015
Charleston, SC



D. Conor Keys
843 Robert E. Lee Blvd.
Charleston, SC 29412
Phone: 843-906-3998
Facsimile: 843-971-6055
dconorkeys@gmail.com
*Individually and as
Attorney for Appellant.*

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

OCT 12 2015
SC Court of Appeals

The Honorable Mikell R. Scarborough, Master in Equity

Case No. 2013-CP-10-4248

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

v.

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

David Conor Keys & Karen Keys, Third-Party Plaintiffs,.....Appellants.

PROOF OF SERVICE

I certify that on this 7th day of October 2015, I have served the Motion for Extension of Time to file the Initial Reply Brief of Appellants upon all counsel of record by depositing a copy in the United States Mail, postage prepaid addressed as follows:

Amanda Reece
Reece Law Firm, LLC
217 Lucas Street, Unit J
Mt. Pleasant, SC 29464
*Attorney for John A. Murray,
Trustee of the John E. Murray and
Gloria C. Murray Family Trust*

Stephanie C. Trotter
McCabe Trotter & Beverly, P.C.
P.O. Box 212069
Columbia, SC 29221
*Attorney for Belle Hall Plantation
Homeowner's Association, Inc.*


D. Conor Keys

D. Conor Keys, Esq.
843 Robert E. Lee, Blvd.
Charleston, SC 29412
Phone: 843-906-3998
dconorkeys@gmail.com

October 7, 2015,

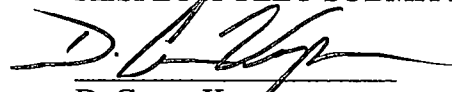
The Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

**RE: Belle Hall Plantation Homeowner's Association, Inc. v. John A.
Murray, Trustee of John E. Murray Gloria C. Murray Family Trust
Appellate Case No.: 2014-002018**

Madam Clerk,

Please find enclosed, Appellants, Motion for a First Extension of Time to File Appellants' Initial Reply Brief, as well as a corresponding check for the same. I kindly request that you file the motion.

RESPECTFULLY SUBMITTED,



D. Conor Keys

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

D. Conor Keys
843 Robert E. Lee Blvd.
Charleston, SC 29412

The Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals



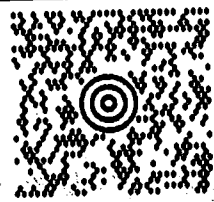
JENNY ABBOTT KITCHINGS
1220 SENATE ST
COLUMBIA SC 29201-3769
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CONOR KEYS
(843) 906-3998
THE UPS STORE #3069
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520 FOLLY RD
CHARLESTON SC 29412-3019

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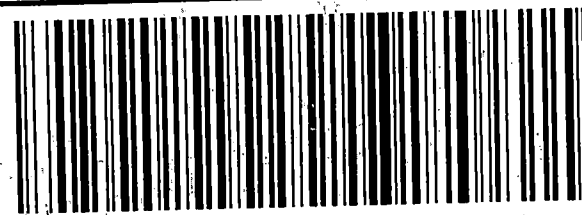


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