

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

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DEC 01 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
..... Appellants

**MOTION FOR THE COURT TO ACCEPT
BRIEF OF RESPONDENT OUT OF TIME**

Pursuant to Rule 240 and 263 (b), SCACR, Respondent hereby moves this Court to accept for filing out of time the brief of respondent. The brief of respondent was due to be filed on November 25, 2015 and would ask that the brief of respondent be conditionally filed with this motion and served on all other parties.

(SIGNATURE PAGE TO FOLLOW)

November 30, 2015

Respectfully Submitted,



Amanda Reece, SC Bar # 81252
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Attorney for Respondent

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David Conor Keys & Karen Keys, Appellants.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellant and the Respondent, with a copy of the *Motion out of Time to Accept Brief of Respondent* and conditionally accepted *Brief of Respondent* and 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
Appellants

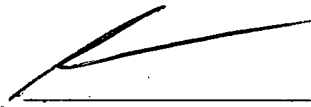
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Stephanie Trotter, Esq.
McCabe Trotter & Beverly, PC
P.O. Box 212069
Columbia, SC 29221-3200
Attorney for Plaintiff.

November 30, 2015



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November 30, 2015

VIA FEDEX

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

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, Appellants*

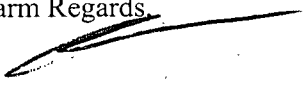
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Dear Ms. Kitchings:

Enclosed for service please find an original and seven (7) copies of *Motion out of Time to Accept Brief of Respondent and Proof of Service*. Further, please also find an unbound *Brief of Respondent* and fifteen (15) bound copies of *Brief of Respondent*, all of which include *Certificate of Counsel* and *Proof of Service*. I have also included a check in the amount of \$25.00 representing the filing fee.

As always, if you should require anything further, please do not hesitate to contact me.

Warm Regards,


Amanda M. Reece, Esq.

Cc: Stephanie C. Trotter, Esq. (with enclosures, via Federal Express)
David Conor Keys, Esq. (with enclosures, via Federal Express)

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