

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

The Honorable Eugene C. Griffith, Circuit Court Judge

Appellate Case No. 2020001472

Vidhyaben R. Patel, Individually and as Co-Personal Representative of the Estate of Rameschandra Prabhudas Patel, and Darshak Kumar Patel, Individually and as Co-Personal Representative of the Estate of Rameschandra Prabhudas Patel Appellants/Respondents,

v.

Hardik R. Patel, Anal H. Patel and AAHARVID, LLC.....Respondents/Appellants.

OBJECTION TO MOTION FOR COSTS

Vidhyaben R. Patel, Individually and as Co-Personal Representative of the Estate of Rameschandra Prabhudas Patel, and Darshak Kumar Patel, Individually and as Co-Personal Representative of the Estate of Rameschandra Prabhudas Patel, the Appellants/Respondents, hereby object to an award of costs and attorney’s fees.

This is a sad and tragic case in which a family has become divided. Rameschandra Prabhudas Patel, deceased, was a businessman originally from India. His older son, Hardik R. Patel came to the United States before his father and mother. The residence in which his mother and father lived, together with a convenience store were put in the name of Hardik Patel, Anal H. Patel or LLCs owned by Hardik R. Patel and/or Anal H. Patel, his wife. Respondents/Appellants

took the position that Hardik R. Patel and/or his wife owned the real estate. At one time, evicting Hardik R. Patel's mother from her residence.

The lower court ruled against the Appellants/Respondents (mother and younger son of the decedent.) The trial court denied costs and attorney's fees to Respondents/Appellants (older son and his wife.) Because the trial court did not award legal costs and attorney's fees and because the facts of the case were so harsh, the appellate court should not add insult to injury by requiring the mother and younger son to pay legal costs and attorney's fees.

/s/ Samuel M. Price, Jr.
Samuel M. Price, Jr., SC Bar No. 4566
Jennifer Dowd Nichols, SC Bar No. 75916
NICHOLS & PRICE
1413 Main Street
P. O. Drawer 836
Newberry, SC 29108
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ATTORNEY FOR APPELLANTS/RESPONDENTS

June 20, 2024

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Jun 20 2024

SC Court of Appeals

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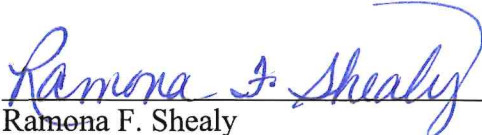
v.

Hardik R. Patel, Anal H. Patel and AAHARVID, LLC.....Respondents/Appellants.

PROOF OF SERVICE

I, Ramona F. Shealy, an employee with Nichols & Price, Attorneys at Law, do hereby
certify that on June 20, 2024, I served a copy of the **Objection to Motion for Costs** in the above
captioned case on the following individuals by electronic mail, addressed as follows:

Desa Ballard, Esquire
Ballard & Watson, Attorneys at Law
desab@desaballard.com



Ramona F. Shealy

June 20, 2024
Newberry, South Carolina

RECEIVED

Jun 20 2024

SC Court of Appeals

Nichols & Price

Attorneys at Law

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Jennifer Dowd Nichols, Esquire

Samuel M. Price, Jr., Esquire

June 20, 2024

Via Email (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings

Clerk of Court

South Carolina Court of Appeals

P. O. Box 11629

Columbia, South Carolina 29211

RE: Vidhyaben R. Patel, et al. vs. Hardik R. Patel, et al.
Case No.: 2020-001472

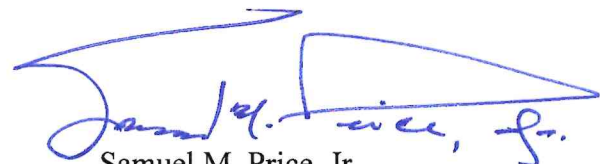
Dear Ms. Kitchings:

I enclose herewith Objection to Motion for Costs together with Proof of Service for filing in the above captioned matter.

By copy of this letter and as evidenced by the Proof of Service, this filing has been served upon counsel for Respondents/Appellants.

If you have any questions or need additional information, please do not hesitate to contact me.

Respectfully,



Samuel M. Price, Jr.

rfs

Enclosures

CC: Via Email
Desa Ballard, Esquire