

STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM Horry COUNTY  
Court of Common Pleas

170339

William H. Seals, Jr., Circuit Court Judge

Civil Action No: 2009-CP-26-5743

Hotel and Motel Holdings, LLC.....Respondent,

v.

BJC Enterprises, LLC, Wendy J. Bellamy, Americana, Inc. a/k/a Americana Motel of Myrtle Beach, Inc., Mozingo & Wallace Architects, LLC, Kersi S. Shroff, Shroff Management, Inc., .....Defendants

of whom

BJC Enterprises, LLC, Wendy J. Bellamy, Americana, Inc. a/k/a Americana Motel of Myrtle Beach, Inc., .....Appellants

v.

First Palmetto Savings Bank, F.S.B., Jack Jones, Donald D. Goodwin, and Bhupendra Patel .....Respondents

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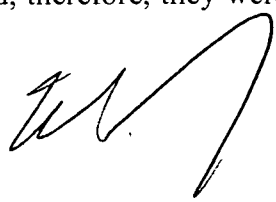
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**MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF**

**SC Court of Appeals**

Counsel for Respondent, Bhupendra Patel, hereby respectfully moves the Court, pursuant to Rule 224, SCACR, for an extension of time to file Respondent Patel's Initial Brief.

Respondent Patel and his counsel were of the opinion that all issues between the Appellants and Respondent Patel had been settled and, therefore, they were surprised that those

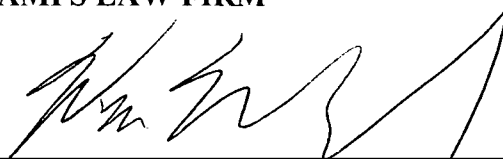


issues were part and parcel of the Appellants' Initial Brief. Therefore, the undersigned counsel had not anticipated that he would be served with Appellants' Initial Brief.

The undersigned counsel has confirmed with Appellants' counsel that all issues between their respective clients had been settled; however, Appellants' counsel has not yet copied him with any such notification to the Court of Appeals. Therefore, as good cause exists for an extension of time for Respondent Patel to file his Initial Brief, the undersigned respectfully prays to the Court for an order granting Respondent Patel an extension of thirty (30) days to file his Initial Brief.

November 6, 2013

**DESCHAMPS LAW FIRM**



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Attorney for Defendants: Kersi S. Shroff and Shroff Management, Inc.

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM HORRY COUNTY  
William H. Seals, Jr., Circuit Court Judge

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Civil Action No: 2009-CP-26-5743

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Hotel and Motel Holdings, LLC, Respondent,

vs.

BJC Enterprises, LLC, Wendy J. Bellamy, Americana, Inc.,  
a/k/a Americana Motel of Myrtle Beach, Inc., Mozingo &  
Wallace Architects, LLC, Kersi S. Shroff, and Shroff Management,  
Inc., Defendants,

BJC Enterprises, LLC, Wendy J. Bellamy, Americana, Inc.,  
a/k/a Americana Motel of Myrtle Beach, Inc., Appellants,

v.

First Palmetto Savings Bank, F.S.B., Jack Jones, Donald D. Goodwin,  
and Bhupendra Patel, Respondents.

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PROOF OF SERVICE

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I certify that I have served one (1) copy of the Motion for Extension of Time to File Initial Brief of Respondent upon counsel for Appellants depositing a copy of the same in the United States Mail, postage prepaid, on November 8, 2013, to the following address:

Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

Audra M. Byrd  
R. Wayne Byrd  
Turner Padgett Graham & Laney, PA  
Post Office Box 2116

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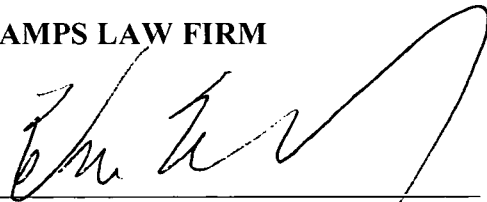
Myrtle Beach, SC 29578  
Attorneys for Respondents Hotel and Motel, LLC,  
Donald Goodwin and Jack Jones

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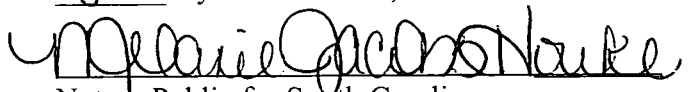
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**DESCHAMPS LAW FIRM**



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SWORN to before me this  
8<sup>th</sup> day of November, 2013

  
Notary Public for South Carolina  
My Commission Expires: 01/30/2020

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SC Court of Appeal

**DESCHAMPS LAW FIRM**  
**ATTORNEYS-AT-LAW**

[www.deschampslaw.com](http://www.deschampslaw.com)

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BHUMI A. PATEL, ESQ.  
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TELEPHONE: (843) 448-2391  
FACSIMILE: (843) 448-3308

November 8, 2013

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Clerk of Court  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: Hotel and Motel Holdings, LLC vs. BJC Enterprises, LLC, et al  
Case No.: 2009-CP-26-5743  
Appellate Case No.: 2011-198106

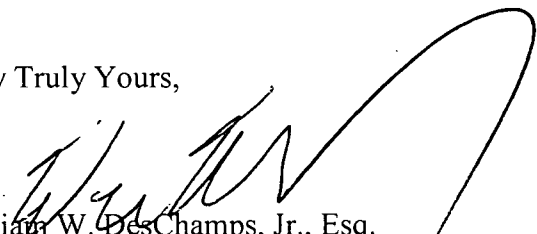
Dear Ms. Kitchings:

Enclosed herewith is the Respondent Patel's original Motion for Extension of Time to File Initial Brief and Proof of Service in the above referenced case and DesChamps Law Firm Check Number 7639 in the amount of \$25.00 for filing of said motion. Also, I have enclosed a copy of Respondent's Motion for Extension of Time to File Initial Brief to be stamped the date received and returned to me in the self-addressed stamped envelope enclosed. By copy of this letter I am serving all other counsel of record documents as are enclosed.

If you have any questions regarding the enclosed documents, please do not hesitate to contact me.

With kind regards, I am

Very Truly Yours,



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Attorney for Respondent Bhupendra Patel

/mjh

Enclosures

cc: Audra Byrd  
R. Wayne Byrd  
Kathryn M. Cook  
William H. Short  
Susan P. MacDonald

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