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Mar 18 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Charles B. Simmons, Jr., Master-In-Equity

Trial Court Case No. 2024-CP-23-04910
Appellate Case No. 2025-002386

Estate of Rajiv Kumar Lakhaney, Deceased,

Appellant,

v.

Harbor Town Association, Inc.; Oriole Properties, LLC;
Thomas and Son Properties, LLC; and
Kelley Yarborough Woody, Esq., Guardian ad Litem Nisi,

Respondents.

**MOTION FOR SECOND EXTENSION OF TIME FOR APPELLANT TO FILE INITIAL
BRIEF AND DESIGNATION OF MATTER**

Appellant, the Estate of Rajiv Kumar Lakhaney, Deceased, by and through undersigned counsel, respectfully moves this Court pursuant to Rule 263(b), SCACR, for a second extension of time in which to file Appellant's Initial Brief and Designation of Matter. As grounds for this Motion, Appellant would respectfully show the Court as follows:

1. Appellant previously received a first extension of time, and Appellant's current deadline to file the Initial Brief and Designation of Matter is March 25, 2026.
2. Appellant respectfully requests a further extension of thirty (30) days, up to and including April 24, 2026, in which to file the Initial Brief and Designation of Matter.

3. Good cause exists for the requested extension. Due to counsel's current workload and other existing litigation obligations, additional time is necessary to complete the Initial Brief and Designation of Matter in a thorough and proper manner.

4. This request is made in good faith and not for purposes of delay. Appellant respectfully submits that the requested extension will not unfairly prejudice Respondents.

WHEREFORE, Appellant respectfully requests that the Court enter an order extending the deadline for Appellant to file the Initial Brief and Designation of Matter by thirty (30) days, up to and including April 24, 2026, and granting such other and further relief as the Court deems just and proper.

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC**

s/J. Boone Aiken, IV
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March 18, 2026
Columbia, South Carolina

Other Counsel of Record:

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Attorneys for Harbor Town Association, Inc.

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Harbor Town Association, Inc.; Oriole Properties, LLC;
Thomas and Son Properties, LLC; and
Kelley Yarborough Woody, Esq., Guardian ad Litem Nisi,

Respondents.

PROOF OF SERVICE

I certify that I have served the foregoing Motion for Second Extension of Time for Appellant to File Initial Brief and Designation of Matter on counsel of record on March 18, 2026, by electronic mail addressed as follows:

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March 18, 2026

VIA E-MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
E-Mail: ctappfilings@sccourts.org

Re: Rule 263(b) Correspondence – Transmittal of Motion for Second Extension of Time to File Initial Brief and Designation of Matter
Estate of Rajiv Kumar Lakhaney, Deceased v. Harbor Town Association, Inc., et al.
Appellate Case No. 2025-002386

Dear Ms. Kitchings:

This firm represents the Appellant in the above matter. Please find enclosed for filing Appellant's Motion for Second Extension of Time to File Initial Brief and Designation of Matter. Pursuant to Rule 263(b), SCACR, and due to the workload of counsel, Appellant respectfully requests a further 30-day extension of time in which to file the Appellant's Initial Brief and Designation of Matter, making them due on April 24, 2026.

We are currently coordinating submission of the \$50 filing fee associated with this request, which will be paid by check payable to the South Carolina Court of Appeals and hand-delivered as soon as practicable.

Please note service on counsel of record by copy of the enclosed motion. In the meantime, we ask that the current filing deadline – March 25, 2026 – be stayed pending resolution of this request. If you have any questions, I would be happy to address them. Thank you for your time and consideration in this matter.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC**

/s/ J. Boone Aiken, IV
J. Boone Aiken, IV

March 18, 2026

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With electronic copy to:

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