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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

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

Harbor Town Association, Inc., Respondent,

v.

Rajiv Kumar Lakhaney, Deceased, deceased; and any children and heirs at law, distributes and devisees, and if any be deceased then any persons entitled to claim under or through them; also all other persons unknown claiming any right, title, interest or lien upon the real property described in the complaint herein, any unknown adults being a class designated as John Doe; and any unknown minors or persons under disability or in the military service being a class designated as Richard Roe, Defendants,

of which Rajiv Kumar Lakhaney, Deceased is the Appellant, and Oriole Properties, LLC, Thomas and Son Properties, LLC, and Kelley Yarborough Woody, Esq, Guardian ad Litem Nisi are Respondents.

PROOF OF SERVICE

I certify that I have served *Final Brief of Appellant* and the *Final Reply Brief of Appellant* on counsel of record on September 28, 2026, by electronic mail to the following:

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September 28, 2026

VIA E-MAIL

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

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Re: Appellant's Final Brief, Appellant's Final Reply Brief, and Record on Appeal

**Estate of Rajiv Kumar Lakhaneey, Deceased v. Harbor Town Association, Inc., et al.
Appellate Case No. 2025-002386**

Dear Ms. Kitchings:

This firm represents the Appellant in the above-captioned matter. Attached for filing are the original Record on Appeal, in two volumes, the original Final Brief of Appellant, and the original Final Reply Brief of Appellant, submitted in electronic form as permitted by the Court's August 7, 2026 letter, together with Proof of Service for the final briefs. The Record on Appeal was previously served on all counsel of record, and Proof of Service for the Record was filed with the Court at that time.

We are also hand delivering today, simultaneously with this filing, one bound paper copy of the Record on Appeal, in two volumes, one bound paper copy of the Final Brief of Appellant, and one bound paper copy of the Final Reply Brief of Appellant. Each document bears the caption prescribed in the Court's August 7, 2026 letter.

Should you have any questions, please do not hesitate to contact me. Thank you for your assistance in this matter.

Respectfully submitted,

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

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

4909-5518-4852

September 28, 2026

Page 2

With electronic copy to:

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