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Oct 29 2026

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA

In the Supreme Court

Appellate Case No. 2026-002158

Devan Chokshi, Individually and as Personal Representative of the Estate of Freni Hazare,
Deceased; Vatsal Chokshi, Individually and as Personal Representative of the Estate of Dhruv
Chokshi, Deceased,

Respondents,

v.

BIF-Summerville Station, LLC; PAC-Summerville, LLC; Beach Investment Fund, L.P.; Beach
Real Estate Funds, LLC; Beach Co.; Lincoln BP Management, Inc.; Lincoln Property Company
National, LLC; John/Mary Does 1-3; Corporations XYZ 1-3,

Defendants,

of which BIF-Summerville Station, LLC, and PAC-Summerville, LLC are the Petitioners.

**RESPONDENTS' MOTION FOR EXTENSION OF TIME
TO FILE RETURN TO PETITION FOR WRIT OF CERTIORARI**

Pursuant to Rule 242(f), SCACR, and this Court's Order Regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals (dated July 16, 2014), Respondents Devan Chokshi, Individually and as Personal Representative of the Estate of Freni Hazare, and Vatsal Chokshi, Individually and as Personal Representative of the Estate of Dhruv Chokshi, through undersigned counsel, respectfully request a ten (10) day extension of time to file Respondents' Return to the Petition for Writ of Certiorari. This is Respondents' first request for an extension of time as to this filing.

Good cause exists for the requested extension. Deadlines and hearings in undersigned counsel's other matters in the Court of Appeals and the circuit courts, none of which could be

deferred, have fallen within the return period, required immediate attention, and affected the schedule for completing the Return.

The Return is currently due on Friday, October 30, 2026. If this Motion is granted, the new deadline will be Monday, November 9, 2026. The requested ten (10) days falls well within the twenty (20) day cumulative limit permitted under this Court's Order Regarding Extensions, and no prior extensions have been sought or granted at any stage of these proceedings before this Court. The extension will serve the interests of justice by allowing Respondents' counsel adequate time to properly address the arguments raised in the Petition. Respondents do not request this extension for any improper purpose or to cause delay.

Respondents also respectfully request that this Court hold all deadlines in this matter in abeyance until an Order has been issued on this Motion.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/ Jesse Sanchez

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Attorney for Respondents

October 29, 2026
Mount Pleasant, South Carolina