

JAMES W. FAYSSOUX, SR.
JAMES W. FAYSSOUX, JR.



PAUL S. LANDIS
T. HUNT REID

June 9, 2014

Hon. Daniel E. Shearouse
Clerk of Court
The Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RECEIVED

JUN 11 2014

S.C. SUPREME COURT

RE: Amrik Singh v. City of Greenville
Appellate Case No. 2012-212321

Dear Clerk:

I am in receipt of your letter dated May 30, 2014 inquiring into the status of the hotel building and the justiciability of the above-referenced case. Yes, the building was totally demolished in early 2011. There is no trace of Mr. Singh's existence as a hotel operator at 755 Wade Hampton Boulevard, Greenville, South Carolina.

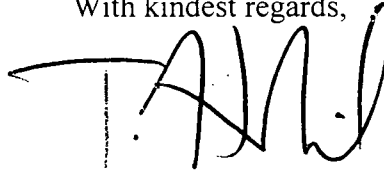
However, the City's demolition of Mr. Singh's hotel does not render the case a moot point; it validates his claim. Following the City of Greenville's illegal revocation of Mr. Singh's business license, he was forced to shut down operations. As a result, Mr. Singh defaulted on his mortgage with Pinnacle Bank, who foreclosed shortly thereafter, putting him in severe financial hardship. Shortly thereafter, the City demolished the hotel building and began redeveloping the property along a prime commercial corridor. Mr. Singh cannot get his hotel back no matter what the Court may decide, which is thrust of his case. For the Court to render this appeal as moot simply because the hotel building no longer exists would be to ignore the fact that Mr. Singh had a vested property right in his business license.

Also, Mr. Singh's appeal to the Supreme Court of South Carolina is necessary to resolve at least two legal controversies: (1) the municipal separation of powers issues raised within Appellant's Writ of Certiorari; and, (2) the damages sustained by Mr. Singh at the hands of the City of Greenville, by virtue of this appeal and in a collateral action in the Court of Common Pleas for Greenville County. As you may know, Mr. Singh is also the Plaintiff in a companion case, *Singh v. City of Greenville*, C.A. No. 2007-CP-23-2417, wherein he alleges the City is liable under theories of breach of contract, fraud, inverse condemnation, fifth amendment takings and violation of 42 U.S.C. §1983, among other claims. The extent of Mr. Singh's alleged damages turns upon the outcome of this appeal. Although some causes of action may be dismissed with the Court's affirmation of the lower court's ruling, other causes of action would be buttressed by the same ruling.

Furthermore, even if Court were to find that continuation of this matter to have no practical legal effect, it should take jurisdiction to determine the recurring dilemma of when a municipality has properly delegated its legislative authority.

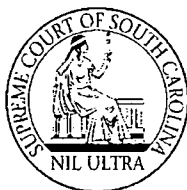
Accordingly, I respectfully request the Supreme Court find this case is not moot and to render its decision on the merits. I would be glad to elaborate further upon the issues raised in your letter should the Court view matters differently.

With kindest regards,

A handwritten signature in black ink, appearing to read 'T. Hunt Reid'. The signature is stylized with a large, sweeping 'T' and 'H'.

T. Hunt Reid
Attorney for Appellant

Cc: Robert P. Coler, City of Greenville



The Supreme Court of South Carolina

DANIEL E. SHEAROUSE
CLERK OF COURT

BRENDA F. SHEALY
CHIEF DEPUTY CLERK

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May 30, 2014

Ryan Lewis Beasley, Esquire
650 E Washington St
Greenville SC 29601-2931

James Walter Fayssoux, Jr., Esquire
209 E. Washington St.
Greenville SC 29601

Re: Amrik Singh v. City of Greenville
Appellate Case No. 2012-212321

Dear Counsel:

It appears that the hotel building involved in this litigation may have been demolished. I ask that you please advise this Court if this is the case. If the building had been demolished, I would also ask you to advise this Court as to why this matter is not now moot. The response should be provided within ten (10) days of the date of this letter.

Very truly yours,

CLERK

cc: Ronald W. McKinney, Esquire

FAY SPOUX

LAW FIRM P.A.

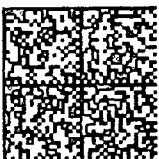
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