

**RECEIVED**

**Jul 22 2021**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM LAURENS COUNTY  
EUGENE C. GRIFFITH, JR., CIRCUIT COURT JUDGE

---

Case No. 2019-CP-30-00140  
Appellate Case No. 2020-001472

---

Vidhyaben R. Patel, Individually and as Co-Personal  
Representative Of the Estate of Rameschandra Prabhudas  
Patel, and Darshak Kumar Patel, Individually and as  
Co-Personal Representative Of the Estate of  
Rameschandra Prabhudas Patel, .....Appellants/Respondents,

v.

Hardik R. Patel, Anal H. Patel and AAHARVID, LLC, .....Respondents/Appellants.

---

**RESPONDENT/APPELLANT’S REPLY DESIGNATIONS**

---

Pursuant to Rule 209, SCACR, Appellant proposes the following be included in the Record on Appeal. Unless otherwise stated, all items designated include exhibits and exclude proof of service, cover sheets, motion forms, and notices. Appellant reserves the right to include additional designations in connection with her initial reply brief or otherwise.

**ORDERS**

1. Order Granting Summary Judgment for Case No.: 2019-CP-46-03009 filed December 29, 2020.

**PLEADINGS**

2. Summons and Complaint for Case No.: 2019-CP-30-00598 filed July 11, 2019

3. Motion to Dismiss, Answer and Counterclaims for Case No.: 2019-CP-30-00598 filed August 1, 2019
4. Motion for Attorney fees with exhibits filed September 8, 2020
5. Affidavit of Attorney's Fees with exhibit filed November 9, 2020
6. Memorandum In Opposition to Motion for Attorneys fees filed January 6, 2021
7. Reply Memorandum to Motion for Attorneys fees filed January 7, 2021
8. Notice of Appeal filed January 25, 2021

### **TRANSCRIPTS**

9. Transcript of Proceedings Deposition for Vidyaben R. Patel dated June 17, 2019

### **OTHER**

10. Email from Desa Ballard to Judge Griffith on October 29, 2020
11. Email from Judge Griffith's clerk to Desa Ballard on November 6, 2020
12. Email correspondences from Jake Moore and Desa Ballard to Judge Griffith on November 10, 2020
13. Email from Desa Ballard to Judge Griffith sending revised Order for Attorney fees dated December 9, 2020
14. Email correspondences between Desa Ballard and Jake Moore on December 9, 2020
15. Email from Beth Cogan to Judge Griffith's law clerk w attached Reply Memorandum for Attorneys fees dated January 7, 2021

I certify that this designation contains no matter which is irrelevant to this appeal.

[signature next page]

Respectfully submitted,

s/ Desa Ballard

Desa Ballard

Harvey M. Watson III

**BALLARD & WATSON**

226 State Street

West Columbia, South Carolina 29169

Telephone 803.796.9299

Facsimile 803.796.1066

desab@desaballard.com

harvey@desaballard.com

ATTORNEYS FOR RESPONDENTS/  
APPELLANTS HARDIK R. PATEL, ANAL H.  
PATEL AND AAHARVID, LLC

July 22, 2021

**RECEIVED**

**Jul 22 2021**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM LAURENS COUNTY  
EUGENE C. GRIFFITH, JR., CIRCUIT COURT JUDGE

---

Case No. 2019-CP-30-00140  
Appellate Case No. 2020-001472

---

Vidhyaben R. Patel, Individually and as Co-Personal  
Representative Of the Estate of Rameschandra Prabhudas  
Patel, and Darshak Kumar Patel, Individually and as  
Co-Personal Representative Of the Estate of  
Rameschandra Prabhudas Patel, .....Appellants/Respondents,

v.

Hardik R. Patel, Anal H. Patel and AAHARVID, LLC, .....Respondents/Appellants.

---

**PROOF OF SERVICE**

---

I, Beth Cogan, an employee with Ballard & Watson, Attorneys at Law, do hereby certify that on July 22, 2021, I served a copy of the **Respondent/Appellant's Initial Reply Brief** and **Respondent/Appellant's Reply Designation of Matter** in the above-captioned case on the following individuals by electronic mail, addressed as follows:

**S. Jahue Moore, Esquire**  
**Moore Taylor Law Firm, P.A.**  
**jake@mttlaw.com**

**Samuel Price, Jr., Esquire**  
**rshealy517@hotmail.com**

**Jennifer D. Nichols, Esquire**  
**jennifer@nicholspricelaw.com**

*Beth Cogan*

Beth Cogan, Paralegal

July 22, 2021

West Columbia, South Carolina

## Beth Cogan

---

**From:** Beth Cogan  
**Sent:** Thursday, July 22, 2021 11:27 AM  
**To:** jennifer@nicholspricelaw.com; Samuel M. Price, Jr., Esquire; jake@mttlaw.com; Diane Corley  
**Cc:** Desa Ballard  
**Subject:** (Patel v. Patel 2020-001472) Ltr to COA encl Initial Reply Brief and Reply DOM  
**Attachments:** 2021 07 22 Ltr to COA encl Resp. Appell. IRB.pdf; 2021 07 22 Resp. Appell. Initial Reply Brief.pdf; 2021 07 22 Resp. Appell. Reply DOM.pdf; 2021 07 22 POS Resp. Appell. IRB.pdf

Good morning,

The attached Initial Brief and Reply Designations of Matter for the above-referenced matter are being filed today with the COA.

Kindest Regards,

-Beth

Beth Cogan, Paralegal  
Ballard & Watson, Attorneys at Law  
226 State Street  
West Columbia, South Carolina 29169  
803.796.9299  
803.796.1066 Facsimile  
[beth@desaballard.com](mailto:beth@desaballard.com)  
[www.desaballard.com](http://www.desaballard.com)



**Ballard & Watson**  
Attorneys at Law  
PERSISTENT. UNWAVERING.

Desa Ballard  
Harvey M. Watson III

Post Office Box 6338 | West Columbia, SC 29171  
226 State Street | West Columbia, SC 29169  
ph 803.796.9299 | fx 803.796.1066 | [desaballard.com](http://desaballard.com)

July 22, 2021

Via Email ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))  
Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
**Jul 22 2021**  
**SC Court of Appeals**

Re: *Vidhyaben R. Patel v. Hardik R. Patel*  
Appellate Case No.: 2020-001472

Dear Ms. Kitchings:

Enclosed for filing please find **Respondent/Appellant's Initial Reply Brief and Reply Designation of Matter** for the above-referenced matter.

By copy of this letter and as evidenced by the Proof of Service, these filing has been served upon counsel for the Appellants/Respondents. Thank you for your time in this matter. If you have any questions, please do not hesitate to contact our office.

Please do not hesitate to contact our office if you should have any questions. With warm personal regards, I am,

Sincerely yours,

*Desa Ballard / etc*

Desa Ballard  
[desab@desaballard.com](mailto:desab@desaballard.com)

cc: Via Electronic Mail  
Jake Moore, Esquire  
Samuel Price, Jr., Esquire  
Jennifer Nichols, Esquire  
Hardik and Anal Patel