

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

**RECEIVED**

**Sep 10 2021**

Appellate Case No. 2020-001472

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**SC Court of Appeals**

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.

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**MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL RECORD ON APPEAL**

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Respondents/Appellants Hardik R. Patel, Anal H. Patel and AAHARVID LLC, by and through their undersigned counsel, hereby move pursuant to Rule 212, SCACR for an order of this Court accepting the attached Supplemental Record on Appeal for the reasons set forth hereinbelow:

The proposed Supplemental Record on Appeal that is attached includes the following materials:

1. Cancellation of Lis Pendens dated October 28, 2020 for case number 2019-LP-30-0028;
2. Motion to Compel dated July 11, 2019 for case number 2019-CP-30-0140;
3. Moore email 11.10.2020 with Desa Ballard response email of same date.

As to the third item listed above, the original email was included in the Record on Appeal after previously identification and inclusion within the designations of matter, but Ms. Ballard's relevant email response thereto was omitted. The other two items listed above and requested for inclusion in a Supplemental ROA are materials that were cited to and addressed in the previously exchanged briefs, which were only able to be finalized per Rule 211, SCACR by citation thereto, but which were inadvertently omitted from listing within the Respondents/Appellants' prior Designation of Matter before compilation of the primary Record on Appeal. As such, all the materials sought for inclusion in the supplement have been within the scope of the arguments being briefed by the parties, and otherwise would have been proper for inclusion in prior designation of matter/inclusion within the primary ROA pursuant to Rule 210(c), SCACR. The Respondents/Appellants are therefore informed and believe that no party will sustain prejudice should the Supplemental Record on Appeal in the form requested herein be accepted.

WHEREFORE, pursuant to Rule 212, SCACR, Respondents/Appellants respectfully requests that the proposed Supplemental Record on Appeal, copy of which is being filed contemporaneously with this motion and final briefs, be accepted as filed.

s/ Desa Ballard  
Desa Ballard (S.C. Bar No. 498)  
Harvey M. Watson III (S.C. Bar No. 74053)

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

September 10, 2021