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Jan 16 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No.: 2018-CP-10-4083

Appellate Case No.: 2022-001114

Charleston Carriage Works, L.L.C.,

Appellant,

v.

Charleston Animal Society, Ellen Harley and
Charleston Carriage Horse Advocates, Inc.,

Respondents.

APPELLANT'S REPLY TO RESPONDENTS' RETURN
TO MOTION TO SUBSTITUTE PARTIES

Pursuant to *South Carolina Appellate Court Rules*, Rule 240(f), the Appellant replies to the Respondent's, Ellen Harley and Charleston Carriage Horse Advocate's, January 8, 2024, Return as follows:

After consultation with Respondents' counsel (Charleston Animal Society has not identified a preference), the Appellant agrees with Respondents that the most uncomplicated manner to address Appellant's sale of assets to a third party is to change the name of the Appellant from *Charleston Carriage Works, L.L.C* to *Charleston CW, L.L.C*. Based on the consent of opposing counsel (counsel for Charleston Animal Society has not expressed a preference),

Appellant amends its October 30, 2023 request for substitution of parties to a request to change the name of the Appellant from *Charleston Carriage Works, L.L.C* to *Charleston CW, L.L.C*.

Respectfully submitted,

January 14, 2024

/s/Thomas R. Goldstein
Thomas R. Goldstein, S. C. Bar No. 2186
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PROOF OF SERVICE

I certify that I provided a copy of the Appellant's Reply to Respondents' Return to Motion to Substitute Parties upon the Charleston Animal Society by depositing a copy of it in the United States Mail, postage prepaid to Elizabeth Palmer at her office at Saxton & Stump, 151 Meeting Street, Suite 400, Charleston, South Carolina 29401 and to Jenkins Mann and Kevin Maroney at their office, Mann, Blake & Jackson at 1901 Main Street, Suite 1205, Columbia, South Carolina 29201 on January 14, 2024, and via electronic versions to all counsel and to Joseph Thompson and Spencer Gill at their office, Hall Booth Smith, P.C. at 111 Coleman Boulevard, Mt. Pleasant, S. C. 29464 (digital copies only).

January 14, 2024

/s/Thomas R. Goldstein

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