

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Roger M. Young, Sr., and George M. McFaddin, Jr., Circuit Court Judge

Trial Court Case No. 2023-CP-10-01512
Appellate Case Nos. 2023-001494 & 2024-000723

Charleston SC Property Holdings, LLC, Hanahan SC Property Holdings, LLC, and Michael
Flanagan, Receiver.....Respondents,

v.

Rittenberg OP, LLC, Hanahan OP, LLC, Goldner Capital Management, LLC, SC Two
OP Holdings, LLC, and Samuel Goldner.....Appellants.

**RESPONDENTS CHARLESTON SC PROPERTY HOLDINGS, LLC,
AND HANAHAN SC PROPERTY HOLDINGS, LLC’S RESPONSE TO
APPELLANTS’ MOTION TO CONSOLIDATE RECORDS ON APPEAL**

Respondents Charleston SC Property Holdings, LLC and Hanahan SC Property Holdings,
LLC (hereinafter, “these Respondents”) submit this Response to the Appellants’ Motion to
Consolidate Records on Appeal in Appellate Case Nos. 2023-001494 and 2024-000723. Without
waiving any positions or assenting to any assertions in Appellants’ Motion, these Respondents do
not oppose the Motion and consent to the use of a consolidated record on appeal in the two above-
referenced matters.

Respectfully submitted,

s/ James W. Clement

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*ATTORNEYS FOR THE RESPONDENTS
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HOLDINGS, LLC*

Charleston, South Carolina
July 8, 2024

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SC Court of Appeals

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PROOF OF SERVICE

I certify that on July 8, 2024, I served Respondents Charleston SC Property Holdings,
LLC and Hanahan SC Property Holdings, LLC’s Response to the Appellants’ Motion to
Consolidate Records on Appeal on counsel of record for all parties by sending a copy of the same
to their email addresses of record with AIS:

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s/ James W. Clement

ATTORNEY FOR RESPONDENTS
CHARLESTON SC PROPERTY
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PROPERTY HOLDINGS, LLC

Charleston, South Carolina
July 8, 2024