

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable George M. McFaddin, Jr., Circuit Court Judge

Case No. 2023-CP-10-01512
Appellate Case No. 2023-001494

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.

**STATEMENT OF RESPONDENTS
CHARLESTON SC PROPERTY HOLDINGS, LLC AND
HANAHAN SC PROPERTY HOLDINGS, LLC
JOINING AND ADOPTING IN WHOLE
THE INITIAL BRIEF AND DESIGNATION OF MATTER FILED
BY THE RESPONDENT MICHAEL FLANAGAN**

In accordance with Rule 208(b)(6), SCACR, Respondents Charleston SC Property Holdings, LLC and Hanahan SC Property Holdings, LLC hereby join in and adopt by reference the following and present the same as if fully restated herein:

1. Initial Brief of Respondent Michael Flanagan, Receiver; and
2. Designation of Matter to be Included in the Record on Appeal by Respondent Michael Flanagan, Receiver.

Respectfully submitted,

s/ Thomas P. Gressette, Jr.

Thomas P. Gressette, Jr. (S.C. Bar #14065)
James W. Clement (S.C. Bar #102467)
Walker, Gressette & Linton, LLC
Post Office Box 22167
Charleston, SC 29413
T: (843) 727-2200
F: (843) 727-2238
Gressette@wglfirm.com
Clement@wglfirm.com

-AND-

Aharon S. Kaye (*pro hac vice*)
Noah Siegel (*pro hac vice*)
Gutnicki LLP
4711 Golf Road, Suite 200
Skokie, Illinois 60076
Telephone: (847) 745-6594
akaye@gutnicki.com
nsiegel@gutnicki.com

*ATTORNEYS FOR RESPONDENTS
CHARLESTON PROPERTY HOLDINGS,
LLC AND HANAHAN SC PROPERTY
HOLDINGS, LLC*

Charleston, South Carolina
September 12, 2024

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The Honorable George M. McFaddin, Jr., Circuit Court Judge

Case No. 2023-CP-10-01512
Appellate Case No. 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.

PROOF OF SERVICE

I certify that on September 12, 2024, I caused the foregoing STATEMENT OF RESPONDENTS CHARLESTON SC PROPERTY HOLDINGS, LLC AND HANAHAN SC PROPERTY HOLDINGS, LLC JOINING AND ADOPTING IN WHOLE THE INITIAL BRIEF AND DESIGNATION OF MATTER FILED BY THE RESPONDENT MICHAEL FLANAGAN to be served upon counsel of record using the following email addresses:

Christopher Todd Brumback, Esq.
Brumback & Langley, LLC
chris@brumbacklangley.com

Ross Conrad DuRant
Law Office of N. David DuRant
rossdurant@lawofficesofdurant.com

Michael Weaver, Esq.
Rogers Townsend, LLC
michael.weaver@rogerstownsend.com

Noah D. Siegel, Esq.
Gutnicki LLP
nsiegel@gutnicki.com

Aharon S. Kaye, Esq.
Gutnicki LLP
akaye@gutnicki.com

/s/ Thomas P. Gressette, Jr.



G. Trenholm Walker
Thomas P. Gressette, Jr.
John P. Linton, Jr.
Charles P. Summerall, IV
Jennifer Ivey
James W. Clement

THOMAS P. GRESSETTE, JR.
Direct: 843.727.2249
Email: Gressette@WGLFirm.com

RECEIVED

Sep 12 2024

SC Court of Appeals

September 12, 2024

VIA ELECTRONIC FILING (One Drive)

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *Charleston SC Property Holdings, LLC, et al. v. Rittenberg OP, LLC, et al. (1)*
Appellate Case No. 2023-001494

Dear Ms. Kitchings:

On behalf of Respondents Charleston SC Property Holdings, LLC and Hanahan SC Property Holdings, LLC, enclosed please find:

- ♦ Statement of Respondents Joining and Adopting in Whole the Initial Brief and Designation of Matter filed by the Respondent Michael Flanagan; and
- ♦ Proof of Service.

By copy of this email, we are serving all counsel of record.

With kind regards, I am

Sincerely yours,

/s/ *Thomas P. Gressette, Jr.*
Thomas P. Gressette, Jr.

Enclosures (as stated)

cc: Michael Henry Weaver, Esq. (via e-mail) (michael.weaver@rogerstownsends.com)
Christopher Todd Brumback, Esq. (via e-mail) (chris@brumbacklangleys.com)
Ross Conrad DuRant, Esq. (via e-mail) (rossdurant@lawofficesofdurant.com)
Aharon S. Kaye, Esq. (via e-mail) (akaye@gutnicki.com)
Noah Siegel, Esq. (via e-mail) (nsiegel@gutnicki.com)
James Whittington Clement, Esq. (via e-mail) (clement@wglfirm.com)