

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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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

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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.

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**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**

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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.*

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

Charleston, South Carolina  
September 12, 2024

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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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. 2024-000723

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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.

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**PROOF OF SERVICE**

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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:

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

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**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)

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