

94049

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APR 02 2021

APPEAL FROM MARION COUNTY
Court of Common Pleas

SC Court of Appeals

Haigh Porter, Special Referee

Case No. 2019-CP-33-00853

HSGCHG Investments, LLC f/k/a Carolina
Entertainment Complex, LLC; Partners 95,
LLC; Oil Barons, Inc.; and Robert D.
Hartmann, Sr.,

Appellants,

v.

Avatar Partners CT, LLC,

Respondent.

NOTICE OF APPEAL

HSGCHG Investments, LLC f/k/a Carolina Entertainment Complex, LLC; Partners 95, LLC;
Oil Barons, Inc.; and Robert D. Hartmann, Sr., appeal the Order and Judgment of Foreclosure and
Sale with (Form 4) Granting Deficiency Judgment Against them, the Order dated February 8, 2021,
and entered and electronically served by the Clerk of Court for Marion County on March 1, 2021.
Undersigned counsel received electronic notice of the entry of the Order on March 1, 2021.

CALLISON TIGHE & ROBINSON, LLC

s/ Louis H. Lang

Louis H. Lang (SC Bar No. 3127)
1812 Lincoln Street, Suite 200 (29201)
Post Office Box 1390
Columbia, South Carolina 29202-1390
Tel: (803) 404-6900
Fax: (803) 404-6902
Email: LouisLang@CallisonTighe.com

Attorneys for the Appellants

March 31, 2021
Columbia, South Carolina

Other Counsel of Record:

Magalie A. Creech (S.C. Bar 78855)
FINKEL LAW FIRM LLC
Post Office Box 41489
Charleston, South Carolina 29423
Telephone: (843) 577-5460
Facsimile: (866) 800-7954
MCreech@FinkelLaw.com

ATTORNEYS FOR AVATAR PARTNERS CT, LLC

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas

Haigh Porter, Special Referee

Case No. 2019-CP-33-00853

RECEIVED

APR 02 2021

SC Court of Appeals

HSGCHG Investments, LLC f/k/a Carolina
Entertainment Complex, LLC; Partners 95,
LLC; Oil Barons, Inc.; and Robert D.
Hartmann, Sr.,

Appellants,

v.

Avatar Partners CT, LLC,

Respondent.

PROOF OF SERVICE

I hereby certify that, on this date, the **NOTICE OF APPEAL** was served on Respondent's counsel via email, pursuant to Supreme Court Order dated March 20, 2020, as amended on May 29, 2020, and by first class U.S. mail as follows:

ATTORNEY FOR AVATAR PARTNERS CT, LLC:

Magalie A. Creech (S.C. Bar 78855)
FINKEL LAW FIRM LLC
Post Office Box 41489
Charleston, South Carolina 29423
Telephone: (843) 577-5460
Facsimile: (866) 800-7954
MCreech@FinkelLaw.com

A copy of the service email is attached hereto, as required.

I further certify that all parties required by Rule to be served have been served.

s/ Louis H. Lang

Louis H. Lang

March 31, 2021
Columbia, South Carolina

From: [Crystal Smith](#)
To: mcreech@finkellaw.com
Cc: [Louis Lang](#)
Subject: Notice of Appeal | HSGCHG Investments, LLC, et al. v. Avatar Partners CT, LLC | 2019-CP-33-00853
Date: Wednesday, March 31, 2021 4:03:03 PM
Attachments: [Notice of Appeal.v1.pdf](#)
[Proof of Service \(for Notice of Appeal\).pdf](#)
[Order & Judgment of Foreclosure and Sale-FILED-03.01.2021.pdf](#)
[Clerk.Court of Appeals.001.pdf](#)

Dear Ms. Creech:

Attached please find Defendants' Notice of Appeal and Proof of Service with our correspondence to the appellate clerk regarding the above-referenced matter. The attached documents are being submitted today to the Court of Appeals for filing. Thank you.

With kind regards,

Crystal Smith

Legal Secretary to D. Reece Williams, III
& Louis H. Lang

CALLISON  TIGHE

Crystal C. Smith
Legal Secretary to D. Reece Williams, III, Esq.
and Louis H. Lang, Esq.
CALLISON TIGHE & ROBINSON, LLC
Palmetto Armory Building
1812 Lincoln St., Ste. 200
Columbia SC 29201

Direct Dial: 803.404.6984
Phone: 803.404.6900
Fax: 803.404.6902
Email: CrystalSmith@CallisonTighe.com

Mailing Address:

PO Box 1390
Columbia SC 29202-1390

CONFIDENTIAL COMMUNICATION: The information contained in this message may contain legally privileged and confidential information intended only for the use of the individual or entity named above. If you have received this communication in error, please notify us by telephone or email immediately and return the original message to us or destroy all printed and electronic copies.

LOUIS H. LANG - Member
Direct: 803-404-6963
Main: 803-404-6900
Louis.Lang@callisontighe.com

March 31, 2021

RECEIVED

APR 02 2021

SC Court of Appeals

VIA EMAIL: ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

**Re: Avatar Partners CT, LLC, vs. HSGCHG Investments, LLC f/k/a Carolina Entertainment Complex, LLC; Partners 95, LLC; Oil Barons, Inc.; and Robert D. Hartmann, Sr.
Marion County Case No: 2019-CP-33-00853
Our File No. 6151.014**

Dear Ms. Kitchings:

Enclosed herewith please find the Notice of Appeal, Proof of Service of the Notice of Appeal on the Respondents/Defendants, and a copy of the Order to be challenged on appeal, in regard to the above-referenced matter.

Kindly file the same and return the clocked-in copies to the undersigned via return email. My firm's check in the amount of \$250.00 as the filing fee is being mailed to your office under separate cover as instructed.

The enclosed documents have been served upon Respondents' counsel today via email as indicated in the Proof of Service.

Please feel free to contact me with any questions. Thank you.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

s/ Louis H. Lang

Louis H. Lang

LHL:cs

Enclosures

cc: (w/ encl.)

Magalie A. Creech, Esq. (via email and first-class mail)

The Honorable Haigh Porter (via email and first-class mail)

The Honorable Christy M. Gray, Marion County Clerk of Court (via first-class mail)

Clerk.Court of Appeals.001

Haster


02/11/2021
US POSTAGE \$007.70²

RECEIVED



ZIP 29201
011010548505

APR 02 2021
SC Court of Appeals

CALLISON  TIGHE

Louis H. Lang, Esq.
PO Box 1390
Columbia, South Carolina 29202-1390
(815.1014)

To: Hon. Jenny Abbott Kitchings
Clerk, SC Court of Appeals
1015 Sumter St.
PO Box 11629
Columbia SC 29211

