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**Jun 04 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM MARION COUNTY  
Court of Common Pleas

Haigh Porter, Special Referee

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Case No. 2019-CP-33-00853  
Appellate Case No. 2021-000340

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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.

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APPELLANTS' SECOND MOTION REQUESTING AN EXTENSION  
TO FILE AND SERVE ITS INITIAL BRIEF AND DESIGNATION OF MATTERS  
TO BE INCLUDED IN THE RECORD ON APPEAL

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Appellants, HSGCHG Investments, LLC, f/k/a Carolina Entertainment Complex, LLC,  
Partners 95, LLC, Oil Barons, Inc., and Robert D. Hartmann, Sr., respectfully request a fourteen (14)  
day extension to submit their Initial Brief and Designation of Matters to be Included in the Record  
on Appeal.

Appellants' Initial Brief is currently due June 9, 2021. If the requested extension is granted,  
Appellants' Initial Brief and Designations will be due no later than June 23, 2021.

The undersigned is scheduled to select a jury in a federal criminal case on Wednesday, June 9, 2021, with the trial to begin Monday, June 14, 2021. Given the foregoing, the undersigned respectfully requests a fourteen (14) day extension.

Counsel has consulted with counsel for the Respondent regarding the requested extension and is informed Respondent does object to the requested extension.

**CALLISON TIGHE & ROBINSON, LLC**

*/s/ Louis H. Lang*  
\_\_\_\_\_  
Louis H. Lang (SC Bar No. 3127)  
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Columbia, South Carolina 29202-1390  
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*Attorneys for the Appellants*

June 4, 2021  
Columbia, South Carolina

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LLC; Oil Barons, Inc.; and Robert D.  
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**PROOF OF SERVICE**

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I hereby certify that, on this date, the **APPELLANTS' SECOND MOTION REQUESTING AN EXTENSION TO FILE AND SERVE ITS INITIAL BRIEF AND DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL** was served on Respondent's counsel via email, pursuant to Supreme Court Order dated June 4, 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](mailto: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

June 4, 2021  
Columbia, South Carolina

**From:** [Crystal Smith](#)  
**To:** [mcreech@finkellaw.com](mailto:mcreech@finkellaw.com)  
**Cc:** [Louis Lang](#); [Crystal Smith](#)  
**Subject:** Appellate Case No. 2021-000340 | Avatar Partners CT, LLC v. HSGCHG Investments, LLC, et al.  
**Date:** Friday, June 4, 2021 4:41:34 PM  
**Attachments:** [POS \(for 2nd Motion for Extension.\)pdf](#)  
[Motion for Extension No. 2.pdf](#)  
[Clerk.Court of Appeals.003.pdf](#)

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Dear Counsel,

Attached please find Appellants' Second Motion Requesting an Extension to File and Serve its Initial Brief and Designation of Matter, Proof of Service, and letter to the appellate clerk regarding the above-referenced matter. The attached documents are being submitted today to the Court of Appeals for filing.

Sincerely,

*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.  
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**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.

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LOUIS H. LANG - Member  
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[LouisLang@callisontighe.com](mailto:LouisLang@callisontighe.com)

June 4, 2021

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**Jun 04 2021**

**SC Court of Appeals**

**VIA EMAIL: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 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.  
Appellate Case No. 2021-000340  
Our File No. 6151.014**

Dear Ms. Kitchings:

Enclosed herewith please find Appellants' Second Motion Requesting an Extension to File and Serve its Initial Brief and Designation of Matter, together with the Proof of Service, in the above-referenced matter.

Kindly file the same and return a clocked-in copy of each to the undersigned via return email. It is my understanding that, pursuant to Supreme Court Order dated March 20, 2020 as amended, no filing fee is required for this Motion.

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.

With kind regards, I am

Sincerely yours,

**CALLISON TIGHE & ROBINSON, LLC**

*s/ Louis H. Lang*

Louis H. Lang

LHL:cs

Enclosures

cc: (w/ encls.) Magalie A. Creech, Esq. (via email and first-class mail)  
Clerk.Court of Appeals.003