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Jul 16 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas

The Honorable W. Haigh Porter, Special Referee

Appellate Case No. 2021-00340

Avatar Partners, CT, LLC,

Respondent,

v.

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

Appellants.

**MOTION FOR EXTENSION TO FILE AND SERVE
RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER**

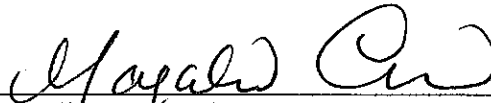
Magalie A. Creech (S.C. Bar 78855)
FINKEL LAW FIRM LLC
Post Office Box 41489
Charleston, South Carolina 29423
Telephone: (843) 577-5460
Facsimile: (866) 800-7954
mcreech@finkellaw.com
Attorneys for Respondent

NOW COMES Respondent Avatar Partners, CT, LLC, who, by and through its undersigned counsel, respectfully moves before the Court for an extension of time in which to serve the *Respondent's Initial Brief and Designation of Matter* upon the Appellants and file the same and the accompanying *Proof of Service* with the Court. The *Respondent's Initial Brief and Designation of Matter* is due to be served on opposing counsel, and an original *Proof of Service* filed with the Court, on or before Friday, July 23, 2021. Appellant moves for the due date to be extended to Monday, August 23, 2021.

The undersigned seeks this extension due to various scheduling conflicts and does so with the consent of counsel for the Appellants, which whom she conferred prior to filing this Motion.

Respectfully submitted,

FINKEL LAW FIRM LLC



Magalie A. Creech (SC Bar 78855)
4000 Faber Place Drive, Suite 450
N. Charleston, South Carolina 29405
Telephone: (843) 577-5460
mcreech@finkellaw.com
Attorneys for Respondent

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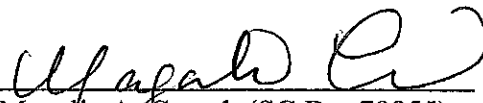
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Entertainment Complex, LLC, Partners 95 LLC,
Oil Barons, Inc., and Robert D. Hartmann, Sr.,

Appellants.

PROOF OF SERVICE

I certify that on July 16, 2021, I have served the *Motion for Extension to File and Serve Respondent's Initial Brief and Designation of Matter* by email to Appellants' counsel, pursuant to S.C. Supreme Court Order Dated June 4, 2020, as amended on May 29, 2021, and by depositing a copy of same in the United States Mail, postage prepaid, addressed to Appellants' counsel as follows:

Louis H. Lang, Esq.
CALLISON TIGHE & ROBINSON, LLC
Post Office Box 1390
Columbia, SC 29202-1390
Attorneys for Appellants


Magalie A. Creech (SC Bar 78855)
4000 Faber Place Drive, Suite 450
N. Charleston, South Carolina 29405
Telephone: (843) 577-5460
mcreech@finkellaw.com
Attorneys for Respondent



MAGALIE A. CREECH
MCREECH@FINKELLLAW.COM

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REPLY TO:
CHARLESTON LITIGATION

July 16, 2021

Via Email To: ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Avatar Partners CT, LLC vs. HSGCGH Investments, et al.
Appellate Case No.: 2021-00340
Our File No.: 90039.54728

Dear Ms. Kitchings:

Enclosed for filing please find the *Respondent's Motion for an Extension to File and Serve its Initial Brief and Designation of Matter* and related *Proof of Service* in the above-referenced matter. Kindly return a filed copy to me via email at mcreech@finkellaw.com.

A copy of the enclosures has been served on Appellants' counsel by email today, as referenced in the Proof of Service. Please do not hesitate to let me know if you have any questions.

With kind personal regards, we are

Yours very truly,

FINKEL LAW FIRM


Magalie A. Creech

CC: Louis H. Lang, Esquire

COLUMBIA
1201 Main Street, Suite 1800
Post Office Box 1799 (29202)
Columbia, SC 29201
Tel: (803) 765-2935
Fax: (803) 252-0786

CHARLESTON
LITIGATION, REAL ESTATE & REO
4000 Faber Place Drive, Suite 450
North Charleston, SC 29405
Tel: (843) 577-5460
Fax: (843) 577-5135

CHARLESTON
FORECLOSURE
4000 Faber Place Drive, Suite 450
Post Office Box 71727 (29415)
North Charleston, SC 29405
Tel: (843) 577-5460
Fax: (843) 725-0015