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Aug 12 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.

**RESPONDENT'S DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent proposes the following to be included in the Record on Appeal:

1. Respondent's Lis Pendens, Summons and Complaint in Civil Action No. 2019-CP-33-00853, filed December 17, 2019;
2. Appellants' Motion to Dismiss, filed March 20, 2020.
3. Respondent's Response to Motion to Dismiss, filed May 27, 2020;
4. Respondent's CARES Certification, filed May 29, 2020;
5. Appellants' Reply to Response to Motion to Dismiss, filed June 8, 2020;
6. Appellants' Supplemental Reply to Response to Motion to Dismiss, filed June 10, 2020;
7. Order Denying Motion to Dismiss, entered June 30, 2020;
8. Appellants' Answer, filed July 14, 2020;
9. Order of Reference, entered July, 14, 2020;
10. Transcript of Trial held December 14, 2020;
11. Respondent's Trial Exhibits 1, 2, 3, 4, 6, 7, 8, 10, 11, and 12;
12. Appellants' Trial Exhibits 1, 2, 3, 4, 5, 6, and 7;
13. Order and Judgment of Foreclosure and Sale, entered March 1, 2021;
14. Notice of Appeal, filed April 8, 2021.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

FINKEL LAW FIRM LLC


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Dated: August 12, 2021

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Appellants.

PROOF OF SERVICE

I certify that on August 12, 2021, I have served the *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:

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REPLY TO:
CHARLESTON LITIGATION

August 12, 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

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SC Court of Appeals

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

Dear Ms. Kitchings:

Enclosed for filing is the *Respondent's Initial Brief and Designation of Matter* and related *Proof of Service* in the above-referenced case, which we kindly ask you to file and return in the attached, self-addressed, stamped envelope.

Should you have any questions concerning this matter, please do not hesitate to contact our office at your earliest convenience.

With kind personal regards, we are

Yours very truly,

FINKEL LAW FIRM

Magalie A. Creech

CC: Louis H. Lang, Esquire (*via email and regular mail*)

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