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Aug 20 2021

SC Court of Appeals

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
Appellate Case No. 2021-000340

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.

APPELLANTS' MOTION REQUESTING AN EXTENSION
TO FILE AND SERVE ITS INITIAL REPLY BRIEF

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 seven (7) day extension to submit their Initial Reply Brief in this matter.

Appellants' Initial Reply Brief is currently due August 23, 2021. If the requested extension is granted, Appellants' Initial Reply Brief will be due no later than August 30, 2021.

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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Attorneys for the Appellants

August 20, 2021
Columbia, South Carolina

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Respondent.

PROOF OF SERVICE

I hereby certify that, on this date, the **APPELLANTS' INITIAL REPLY BRIEF** 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

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

August 20, 2021
Columbia, South Carolina

From: [Crystal Smith](#)
To: mcreech@finkellaw.com
Cc: [Louis Lang](#); [Crystal Smith](#)
Subject: Avatar Partners v. HSGCHG (2021-000340)
Date: Friday, August 20, 2021 4:32:07 PM
Attachments: [Clerk.Court of Appeals.005.pdf](#)
[Motion for Extension No. 3.pdf](#)
[POS \(for 3rd Motion for Extension.\)pdf](#)

Dear Counsel,

Attached please find Appellants' Motion Requesting an Extension to File and Serve Its Initial Reply Brief, 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. 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.
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LOUIS H. LANG - Member
Direct: 803-404-6963
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LouisLang@callisontighe.com

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Aug 20 2021

SC Court of Appeals

August 20, 2021

VIA EMAIL: 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' Motion Requesting an Extension to File and Serve its Initial Reply Brief, 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.005