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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM AIKEN COUNTY  
Court of Common Pleas  
Martha M. Rivers, Circuit Court Judge

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Appellate Case No. 2025-000150  
Case No. 2022-CP-2023  
Case No. 2022-CP-2024

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Heather Crespo,

Respondent/Appellant,

v.

Rhett Riviere, Josee Riviere, Chase Enterprises, LLC, and  
R.C. Riviere Properties, LLC,

Defendants,

AND

Gabriel Crespo,

Respondent/Appellant,

v.

Rhett Riviere, Josee Riviere, Chase Enterprises, LLC, and  
R.C. Riviere Properties, LLC,

Defendants,

of which Rhett Riviere, Chase Enterprises, LLC, and  
R.C. Riviere Properties, LLC, are the

Appellants/Respondents,

and

Josee Riviere is the

Respondent/Appellant.

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**Designation of Matter on Appeal of Respondents /  
Appellants Heather Crespo and Gabriel Crespo**

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Attorneys for Respondents/Appellants Heather  
Crespo and Gabriel Crespo

July 23, 2025  
Greenville, South Carolina

Respondents/Appellants Heather Crespo and Gabriel Crespo designate the following material under Rule 209, SCACR, for inclusion in the record on appeal. Undersigned counsel certifies, under Rule 209(c), SCACR, that the designation contains no matter which is irrelevant to this appeal.

### **Orders**

Order granting Plaintiffs' Motion for a Continuance and Date Certain Trial, filed Aug. 15, 2024

Order granting Plaintiffs' Motions to Consolidate, filed Sept. 12, 2024

Form 4 Orders/Verdict Forms, filed Sept. 24, 2024

Form 4 Orders/Punitive Damages Verdict Forms, filed Sept. 25, 2024

Order as to Post-trial Motions of the Rhett Riviere Defs., filed Jan. 3, 2025

Order as to Post-trial Motions of Josee Riviere, filed Jan. 3, 2025

Order granting Attorneys' Fees and Litigation Costs to Heather Crespo Pursuant to the SCUTPA, filed Mar. 14, 2025 (Case No. 2022-CP-02-02323)

Order granting Attorneys' Fees and Litigation Costs to Gabriel Crespo Pursuant to the SCUTPA, filed Mar. 14, 2025 (Case No. 2022-CP-02-02324)

### **Pleadings**

Complaint of Heather Crespo, filed Oct. 10, 2022

Complaint of Gabriel Crespo, filed Oct. 10, 2022

### **Motions, Supporting Memoranda, and other Filings**

Pl.'s Mot. to Consolidate, filed Aug. 12, 2024

Pl.'s Mot. for Continuance and Date Certain trial, filed Aug. 12, 2024

Pls.' Mot. for Attys.' Fees and Costs, filed Oct. 4, 2024

Aff. of Deborah B. Barbier, filed Oct. 7, 2024

Aff. of Ryan Beasley, filed Oct. 8, 2024

Decl. of Wesley D. Few, filed Oct. 10, 2024

Brief on Behalf of Josee Riviere as to Pls.' Request for Fees, filed Jan. 20, 2025

Pls.' Supp. Memo in Support of Attorneys' Fees and Costs, filed Jan. 28, 2025

Am. Aff. of Deborah B. Barbier, filed Jan. 28, 2025

Rhett Riviere Defs.' Mem. in Opp. to Pet. for Attorneys' Fees & Costs, filed Jan. 28, 2025

Rhett Riviere Defs.' Mot. for JNOV, filed Oct. 4, 2024

Rhett Riviere Defs.' Mot. for New Trial, or in the Alternative for New Trial Nisi Remittitur, filed Oct. 4, 2024

Rhett Riviere Defs.' Mot. to Reduce Punitive Damages, filed Oct. 4, 2024

Rhett Riviere Defs.' Supp. Mot. for New Trial, filed Oct. 10, 2024

Rhett Riviere Defs.' Supp. Mot. for Election of Remedies, New Trial, New Trial Nisi Remittitur, or to Set Aside Verdicts, filed Oct. 10, 2024

Def. Josee Riviere's Supp. Mot. for JNOV, or in the Alternative for a New Trial, or in the Alternative for a New Trial Nisi Remittitur, filed Oct. Oct. 8, 2024

Def. Josee Riviere's Am. Mem. in Supp. of Mot. for JNOV, filed Nov. 12, 2024

Pl.'s Resp. Opp. Def. Josee Riviere's Mot. for JNOV, filed Oct. 21, 2024

Pl.'s Resp. Opp. Rhett Riviere Defs.' Mot. for JNOV, filed Oct. 21, 2024

Pl.'s Resp. Opp. Rhett Riviere Defs.' Supp. Mot. for Election of Remedies, filed Oct. 21, 2024

Pl.'s Resp. Opp. Rhett Riviere Defs.' Mot. for New Trial, filed Oct. 21, 2024

Pl.'s Resp. Opp. Rhett Riviere Defs.' Mot. to Reduce Punitive Damages, filed Oct. 21, 2024

Notice of Appeal by Respondents/Appellants, filed Feb. 5, 2025

Notice of Appeal by Respondents/Appellants, filed April 4, 2025

## **Transcripts**

Transcript of Trial, Sept. 16-25, 2024

All Trial Exhibits, Sept. 16-25, 2024

Transcript of Hearing on Post-trial Motions, Nov. 13, 2024

Transcript of Hearing on Attorneys Fee and Costs, Jan. 21, 2025

## **Miscellaneous**

Docket from Criminal Case No. 2021-A-02-10700228

Docket from Criminal Case Nos. 2022-A-02-10700181 and -182

Docket from Case No. 2020-CP-02-01616 (Plaintiff Simmons for Minor Child)

Docket from Case No. 2021-CP-02-00333 (Plaintiff Michele Jain)

Docket from Civil Case No. 2021-CP-02-00889 (Plaintiff Julianne Foster)

Sept. 15, 2024 Letter from Jim Griffin to Judge Rivers re: Bifurcation of Trial

Jan. 21, 2025 Email from Jim Griffin to Judge Rivers

## **Certificate of Counsel**

The undersigned certifies that this Designation of Matter to be Included in the Record on Appeal complies with Rule 209(b), SCACR.

Respectfully submitted,

/s/ Deborah B. Barbier

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