

RECEIVED

Apr 28 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

Appellate Case No. 2025-000150
Case No. 2022-CP-02-2323
Case No. 2022-CP-02-2324

Heather Crespo.....Respondent/Appellant,

v.

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

AND

Gabriel CrespoRespondent/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 theRespondent/Appellant.

**THIRD AMENDED (SUPPLEMENTAL)¹ RECORD ON APPEAL
VOLUMES ONE - SEVEN**

COUNSEL OF RECORD

¹ Filed per this Court’s Order dated April 8, 2026 (adding RoA_2837 to 2891, as Vol. 7).

GRIFFIN HUMPHRIES LLC
James M. Griffin, S.C. Bar No.: 9995
Margaret N. Fox, S.C. Bar No.: 76228
8906 Two Notch Road, Suite 200
P.O. Box 999 (29202)
Columbia, South Carolina 29223
Telephone: 803-744-0800
jgriffin@griffinhumphries.com
mfox@griffinhumphries.com

MCCULLOCH & SCHILLACI,
ATTORNEYS AT LAW
Joseph M. McCulloch, S.C. Bar No.: 3760
Kathy R. Schillaci, S.C. Bar No.: 17248
1116 Blanding Street
P.O. Box 11623 (29211)
Columbia, South Carolina 29201
Telephone: 803-779-0005
joe@mccullochlaw.com
kathy@mccullochlaw.com

*Attorneys for Appellants/Respondents
Rhett Riviere Chase Enterprises, LLC
and R.C. Riviere Properties, LLC*

JOHN HARTE LAW
John Harte, S.C. Bar No.: 2773
Dalton P. Cooper, S.C. Bar No.: 105959
P.O. Box 7215
Aiken, South Carolina 29804
Telephone: 803-226-0755
john@jwhartelaw.com and
dalton@jwhartelaw.com

THE MOSTELLER LAW FIRM, LLC
James D. Mosteller, III, S.C. Bar No.: 12008
P.O. Box 1832
Barnwell, South Carolina 29812
Telephone: 803-259-4964
jdmosteller@gmail.com

*Attorney for Respondent/Appellant Josee
Riviere*

DEBORAH B. BARBIER, LLC
Deborah B. Barbier, S.C. Bar No.: 6920
1811 Pickens Street
Columbia, South Carolina 29201
Telephone: 803-445-1032
dbb@deborahbarbier.com

WESLEY D. FEW, LLC
Wesley D. Few, S.C. Bar No.: 15565
P.O. Box 9398
Greenville, South Carolina 29605
Telephone: 864-527-5906
wes@wesleyfew.com

RYAN L. BEASLEY, ATTORNEY AT
LAW, P.A.
Ryan L. Beasley, S.C. Bar No.: 68307
416 East North Street
Greenville, South Carolina 29601
Telephone: 864-679-7777
rlb@ryanbeasleylaw.com

*Attorneys for Respondents/Appellant
Heather Crespo and Gabriel Crespo*

RECORD ON APPEAL INDEX

VOLUME ONE

ORDERS

Order granting Plaintiffs’ Motion for Continuance and Date Certain Trial, filed August 15, 2024.....	1
Order granting Plaintiffs’ Motions to Consolidate, filed September 12, 2024.....	7
Form 4 Orders/Verdict Forms, filed September 24, 2024	13
Form 4 Orders/ Actual and Punitive Damages Verdict Forms, filed September 25, 2024.....	23
Order as to Post-trial Motions of Rhett Riviere, filed January 3, 2025	49
Order as to Post-trial Motions of Josee Riviere, filed January 3, 2025	62
Order granting Attorneys’ Fees and Litigation Costs to Heather Crespo Pursuant to the SCUTPA, filed March 14, 2025 (Case No. 2022-CP-02-02323)	70
Order granting Attorneys’ Fees and Litigation Costs to Gabriel Crespo Pursuant to the SCUTPA, filed March 14, 2025 (Case No. 2022-CP-02-02324)	82

PLEADINGS

Complaint of Heather Crespo, filed October 10, 2022	94
Complaint of Gabriel Crespo, filed October 10, 2022.....	109
Answer of Rhett Riviere, Chase Enterprises, LLC of South Carolina and R.C. Riviere Properties, LLC, in the Heather Crespo matter, filed November 14, 2022	124
Answer of Rhett Riviere, Chase Enterprises, LLC of South Carolina and R.C. Riviere Properties, LLC, in the Gabriel Crespo matter, filed November 14, 2022	131
Answer of Josee Riviere to Heather Crespo, filed November 22, 2022	138
Answer of Josee Riviere to Gabriel Crespo, filed November 22, 2022.....	147

MOTIONS, SUPPORTING MEMORANDA, and OTHER FILINGS

Plaintiffs’ Motion to Consolidate, filed August 12, 2024.....	156
Plaintiff’s Motion for Continuance and Date Certain trial, filed August 12, 2024	163
Defendant Josee Riviere’s Motion In Limine to Exclude Witnesses and Inadmissible Hearsay, filed September 6, 2024.....	165
Defendant Josee Riviere’s Motion In Limine to Exclude Irrelevant Evidence pursuant to the Rules of Civil Procedure and the Rules of Evidence, filed September 9, 2024	322
Defendant Josee Riviere’s Motion for Severance, filed September 11, 2024	337
Defendants Rhett Riviere, Chase Enterprises, LLC of South Carolina and R.C. Riviere Properties, LLC’s Motion in Limine, filed September 11, 2024	341
Defendant Josee Riviere’s Brief in Support of Separate Trial, filed September 13, 2024	352
Defendants Rhett Riviere, Chase Enterprises, LLC of South Carolina and R.C. Riviere Properties, LLC’s Motion for Directed Verdict, filed September 23, 2024	358
Plaintiffs’ Motion for Attorneys’ Fees and Costs, filed October 4, 2024.....	368
Defendants Rhett Riviere, Chase Enterprises, LLC of South Carolina and R.C. Riviere Properties, LLC’s Motion for JNOV, filed October 4, 2024	398
Defendants Rhett Riviere, Chase Enterprises, LLC of South Carolina and R.C. Riviere Properties, LLC’s Motion to Reduce Punitive Damages, filed October 4, 2024.....	408
Defendants Rhett Riviere, Chase Enterprises, LLC of South Carolina and R.C. Riviere Properties, LLC’s Motion for New Trial or in the Alternative for New Trial Nisi Remittitur, filed October 4, 2024.....	411
Defendant Josee Riviere’s Motion for JNOV, filed October 4, 2024.....	418
Affidavit of Deborah B. Barbier, filed October 7, 2024.....	444
Affidavit of Ryan Beasley, filed October 8, 2024	450
Defendant Josee Riviere’s Supp. Motion for JNOV, or in the Alternative for a New Trial, or in the Alternative for a New Trial Nisi Remittitur, filed October 8, 2024	464
Declaration of Wesley D. Few, filed October 10, 2024.....	466
Defendants Rhett Riviere, Chase Enterprises, LLC of South Carolina and R.C. Riviere Properties, LLC’s Supp. Motion for New Trial, filed October 10, 2024.....	471
Defendants Rhett Riviere, Chase Enterprises, LLC of South Carolina and R.C. Riviere Properties, LLC’s Supp. Motion for Election of Remedies, New Trial, New Trial Nisi	

Remittitur, or to Set Aside Verdicts, filed October 10, 2024479

VOLUME TWO

Plaintiffs’ Response Opposing Defendant Josee Riviere’s Motion for JNOV,
filed Oct. 21, 2024486

Plaintiffs’ Response Opposing Rhett Riviere Defendants’ Motion for JNOV,
filed October 21, 2024501

Plaintiffs’ Response Opposing Rhett Riviere Defendants’ Supp. Motion for Election of
Remedies, filed October 21, 2024.....516

Plaintiffs’ Response Opposing Rhett Riviere Defendants’ Motion for New Trial,
filed October 21, 2024531

Plaintiffs’ Response Opposing Rhett Riviere Defendants’ Motion to Reduce Punitive
Damages, filed October 21, 2024546

Defendant Josee Riviere’s Amended Memorandum of Law in Supp. of Motion for JNOV,
filed November 12, 2024555

Brief on Behalf of Josee Riviere as to Plaintiffs’ Request for Fees, filed January 20, 2025.....601

Plaintiffs’ Supplemental Memorandum in Support of Attorneys’ Fees and Costs, filed
January 28, 2025607

Amended Affidavit of Deborah B. Barbier, filed January 28, 2025.....622

Rhett Riviere Defendants’ Memorandum in Opposition to Petition for Attorneys’ Fees
and Costs, filed January 28, 2025645

OTHER

Notice of Appeal, filed January 27, 2025653

Notice of Appeal by Respondents/Appellants, filed February 5, 2025683

Notice of Appeal by Respondents/Appellants, filed April 4, 2025719

TRANSCRIPTS

Trial Transcript, September 16-25, 2024731

VOLUME THREE

Trial Transcript, September 16-25, 2024, continued951

VOLUME FOUR

Trial Transcript, September 16-25, 2024, continued1441

VOLUME FIVE

Trial Transcript, September 16-25, 2024, continued1932

VOLUME SIX

Trial Transcript, September 16-25, 2024, continued2423

All Trial Exhibits, September 16-25, 20242476

Riviere Defendants Proposed Verdict Form2499

Transcript of Hearing on Post-trial Motions, November 13, 20242503

Transcript of Hearing on Attorneys Fee and Costs, January 21, 20252614

MISCELLANEOUS

Docket from Criminal Case No. 2021-A-02-107002282658

Docket from Criminal Case Nos. 2022-A-02-10700181 and -182.....2660

Docket from Case No. 2020-CP-02-01616 (Plaintiff Simmons for Minor Child)2664

Docket from Case No. 2021-CP-02-00333 (Plaintiff Michele Jain)2666

Docket from Civil Case No. 2021-CP-02-00889 (Plaintiff Julianne Foster).....2668

September 15, 2024 Letter from Jim Griffin to Judge Rivers re: Bifurcation of Trial2699

January 21, 2025 Email from Jim Griffin to Judge Rivers2700

Notice of Appeal by Respondents/Appellants, filed February 5, 20252719

Notice of Appeal, filed April 3, 20252809

AMENDED RECORD ON APPEAL (AS OF FEB. 10, 2026)

Order for Attorneys' Fees & Costs per UTPA, 2022-CP-02-02323, filed Mar. 14, 2025.....	2813
Order for Attorneys' Fees & Costs per UTPA, 2022-CP-02-02324, filed Mar. 14, 2025.....	2825

VOLUME SEVEN

SUPPLEMENTAL - PER ORDER DATED APRIL 8, 2026

Indictment (Julianne Foster), Case No. 2021-A-02-10700228.....	2837
Indictment (Heather Crespo), Case No. 2022-A-02-10700181	2839
Indictment (Gabriel Crespo), Case No. 2022-A-02-10700182.....	2841
Sentencing Sheet (Julianne Foster), Case No. 2021-A-02-10700228	2843
Sentencing Sheet (Heather Crespo), Case No. 2022-A-02-10700181	2844
Sentencing Sheet (Gabriel Crespo), Case No. 2022-A-02-10700182	2845
Hearing Transcript, Guilty Pleas, Feb. 17, 2026 (46 pages)	2846