



THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2025-002429

Lower Court Case No. 2022-CP-23-00240

DiscoverFresh Foods, Inc.....Respondent,

v.

Jesus Concepcion, Kendry S. Tavarez a.k.a. Kendry Solange Feliz, and National Risk Solutions, LLC, Defendants, of which Jesus Concepcion is the Appellant.

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

Respondent DiscoverFresh Foods, Inc. proposes the same record identified by Appellant

Jesus Concepcion with all exhibits included as well as the following documents:

Lis Pendens for 10 Howden Place, Simpsonville, SC 29781 (Dec. 29, 2021)

Lis Pendens for 5 Mitchell Spring Court, Simpsonville, SC 29681 (Dec. 29, 2021)

Verified Complaint (Jan. 18, 2022)

Tavarez Affidavit of Service (Feb. 17, 2022)

NRS Affidavit of Service (Feb. 17, 2022)

Certificate of Service (Mar. 29, 2022)

Motion for Entry of Default against Appellant (Oct. 19, 2022)

Motion for Entry of Default against Tavarez and NRS (Oct. 19, 2022)

Order for Entry of Default against Appellant (Oct. 25, 2022)

Order for Entry of Default against Tavarez and NRS (Oct. 25, 2022)

Motion for Default Judgment Against Appellant (Feb. 9, 2023)

Amended Affidavit of Damages (Feb. 13, 2023)

Certificate of Service for Motion for Entry of Default, Order for Entry of Default, Amended Affidavit of Damages, and Motion for Default Judgment (Apr. 24, 2023)

Concepcion Criminal Indictment (Oct. 10, 2023)

Order for Bench Warrant (Oct. 10, 2023)

Motion to Stay (Oct. 23, 2023)

Appellant Ltr. to Court (Dec. 21, 2023)

Stipulation of Dismissal for Mahon (Aug. 30, 2024)

Respondent's Renewed Motion for Default Judgment (Sept. 19, 2024)

Order for Final Default Judgment (Oct. 2, 2024)

Arrest Warrant (Oct. 15, 2024)

Transcript of Judgment (Oct. 21, 2024)

Execution Against Property to Greenville County Sheriff (Oct. 28, 2024)

Nulla Bonas as to Appellant, Tavarez and NRS (Mar. 12, 2025)

Concepcion Ltr. to Court (Jan. 22, 2025)

Concepcion Emergency Motion to Stay and Motion to Vacate Default Judgment (Feb. 11, 2025)

Motion for Appointment of Guardian ad Litem & Renewed Motion to Stay (Apr. 1, 2025)

Order (Apr. 21, 2025)

Concepcion Criminal Guilty Plea (June 9, 2025)

Certificate of Service of Response in Opposition to Motion to Stay/Vacate Default Jdt. (July 17, 2025) (Filed Sept. 26, 2025)

Respondent's Resp. in Opp. to Appellant's Motions (July 15, 2025)

Order for Hearing (July 21, 2025).

Notice of Hearing (Sept. 26, 2025)

Respondent's Supplemental Memo. in Opposition to Appellant's Motions (Sept. 30, 2025)

Entire Transcript of Hearing on October 6, 2025

Order Denying Appellant's Motions (Oct. 14, 2025)

Motion to Reconsider (Oct. 21, 2025)

Order Denying Appellant's Motion to Reconsider (Oct. 30, 2025)

Appellant's Notice of Appeal (Nov. 10, 2025)

TIMMONS BROGDON LAW FIRM, LLC

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***Counsel for Respondent DiscoverFresh Foods,  
Inc.***

Greenville, South Carolina  
June 3, 2026