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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM YORK COUNTY

COURT OF COMMON PLEAS

Jackson S. Kimball, III, Master-in-Equity

**RECEIVED**

OCT 02 2017

SC Court of Appeals

Appellate Case No. 2017-001254

Triple M Partners, LP., Plaintiff

vs.

Suzette Lefebvre, as Individual and as trustee of the Suzette Lefebvre Trust N/A, and Blanco GmbH+CO.KG, Defendants.

Of whom Suzette Lefebvre, as individual and as Trustee of the Suzette Lefebvre Trust N/A is the Appellant,

And

Of which Blanco GmbH+CO.KG is the Respondent.

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S BRIEF AND DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL

Robert A. Bernstein, Esquire  
5418-B Rivers Avenue  
North Charleston, SC 29406-6129  
(843) 529-1111  
Attorneys for Respondent



The attorneys for Respondent Blanco GmbH+CO.KG hereby move for a thirty-day extension to file the Initial Brief of the Respondent in this matter, as well as the Designation of Materials to Be Included in the Record on Appeal. The Initial Brief of the Respondent is due to be filed on October 6, 2017, and an additional thirty days would extend the time for the filing of the Initial Brief and related documents to November 5, 2017. This motion is supported by the affidavit of Robert A. Bernstein, filed herewith, and counsel for the Appellant and co-Respondent have no objection to the grant of additional time for the filing of the responsive brief and designation.

Respectfully Submitted,

BERNSTEIN & BERNSTEIN, P.A.



Robert A. Bernstein SC Bar No. 0677  
5418-B Rivers Avenue  
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(843) 529-1111; (843) 529-0035 (fax)  
[rbernstein@bernsteinpa.com](mailto:rbernstein@bernsteinpa.com)  
ATTORNEYS FOR RESPONDENT  
BLANCO GmbH+CO.KG

September 27, 2017

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )

AFFIDAVIT

Personally appeared before me, Robert A. Bernstein, who being first duly sworn, deposes and says:

1. I am the attorney for Respondent Blanco GmbH+CO.KG in the appeal entitled "Triple M Partners, LP. v. Suzette Lefebvre, as Individual and as Trustee of the Suzette Lefebvre Trust N/A, and Blanco GmbH+CO.KG, of whom Suzette Lefebvre, as individual and as Trustee of the Suzette Lefebvre Trust N/A is the Appellant, and Blanco GmbH+CO.KG is the Respondent, bearing Appellate Case No. 2017-001254.

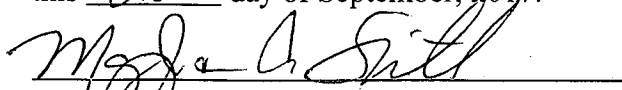
2. The Appellant filed her Initial Brief and Designation of Matter to Be Included in the Record on Appeal on September 6, 2017, making the Initial Brief of the Respondent and Respondent's designation due on October 6, 2017.

3. The undersigned requests thirty additional days to file the Initial Respondent's Brief and Designation of Matter to Be Included in the Record on Appeal, for the reasons that he has incurred a death in the family within the last four days, there have observed and is observing two religious holidays occurring within the last week and the ensuing week, all of which have diverted available time from me to work on the Initial Brief of the Respondent and the Initial Designation.

I have consulted with counsel for the Appellant and Counsel for the co-Respondent, and both are in agreement with and do not oppose the grant of additional time to file the required documents; I am further informed and believe that no person will suffer any prejudice from the grant of such additional time.

FURTHER DEPONENT SAYETH NOT!

SWORN and subscribed before me  
this 28<sup>th</sup> day of September, 2017.

  
\_\_\_\_\_  
Notary Public for the State of South Carolina;  
My Commission Expires: 08-26-18

  
\_\_\_\_\_

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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**SC Court of Appeals**

Triple M Partners, LP., Plaintiff

vs.

Suzette Lefebvre, as Individual and as trustee of the Suzette Lefebvre Trust N/A, and Blanco GmbH+CO.KG, Defendants.

Of whom Suzette Lefebvre, as individual and as Trustee of the Suzette Lefebvre Trust N/A is the Appellant,

And

Of which Blanco GmbH+CO.KG is the Respondent.

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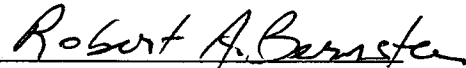
CERTIFICATE OF SERVICE

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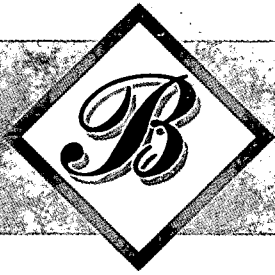
The undersigned hereby certifies that I am the attorney for the Respondent in the above case and that on September 28, 2017, I did serve a copy of the foregoing Motion for Extension of Time upon counsel for the Appellant and counsel for the Plaintiff by depositing a copy of the same in the United States Mail, postage prepaid, and addressed as follows:

Daniel J. Ballou  
Morton & Gettys, LLC  
331 E. Main Street, Suite 300  
Rock Hill, SC 29731  
Attorneys for Triple M. Partners

M. Heath Gilbert, Jr.  
Baucom, Claytor, Benton, Morgan & Wood, P.A.  
P.O. Box 35246  
Charlotte, NC 28325  
Attorneys for Appellant



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**RECEIVED**

ROBERT A. BERNSTEIN, ESQUIRE  
rbernstein@bernsteinpa.com

September 28, 2017

OCT 02 2017

CHARLES S. BERNSTEIN, ESQUIRE  
(Retired)

**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk of SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: Triple M Partners, LP.  
vs. Suzette Lefebvre, as Individual and as  
trustee of the Suzette Lefebvre Trust  
N/A, and Blanco GmbH+CO.KG  
Of whom Suzette Lefebvre is the Appellant,  
and Blanco GmbH+CO.KG is the Respondent  
Appellate Case No. 2017-001254

Dear Ms. Kitchings:

Enclosed herein for filing please find the original and six copies of the Respondent's Motion for Extension of Time to file Respondent's Initial Brief and Initial Designation of Matter to Be Included in the Record on Appeal, an affidavit in support thereof, and the Certificate of Service hereof. We also enclose our firm's check for \$25.00 for filing the Motion. Thanking you for your consideration, we are

Yours Very Truly,

BERNSTEIN & BERNSTEIN, P.A.

*Robert A. Bernstein*

Robert A. Bernstein

cc: M. Heath Gilbert, Jr., Esquire ✓  
Daniel J. Ballou, Esquire ✓  
Jerome F. Gallagher, Esquire ✓  
Laura Budd, Esquire ✓

