

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM YORK COUNTY

COURT OF COMMON PLEAS

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

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Appellate Case No. 2017-001254

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RECEIVED

OCT 06 2017

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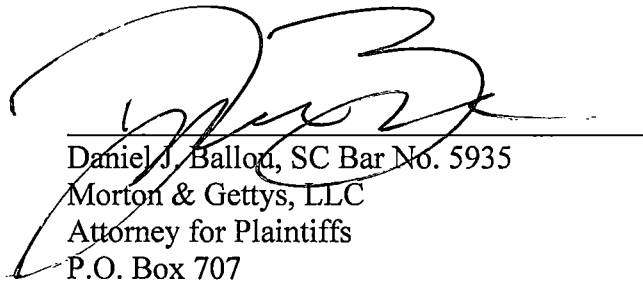
MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S BRIEF AND  
DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL

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Daniel J. Ballou, Esquire  
331 East Main Street; Suite 300 (P.O. Box 707)  
Rock Hill, South Carolina 29730 (29731)  
803-366-3388  
Attorney for Respondent

The attorneys for Respondent Triple M. Partners, LP, 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 Daniel J. Ballou, 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,



Daniel J. Ballou, SC Bar No. 5935  
Morton & Gettys, LLC  
Attorney for Plaintiffs  
P.O. Box 707  
Rock Hill, SC 29731  
T: 803.366.3457  
F: 803.366.4044  
dan.ballou@mortongettys.com

10/3, 2017  
Rock Hill, South Carolina

STATE OF SOUTH CAROLINA            )  
  )  
COUNTY OF YORK                    )       AFFIDAVIT

Personally appeared before me, Daniel J. Ballou, who being first duly sworn, deposes and says:

1. I am the attorney for Respondent Triple M. Partners, LP 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 is the Appellant, and Blanco GmbH+CO.KG is the respondent” bearing Appellate Case No. 2017-001254

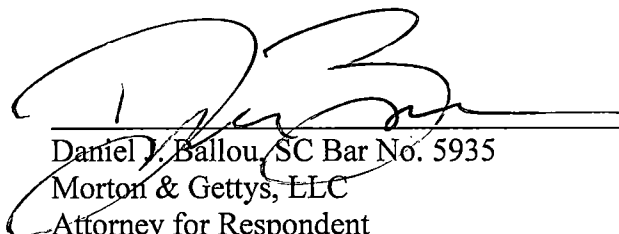
2. The Appellant filed her Initial Brief and Designation of Matter to Be Included in the Record on Appeal on September 6, 2017, making the Initial Brief of the Respondent and Respondent’s Designation due on October 6, 2017.

3. The undersigned requests thirty additional days to adequately prepare the Initial Brief of the Respondent and 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 THE AFFIANT SAYETH NOT.

[SIGNATURE PAGE FOLLOWS] **RECEIVED**  
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Daniel J. Ballou, SC Bar No. 5935  
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dan.ballou@mortongettys.com

SWORN TO AND SUBSCRIBED before me on  
This 3 day of October, 2016

Leanne McCreary [SEAL]  
Notary Public for South Carolina  
My Commission Expires: 12/1/21

THE STATE OF SOUTH CAROLINA

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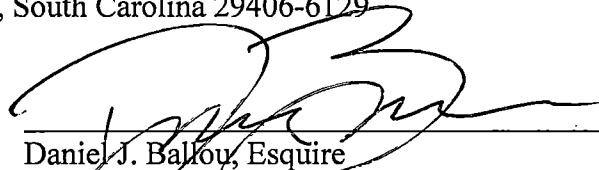
The undersigned hereby certifies that I am the attorney for the Respondent in the above case and that on September 28, 2017, I did serve a copy of the foregoing Motion for Extension of Time upon counsel for the Appellant and counsel for the Plaintiff by depositing a copy of the same in the United States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

M. Heath Gilbert, Jr.  
Baucom, Claytor, Benton, Morgan & Wood, PA  
P.O. Box 35246  
Charlotte, North Carolina 28325

Robert A. Bernstein  
Bernstein & Bernstein, PA  
5418-B Rivers Avenue

North Charleston, South Carolina 29406-6129

10/3/17



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Daniel J. Ballou, Esquire  
331 East Main Street, Suite 300 (P.O. Box 707)  
Rock Hill, South Carolina 29730 (29731)  
803-366-3388  
Attorney for Respondent

MORTON & GETTYS  
ATTORNEYS AT LAW

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OCT 06 2017

SC Court of Appeals

JAMES M. MORTON

JOHN P. GETTYS, JR. \*

MICHAEL B. SMITH †

JOSHUA B. VANN

ELIZABETH SMITH OWEN

J. RICHARDS MCCRAE, III

MICHAEL K. HATCH ‡

MELISSA G. CASSELL §

JOSEPH L. RAAD ¶

DANIEL J. BALLOU •

JAMES D. DUNCAN §

J. NATHANIAL PIERCE

Certified Civil Court Mediator \*

Certified Family Court Mediator †

Certified Specialist in Estate Planning  
and Probate Law ¶

Licensed in SC & NC §

Licensed in SC, GA, FL & NC ‡

Licensed in SC, TX (Inactive) •

October 3, 2017

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


**RE: 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 Suzeette Lefebvre is the Appellant, and Blanco GmbH+CO.KG is the respondent**  
**Appellate Case No.: 2017-001254**

Ms. Kitchings:

Enclosed 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. Also enclosed please find our firm's check in the amount of \$25.00 (Twenty-five and 00/100 dollars) for the filing of the same.

Please do not hesitate to contact our office with any questions. I can be reached directly at 803-366-3425. With kind regards, I am

Sincerely,

  
Leah Anderson McCraney  
Paralegal for Daniel J. Ballou

LAM/

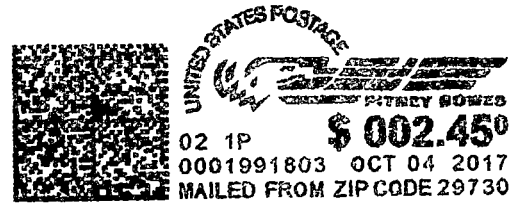
enclosures

cc: Robert A. Bernstein, Esquire  
M. Heath Gilbert, Jr., Esquire  
Laura Budd, Esquire

www.mortongettys.com

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A LIMITED LIABILITY COMPANY



**MORTON & GETTYS**  
ATTORNEYS AT LAW

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PO Box 707  
Rock Hill, SC 29731

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OCT 06 2017  
SC Court of Appeals

**To:**  
The Honorable Jenny Abbott Kitchings  
Clerk of SC Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

