

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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SC 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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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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RESPONDENT'S DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL


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Robert A. Bernstein, Esquire      SC Bar No. 0677  
BERNSTEIN & BERNSTEIN, P.A.  
5418-B Rivers Avenue  
North Charleston, SC 29406-6129  
(843) 529-1111  
Attorneys for Respondent

The Respondent proposes the following to be included in the Record on Appeal:

1. Complaint for Divorce, Case No. 2014-DR46-623
2. Decree of Divorce, dated October 30, 2014, Case No. 2014-DR46-623
3. Notice of Filing of Foreign Judgment, October 3, 2014, Case No. 2014-CP46-03272;
4. Summons & Complaint, November 16, 2016, Case No. 2016-CP46-03382;
5. Lis Pendens, November 16, 2016, Case No. 2016-CP46-03382;
6. Affidavit & Verification of Complaint & Service, November 28, 2016, Case No. 2016-CP46-03382;
7. Affidavit of Service upon Suzette LeFebvre Trust, December 8, 2016, Case No. 2016-CP46-03382;
8. Affidavit of Service upon Suzette LeFebvre, December 8, 2016, Case No. 2016-CP46-03382;
9. Motion for Default Judgment, January 9, 2017, Case No. 2016-CP46-03382;
10. Motion to Intervene, February 14, 2017, Case No. 2016-CP-46-03382;
11. Affidavit of Robert Bernstein, February 14, 2017, Case No. 2016-CP46-03382;
12. Memorandum in Support of Motion to Intervene, February 14, 2017, Case No. 2016-CP46-03382;
13. Judgment of Default, February 24, 2017, Case No. 2016-CP46-03382;
15. Order Permitting Intervention, March 14, 2017, Case No. 2016-CP46-03382;
16. Answer of Intervening Defendant, March 14, 2017, Case No. 2016-CP46-03382;
17. Motion for Modification of Default Judgment, March 15, 2017, Case No. 2016-CP46-03382;
18. Memorandum in Support of Motion of Modification of Default Judgment and for Expedited Hearing, March 15, 2017, Case No. 2016-CP46-03382;
19. Email from Suzette Lefebvre to Maryann Motz, March 21, 2017, re: March 22, 2017 hearing;
20. Order of Reference, March 21, 2017, Case No. 2016-CP46-03382;
21. Supplemental Order of Default, April 4, 2017, Case No. 2016-CP46-03382;
22. Notice of Appearance, April 7, 2017; Case No. 2016-CP46-03382;
22. Motion to Amend or Alter Judgment, April 13 2017, Case No. 2016-CP46-03382;
23. Transcript of Hearing, April 20, 2017, Case No. 2016-CP-46-03382;
24. Exhibit 3, Hearing held on April 20, 2017, Case No. 2016-CP-46-03382
25. Order re: Rule 59 (e) Motion, April 26, 2017, Case No. 2016-CP46-03382;

I certify that this designation contains no matter which is irrelevant to this appeal



Robert A. Bernstein, Esquire      S.C. Bar No. 0677  
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Attorneys for Respondent

November 3, 2017

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM YORK COUNTY

COURT OF COMMON PLEAS

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

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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.

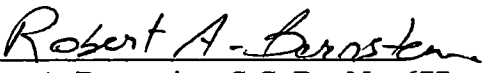
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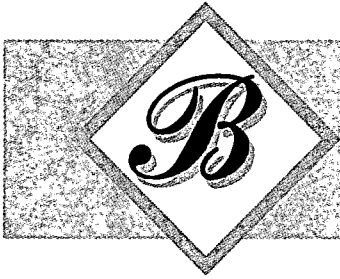
CERTIFICATE OF SERVICE

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The undersigned hereby certifies that I am the attorney for the Respondent in the above case and that on November 3, 2017, I did serve a copy of the Initial Brief of the Respondent and the Respondent's Designation of Matter to be Included in the Record on Appeal upon counsel for the Appellant 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, P.A.  
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Charlotte, NC 28325  
Attorneys for Appellant

  
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**BERNSTEIN & BERNSTEIN, P.A.**  
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(Retired)

November 3, 2017

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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 one copy of the Initial Brief of the Respondent and the Respondent's Designation of Matter to Be Included in the Record on Appeal, with the Certificate of Service hereof. By copy of this correspondence to M. Heath Gilbert, Attorney for the Appellant, we are serving the Appellant with a copy of these documents. Thanking you for your consideration, we are

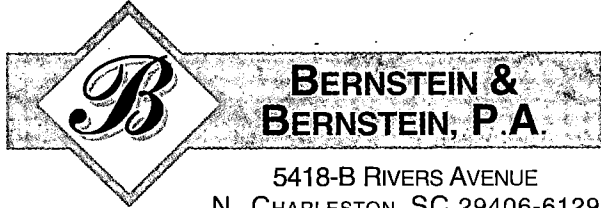
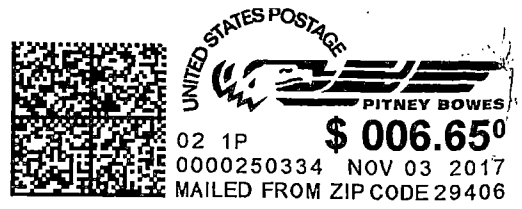
Yours Very Truly,

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 ✓



5418-B RIVERS AVENUE  
N. CHARLESTON, SC 29406-6129

ADDRESS CORRECTION REQUESTED

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

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