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THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM YORK COUNTY

Court of Common Pleas

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

C/A NO.: 2017-001254

TRIPLE M PARTNERS, LP.

.....Plaintiff

vs.

SUZETTE LEFEBVRE, as Individual,

and as Trustee of the SUZETTE LEFEBVRE TRUST N/A

..... Defendant Appellant

vs.

BLANCO GmbH + CO.KG

..... Respondent Intervenor

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APR 20 2018
SC Court of Appeals

PETITION OF COUNSEL FOR DEFENDANT APPELLANT TO WITHDRAW

The attorneys for Defendant Appellant Suzette LeFebvre, hereby petition this Court to withdraw from further representation of Defendant Appellant Suzette LeFebvre pursuant to Rule 264(b), SCACR. Justifiable Cause exists because of the following:

1. Pursuant to Rule 1.16(b)(4), Defendant Appellant Suzette LeFebvre has taken actions that Counsel for Defendant Appellant Suzette LeFebvre consider repugnant, imprudent and with which Counsel for Defendant Appellant Suzette LeFebvre have a fundamental disagreement.

2. Pursuant to Rule 1.16(b)(5), Defendant Appellant Suzette LeFebvre has failed to substantially fulfill her contractual obligations to Counsel for Defendant Appellant regarding the services of Counsel for Defendant Appellant or payment therefor and has been given reasonable warning that the attorneys will withdraw, unless the obligation is fulfilled.

3. Pursuant to Rule 1.16(b)(6), the continued representation of Defendant Appellant Suzette LeFebvre by Counsel for Defendant Appellant will result in unreasonable financial burden on Counsel for Defendant Appellant and the continued representation of Defendant Appellant Suzette LeFebvre by Counsel for Defendant Appellant has been rendered unreasonably difficult by Defendant Appellant Suzette LeFebvre.

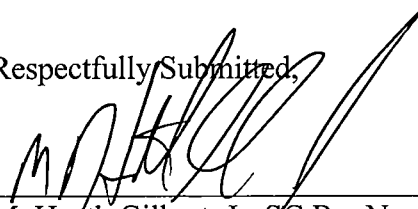
4. Pursuant to Rule 1.16(b)(1), withdrawal by Counsel for Defendant Appellant can be accomplished without a material adverse effect on the interests of Defendant Appellant Suzette LeFebvre as this matter has been fully briefed and submitted to this Honorable Court causing Defendant Appellant Suzette LeFebvre no undue delay or hardship.

5. Other good cause exists to support the request to withdraw as counsel for Defendant Appellant Suzette LeFebvre.

In addition, Pro Hac Vice Attorney for Defendant Appellant Suzette LeFebvre, Laura Stubbs Budd, also seeks to withdraw for the same reasons as set forth above.

Counsel for Defendant Appellant has notified Counsel for Respondent Intervenor regarding this petition and Counsel for Respondent Intervenor has indicated his consent to the filing of the same. Prior to granting of the Petition, Counsel for Defendant Appellant will provide to the Clerk of this Court a current address, a current telephone number and a current electronic mail addresses for Defendant Appellant Suzette LeFebvre.

Respectfully Submitted,



M. Heath Gilbert, Jr. SC Bar No. 72198
Attorney for Defendant-Appellant
Baucom, Claytor, Benton, Morgan & Wood, P.A.
PO Box 35246
Charlotte, NC 28235
Telephone: (704) 376-6527
Fax: (704) 376-6207
hgilbert@baucomclaytor.com

This the 17th day of April, 2018.

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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,

.....Appellant

and

Of which BLANCO GmbH + CO.KG

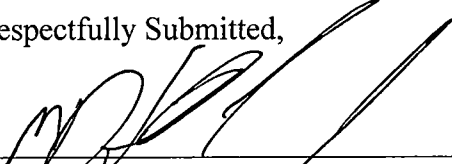
..... Respondent

CERTIFICATE OF COUNSEL

The undersigned certified that this Petition of Counsel for Defendant Appellant to Withdraw complies with Rule 211(b), SCACR:

This the 18th day of April, 2018.

Respectfully Submitted,



M. Heath Gilbert, Jr. SC Bar No. 72198
Attorney for Defendant-Appellant
Baucom, Claytor, Benton, Morgan & Wood, P.A.
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PROOF OF SERVICE

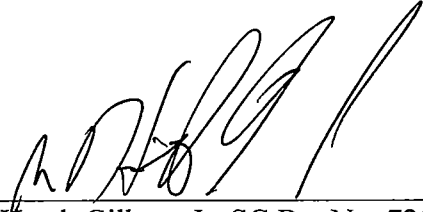
I hereby certify that I am the attorney for the Appellant in the above case and that I did serve a copy of the foregoing Petition of Counsel for Defendant Appellant to Withdraw upon counsel for the Respondent Intervenor by fax and by depositing a copy of same in the United States mail, postage prepaid, and properly addressed and to the Defendant Appellant by

electronic mail and by depositing a copy of same in the United States mail, postage prepaid, and properly addressed as follows :

Robert A. Bernstein
Bernstein & Bernstein, P.A.
P.O. Box 20519
Charleston, SC 29413
Attorney for Respondent Intervenor

Suzette LeFebvre
5960 SW 32nd Terrace
Fort Lauderdale, FL 33312-6325
Zette222@gmail.com

This the 10th day of April, 2018.



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*denotes also licensed
in South Carolina

Clay A. Campbell*
Robert C. Gunst, Jr.*
Elsbeth Crawford Long

Lloyd F. Baucom, Of Counsel
James F. Wood, III (1956-2018)

April 18, 2018

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SC Court of Appeals

VIA US Mail:

The South Carolina Court of Appeals
Attn: V. Claire Allen, Deputy Clerk
PO Box 11629 (29211)
1220 Senate Street
Columbia, SC 29201

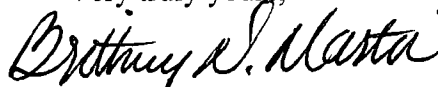
RE: *Triple M. Partners v. Suzette LeFebvre et al.*
Appellate Case No. 2017-001254

Dear Ms. Allen:

Enclosed please find an original and two (2) copies of a Petition of Counsel for Defendant Appellant to Withdraw, Proof of Service and Certificate of Counsel for filing with the court along with a check in the amount of \$25 for the filing fee. Please return the file stamped copies to our office in the self-addressed, postage prepaid envelope enclosed.

Should you have any questions, please do not hesitate to contact our office. I remain,

Very truly yours,



Brittney N. Martin
Paralegal to M. Heath Gilbert, Jr.

Enclosures

OTHER COUNSEL OF RECORD:

Robert A. Bernstein, *Counsel for Respondent*
Daniel J. Ballou, *Counsel for Plaintiff*

BAUCOM, CLAYTOR, BENTON, MORGAN & WOOD, P.A.
200 Providence Road, Suite 106
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