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Elizabeth T. Logan, Esquire

October 31, 2017

Hon. Nancy L. Ridgway, P.J.F.P.
Superior Court of New Jersey
1201 Bacharach Boulevard
Atlantic City, New Jersey 08401

RE: REGNAERT v. REGNAERT
DOCKET NO. FM-01-354-16

#1571-001

Dear Judge Ridgway:

In connection with the hearing in this matter held on October 20, 2017, I am enclosing a copy of Exhibit D-3 marked in evidence at the trial on October 18, 2016. D-3 is a series of photographs of the vehicles owned at various times by the Plaintiff, Todd Regnaert. In connection with these photographs, I am enclosing pages 159 through 167 of the trial transcript in which ~~the Plaintiff recites the history of the purchase and sale of the vehicles.~~

I am also enclosing page 109 of the transcript and invite the Court's attention to lines 6 through 10 which sets forth the Plaintiff's position that each of the parties keep their vehicles without setoff and the Plaintiff's willingness to give up whatever other personal property there was left in the marital home.

For the Court's convenience, I am enclosing a copy of the Amended Final Judgment entered on December 28, 2016 which states in paragraph 12:

12. Each of the parties shall retain their respective vehicles in their possession free and clear of any claims by the other. Each of the parties shall be solely responsible for any and all loans, insurance, maintenance, and all other expenses relating to the vehicles they are retaining and they shall hold the other harmless and indemnify them against same, including reasonable attorney's fees and costs for defending same.

Therefore, it is the Plaintiff's position that the Court correctly addressed the vehicle issue during the trial.

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A Professional Corporation

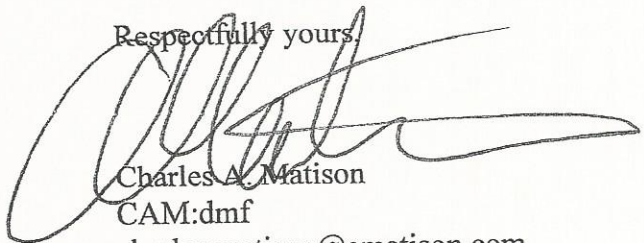
October 31, 2017

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Hon. Nancy L. Ridgway, P.J.F.P.

Thank you for your consideration in this matter.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Charles A. Matison', written over the typed name and email address.

Charles A. Matison

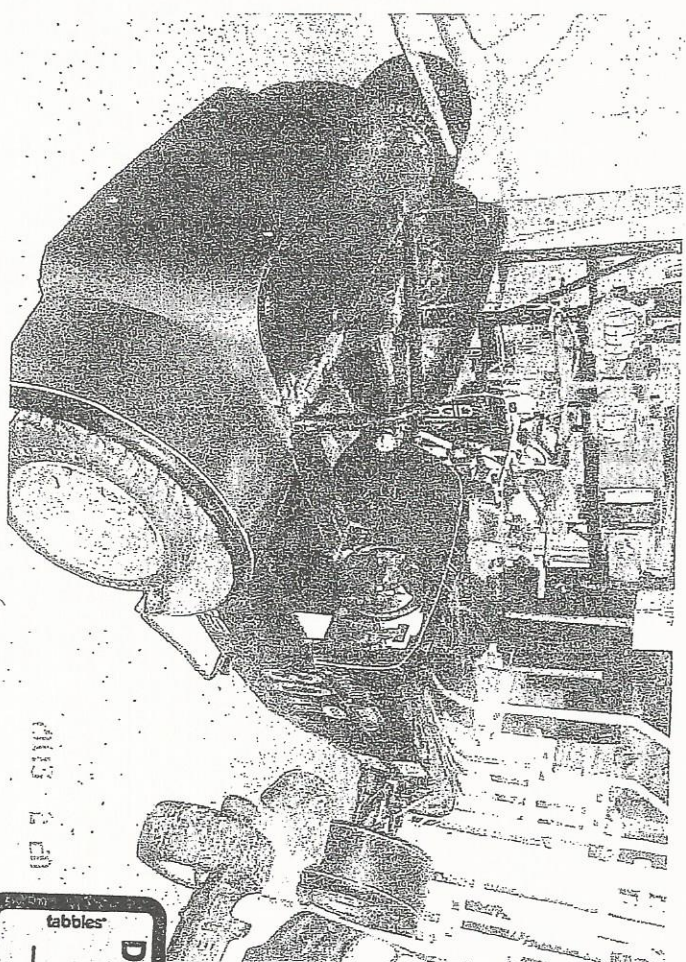
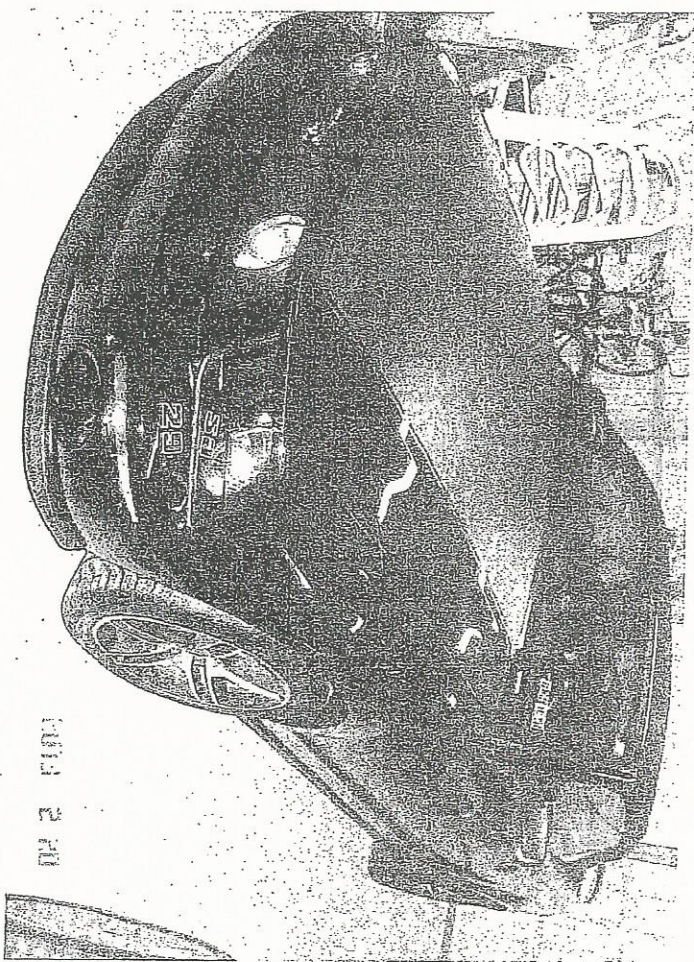
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charles.matison@cmatison.com

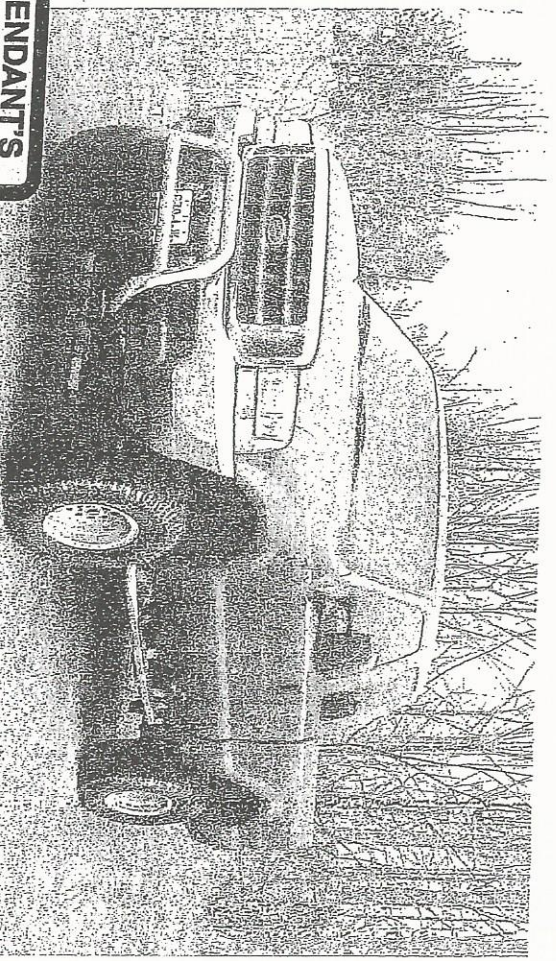
Enclosure

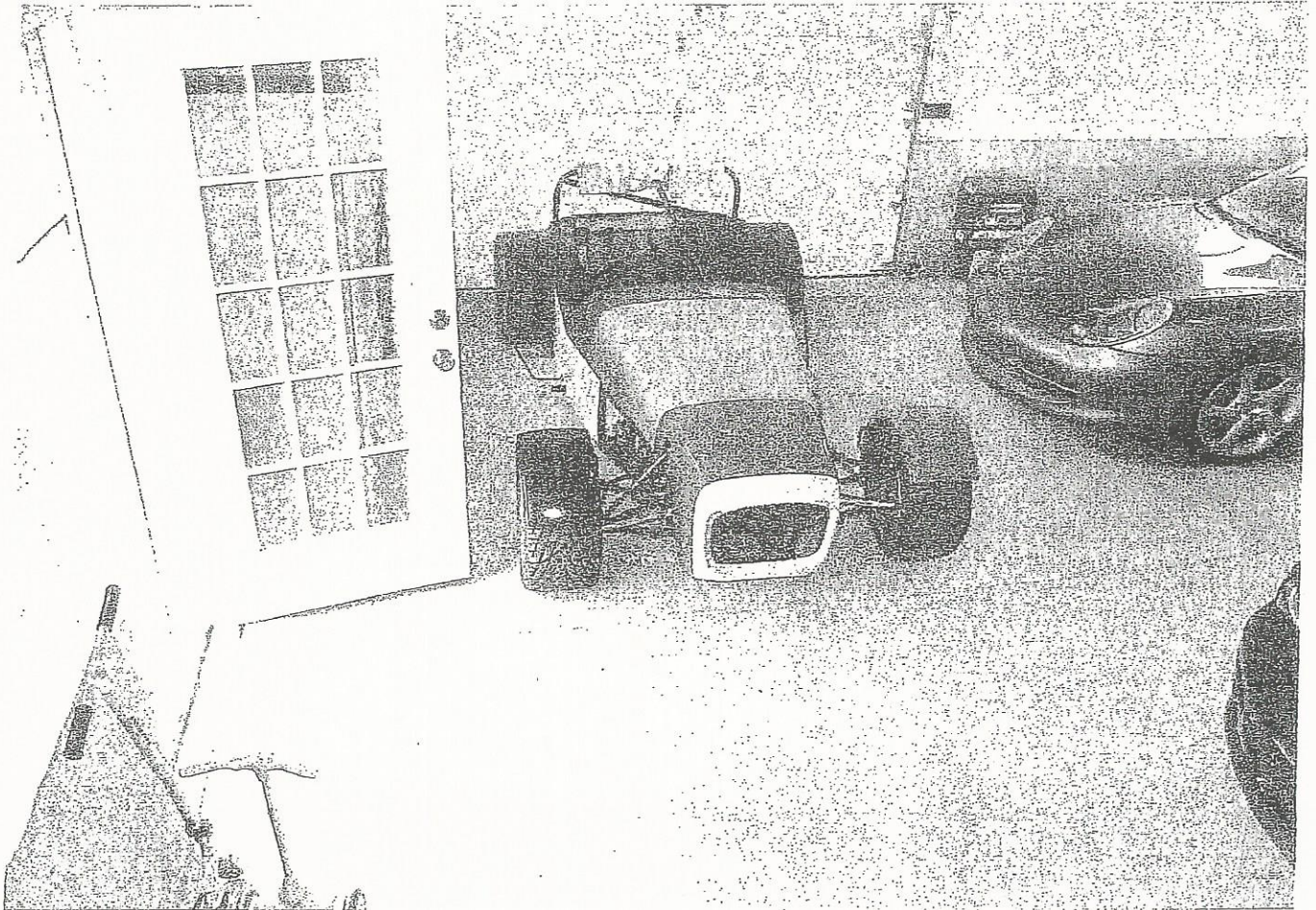
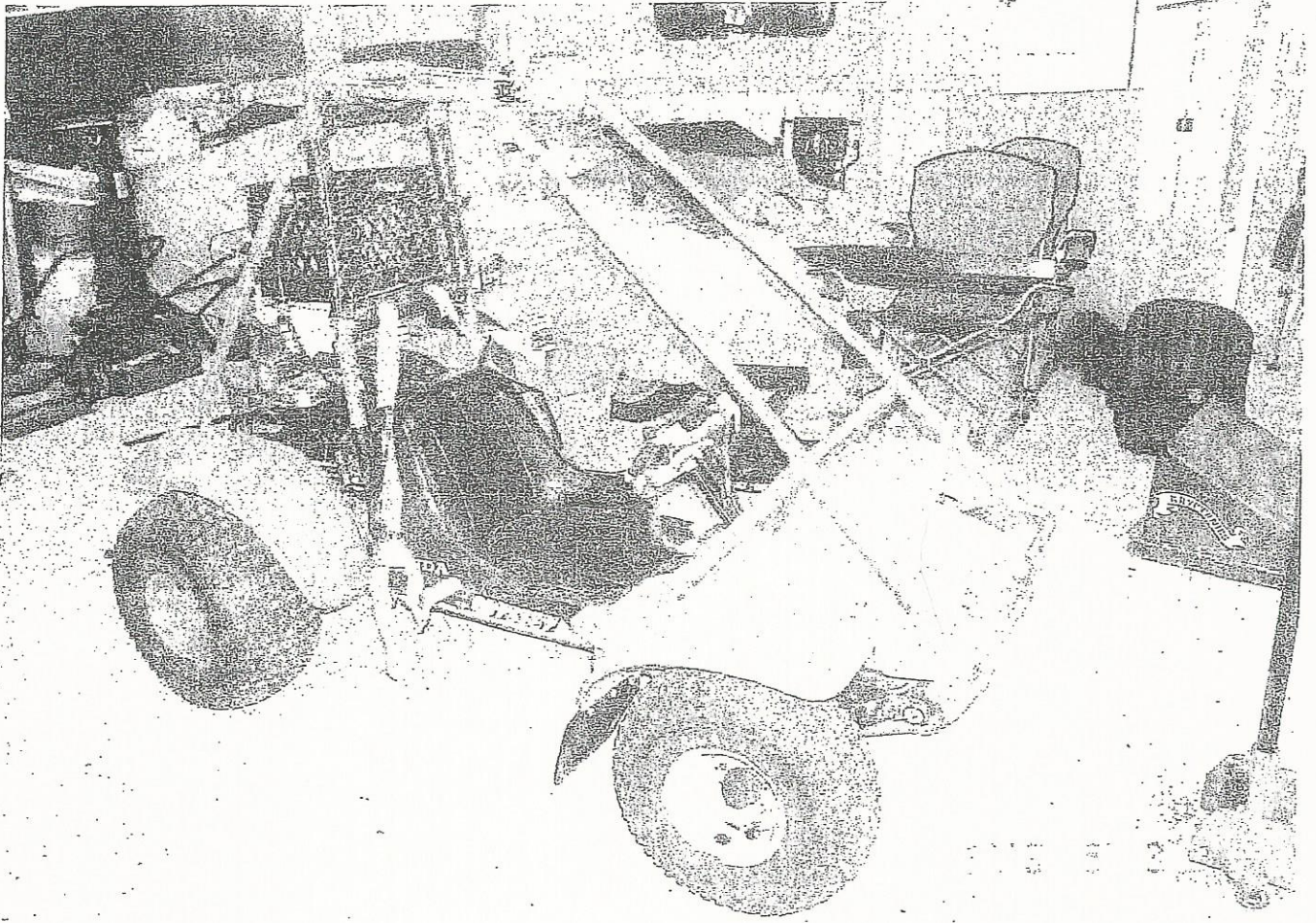
cc: Ms. Sandra Regnaert (via regular and certified mail) (w/enclosure)

Dr. Todd Regnaert (w/enclosure)



tabbles
**DEFENDANT'S
 EXHIBIT**
 0-3-2017
 1011816







1 recording transcribed.

2 MR. MATISON: No further questions, Your
3 Honor.

4 THE COURT: All right. -

5 MR. MATISON: I'd like to call Dr. Regnaert
6 to respond to some of these issues.

7 THE COURT: I assumed so.

8 Dr. Regnaert, take the stand again, please.

9 DR. REGNAERT: Okay.

10 THE COURT: Yeah.

11 DR. REGNAERT: Okay. Do I swear back in?

12 THE COURT: No. You're still under oath.

13 Okay?

14 REDIRECT EXAMINATION BY MR. MATISON:

15 Q. Dr. Regnaert, I'm going to show you D-3,
16 which are the cars. So I want you to tell the judge
17 about each of these cars.

18 MR. MATISON: I'm looking at the first page,
19 Your Honor, starting in the top left-hand corner.

20 BY MR. MATISON:

21 Q. Do you recognize that car?

22 A. Yes.

23 Q. What is that?

24 A. This is a car I bought on a Lotus site, the black
25 little car. I paid \$800 for that car. It didn't run,

1 and I built it into a running vehicle, and you can see
2 it again. She's managed to take a picture of the paint
3 in one of the pictures, the green, the car with a green
4 nose, Your Honor, is the same car after I restored it.

5 MS. REGNAERT: Right.

6 BY THE WITNESS:

7 A. And I sold it to a gentleman in Michigan for
8 \$5,000, but I spent a lot of my time on it, a ton of
9 time. I built the exhaust system before I fixed the
10 carburetors. It's a hobby, sir.

11 BY MR. MATISON:

12 Q. And when -

13 A. And then -

14 Q. When did you sell the car, sir?

15 A. Several years ago.

16 Q. And is the money spent?

17 A. Well, yes.

18 Q. All right. So let's go to the next car.

19 A. This is the - This truck?

20 Q. Yes. It's the -

21 A. Really, seriously, this is -

22 Q. It's a blue, it's a blue, it's the blue
23 truck. It's on the top right-hand corner.

24 A. Right.

25 Q. What's that car?

1 A. This is my F-2 - F-350 dually cab - What do they
2 call that, it's a quad cab I purchased when I had my
3 office in Port Charles in 2002, five years before I met
4 you, I had it paid off in 2005.

5 BY MR. MATLSON:

6 Q. No. You're aren't - you're going to talk to
7 the judge.

8 A. I'm sorry. Your Honor, -

9 Q. You're not talking to Sandra.

10 A. - I had this -

11 Q. The judge is the most -

12 A. Okay.

13 Q. - important person in this courtroom.

14 A. I had this vehicle paid off long before I ever met
15 her.

16 Q. And what - Is that car still around?

17 A. I sold this because she didn't like it sitting in
18 the driveway. I used it for winter driving because I
19 drove a Mazda Miata that couldn't get out of its own
20 way and it was dangerous -

21 Q. Sir, -

22 A. - in the snow.

23 Q. - listen to my question.

24 A. Yes, sir.

25 Q. I asked you the question did you sell the

1 truck.

2 A. Yes, I did.

3 Q. And when did you sell the truck?

4 A. Three years ago to a kid who wanted to haul
5 horses.

6 Q. And is the money spent?

7 A. Yes.

8 Q. All right. Go to the bottom left-hand corner
9 of the first page, what car is that?

10 A. Bottom left?

11 Q. Yes.

12 A. That was a 2007 Saleen Mustang 281 Heritage
13 edition convertible.

14 Q. What happened to that car?

15 A. I purchased that car with proceeds -

16 Q. No.

17 A. What happened to it?

18 Q. What happened to that car?

19 A. I traded that for my Jeep when I got stuck in the
20 snow three years ago.

21 Q. All right. Next car, the one in the bottom
22 right-hand corner, what's that car?

23 A. That's a 911 Carrera -

24 Q. Porsche.

25 A. Porsche.

1 Q. Do you still have that car?

2 A. No. That was the worst car I ever owned.

3 Q. What happened to that car?

4 A. I traded it on a car that my dad and I bought
5 jointly called an Excalibur Cobra.

6 Q. Okay. And when did you do that?

7 A. Two, three years ago.

8 Q. All right.

9 A. Can I have -

10 Q. Next, in the second page there's more cars.

11 At the top of the page what cars do you see there that
12 you recognize?

13 A. The top of the page is the 2010 F250 Sandy and I
14 bought together that she used as her primary drive.
15 It's the large blue truck on the side of the garage
16 with the cap on the back and the dog thing on the back,
17 all -

18 Q. Does she still drive that car?

19 A. She - When Josh and I were in the motel in 2014,
20 in that summer from the end of April through mid-July,
21 she took that and the little blue Mazda 3 that we call
22 our little green car that we drove around town together
23 because it got 40 miles per gallon, and she took both
24 those and sold them and used them as - because they
25 have quite a bit of equity in them, and is the down

1 payment for her Explorer Sport that she drives today.

2 Q. Any other cars on the top that you recognize?

3 A. Yes. The red car, the little Mazda Miata is the
4 one I drove.

5 Q. Is that the car she traded in?

6 A. No. She traded the blue one in.

7 Q. What about the red Miata? Is that still
8 there?

9 A. We had an argument one day and it was fine -

10 Q. No. I asked -

11 A. - and now it's gone.

12 Q. My question is what happened to the car.

13 A. Sold it.

14 Q. Sold. Is there any other car in that picture
15 that you recognize?

16 A. Well, I did sell the cars that - They're the same
17 - it's the same composite of pictures.

18 Q. All right. How about on the bottom of that,
19 are the same cars?

20 A. These two - This is the Saleen, and that that I
21 acquired from my personal injury suit.

22 Q. Tell me about that.

23 A. What's that?

24 Q. The -

25 A. I always wanted a 911.

1 Q. And is that, is that car still around or is
2 it gone?

3 A. No, I sold it. The motor leaked like crazy. It
4 was in - a terrible car.

5 Q. All right. And what are the other cars on
6 that, on that page?

7 A. And that, this, -

8 Q. Can you identify them?

9 A. - this is not a Lotus. People say Lotus, they
10 like to dress it up. This is a homemade car with a
11 Kawasaki 1000 cc engine. It was built for what they
12 call DSR - I used to race cars - DSR auto cross. It
13 has sequential shifter panels. It was developed by a
14 man named Jack Magoo (ph) or something out in
15 Washington. He could never get it to run. I -

16 Q. Do you still have that car?

17 A. I sold it to a man in Detroit many years ago.

18 Q. All right. Did we cover every car on the
19 first two pages?

20 A. Yes, sir, we have.

21 Q. All right. Let's go to the third page.
22 Describe what you - Do you identify any cars on that
23 page?

24 A. Yes.

25 Q. What's there?

1 A. The cars on this page are the Lotus finished.
2 Well, no, it's not quite done, you could see, because I
3 bent aluminum here. It's still a white aluminum. I
4 bought sheets of aluminum and bent it to the frame
5 because no - the body was in terrible shape. So I hand
6 fabricated that body and, as you see, I pieced it
7 together. I painted it by hand. I wet sanded it all
8 down, restored the engine, fixed the axle, -

9 Q. You still have that car?

10 A. No, sir. It's the one I sold.

11 Q. How about the red one at the top?

12 A. This is a little - This is a Honda Pilot. This is
13 the size of a large go kart. I bought this car for a -
14 This is a dune buggy I thought we'd use to ride around
15 the back yard, and when we got it home it had a posit
16 traction rear axle, and Sandy didn't like it tearing
17 the backyard because when we went around a corner the
18 rear wheel -

19 Q. What happened to that car?

20 A. I sold it. This is like a toy. To some young kid
21 on eBay, and this is my old Mustang under the cover
22 that I purchased in like 1999.

23 Q. Do you still have it?

24 A. No. She never wanted it in the garage. So I got
25 rid of it.

1 Q. So of all of the cars that, that Sandy shows
2 in the picture that has now been marked as D-3, they're
3 all gone. Is that correct?

4 A. Yes, sir.

5 Q. All right. So the - Do you have any bank
6 accounts that you failed to disclose on your Case
7 Information Statement?

8 A. As God is my witness, I do not have any other bank
9 account.

10 Q. Do you have any stock accounts or bond
11 accounts that you failed to disclose?

12 A. No, I do not.

13 Q. Do you have any retirement accounts that you
14 failed to disclose?

15 A. No, not at all.

16 Q. Do you have a safe deposit box that has money
17 in it?

18 A. I have no safe deposit box. The only safe deposit
19 box -

20 Q. Oh, that -

21 A. Okay. Sorry.

22 Q. There's no question.

23 A. Okay.

24 Q. Do you have a safe deposit box?

25 A. I do not. My dad does, but it's for their