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Nov 18 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Probate Court

The Honorable Amy W. McCulloch
Richland County
Trial Court Case No. 2020GC4000072

APPELLATE CASE NO. 2022-001226 and 2022-001328

Jane E. Baskin.....Plaintiff/Respondent,

v.

William B. Walkup.....Defendant/Appellant.

**JANE E. BASKIN'S REPLY IN OPPOSITION TO DEFENDANT/APPELLANT'S
MOTION FOR SECOND EXTENSION OF TIME FOR APPELLANT
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

It is with great reluctance to file this Reply in Opposition to the Appellant's counsel's Motion for additional time to file the Appellant's Brief and Designation of Matter in this case. It should be noted that the undersigned Respondent's counsel granted the first request for an extension for the asking. The grounds for opposition at this time are that the Respondent, Jane E. Baskin, is a 76-year-old woman who requires round-the-clock, 24/7 care. She suffers from cerebral palsy and is confined to a wheelchair. The Appellant is the Trustee named in Ms. Baskin's father's Will which established the Eldridge Baskin Trust for her. He is himself 82-years-old. The Probate Court of Richland County removed

Appellant for cause, including “serious breaches of trust,” in a 23-page, single-spaced Order, outlining in great detail his delicts as Trustee. This Court’s review of that Order is limited should there be any evidence to support the Probate Court’s decision. Appellant has also filed motions to have the automatic stay reinstated, following the Probate Court’s Order Lifting Automatic Stay. The Appellant, the Removed Trustee, seeks control of the Trust pending this litigation. Stated bluntly, the Appellant is seeking to run out the clock on this 76-year-old beneficiary, the Respondent.

For the foregoing reasons, the Respondent opposes any further extensions of time that would impede the progression of this appeal.

s/Richard C. Detwiler

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ATTORNEYS FOR THE RESPONDENT

Columbia, South Carolina

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Jane E. Baskin.....Respondent,

v.

William B. Walkup.....Appellant.

PROOF OF SERVICE

The undersigned certifies that I have served a copy of **Jane E. Baskin's Reply in Opposition to Defendant/Appellant's Motion for Second Extension of Time for Appellant to File Initial Brief and Designation of Matter to Be Included in the Record on Appeal**, in this matter on counsel of record by causing a copy of the same to be emailed to the below email addresses on November 18, 2022:

Thornwell P. Sowell, Esquire
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s/ Richard C. Detwiler
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CALLISON  TIGHE

November 18, 2022

VIA EMAIL: ctappfilings@sccourts.org
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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Nov 18 2022

SC Court of Appeals

Re: Jane E. Baskin vs. William B. Walkup
Appellate Case Nos. 2022-001226 and 2022-001328
Our File No. 6660.008

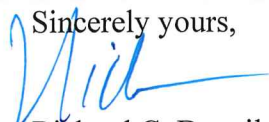
Dear Ms. Kitchings:

Attached hereto is Jane E. Baskin's Reply in Opposition to Defendant/Appellant's Motion for Second Extension of Time for Appellant to File Initial Brief and Designation of Matter to Be Included in the Record on Appeal, together with the Proof of Service, in connection with the above-referenced matters. Please file the same and return a clocked-in copy to us via return email.

By copy of this letter, we are hereby serving copies of same on the Appellant via email.

Thank you for your assistance with this matter.

Sincerely yours,



Richard C. Detwiler

RCD/dmh

Enclosures

cc (w/enc.): Thornwell P. Sowell, Esquire (via email)
Bess J. DuRant, Esquire (via email)
Sarah P. Spruill, Esquire (via email)