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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen Tevis Mullen, Circuit Court Judge

Case No. 2017-CP-07-01180

RECEIVED
FEB 11 2019
SC Court of Appeals

In the Matter of the Estate of Harriet Kathleen Henry Tims, Decedent,

Samuel H. Tims, individually and as Co-
Personal Representative of the Estate
Of Harriet Kathleen Henry Tims,.....Petitioner

Vs.

Michael Tims, Individually and as Co-
Personal Representative of the Estate
Of Harriet Kathleen Henry Tims,.....Respondent

And

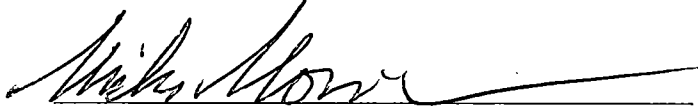
Deborah T. Krane, individually and as Co-
Personal Representative of the Estate
Of Harriet Kathleen Henry Tims,.....Appellant.

MOTION TO AMEND RESPONDENT'S INITIAL BRIEF
AND DESIGNATION OF MATTER

Respondent hereby moves before this Court for an Order allowing Respondent to amend
Respondent's Initial Brief and Designation of Matter to clarify references to the record.
Respondent submits that amendment would assist the Court and Appellant and would be in the

best interests of all parties. Respondent does not seek any substantive changes. Pursuant to Rule 11, Appellant requested the amendment, so further consultation is unnecessary. Respondent has taken the liberty of filing the amended pleadings with this Motion.

FEB. 5, 2019



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Hardeeville, South Carolina 29927
(843) 784-2142
Attorneys for Respondent Michael Tims

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And

Deborah T. Krane, individually and as Co-
Personal Representative of the Estate
Of Harriet Kathleen Henry Tims,.....Appellant.

PROOF OF SERVICE

I certify that I have, on this 10th of February, 2019, served a copy of (1)
Respondent's Motion to Amend Respondent's Initial Brief and Designation of Matter, (2)
Amended Initial Brief of Respondent and (3) Respondent's Amended Designation of Matter to be

Included in the Record on Appeal, by depositing the same in the United States mail, with proper postage affixed, and addressed as follows:

P. Brandt Shelbourne, Esquire
131 E. Richardson Avenue
Summerville, South Carolina 29483

Eric M. Campbell, Esquire
131 E. Richardson Avenue
Summerville, South Carolina 29483

Mr. Samuel Tims
169 Jasmine Hall Road
Seabrook, South Carolina 29940



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DARRELL THOMAS JOHNSON, JR. #
MILLS LANE MORRISON, JR. ** #
WARREN PAUL JOHNSON
JOSHUA FESTER
Certified Civil Court Mediator
**Also Licensed In Georgia

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February 7, 2019

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SC Court of Appeals

Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: In the Matter of Estate of Harriet Kathleen Henry Tims, Decedent
Appellate Case No. 2018-001605

Dear Ms. Kitchings:

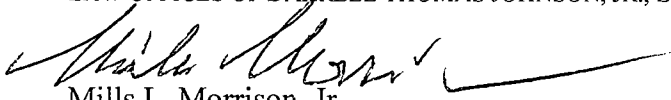
Enclosed please find an original and one copy each of (1) Respondent's Motion to Amend Respondent's Initial Brief and Designation of Matter, (2) Amended Initial Brief of Respondent, (3) Respondent's Amended Designation of Matter to be Included in the Record on Appeal, (4) Proof of Service. Also enclosed is a \$50 filing fee. Please file the originals with the Court and return filed stamped copies to me in the enclosed self-addressed stamped envelope.

Thank you for your assistance in this matter and please let me know if you have any questions or concerns. By copy of this letter, I am serving the same on all parties.

With kind regards, I remain

Sincerely,

LAW OFFICES OF DARRELL THOMAS JOHNSON, JR., LLC


Mills L. Morrison, Jr.

MLM:lm/Enclosures

Cc: Mr. Michael Tims
Mr. Samuel Tims
P. Brandt Shelbourne, Esquire
Eric Campbell, Esquire

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SC Court of Appeals

