

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Circuit Court Judge William P. Keesley

CASE No. 2016- CP-10-4122

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NOV 15 2019
SC Court of Appeals

MICHELE BLANKAppellant

Vs.

PATRICIA TIMMONS, TRUSTEE
OF THE GORDON H. TIMMONS
EXEMPT FAMILY TRUST.....Respondent

APPELLANT'S DESIGNATION OF MATTER

TO BE INCLUDED IN THE RECORD ON APPEAL

Edward A. Bertele
S.C. Bar No. 72521
1812 Pierce Street
Charleston, SC 29492
843-471-2082
Attorney for Appellant

1. Order filed June 14, 2019.....
2. Order filed August 9, 2019 denying Plaintiff's Motion to Alter or Amend Order.....
3. Order Amending Lis Pendens filed September 14, 2016.....
4. Lis Pendens filed August 9, 2016.....
5. Complaint to enforce judgment filed August 9, 2016.....
6. Answer to Complaint and Counterclaims.....
7. Amended Complaint.....
8. Answer to Amended Complaint and Counterclaims.....
9. Defendant's Motion to Cancel or Amend Lis Pendens filed August 26, 2016
10. Affidavit of Andrew Gillette, filed August 26, 2016.....
11. Affidavit of Patricia Timmons filed August 26, 2016.....
12. Plaintiff's Opposition to Motion to Amend Lis pendens.....
13. Affidavit of Edward A. Bertele in Opposition to Motion
14. Plaintiff's Motion to Amend Findings and Alter and Amend Order filed July 8, 2019.
15. Defendant's Opposition to Plaintiff's Motion to Amend Judgment filed July 31, 2019
16. Plaintiff's Reply to Defendant's Opposition to Motion to Amend Findings and Alter
and Amend Order filed August 2019.....
17. Testimony of Jennifer Smith: pages 183-186, 187, 189, 190, 192, 193, 197- 202, 204, 205,
209, 210, 223, 224, 231, 232, 233.....
18. Testimony of Michele Blank: pages 198, 234-237, 239-242, 246-252, 254-271, 272,
273, 279- 281, 284, 286, 288, 290, 296, 297, 309, 310, 317, 318, 321, 322, 324-327,
19. Testimony of David Franklin: pages 90-111, 113, 115-118, -120, 124, 131-133, 138
20. Testimony of Patricia Timmons: pages 158-160, 162-167.....
21. Testimony of Chris Lanning: pages 19-22, 24, 27-31, 33-37, 41.....

- 22. Testimony of Gordon Timmons: pages 392,395,398,401-408,430,431,435,436, 443, 444
- 23. Testimony of Mark Strong: pages 173,174,176-179, 182.....
- 24. Other: 449,450,451-454.....
- 25. Exhibits: P-1,2,3,4A,B,C,D,E,F,G,H,I,K,L, 6A,B,7A,B,C,D,E,F,G,8A,B,9,10, 13,14,16,17,18,20,23,24,26,27,29

CERTIFICATION

Counsel for Appellant hereby certifies that the Record on Appeal contains no material which is irrelevant to the appeal.

November 12, 2019


 Edward A. Bertele

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Vs.

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CERTIFICATION OF SERVICE

I hereby certify that a true copy of Appellant's Initial Brief and Designation of Matter to be included in the Record on Appeal was served upon Respondent's Attorney, Mark Mason, Esq. by regular mail to his last known mailing address shown below.


Edward A. Bertele

November 12, 2019

To: Mark Mason, Esq.
THE MASON LAW FIRM, P.A.
465 West Coleman Boulevard, Suite 302
Mount Pleasant, SC 29464

**EDWARD A. BERTELE
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Member: SC, NJ & NY bars

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SC Court of Appeals

Ms. Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
1220 Senate St.
PO Box 11629
Columbia, SC 29211

**Re: Blank v. Timmons
Appellate Case No. 2019-001555**

Dear Ms. Kitchings:

Enclosed please find Appellant's Initial Brief and Designation of Matter to be included in the Record of Appeal and a Certification of Service. Thank you for your kind assistance in this matter.

Very truly yours

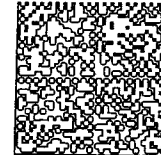

Edward A. Bertele

CC: Mark Mason, Esq.

Encl:

Edward Bertele
1812 Pierce St.
Daniel Island, SC 29492

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Ms. Jenny Abbott Ketchings
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