

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County  
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Case No. 2016-CP-10-4122

Patricia Timmons, Trustee of the Gordon H. Timmons  
Exempt Family Trust,

v.

Michele Blank,

**RECEIVED**

JAN 06 2020

SC Court of Appeals

Respondent,

Appellant.

**RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN  
RECORD ON APPEAL**

THE MASON LAW FIRM, P.A.  
Mark A. Mason (SC Bar No. 3676)  
Tidewatch Centre on Shem Creek  
465 West Coleman Boulevard, Suite 302  
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Post Office Box 1271 (29465)  
Telephone: (843) 884-1444

*Counsel for Respondent Patricia Timmons,  
Trustee of the Gordon H. Timmons Exempt  
Family Trust*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

The Respondent proposes, pursuant to Rule 209 SCACR, the following be included in the Record on Appeal:

1. All matters designated by Appellant in its Designations dated November 29, 2019;
2. All cross-examination testimony of each witness whose direct testimony was designated by Appellant.
3. All direct testimony of Respondent Gordon Timmons, or any other witness called by him at the trial.
3. Every defense exhibit admitted as evidence by the lower court.

I certify that this Designation of Matter contains no matter which is irrelevant to this appeal.

Respectfully submitted,

THE MASON LAW FIRM, P.A.



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Mount Pleasant, South Carolina  
Dated: January 3, 2020

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**PROOF OF SERVICE**

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I, Mark A. Mason, of The Mason Law Firm, P.A., counsel for Respondent, hereby certify that the foregoing **RESPONDENT'S DESIGNATION OF MATTER** was served on all other parties to this matter by depositing a copy of the same in the U.S. mail on January 3, 2020, properly posted for delivery to the following address:

Edward A. Bertele  
Attorney at Law  
1812 Pierce Street  
Charleston, SC 29492

*Counsel for Michele Blank*

Respectfully submitted,

THE MASON LAW FIRM, P.A.



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Mark A. Mason (SC Bar No. 3676)

*Counsel for Respondent Patricia Timmons,  
Trustee of the Gordon H. Timmons Exempt  
Family Trust*

Mount Pleasant, South Carolina  
Dated: January 3, 2020

MARK A. MASON  
ANTHONY E. FORSBERG  
SALAH H. HIBRI  
AMANDA D. MCKENDRICK  
GABRIELLE Z. LEE (OF COUNSEL)

# THE MASON LAW FIRM, P.A.

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January 3, 2020

Ms. Jenny Abbott Kitchings, Clerk  
SOUTH CAROLINA COURT OF APPEALS  
1220 Senate Street  
P.O. Box 11629  
Columbia, SC 29211

**RE: Michele Blank v. Patricia Timmons, Trustee of the Gordon H. Timmons Exempt Family Trust**

Appellate Case Number: 2019-001555

Dear Ms. Kitchings:

Enclosed for filing in the above referenced appeal please find the original and two (2) copies of the Respondent's Designation of Matter to be included in the Record of Appeal and Proof of Service relative to this matter.

Assuming you find the same in order, please file the same and return the file stamped copies to my office in the self-addressed envelope provided. Of course, if there are any questions, please do not hesitate to call me. Thank you for your assistance in this regard.

With kind professional regards, I am

Very truly yours,

THE MASON LAW FIRM, P.A.



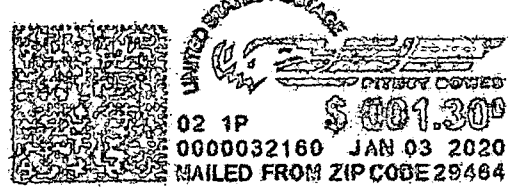
Mark A. Mason

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MAM:adm

Enclosures as stated

cc: Edward A. Bertele, Esq. (w/ enclosures)



**THE MASON LAW FIRM, P.A.**

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Mt. Pleasant, South Carolina 29465

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