

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

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William P. Keesley, Circuit Court Judge

SC Court of Appeals

Case No. 2016-CP-10-4122

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

Respondent,

v.

Michele Blank,

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


Respondent hereby designates the following items for inclusion in the Record on Appeal:

1. Trial testimony of Gorden H. Timmons in 2016-CP-10-4122 in full
2. Trial testimony of Michelle Blank in 2016-CP-10-4122 in full
3. Complaint in 2015-CP-10-3013
4. Answer in 2015-CP-10-3013
5. Reply in 2015-CP-10-3013
6. Form 4 Dismissal in 2015-CP-10-3013
7. Lis Pendens in 2016-CP-10-4122
8. Motion to Amend Lis Pendens in 2016-CP-10-4122
9. Gillete Affidavit in 2016-CP-10-4122
10. Arrington Affidavit in 2016-CP-10-4122
11. Justice Toal's order denying motion for summary judgment in 2016-CP-10-4122
12. Form 4 Order in 2015-CP-10-3013, Plaintiff's Exhibit 16
13. Complaint in 2016-CP-10-4122
14. Order entered June 14, 2019 in 2016-CP-10-4122
15. Plaintiff's Exhibit 27(a) in 2016-CP-10-4122
16. Defendant's Exhibit 4 in 2016-CP-10-4122
17. Plaintiff's Exhibit 2
18. Plaintiff's Exhibit 24
19. Defendant's Exhibit 4
20. Trial testimony in full of Cleve Gillette
21. Trial testimony in full of Rob Arrington
22. Plaintiff's Exhibit 16
23. Plaintiff's Exhibit 4 (e)
24. Defendant's Exhibit 11

25. Plaintiff's Exhibit 1
26. Plaintiff's Exhibit 3
27. Plaintiff's Exhibit 4(b)
28. Plaintiff's Exhibit 4 (L)
29. Plaintiff's Exhibit 8
30. Defendant's Exhibit 5
31. Defendant's Exhibit 7

CERTIFICATION

Counsel for Respondent hereby certifies that the record on Appeal contains no material, which is irrelevant to the appeal.



Mark A. Mason

February 4, 2020

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PROOF OF SERVICE

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Mark A. Mason (SC Bar No. 3676)
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Telephone: (843) 884-1444

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


I, Mark A. Mason, of The Mason Law Firm, P.A., counsel for Respondent, hereby certify that the foregoing **RESPONDENT'S INITIAL BRIEF and RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL** was served on all other parties to this matter by depositing a copy of the same in the U.S. mail on February 4, 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.



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: February 4, 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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FEB 05 2020

February 4, 2020

SC Court of Appeals

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 one (1) copy of the Respondent's Initial Brief and 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

MAM:adm
Enclosures as stated
cc: Edward A. Bertele, Esq. (w/ enclosures)

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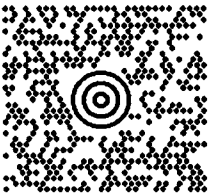


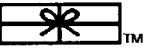
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