

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

MICHELE BLANKAppellant

RECEIVED

JAN 21 2020

SC Court of Appeals

Vs.

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

APPELLANT'S AMENDED 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
ebertele@msn.com
Attorney for Appellant, Michele Blank

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 183-190,192,193,197- 205, 209, 210, 223, 224,
230-233.....
18. Testimony of Michele Blank: pages 234-237,239-242, 246-252, 254- 273, 279- 281,
284-286, 288, 290,296, 297, 309, 310, 317,318, 321,322, 324-327.....
19. Testimony of David Franklin: pages 90-113, 115-120,124,131-133,138.....
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- 437, 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, 17,18,20,23,24,26,27,27A,29 ; D-4,5.....
- 26. Trial Brief.....

CERTIFICATION

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

January 14, 2020


 Edward A. Bertele

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

MICHELE BLANKAppellant

Vs.

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

RECEIVED
JAN 21 2020
SC Court of Appeals

CERTIFICATION OF SERVICE

I hereby certify that a true copy of Appellant's Motion to Amend 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

January 16, 2020

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

**EDWARD A. BERTELE
ATTORNEY AT LAW
1812 PIERCE STREET
CHARLESTON, SC 29492
Email: ebertele@msn.com**

Member: SC, NJ & NY bars

Ph: (843) 471-2082

Fax: (843) 471-2082

January 16, 2020

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

RECEIVED
JAN 21 2020
SC Court of Appeals

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

Dear Ms. Kitchings:

Enclosed please find original and six (6) copies of Appellant's Motion to Amend Designation of Matter to be included in the Record of Appeal and a Certification of Service. Also enclosed is my check for the filing fee of Fifty Dollars (\$50.00). Thank you for your kind assistance in this matter.

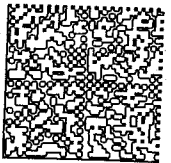
Very truly yours


Edward A. Bertele

CC: Mark Mason, Esq.

Daniel Island, SC 29492-8086

FIRST-CLASS



*** PITNEY BOWES ***
US POSTAGE
02 1P \$ 002.50⁰
0002108357 JAN 17 2020
MAILED FROM ZIP CODE 29492

RECEIVED
JAN 21 2020
SC Court of Appeals

Ms. Jenny Abbott Ketchings, Clerk
South Carolina Court of Appeals
1220 Senate St.
P.O. Box 11629
Columbia SC 29211