

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Charleston County  
Court of Common Pleas

William P. Keesley, Circuit Court Judge

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Case No. 2016-CP-10-4122

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

Respondent,

v.

Michele Blank,

Appellant.

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**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE RETURN TO  
APPELLANT'S MOTION TO STRIKE PART OF RESPONDENT'S  
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL**

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THE MASON LAW FIRM, P.A.  
Mark A. Mason (SC Bar No. 3676)  
Tidewatch Centre on Shem Creek  
465 West Coleman Boulevard, Suite 302  
Mount Pleasant, South Carolina 29464  
Post Office Box 1271 (29465)  
Telephone: (843) 884-1444

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

**RECEIVED**  
**Apr 13 2020**  
**SC Court of Appeals**

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

Respondent hereby moves for a thirty (30) day extension of time from April 13, 2020 for Respondent to file and serve the Respondent's Return to Appellant's Motion to Strike Part of Respondent's Designation of Matter to be Included in Record on Appeal making the same due on May 13, 2020. Respondent has not previously requested an extension for this filing.

Respectfully submitted,

THE MASON LAW FIRM, P.A.

s/ Mark A. Mason

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Mount Pleasant, South Carolina  
Dated: April 13, 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 MOTION FOR EXTENSION OF TIME TO FILE RETURN TO APPELLANT'S MOTION TO STRIKE PART OF RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL** was served on all other parties to this matter by email for electronic delivery on April 13, 2020 and by depositing a copy of the same in the U.S. mail as soon as possible, properly posted for delivery to the following address:

ebertele@msn.com  
Edward A. Bertele  
Attorney at Law  
1812 Pierce Street  
Charleston, SC 29492

*Counsel for Michele Blank*

Respectfully submitted,

THE MASON LAW FIRM, P.A.

s/ Mark A. Mason  
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: April 13, 2020