

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

Appeal from Charleston County
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Appellate Case No. 2019-001555

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

Respondent,

v.

Michele Blank,

Appellant.

**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE FINAL
BRIEF**

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*

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Sep 15 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 September 14, 2020 for Respondent to file and serve the Respondent's Final Brief making the same due on October 13, 2020. Due to challenges associated directly with the COVID-19 pandemic and the order of the Governor, the attorney for the Respondent requires additional time in which to file its final brief, specifically, due to reduced staffing to accommodate employees with children and school starting remotely. It is not believed that the additional time requested will prejudice any party, nor will it extend the overall time that it will take to finally dispose of this Appeal.

Respectfully submitted,

THE MASON LAW FIRM, P.A.

s/ Mark A. Mason

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Mount Pleasant, South Carolina
Dated: September 15, 2020

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PROOF OF SERVICE

THE MASON LAW FIRM, P.A.
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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 FINAL BRIEF** was served on all other parties to this matter by email for electronic delivery on September 15, 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: September 15, 2020