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Oct 28 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Carmen Tevis Mullen, Circuit Court Judge

Unpublished Opinion No. 2021-UP-281 (S.C. Ct. App. Filed July 21, 2021)

In the Matter of the Estate of Harriet Kathleen Henry Tims, Decedent,

Samuel H. Tims, individually and as Co-  
Personal Representative of the Estate  
Of Harriet Kathleen Henry Tims,.....Respondent

Vs.

Michael Tims, Individually and as Co-  
Personal Representative of the Estate  
Of Harriet Kathleen Henry Tims,.....Respondent

And

Deborah T. Krane, individually and as Co-  
Personal Representative of the Estate  
Of Harriet Kathleen Henry Tims,.....Petitioner

RESPONDENT'S MOTION TO FILE RETURN OUT OF TIME

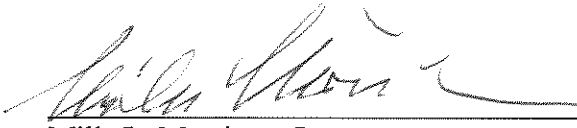
Mills L. Morrison, Jr. (68546)  
Law Offices of Darrell Thomas Johonson, Jr., LLC  
Post Office Box 1125  
Hardeeville, South Carolina 29927  
(843) 784-2142  
Attorney for Respondent Michael Tims

P. Brandt Shelbourne (15143)  
Shelbourne Law  
131 E. Richardson Avenue  
Summerville, South Carolina 29483  
(843) 871-2210  
Attorney for Petitioner

Samuel Tims *Pro Se*  
169 Jasmine Hall Road  
Seabrook, South Carolina 29940

The Respondent, Michael Tims, moves the Court for permission to file a return out of time on the basis that good cause exists. Consultation with opposing counsel would serve no useful purpose. Respondent will not use up the Court's time with a lengthy brief.

Law Offices of Darrell Thomas Johnson, Jr., LLC



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Mills L. Morrison, Jr.  
SC. Bar No. 68546  
Post Office Box 1125  
Hardeeville, South Carolina 29927  
(843) 784-2142  
Attorneys for Respondent Michael Tims

Dated: 04:25, 2021  
Hardeeville, South Carolina

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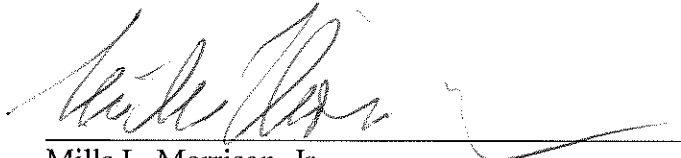
Deborah T. Krane, individually and as Co-  
Personal Representative of the Estate  
Of Harriet Kathleen Henry Tims,.....Petitioner

PROOF OF SERVICE

I certify that I have, on this 28<sup>th</sup> of October, 2021, served a copy  
of Respondent's Motion to File Return Out of Time, by depositing the same in the United States  
mail, with proper postage affixed, and addressed as follows:

P. Brandt Shelbourne, Esquire  
131 E. Richardson Avenue  
Summerville, South Carolina 29483

Mr. Samuel Tims  
169 Jasmine Hall Road  
Seabrook, South Carolina 29940

A handwritten signature in cursive script, appearing to read "Mills L. Morrison, Jr.", written over a horizontal line.

Mills L. Morrison, Jr.  
SC. Bar No. 68546  
Law Offices of Darrell Thomas Johnson, Jr., LLC  
Post Office Box 1125  
Hardeeville, South Carolina 29927  
(843) 784-2142  
Attorneys for Respondent Michael Tims