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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Unpublished Opinion No. 2021-UP-281 (S.C. Ct.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 RETURN TO PETITION FOR WRIT OF CERTIORARI

Mills L. Morrison, Jr. (68546)
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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, hesitates to reply to the Petitioner's Petition for Writ of Certiorari, because the matter has been litigated to death already. Both the Circuit Court and the Court of Appeals have delivered thorough and well-reasoned rulings on the issues Petitioner now brings before this Court and Respondent simply craves reference thereto. Petitioner has not raised one issue which has not already been considered and addressed. Furthermore, the issues in the case are not novel or unsettled. This case is simply one of a mother helping her son and a daughter/sister trying to take advantage of the situation. Respondent respectfully requests that this Court deny the Petition for Writ of Certiorari.

Law Offices of Darrell Thomas Johnson, Jr., LLC



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: 05.28, 2021
Hardeeville, South Carolina

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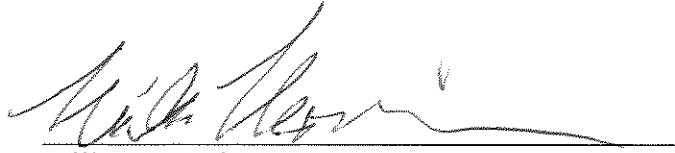
Deborah T. Krane, individually and as Co-
Personal Representative of the Estate
Of Harriet Kathleen Henry Tims,.....Petitioner

PROOF OF SERVICE

I certify that I have, on this 28th of October, 2021, served a copy
of Respondent's Return to Petition for Writ of Certiorari, 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.
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