

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM FLORENCE COUNTY
ROGER L. COUCH, CIRCUIT COURT JUDGE

Case No. 2016-CP-21-1435

Deborah Harwell, Appellant/Respondent,

vs.

Robert Bryan Harwell, Individually,
And as personal representative of the
Estate of David Harwell, and
South Carolina Department of Health
And Environmental Control, Bureau
Of Vital Statistics, Defendants,

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NOV 08 2017
SC Court of Appeals

Of which

Robert Bryan Harwell, Individually
And as personal representative of the
Estate of David Harwell is, Appellant/Respondent

vs.

Law Offices of Deidre W. Edmunds,
P.A. and Deidre W. Edmunds,
Individually, Appellant/Respondents.

**MOTION TO BE RELIEVED AS COUNSEL FOR APPELLANT AND
MOTION TO STAY PROCEEDINGS**

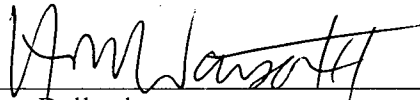
Desa Ballard and Harvey M. Watson III (hereafter "Law Firm") hereby move this Court for an order granting permission for Law Firm to withdraw as counsel for Appellant/Respondent Deborah Harwell (hereafter "Mrs. Harwell") in this action. Law Firm has not been retained to represent Mrs. Harwell and existing circumstances preclude continuance of the attorney-client

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relationship with Mrs. Harwell in this matter. Mrs. Harwell has already begun efforts to secure successor counsel. Nevertheless, Law Firm respectfully requests on behalf of Appellant that this matter be stayed for a period of sixty (60) days to facilitate Mrs. Harwell in securing new counsel and to provide successor counsel with sufficient time to meet applicable deadlines.

Mrs. Harwell has indicated her consent to this relief sought via this motion, and is being served with a copy of this filing.

Respectfully submitted,



Desa Ballard

Harvey M. Watson III

BALLARD & WATSON
Post Office Box 6338
West Columbia, South Carolina 29171
Telephone 803.796.9299
desab@desaballard.com
harvey@desaballard.com

ATTORNEYS FOR APPELLANT

November 6, 2017

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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ROGER L COUCH, CIRCUIT COURT JUDGE

Case No. 2016-CP-21-1435

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P.A. and Deidre W. Edmunds,
Individually, Appellant/Respondents.

PROOF OF SERVICE


I, Beth Cogan, an employee with Ballard & Watson, do hereby certify that on November 6, 2017, I served a copy of the **Motion to be Relieved as Counsel for Appellant and Motion to Stay Proceedings**, in the above-captioned case on the following individuals by U.S. Mail, with sufficient first-class postage affixed, and addressed as follows:

**The Honorable Doris Poulos O'Hara
Florence County Clerk of Court
180 N. Irby Street MSCE-E
Florence, South Carolina 29501**

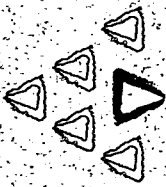
**Kevin Barth, Esquire
Barth, Ballenger & Lewis, LLP
Post Office Box 107
Florence, South Carolina 29503**

**Gena Phillips Ervin, Esquire
Orr Elmore & Ervin, LLC
Post Office Box 2527
Florence, South Carolina 29503**

**Barbara Wagner, Esquire
M. Dawes Cooke, Jr., Esquire
Barnwell Whaley Patterson & Helms, LLC
Post Office Drawer H
Charleston, South Carolina 29402**


Beth Cogan, Paralegal

November 6, 2017



Ballard & Watson
Attorneys at Law
PERSISTENT. UNWAVERING.

Desa Ballard
Harvey M. Watson III

Post Office Box 6338 | West Columbia, SC 29171
226 State Street | West Columbia, SC 29169
ph 803.796.9299 | fx 803.796.1066 | desaballard.com

November 6, 2017

Via U.S. Mail

The Honorable Jenny Abbot Kitchings
Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, South Carolina 29211

Re: *Deborah B. Harwell v. Robert Bryan Harwell, et al.*
Case No.: 2016-CP-21-1435

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Dear Ms. Kitchings:

Enclosed for filing with your office are multiple documents. First, please find the original and one copy of a Notice of Appeal and Proof of Service for the above-referenced matter, along with a check in the amount of \$100 for the respective filing fee.

Also enclosed are an original and copy of a Motion to be Relieved as Counsel for Appellant and Motion to Stay Proceedings and Proof of Service, along with a separate check in the amount of \$25 for the respective filing fee associated with that motion.

Please clock and return a stamped copy of both the Notice of Appeal as well as the motion for relief in the self-addressed, stamped envelope enclosed.

By copy of this letter and as evidenced by the Proofs of Service, these filings have been served upon counsel for the Appellant/Respondent Bryan Harwell, Appellant/Respondents Edwards. A copy is also filed with the Florence County Clerk of Court. Thank you for your time in this matter. If you have any questions, please do not hesitate to contact our office.

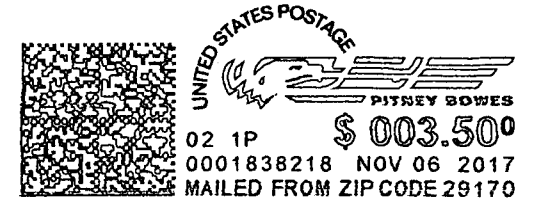
With warm personal regards, I am

Sincerely yours,

Harvey M. Watson III
harvey@desaballard.com

cc: Via U.S. Mail
Honorable Doris Poulos O'Hara

Barbara Wagner, Esquire
M. Dawes Cooke, Jr., Esquire
Kevin Barth, Esquire
Gina Phillips Ervin, Esquire
Debbie Harwell (via email)



Law Offices of Desa Ballard

226 State Street
West Columbia, SC 29169

To:

The Honorable Jenny Abbot Kitchings
Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, South Carolina 29211

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