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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Roger L. Crouch, Circuit Court Judge

Case No. 2016-CP-21-1435
Appellate Case No. 2017-002291

RECEIVED
JAN 09 2018
SC Court of Appeals

Deborah B. Harwell, Respondent/Appellant,

v.

Robert Bryan Harwell, individually and as the
Personal Representative of the Estate of
David W. Harwell; and the South Carolina
Department of Health and Environmental Control,
Division of Vital Records, Defendants,

Of whom Robert Bryan Harwell, individually
and as the Personal Representative of the
Estate of David W. Harwell is the Appellant/Respondent,

v.

Law Office of Deidre W. Edmunds, P.A.
and Deidre W. Edmunds, individually, Respondents/Appellants.

ADDITIONAL APPELLATE CAPTION ON FOLLOWING PAGE

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Kenneth E. Fulp, Jr., Probate Court Judge
Roger L. Crouch, Circuit Court Judge

Case Nos. 2016-ES-07-00302, 2016-CP-21-1435, 2015-ES-21-00778
Appellate Case No. 2017-002290

Deborah B. Harwell, Respondent,

v.

Robert Bryan Harwell, individually and as the
Personal Representative of the Estate of
David W. Harwell; and the South Carolina
Department of Health and Environmental Control,
Division of Vital Records, Defendants,

v.

Law Office of Deidre W. Edmunds, P.A.
and Deidre W. Edmunds, individually, Appellant.

MOTION TO CONSOLIDATE APPEALS AND CORRECT CAPTION

Pursuant to Rules 214 and 240 of the South Carolina Appellate Court Rules, R. Bryan Harwell requests that this Court consolidate Appellate Case Numbers 2017-002290 and 2017-002291 and correct the caption for the consolidated case.

These appeals concern the same circuit order imposing sanctions in favor of Bryan Harwell and against Deborah Harwell, Deirdre Edmonds, and Deirdre Edmonds' law firm. That order was entered in April of 2017. All parties requested reconsideration. The circuit court denied all motions in an order filed October 2, 2017.

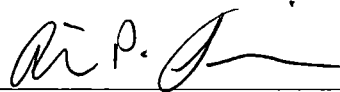
Each party subsequently noticed appeal of the circuit court's order. Deirdre Edmonds and her law firm served a notice of appeal on October 30, 2017. Bryan Harwell served a notice of appeal November 1, 2017. Deborah Harwell served notice of a cross-appeal on November 6, 2017.

Again, these appeals concern the same underlying order. Consolidation will allow the Court to avoid maintaining dual dockets for the same litigation and allow the parties to forego preparing dual appellate records for the Court's review.

January 9, 2018

Respectfully submitted,

Kevin M. Barth # 559
BARTH, BALLENGER & LEWIS, LLP
Post Office Box 107
Florence, South Carolina 29503
(843) 662-6301


_____ on behalf of and
with permission
Blake A. Hewitt # 73674
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Attorneys for R. Bryan Harwell

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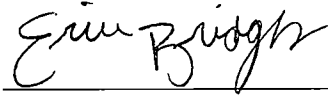
PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served the
pro se party Deborah Harwell and counsel of record with a copy of the *Motion to
Consolidate Appeals and Correct Caption* by mailing copies of the same by United States
Mail with first class postage prepaid to the following addresses:

Barbara J. Wagner
M. Dawes Cooke, Jr.
Barnwell Whaley Patterson & Helms, LLC
PO Drawer H
Charleston, SC 29402-0197

Deborah B. Harwell
P.O. Box 7769
Myrtle Beach, SC 29572

Desa Ballard
Ballard & Watson
PO Box 6338
West Columbia, SC 29171-6338

A handwritten signature in cursive script that reads "Erin Bridges". The signature is written in black ink and is positioned above a horizontal line.

Erin Bridges

January 9, 2018

January 9, 2018

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Deborah Harwell v. Robert Harwell
Case Tracking No. 2017-002291

Deborah Harwell v. Robert Harwell
Case Tracking No. 2017-002290

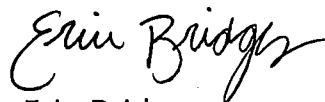
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Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion to Consolidate Appeals and Correct Caption* in reference to the above referenced matters. I have also enclosed a proof of service of this document on the *pro se* party and counsel of record. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Erin Bridges

Paralegal to Blake A. Hewitt
Bluestein Thompson Sullivan, LLC

/emb
Enclosures

cc: Kevin Barth, Esquire
Gena Phillips Ervin, Esquire
Barbara J. Wagner, Esquire
M. Dawes Cooke, Jr., Esquire
Desa Ballard, Esquire
Deborah B. Harwell