

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

Case Nos. 2016-ES-01-00302, 2016-CP-21-1435, 2015-ES-21-00778  
Appellate Case No. 2017-002290

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,

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SC Court of Appeals

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

And the South Carolina Department of  
Health and Environmental Control,  
Division of Vital Records is the ..... Respondent,

v.

Law Office of Deidre W. Edmonds, P.A.  
And Deidre W. Edmonds, Individually, ..... Appellants/Respondents.

**MOTION TO SERVE OUT OF TIME  
MOTION FOR EXTENSION**

*Pro Se* Respondent/Appellant Deborah B. Harwell ("herein Respondent") hereby moves,  
pursuant to Rule 26(b), of the South Carolina Rules of Appellate Procedure (SCRAP), for an

order allowing Respondent to serve a Motion for Extension out of time to comply with Rules 208 and 209 of the SCACR.

In support of this motion Respondent shows the following:

1. The undersigned did not receive notice until April 2, 2018 that she had been virtually abandoned by her legal counsels as documented in the attached exhibit.
2. The *Pro Se* Respondent is not capable of handling complex litigation of the nature of this case without qualified counsel.
3. The *Pro Se* Respondent is not emotionally capable of handling legal matters of this nature that relate to the death of her beloved husband during the eighteenth year of their marriage.
4. The filing of the Motion for Extension does not prejudice the other parties in this matter and hopefully if granted allows *Pro Se* Respondent the right to seek a fair conclusion to the multitude of matters surrounding the death of her beloved husband.

**WHEREFORE**, for the foregoing reasons, the *Pro Se* Respondent respectfully requests leave from this Honorable Court to file the Motion for Extension out of time.

Submitted this April 6, 2018

By:



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

From: Paul Gordon <pgordon@gorlaw.com>  
To: Lake Cruises <adobepalm@aol.com>  
Subject: RE: Rule 40(J)  
Date: Mon, Apr 2, 2018 9:01 pm

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Deborah:

By operating of the court's order, I am automatically dismissed from the case. I no longer have authority to act on your behalf in the case.

However, you don't need me to file a 40(j) dismissal. You can do it yourself.

I was unable to find local counsel to help. As a result, I must take no further action on your behalf. Any action on my part would constitute the unauthorized practice of law in South Carolina.

(I wish I could have come up with a better result for you, and I wish you the best of luck in your endeavors.

Paul Gordon

400 South Colorado Boulevard, Suite 420  
Glendale, Colorado 80246  
Direct: 720-360-4361  
Office: 303-756-0800  
gorlaw.com

-----Original Message-----

From: Lake Cruises <adobepalm@aol.com>  
Sent: Sunday, April 1, 2018 10:13 PM  
To: Paul Gordon <pgordon@gorlaw.com>  
Cc: adobepalm@aol.com  
Subject: Rule 40(J)

EXHIBIT

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on the date indicated below she served the counsel of record with a copy of the Motion for Extension by mailing copies of the same by United States

Mail with first class postage prepaid to the following addresses:

Blake A. Hewitt  
BLUESTEIN THOMPSON SULLIVAN, LLC  
Post office Box 7965  
Columbia, South Carolina 29202

Kevin M. Barth, Esquire  
Ballenger, Barth, Hoefler & Lewis  
P. O. Box 107  
Florence, South Carolina 29503

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504 South Colt Street  
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Barber J. Wagner  
M. Dawes Cooke, Jr.  
Barnwell Whaley Patterson & Helms, LLC  
P.O. Drawer H  
Charleston, SC 29402-0197


John Harleston  
S.C. Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

April 6, 2018

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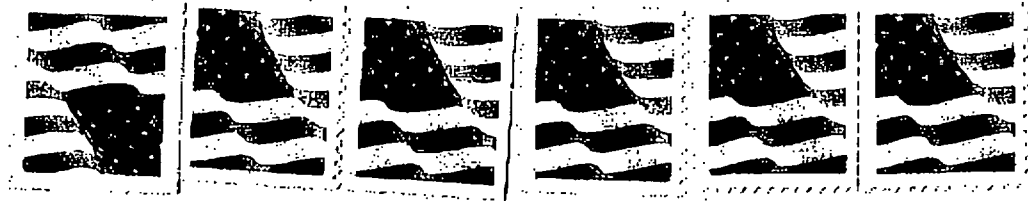
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SC Court of Appeals

  
Deborah B. Harwell



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