

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APR 09 2018
SC 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,

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.

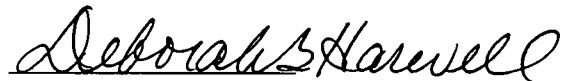
In support of this motion Respondent shows the following:

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

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

PROOF OF SERVICE

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SC Court of Appeals

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

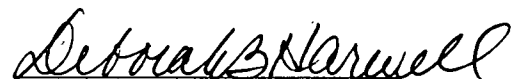
Kevin M. Barth, Esquire
Ballenger, Barth, Hoefler & Lewis
P. O. Box 107
Florence, South Carolina 29503

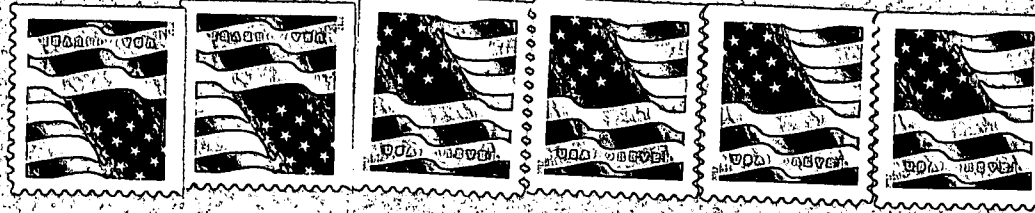
Gena Phillips Ervin
Orr Elmore & Elmore
P.O. Box 2527
504 South Colt Street
Florence, South Carolina 29503

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

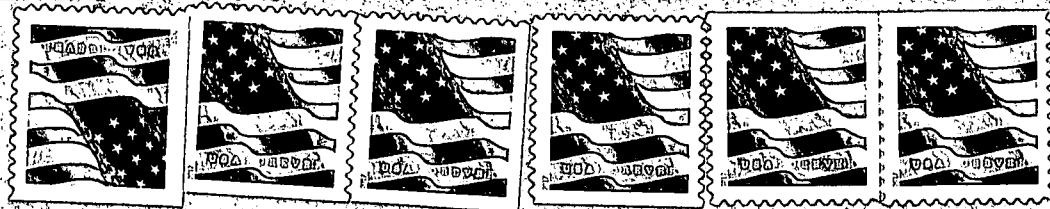
John Harleston
S.C. Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201

April 6, 2018

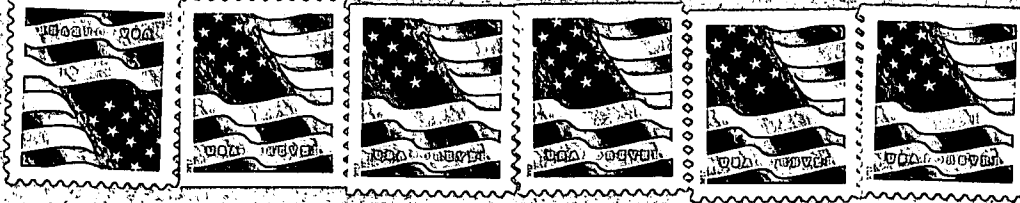

Deborah B. Harwell



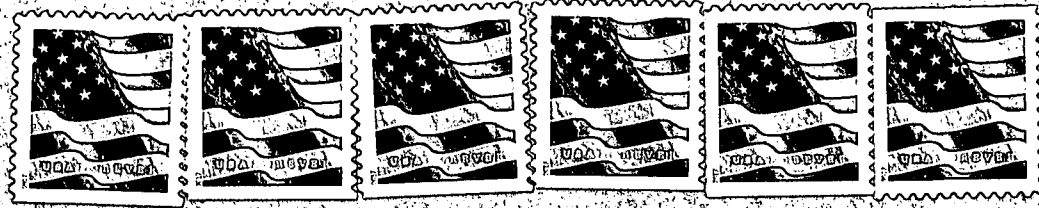
Barbara Wagner
Barnwell, Whaley, Patterson
288 Meeting Street, Suite 200
P. O. Box H
Charleston, S.C. 29402



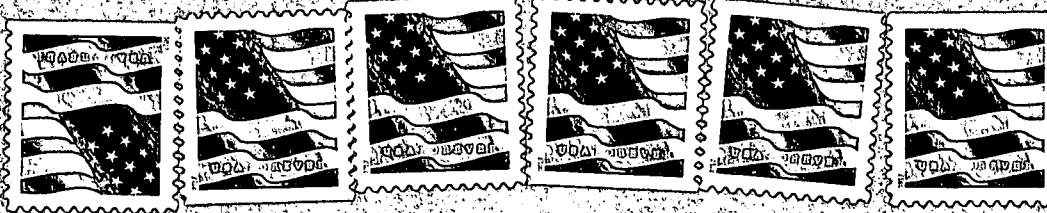
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