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STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

CASE NUMBER: 2017-002519

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MAY 23 2018  
SC Court of Appeals

Appeal From Florence County  
Honorable Thomas A. Russo, Circuit Court Judge

COUNTY OF FLORENCE AND THOMAS J. HEWITT,

RESPONDENT(S)

vs.

CAROL EAGERTON,

APPELLANT

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF AND  
DESIGNATION OF MATTER**

This Motion comes before the Court pursuant to Rules 240, 208 and 209 of the South Carolina Rules of Court and request that the Appellant be allowed an additional 30 days to file her Initial Brief and Designation of Matter.

This motion is based on the following facts. The Appellant's undersigned attorney is scheduled to appear in a date certain Jury Trial in the case of *State v. John Courson*, which will begin on June 4, 2018, in the Richland County Court of General Sessions. It is expected that this Jury Trial will last one to two weeks. This is very complex trial which involves nearly one million pages of discovery. Due to the voluminous amount of discovery along with complexity of the issues involved Appellant's counsel has had to devote a great deal of time to trial preparation. Given this, the undersigned has been unable complete the Appellant's Initial Brief. The undersigned is working diligently to do so. Further, the undersigned has spoken with opposing counsel, Malloy D. McEachin, Jr., and he has stated that he is on vacation in June and would appreciate the Appellant being granted this extension.

It is therefore requested of this Honorable Court that an extension to file this information be ordered.

Respectfully Submitted:

A handwritten signature in black ink, appearing to read "Rose Mary Parham". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rose Mary Parham  
Parham Law Firm, LLC  
P.O. Box 1514  
Florence, South Carolina 29503  
(843)407-7757 (office)  
(843) 407-7758 (facsimile)  
Bar Number 17032

**Attorney for Appellant**

CERTIFICATE OF SERVICE

I, Lawton Matthews hereby certify that a copy of Appellant's Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter was served on the following, this 22<sup>nd</sup> day of May 2018, via United States mail, first class, to the following address:

**Malloy D. McEachin, Jr., Esq**  
**323 S. McQueen Street**  
**Florence, SC 29501**

  
Lawton S. Matthews  
Parham Law Firm, LLC

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MAY 23 2018  
SC Court of Appeals

# P A R H A M

PARHAM LAW FIRM, LLC

May 22, 2018

VIA U.S. MAIL

Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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MAY 23 2018

SC Court of Appeals

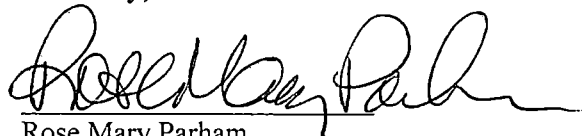
**RE: RE: County of Florence and Thomas J. Hewitt vs. Carol Eagerton  
Case No. 2017-001927**

Dear Clerk of Court:

Enclosed please find the original and one copy of Appellant's Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter, along with a certificate of service which is being forwarded to you for filing. I am also enclosing a check for \$25.00 to cover the motion filing fee.

By copy of this letter, I am serving Malloy D. McEachin, Jr., counsel for the Respondents, with a copy of the same. Should you have any questions or comments, please do not hesitate to contact me.

Sincerely,



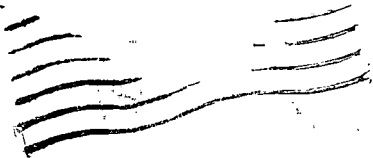
Rose Mary Parham  
SC Bar Id. 17032  
Parham Law Firm, LLC  
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Florence, SC 29503  
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Cc: : Malloy D. McEachin, Jr., Esq.;  
File

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