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JUN 13 2018

SC Court of Appeals

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 Couch, 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 AMEND INITIAL BRIEF OF DEBORAH HARWELL

Pursuant to Rule 240, SCACR, Respondent/Appellant *Pro Se* Deborah B. Harwell requests
the included Amended Initial Brief be substituted and used as the Initial Brief of the Pro Se

Deborah Harwell. Mrs. Harwell who has never filed an Initial Brief and has no legal training tried to put together an Initial Brief but was unable to effectively do so. Mrs. Harwell had experienced computer and internet problems due to thunderstorms as she struggled to put together the document submitted and clearly the final product submitted is not within the guidelines for the ease of review. The index is incorrect, and issues raised on the document submitted were from a draft document sent in error.

SUMMARY

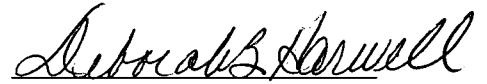
Acceptance of this amended copy does not prejudice any side. The document is simply a corrected attempt of a *Pro Se* litigant trying to comply with rules she does not fully understand. The amended brief will conserve the Courts time as the initial submission is disorganized and hard to follow.

The undersigned prays this Honorable Court will allow the substitution. Mrs. Harwell could not find an attorney who will represent her based on who the opposing party is and the thirty-day time constraint for extension. Mrs. Harwell was forced to attempt to do this on her own. Furthermore, multiple transcripts were not received to date despite requests to rush them by Mrs. Harwell. Former counsel informed Mrs. Harwell the transcripts were requested however Mrs. Harwell had not been provided them by former counsel. Therefore, Mrs. Harwell was limited in access of records necessary for development of the Initial Brief. Thank you for your kind consideration of this request to amend.

SIGNATURE ON FOLLOWING PAGE

June 13, 2018

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Deborah B. Harwell".

Deborah B. Harwell, *Pro Se*
1459 River Highway
Mooresville, N.C. 28117

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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served the counsel of

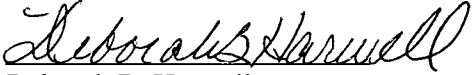
record with a copy of the MOTION TO AMEND INITIAL BRIEF OF DEBORAH HARWELL
by mailing copies of the same by United States Mail with first class postage prepaid to the
following addresses:

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

Barber J. Wagner
M. Dawes Cooke, Jr.
Barnwell Whaley Patterson & He3lms, 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

June 13, 2018


Deborah B. Harwell
1459 River Highway
 Mooresville, N.C. 28117

Mrs. Deborah B. Harwell
1459 River Highway
Mooreville, N.C. 28117
(843) 458-3300

June 13, 2018

Via Hand Delivery

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

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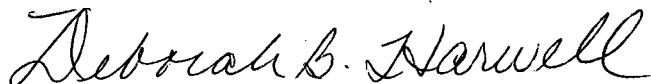
SC Court of Appeals

Re: *Deborah B. Harwell v. Robert Bryan Harwell, et al.*
Appellate Case No.: 2017-002291

Dear Ms. Kitchings:

Please change my mailing address to 1459 River Highway, Mooreville, N.C. 28117. This will facilitate me receiving documents as the old address was problematic for me at times. If you have any questions or concerns, please do not hesitate to contact me. Thank you very much.

Yours truly,



Deborah B. Harwell, *Pro Se*

Cc:

Blake A. Hewitt, Esquire
Barber J. Wagner, Esquire
John Harleston, Esquire