

87707

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

CASE NUMBER: 2017-002519

RECEIVED
AUG 29 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 was on a family vacation the week of August 7, 2018. Further, the undersigned has had an extremely heavy case load which has required her to make General Sessions court appearances and federal court appearances upon her return from vacation. The undersigned then helped move her eldest daughter move to California for graduate school. As such, she was out of the state from August 20 through August 27, 2018. Given this, the undersigned has been unable to 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 has no objection to 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 the first name "Rose" and last name "Parham" being the most prominent parts.

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 27th day of August 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

RECEIVED

AUG 29 2018

SC Court of Appeals

PARHAM

PARHAM LAW FIRM, LLC

August 28, 2018

VIA U.S. MAIL

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

RECEIVED
AUG 29 2018
SC Court of Appeals

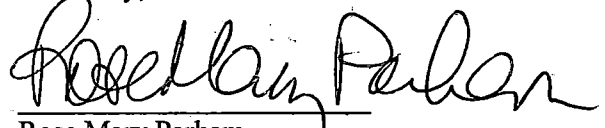
RE: *RE: County of Florence and Thomas J. Hewitt vs. Carol Eagerton*
Case No. 2017-001927

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
P.O. Box 1514
Florence, SC 29503
(843) 407-7757

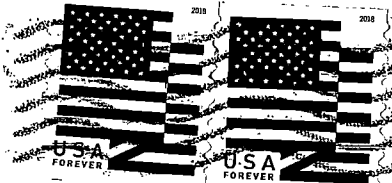
Cc: : Malloy D. McEachin, Jr., Esq.;
File

PO Box 1514 Florence SC 29503
541 W. Evans St. Florence SC 29501
p 843.407.7757 f 843.407.7758 parhamlaw@sc.rr.com
www.rosemaryparham.com

Parham Law Firm, LLC
Post Office Box 1514
Florence, SC 29503

COLUMBIA SC 290

28 AUG 2018 PM 3 1



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

RECEIVED

AUG 29 2018

SC Court of Appeals

29211-1629-2012

