

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY

Honorable Thomas A. Russo, Circuit Court Judge

Case Number: 2017-002519

**RECEIVED**  
JAN 29 2019  
SC Court of Appeals

County of Florence and Thomas J. Hewitt,.....Respondents,

v.

Carol Eagerton, .....Appellants.

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

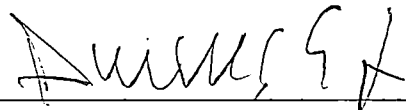
This Motion comes before the Court pursuant to Rules 240, 208 and 209 of the South Carolina Rules of Court and request that the Respondents be allowed an additional 30 days to file their Response to Appellant's Initial Brief and Designation of Matter.

This Motion is based on the following facts. The Appellant's Initial Brief was received on January 9<sup>th</sup>, 2019. The undersigned has a trial in Common Pleas Court in Lee County beginning January 28<sup>th</sup>, 2019.

Further, the assigned has spoken with opposing counsel, Rose Mary Parham, and she has stated that she has no objection to the Respondents being granted this extension.

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

January 25, 2019

  
D. Malloy McEachin, Jr.  
D. MALLOY MCEACHIN, JR., P.A.  
2117-B W. Palmetto Street  
Florence, South Carolina 29501  
(843) 665-0135  
*Attorney for Respondents, County of  
Florence and Thomas J. Hewitt*

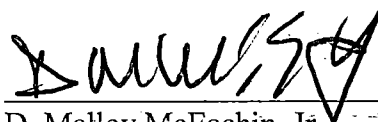
Other Counsel of Record:

Rose Mary Parham  
Parham Law Firm, LLC  
P.O. Box 1514  
Florence, SC 29503  
(843) 407-7757  
Attorney for the Appellant, Carol Eagerton

CERTIFICATE OF SERVICE

I, D. Malloy McEachin, Jr., Esq., hereby certify that a copy of the Respondent's Motion for Extension of Time to Respond to the Appellant's Initial Brief and Designation of Matter was served on the following, this 25 day of January, 2019, via United States mail, first class, to the following address:

**Rose Mary Parham  
Parham Law Firm, LLC  
P.O. Box 1514  
Florence, SC 29503**



\_\_\_\_\_  
D. Malloy McEachin, Jr.  
D. Malloy McEachin, Jr., P.A.

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# D. Malloy McEachin, Jr., P.A.

## Attorney-At-Law

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January 25, 2019.

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

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JAN 29 2019

SC Court of Appeals

RE: County of Florence and Thomas J. Hewitt v. Carol Eagan  
Case No.: 2017-001927

Dear Clerk of Court:

Enclosed you will find the original and one (1) copy of the Respondent's Motion for Extension of Time to File a Response to Appellant's Initial Brief and Designation of Matter. Also enclosed is the Certificate of Service to be filed. I have enclosed a check in the amount of \$25.00 to cover the motion filing fee.

By copy of this letter, I am serving Rose Mary Parham, counsel for the Appellant, with a copy of the same.

If you have any questions or concerns, please do not hesitate to contact me.

With kind regards I am,

Yours very truly,



D. Malloy McEachin, Jr.

DMMjr/hgm

Cc: Rose Mary Parham, Esq.

✓

MALLOY MCEACHIN  
2117-B W. PALMETTO STREET  
FLORENCE, SC 29501

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SC Court of Appeals



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