

**Deborah Harwell**  
1459 River Highway  
 Mooresville, NC 28117  
[adobepalm@aol.com](mailto:adobepalm@aol.com)  
843-458-3300

February 16, 2019

The Honorable V. Claire Allen, Deputy Clerk  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

Hand Delivered to the Court

RE: Deborah Harwell v. Robert Bryan Harwell  
Appellate Case No.: 2017-002290  
Your Correspondence of February 8, 2019

Dear Mrs. Allen:

I do not understand how my letter of February 2, 2019, addressed to the Honorable Mrs. Kitchings, which was requested to be sent by my case manager, Miss Mary Catherine Singleton, can be construed as a motion. (See attached copy)

As I understand, under SC Rule 240, a Motion needs to be filed with an original and six copies and shall comply with Rule 267. The letter attached, in no way, can be considered a Motion. It was a request for clarification because as Miss Singleton put it; there was confusion and mistakes that were made at the Clerk of Court's office; therefore, I am filing a proper Motion concurrent with this response to this letter of February 8, 2019, a Motion that through no error on my part should have been under consideration.

Very truly yours,

*Deborah Harwell*

Deborah Harwell, *Pro Se*

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FEB 19 2019  
SC Court of Appeals

cc: The Honorable Jenny Abbott Kitchings  
Kevin Barth, Esquire  
Gena Phillips Ervin, Esquire  
Blake A. Hewitt, Esq.  
John Harleston, DHEC  
M. Dawes Cooke, Jr., Esquire  
Barbara J. Wagner, Esquire

VIA U.S. MAIL

RE: Deborah Harwell v. Robert Bryan Harwell, individually and as Personal Representative of the Estate of David W. Harwell, and South Carolina Department of Health and Environmental Control Division of Vital Records, and Law Office of Deirdre W. Edmonds, PA; and Deirdre W. Edmonds, individually

Appellate Case No: 2017-002290  
Case No: 2016-CP21-1435

Kevin Barth, Esquire  
Ballenger, Barth, Hoefler and Lewis, L.L.P  
P. O. Box 107  
Florence, SC 29503

Gina Phillips Ervin, Esquire  
Orr Elmore & Ervin, LLC  
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Blake Hewitt, Esquire  
Bluestein Thompson Sullivan, LLC  
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John Harleston  
S.C. Department of Health and Environmental Control  
2600 Bull Street  
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Barbara J. Wagner, Esquire  
M. Dawes Cooke, Jr., Esquire  
Barnwell Whaley Patterson & Helms LLC  
288 Meeting Street, Suite 200  
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February 2, 2019

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

Served via US Mail  
Also via Fax to: 803-734-1839

RE: Deborah Harwell v. Robert Bryan Harwell  
Appellate Case No.: 2017-002290  
Your My correspondence of January 27, 2019

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FEB 19 2019  
SC Court of Appeals

Dear Clerk Kitchens:

Yesterday, I placed a call to the court. You were not in; but the new case worker Mary Catherine Singleton was available. She asked me to clarify the status of the case based on my submissions. She informed me that the prior case manager had left and that some confusion had occurred within the office as to filings; particularly ones that I made that have not been entered into C-track, cross correspondence that had been sent to the wrong address because of a lack of address change on a timely basis. Miss Singleton said that you had sent a request to her to change my mailing address and she did that yesterday. She has asked me to provide correspondence detailing what has not been recorded in a letter to the court.

In that regard, I informed Miss Singleton that I needed to file a Motion regarding the Record on Appeal and proceed thereafter which I am humbly requesting 30-days so I can do that. It will also allow me to attempt once again to engage a qualified council to represent me as I am a forced, lay pro se litigant, who has no understanding of the Appellate process. As you can see from my prior correspondence, I have spent thousands of dollars and hundreds of hours trying to secure competent legal counsel. Without counsel; I am effectively being denied due process rights.

In conclusion, please allow me the 30-days so I can get the Motion submitted regarding the Record on Appeal to correct the misfiling's that were not properly filed on C-track; as Miss Singleton kindly advised me.

I look forward to hearing from you at your earliest convenience.

With Respect and Regards,

*Deborah Harwell*

Deborah Harwell, Pro Se

cc: Mary Catherine Singleton  
Kevin Barth, Esquire  
Gena Phillips Ervin,  
Esquire Blake A. Hewitt,  
Esq.  
John Harleston, DHEC  
M. Dawes Cooke, Jr.,  
Esquire Barbara J.  
Wagner, Esquire

VIA MAIL

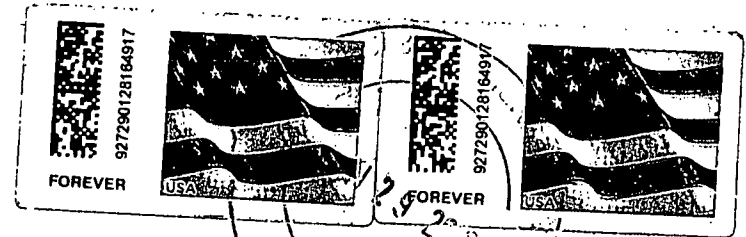
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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
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FEB 06 2019

SC Court of Appeals

*Mary Catherine Singleton  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, S.C. 29211*

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