

89704

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

CASE NUMBER: 2017-002519

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

**RECEIVED**  
MAY 01 2019  
SC Court of Appeals

COUNTY OF FLORENCE AND THOMAS J. HEWITT,

RESPONDENT(S)

vs.

CAROL EAGERTON,

APPELLANT.

**MOTION FOR EXTENSION OF TIME TO FILE THE RECORD ON APPEAL**

This Motion comes before the Court pursuant to Rules 240 of the South Carolina Rules of Court and request that the Appellant be allowed an additional 30 days to file the Record on Appeal.


This motion is based on the following facts. The Appellant's undersigned attorney has had an extremely heavy case load, which has required numerous court appearances in State and Federal Court across the state. The undersigned was then out of the office on a pre-planned family vacation, from April 17, through April 27, 2019. Further, the undersigned has been in communication with opposing counsel, Malloy D. McEachin, Jr., and there has been discussion as to what records shall be included. The undersigned is working diligently to complete the Record on Appeal. Further, upon consulting with opposing counsel, he has stated that he has no objection to this request for extension of time and consent thereto.

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

[SIGNATURE PAGE TO FOLLOW]

April 30, 2019

Respectfully Submitted:

A handwritten signature in black ink, appearing to read 'RMP', written in a cursive style.

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 the Record on Appeal was served on the following, this 30<sup>th</sup> Day of April 2019, via United States mail, first class, to the following address:

**Malloy D. McEachin, Jr., Esq**  
**2117-B W. Palmetto Street**  
**Florence, SC 29501**



Lawton S. Matthews  
Parham Law Firm, LLC

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MAY 01 2019  
SC Court of Appeals

# PARHAM

PARHAM LAW FIRM, LLC

April 30, 2019

VIA U.S. MAIL

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

RE: *RE: County of Florence and Thomas J. Hewitt vs. Carol Eagerton*  
Case No. 2017-002519

Dear Clerk of Court:

Enclosed please find the original and one copy of Appellant's Motion for Extension of Time to File the Record on Appeal, along with a certificate of service which is being forwarded to you for filing. I am also enclosing a check for \$50.00 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

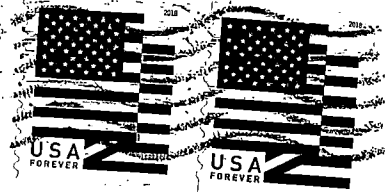
Cc: : Malloy D. McEachin, Jr., Esq.;  
File

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MAY 01 2019  
SC Court of Appeals

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](http://www.rosemaryparham.com)

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

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