

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**  
JUN 03 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 10 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 also preparing for a three-week Federal drug trial which was just recently resolved by way of a guilty plea. The undersigned is working diligently to complete the Record on Appeal but has been unable to do so due to the foregoing conflicts. Further, the undersigned has consulted with opposing counsel, D. Malloy McEachin, Jr. and he has stated that he has no objection to a continuance.

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

[SIGNATURE PAGE TO FOLLOW]

Respectfully Submitted:

A handwritten signature in black ink, appearing to read 'RMP', with a long horizontal flourish extending to the right.

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

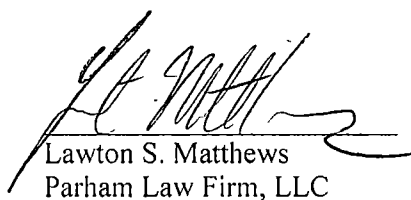
May 31, 2019

**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 31<sup>th</sup> Day of May 2019, via United States mail, first class, to the following address:

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



Lawton S. Matthews  
Parham Law Firm, LLC

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JUN 03 2019  
SC Court of Appeals

# PARHAM

PARHAM LAW FIRM, LLC

May 31, 2019

VIA U.S. MAIL

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

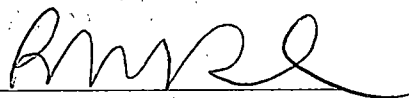
**RE: RE: County of Florence and Thomas J. Hewitt vs. Carol Eagerton  
Case No. 2017-002519**

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 D. Malloy 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

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**SC Court of Appeals**

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

File

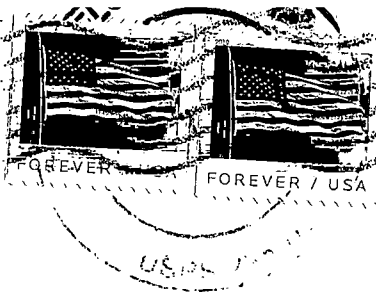
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FLORENCE

COLUMBIA SC 29201

31 MAY 2019



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South Carolina Court of Appeals  
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SC Court of Appeals

FLORENCE

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