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STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

CASE NUMBER: 2017-002519

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NOV. 14 2019

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 TO REINSTATE APPEAL

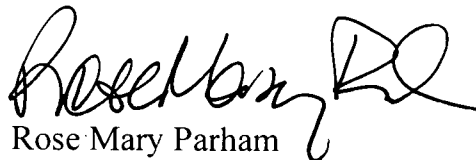
This Motion comes before the Court pursuant to Rules 240 and 260(a) of the South Carolina Rules of Court. The undersigned respectfully requests that the appeal be reinstated based on the following:

Appellant's undersigned attorney confused the filing deadline because she mistakenly believed that she had filed another request for extension of time in which to file her Final Brief. Appellant's undersigned attorney prepared for and appeared in contested criminal hearings in state and federal court in September and October 2019. The undersigned had two properties that sustained damage from hurricane Dorian during the first week of September 2019. The undersigned was also preoccupied with some personal matters of one of her children during the same time frame. Due to the foregoing, the undersigned should have timely requested an extension of time in which to file her Final Brief but did not. The undersigned has completed the Final Brief and submits it for consideration with this motion.

It is therefore requested of this Honorable Court consider the granting of this motion to reinstate the appeal.

November 14, 2019

Respectfully Submitted:



Rose Mary Parham
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Bar Number 17032

Attorney for Appellant

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM FLORENCE COUNTY

Thomas Russo, Circuit Court Judge

Appeal Number 2017-002519

County of Florence and Thomas J. Hewitt, Respondents,

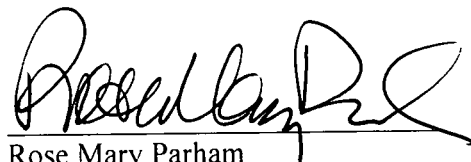
vs.

Carol Eagerton, Appellant.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Appellant's Motion to Reinstate Appeal, Motion to File out of Time, and Final Brief of Appellant was served on D. Malloy McEachin, Jr., Esq, as attorney for Respondent, via hand delivery, on November 14, 2019.

D. Malloy McEachin Jr.
D. Malloy McEachin, Jr., P.A.
180 N. Irby Street, MSC XX (Room 503)
Florence, SC 29501



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Attorney for Appellant

PARHAM

PARHAM LAW FIRM, LLC

November 14, 2019

VIA U.S. MAIL

Clerk of Court

South Carolina Court of Appeals

P.O. Box 11629

Columbia, SC 29211

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SC Court of Appeals


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 requisite copies of the Appellant's Motion for Extension of Time to File Final Brief, Appellant's Motion to Reinstate Appeal, Appellant's Final Brief, and Certificate of Service.

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
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Parham Law Firm, LLC
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(843) 407-7757
Attorney for Appellant

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

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