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THE STATE OF SOUTH CAROLINA  
In the Supreme Court

**RECEIVED**  
DEC 29 2020  
SC Court of Appeals

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas  
Roger L. Couch, Circuit Court Judge

APPELLATE CASE NO. 2017-002290

Deborah B. Harwell, ..... Respondent,

v.

Robert Bryan Harwell, individually and as the  
Personal Representative of the Estate of  
David W. Harwell; and the South Carolina  
Department of Health and Environmental Control,  
Division of Vital Records, Defendants,

Of whom Robert Bryan Harwell, individually  
and as the Personal Representative of the  
Estate of David W. Harwell is the ..... Petitioner,

Of whom the South Carolina Department of  
Health and Environmental Control,  
Division of Vital Records is the ..... Respondent,

v.

Law Office of Deidre W. Edmunds, P.A.  
And Deidre W. Edmunds, Individually, ..... Respondents.

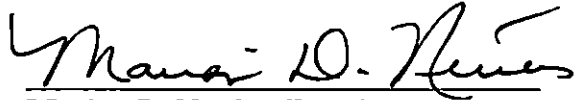
MOTION TO DISMISS

The Respondent, Robert Bryan Harwell, individually and as Personal Representative of the Estate of David W. Harwell, hereby moves to Dismiss the "Appeal to the South Carolina Supreme Court" filed in the South Carolina Court of Appeals, by the Appellant

Deborah Harwell, dated December 11, 2020 and mailed to Respondent on December 15, 2020.

December 21, 2020

Respectfully Submitted,



Marian D. Nettles, Esquire  
Nettles, Turbeville & Reddeck  
P.O. Box 699  
Lake City, SC 29560  
(843) 374-8511  
(843) 374-3211 (fax)  
missy@ntrlaw.com

**Other counsel of record:**  
M. Dawes Cooke, Jr., Esq.  
Barbara J. Wagner, Esq.  
Barnwell, Whaley, Patterson &  
Helms, LLC

288 Meeting Street, Suite 200 (29401)  
Post Office Drawer H  
288 Meeting Street, Suite 200 (29401)  
Charleston, SC 29402  
(843) 577-7700 Fax: (843) 577-7708  
[mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com)  
[bwagner@barnwell-whaley.com](mailto:bwagner@barnwell-whaley.com)  
Attorneys for Respondents  
Law Office of Deidre W. Edmunds, P.A.  
and Deirdre W. Edmunds, individually

Kevin M. Barth, Esquire  
Ballenger, Barth, Hoefler and Lewis, L.L.P.  
P.O. Box 107  
Florence, SC 29503  
kbarth@bbblawsc.com

**Other Counsel of Record:**

Deborah B. Harwell, *Pro Se*  
1459 River Highway  
 Mooresville, NC 28117

John Harleston  
South Carolina Department  
of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201  
Respondent

Gena Phillips Ervin, Esq.  
Orr Elmore & Ervin, LLC  
P.O. Box 2527  
504 S. Colt Street  
Florence, SC 29503  
Petitioner  
Attorneys for R. Bryan Harwell,  
Individually and as Personal  
Representative of the Estate  
of David W. Harwell

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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY

In the Courts of Common Pleas of Beaufort and Florence Counties  
Trial Court Case Nos. 2016-ES-07-00302, 2016-CP-21-01435, and 2015-ES-21-00778  
The Honorable Kenneth E. Fulp, Jr. And  
The Honorable Roger L. Couch

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APPELLATE CASE NO. 2017-002290

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Deborah B. Harwell, ..... Respondent/Appellant,

v.

Robert Bryan Harwell, individually and as the  
Personal Representative of the Estate of  
David W. Harwell; and the South Carolina  
Department of Health and Environmental Control,  
Division of Vital Records, ..... Defendants,

Of whom Robert Bryan Harwell, individually  
and as the Personal Representative of the  
Estate of David W. Harwell is the ..... Respondent/Appellant,

And the South Carolina Department of  
Health and Environmental Control,  
Division of Vital Records is the ..... Respondent,

v.

Law Office of Deidre W. Edmunds, P.A.  
And Deidre W. Edmunds, Individually, ..... Appellants/Respondents.

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PROOF OF SERVICE

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I certify that I have served the Motion to Dismiss and Memorandum in Support of Motion filed on behalf Robert Bryan Harwell, individually and as personal representative of the Estate of David W. Harwell, on the above-referenced parties by depositing copies in the United States Mail, postage prepaid, on December 21, 2020, addressed to them or to their attorneys of record;

**Deborah B. Harwell, *Pro Se***  
1459 River Highway  
Mooreville, NC 28117  
Respondent/Appellant

**Deborah Harwell**  
PO Box 298  
Fallston, NC 28042

**John Harleston**  
S.C. Department of Health and  
Environmental Control  
2600 Bull Street  
Columbia, SC 29201  
Respondent

**M. Dawes Cooke, Jr., ESQ.**  
**Barbara J. Wagner, Esq.**  
**Barnwell, Whaley, Patterson & Helms, LLC**  
288 Meeting Street, Suite 200 (29401)  
Post Office Drawer H  
Charleston, SC 29402  
Attorneys for Appellants/Respondents  
Deirdre W. Edmonds, PA and Deirdre W. Edmonds, individually



**Marian D. Nettles, Esquire**  
**NETTLES, TURBEVILLE & REDDECK**  
PO Box 699/261 Kelley Street  
Lake City, SC 29560  
843-374-8511/843-493-2221  
843-374-3211(fax)

**Kevin M. Barth #559**  
**BARTH BALLENDER & LEWIS**  
P.O. Box 107  
Florence, SC 29503  
(843)662-6301  
(843)664-8384(fax)  
[kbarth@bblawsc.co](mailto:kbarth@bblawsc.co)

**Gena Phillips Ervin #4453**  
**ORR ELMORE & ERVIN LLC**  
P.O. Box 2527  
Florence, SC 29503  
(843) 667-6613  
(843) 667-0340(fax)  
[gpe@orrfirm.com](mailto:gpe@orrfirm.com)

**Attorneys for R. Bryan Harwell**

LAW OFFICES

NETTLES, TURBEVILLE & REDDECK

P. O. BOX 699  
261 KELLEY STREET  
LAKE CITY, SOUTH CAROLINA 29560

E. LEROY NETTLES  
ELBERT K. TURBEVILLE  
LARRY G. REDDECK  
MARIAN D. NETTLES  
E. LEROY NETTLES III

843-374-8511  
843-493-2221  
FAX: 843-374-3211

Via Fax and First Class Mail  
Email to [ctappfiling@sccourts.org](mailto:ctappfiling@sccourts.org)  
December 21, 2020

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

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DEC 20 2020  
SC Court of Appeals

RE: *Deborah B. 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, Appellants/Respondents*

Appellate Case No. 2017-002290

Dear Ms. Kitchings:

Enclosed for filing please find the following regarding the above referenced matter:

1. Original and six (6) copies of the Motion to Dismiss, and Memorandum in Support of Motion
2. Original and one (1) copy of my proof of Service;
3. \$50.00 filing;

I have enclosed an additional copy of each document, which I would appreciate your clocking and returning to me in the self-addressed, stamped envelope provided for your use. Under cover of a separate copy of this letter,

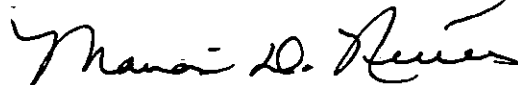
The Honorable Jenny Abbott Kitchings  
Page 2  
December 21, 2020

I am serving opposing counsel for the Respondent as reflected by my Proof of Service.

With my best regards, I am

Yours very truly,

NETTLES, TURBEVILLE & REDDECK



Marian D. Nettles

MDN/mmd

Enclosure

cc: Kevin M. Barth  
Gena Philips Erwin  
Blake A. Hewitt  
M. Daws Cooke, Jr.  
Barbara J. Wagner  
Deborah B. Harwell  
John Harleston



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LAW OFFICES

Nettel, Turbeville and Rodlock

P.O. BOX 600  
 201 KELLEY STREET  
 LAKE CITY, SOUTH CAROLINA 29560

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SC Court of Appeals

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

EXPECTED DELIVERY DAY: 12/22/20

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