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Jul 14 2022

SC Court of Appeals

July 13, 2022

V. Claire Allen, Chief Deputy Clerk
The South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201

Re: Karrie Gurwood & Howard Gurwood v. GCA Services Group, Inc.
Appellate Case No. 2019-001403

Dear Chief Deputy Clerk Allen;

I hope this correspondence finds you well. My wife, Karrie Gurwood, and I are in receipt of your July 1, 2022 letter, which requests six bound copies of two of our case documents. That specific legal paperwork needed is the Record On Appeal and the Appellant's Final Brief. As your letter also states, you gave us ten days (from the letter's date) to submit those documents. In my calculations of business days, counting 7/1, but not the federal holiday (7/4) and weekends, 7/15/22 will be that tenth day. **Our primary goal, in writing today, is to respectfully ask for an extension of the above due date.**

Also to note, I'm submitting this letter, on my wife's and my behalf, as she is very heavily medicated. (She takes Morphine and other strong prescription pharmaceuticals round-the-clock. That's for her excruciatingly-painful dystrophy condition. Her contracting this incurable disease is directly related to the above-noted lawsuit.) I apologize for not contacting you sooner. But, in addition to Karrie having severe burning pain (from the waist down), both of us have tested positive for COVID. That has occurred multiple times this year and has left us very ill, for months on end. I am also a diabetic (on daily insulin shots), do my best as the caregiver for my wife, work a full-time job (outside the home), handle all household chores (that my wife can no longer help with), etc. Taking that into consideration, as well as what I state below, my wife and I prayerfully hope you will approve a later copy receipt date.

When we received your 7/1/22 letter, we thought our prior attorneys (who filed the 2020 appeal) had already submitted all you requested. That is, to review and hopefully grant us another jury trial. To confirm, though, I contacted their office (Slotchiver Law). And one of their attorneys wrote me back. He shockingly stated that he and his colleagues had not submitted those 6 copies to your Court. Instead, he said it was our responsibility to do so, as they no longer represent us. Additionally, he quoted that a legal copy company would likely charge us almost \$3,000 (to prepare both those bound and color documents for you). That same attorney, in his brief email this week, offered to pass along additional information to us (re: your request). However, he has left us in even more of a bind, by not yet forwarding further details. His quoted copy/binding fee is an amount my wife and I cannot (in any way) afford. Especially since Karrie is no longer able to work. So my salary, as a Parts Manager, and her small Social Security disability income, can barely pay all our necessary monthly bills. Plus payments towards Karrie's astronomical medicals. I'm sure you can imagine the panic, that set in both of us, just learning the following this week: these 6 copies still had not been submitted, that the firm who sent the appeal has no intention of completing their responsibility, that we somehow have to come up with almost \$3,000 assumedly tomorrow (to get it to the legal copiers), that we have to find a copier able to provide this quick turn-around, and that we are the ones who must make sure you receive these large legal documents (in a very specific way) by this Friday.

Furthermore, my wife and I don't understand the legal rules, of how these copies need to be sent. Nor what is contained in our appeal. In the past months, since Slotchiver Law was legally dismissed from our case, we have yet to find a replacement attorney/firm. One to explain/comply with our case's legal requirements, one to take over representation on our complex medical lawsuit, one willing to split the attorney's percentage with the prior lawyers, one who can quickly respond to your Court's requests, one that would have to read over boxes of case paperwork (from the last 10 years), one that can otherwise prepare for an appeal hearing (just 2 months from now). And one okay doing all this, via a contingency fee.

In conclusion, I hope I've provided you with sufficient detail, to allow for an extended document due date. And I wholeheartedly thank you for your time, efforts and consideration of our request.

Sincerely,

Howard Gurwood

Karrie Gurwood

Howard M. Gurwood, co-plaintiff (and Karrie L. Gurwood, co-plaintiff)
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