

May 23, 2013

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

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MAY 23 2013

SC Court of Appeals

RE: Glenda Couram v. Lula N. Davis, Shirley Rivers, Constance "Connie" Rhett, Marcia Adams, Dottie Blankenship, Tosha Autry, Steven W. Lake and SC Department of Motor Vehicles in their official and individual capacities
C/A No.: 2011-CP-40-07134
Appeal Case No.: 2012-213441.

Dear Ms. Kitchings:

As *pro se* litigant in the above referenced matter, I respectfully ask that you (Court) *deny* the Respondents' request for a 30 day extension to file and serve their Initial Respondent's Brief and Designation of Matter to be included in the Record on Appeal. Respondents' Brief and Designation were due on or about Tuesday, May 21, 2013, instead on May 20, 2013 the Respondents *hand delivered* a request for a 30 day extension on May 20, 2013 to the Court.

Mr. Matthews, Respondents' counsel, state that he is making this request because of a recent absence of several days for military service. Mr. Matthews, is not the one being sued, is he allowed to repeatedly use the protection of the Service Members' Civil Relief Act (SCRA) and the Uniformed Services Employment and Reemployment Relief Act of 1994 (USERRA) to benefit the Respondents?

Respondents' counsel has used his military service or obligations as an excuse since this matter began in 2008. He used it to deny the Appellant time to file essential discovery while this matter pended in federal court when she asked for an extension of time (denied) due to his delay in providing her with the court ordered discovery, he used this excuse in trial court on November 5, 2012, stating that "he has gone to Iraq and back" and this matter is still in court "almost three years later" to expedite the dismissal of Appellant's complaint forcing this Appeal.¹

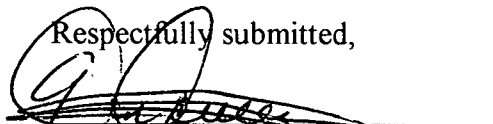
If the court is so inclined to honor this request, Appellant respectfully ask the court to require a response to the Initial Appellant Brief and Designation of Matter within the next ten days of the date of this letter in the interest of justice.

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¹ In 2011, when he went to meet his obligation to serve he had another attorney follow thru and then another attorney to timely respond to the appeal .

I thank you for your time and consideration and I am notifying the Respondents of this request to deny their motion for a 30 day extension by copy of this correspondence.

Respectfully submitted,



Glenda R Couram, *pro se*

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Lexington, SC 29073

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Pro se Appellant

/grc

Encl: corrected cover page for Initial Appellant Brief per your letter dated May 15, 2013.

c: Eugene H. Matthews, Esq.,
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