

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

**RECEIVED**

MAR 13 2023

SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
H.W. Funderburk, Administrative Law Judge  
Case No.: 21-ALJ-22-0245-AP

---

Appellate Case No. 2021-001444

---

Keiarra Carr, Appellant,  
v.  
South Carolina Department of Employment  
and Workforce & JDC Management, LLC, Respondents..

---

Motion to Reinstate

---

The appellant is a mother to 3 school aged children, battling depression, anxiety, scoliosis, arthritis, and lupus. Throughout this entire ordeal, the appellant has been faced with homelessness and lack of work. Due to unforeseen medical reasons, and conditions the appellant has been out of work and cannot afford a legal attorney. The appellant ask that the case be reinstated, being that the case has its facts, there is just error in the presenting of those facts. The appellant is requesting a motion to reinstate.

March 2, 2023

Keiarra Carr  
Appellant  
4430 Esmeralda Drive  
Charlotte, NC 28269  
704-901-7650 (phone)  
keiarramcarr@gmail.com

s/ Steven Jordan, Jr.  
Steven A. Jordan, Jr. (SC Bar # 100314)  
SC Department of Employment and Workforce  
Post Office Box 8597  
Columbia, SC 29202  
803.737.0395 (phone)  
803.737.0124 (fax)  
Legal@dew.sc.gov

Attorney for Respondent SC Department of  
Employment and Workforce

BLOODGOOD & SANDERS, LLC

\_s/ Lucy Sanders

---

Lucy C. Sanders, SC Bar No.: 78169  
242 Mathis Ferry Road, Suite 201  
Mt. Pleasant, SC 29464  
Telephone: (843) 972-0313  
Email: lsanders@bloodgoodsanders.com  
Attorneys for Respondent JDC Management, LLC

FORM 7  
PROOF OF SERVICE

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

MAR 13 2023

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
The Honorable H. W. Funderburk Jr.

Case No. 2021-001444

Keiarra Carr,

Appellant,

v.

South Carolina Department of  
Employment and Workforce  
and JDC Mgmt. LLC

Respondent.

PROOF OF SERVICE

I certify that I have served the Motion to Reinstate on March 13, 2023

Keiarra Carr

(Print Your Name)

  
(Your Signature)

16158 Coyridge Lane

(Street)

Houston, TX 77053

(City, State, Zip Code)

S.C Administrative Law Court  
1205 Pendleton St. Suite 224  
Columbia, SC  
803-734-6401

Attorney for Appellant  
Steven A. Jordan Jr., Esquire  
Office of General Counsel  
SC Dep't of Employment & Workforce  
PO Box 8597  
Columbia, SC 29202  
Counsel for Respondent SCDEW

Lucy C. Sander, Esquire  
242 Mathis Ferry Road  
Mt. Pleasant SC 29464  
Counsel for Respondent JDC Management