

June 6, 2023

VIA ELECTRONIC MAIL

The Honorable Patricia A. Howard
Clerk, Supreme Court of South Carolina
Post Office Box 11330
Columbia, SC 29211

RECEIVED

Jun 07 2023

S.C. SUPREME COURT

Re: *Karrie Gurwood, et al. v. GCA Services, et al.*
Appellate Case No. 2023-000606 / 2019-001403

Dear Honorable Clerk Howard:

We hope this letter finds you well. Our purpose in writing is to respectfully request an additional extension, for filing a RETURN TO THE PETITION FOR A WRIT OF CERTIORARI. For brevity herein, we'll refer to that document as the "RETURN." As a reminder, we are the appellants/plaintiffs, in the above-named lawsuit. The respondents/defense (in this case) are GCA Services, et al., represented by Attorney Robert T. Lyles, Jr. (of Lyles and Associates, Mt. Pleasant, SC). And on April 17, 2023, Mr. Lyles filed the above PETITION, with your SC Supreme Court, as he/his clients disagree with the Appellate Court's late 2022 decision to allow us a 2nd jury trial. (The first jury trial took place in April 2019, and due to major courtroom errors, our prior legal representation thereafter filed an appeal.)

Wholeheartedly grateful we are that, on May 18, 2023, you sent us an Order that granted a 20-day extension. (We requested that additional time, on May 17, 2023.) Although we intended on fully utilizing your granted 2 ½-week extension, to secure counsel (for preparing this RETURN), we were sadly unable to contract with a new attorney/law firm. That was because much of the time, since mid. May, both of us have been quite ill. Our symptoms have included migraines, extreme fatigue, excessive coughing, nausea, etc., which mimics how we felt during 2022 bouts with COVID. Additionally, in May and so far this month, Karrie has had a sharp increase in leg pain, swelling and discoloration (all part of her Reflex Sympathetic Dystrophy condition). But because this lawsuit so critically affects every aspect of our lives, and we're truly grateful for your granting us the first extension, please know we've tried our hardest to rest, take pharmaceuticals and even sought medical attention. That is, to feel well enough to keep contacting possible attorneys. Considering how horrible we both have felt, we haven't been able to seek consults with nearly as many legal professionals as we otherwise could have. A few of the attorneys considered representing us, but they just didn't have enough time (in less than three weeks) to become intrinsically familiar with the case and appeal. Followed by preparing a RETURN, specifically addressing the defenses' PETITION points. Especially because the case is now being considered by the highest court in SC, and different firms represented us in our first trial/ wrote our complex appeal. In the eight years, since filing the above lawsuit, there have minimally been hundreds of case happenings and several boxes of documents accumulated. As well as the lengthy jury trial transcript, for which the appeal is based. That is, for any new attorney to properly review before preparing the RETURN. And following that document might even be a need for new counsel to defend his/her case points, in person, before your SC Supreme Court. That might seem a daunting task, even for a 30+ year, veteran attorney and staff. But not submitting a RETURN is against the advice of multiple attorneys we spoke with (since learning Mr. Lyles filed the above PETITION). It was unanimously agreed (by those attorneys) for us to continue to defend the Appellate Court's decision. That is, of the 2nd jury trial they granted. [Because Karrie now has the above rare, incurable and catastrophic dystrophy condition, as a direct result of severe injuries sustained after a slip and fall. That was when the GCA Services floor waxer was negligent in warning of the slippery-as-ice conditions she left and Karrie fell on. And that dystrophy condition Karrie will suffer from (the remaining 35+ years of life) has been researched/deemed one of the most painful conditions of all. Therefore, Karrie desperately needs a 2nd jury trial (this next time with the legal right of punitive damages). So that Karrie can win a jury award of significant value (to pay for extremely expensive medical treatments, for the rest of her life).]

That being said, to successfully submit the above-discussed RETURN, it is our hope you will grant us as much time as is allowed (which we understand is another 20 days). With this maximum extension, we would continue the diligent work of seeking counsel, willing to assist in all of the above duties. And we remain optimistic, as we are starting to feel at least better (from the typical COVID symptoms), to then contact even more law firms (open to writing this legal doc, on our behalf). If they are given this additional time to review our case records and complete the RETURN. In summary, we are truly grateful for your consideration. The \$50.00 extension fee will be mailed within the grace period allowed. Please contact us, if clarification or further information is needed.

Sincerely,

Karrie and Howard Gurwood

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Attachments

cc Robert T Lyles, Jr. (Lyles & Associates, LLC, Attorneys at Law) by way of email (rtl@lylesfirm.com)