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Aug 28 2025
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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AUG 18 2025
SC Court of Appeals

APPEAL FROM THE COMMON PLEAS COURT

Clifton B. Newman, Common Pleas Fifth Judicial Circuit Judge

Appellate Case No. 2024-001835

Common Pleas Case No. 2022-CP-40-00027

South Carolina Department of Health and Environmental Control,
DOES 1 through X, inclusive:
and ROE Business Entities 1 through X, inclusive — Respondent

Teresa McWilliams
pro se — Appellant,

MOTION TO REQUEST EXTENSION TO FILE APPELLANT'S AMENDED BRIEF AND RECORD ON APPEAL

Teresa McWilliams
105 Arborgate Circle
Columbia, SC 29212
(803) 530-4738
Appellant, *pro se*

Meredith Seibert, Esquire
P.O. Box 1486
Columbia, SC 29202
(803) 790-0603
Attorney for Respondent

Amended Briefs were filed with and stamped by the Supreme Court of Appeals on March 7, 2025, and again on March 21, 2025, in response to letters received by appellant from the Supreme Court of Appeals Clerk. In a subsequent letter dated August

6, 2025, the Supreme Court of Appeals Clerk stated, "No amended brief has been received." Appellant draws the conclusion she filed improperly by not submitting a motion requesting permission to file amended briefs, even though appellant was following the instructions of the letters sent by the Supreme Court of Appeals Clerk.

On August 6, 2025, appellant received a letter from the SC Supreme Court of Appeals clerk informing appellant that a Proof of Service she filed with the Supreme Court dated July 14, 2025, with the green certified mail signature confirmation (the Certificate of Service declaring the amended brief had been sent to the respondent had already been filed with the SC Court of Appeals previously when the amended brief was sent) did not match a filed amended brief. The letter said, "No amended brief has been received."

Attached is:

- An amended brief cover page with the court stamped date of March 21, 2025.
- An amended brief cover page with the court stamped date of March 7, 2025.

Appellant received a letter from the SC Supreme Court of Appeals Clerk dated on or near February 25, 2025, stating that appellant had 10 days to respond. Appellant had included proofs and documents that should not have been in the initial brief. Appellant included proofs and documents as a supplement following the initial brief, with pages numbers within the initial brief referring the court to the proofs in the supplement. (Appellant believes, although due to her inexperience and lack of legal representation she is unsure, that she included proofs and documents within the initial brief that should have been included in a Record on Appeal instead.) The letter said that appellant had 10 days to respond. Within that 10-day period, appellant filed the amended brief dated March 7, 2025, removing those proofs and documents.

Subsequently, appellant filed motions requesting a time extension because she did not have the transcripts from all the hearings. When she received the Order denying that request, she filed an amended brief dated March 21, 2025, removing those motions from the March 7 amended brief. Both amended briefs were sent to the respondent, as the Proof of Service proved. Appellant did not understand that she also needed to file a Motion requesting late filing, because the letter from the Supreme Court of Appeals Clerk said she had 10 days to respond. Appellant now believes she was supposed to file a Motion rather than just correcting the things stated in the letter.

Appellant respectfully requests permission for an extension to file an amended brief as directed by the Supreme Court of Appeals in the letter dated on or about February 25, 2025, along with the proper format for the Record on Appeal.

Appellant has also attached:

- Copies of pages from the initial brief indicating documents that should have been in a Record on Appeal.

Appellant apologizes for these mistakes and hopes that the SC Supreme Court of Appeals will not dismiss her complaint based on an administrative detail. Appellant is studying the Rules, but without examples, she made a mistake in procedure.

Respectfully Submitted;

By: Teresa M. Williams

Teresa McWilliams

August 16, 2025
(Motion is stamped August 18 because August 16 was Saturday and the courts were not open)
Columbia, South Carolina

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and ROE Business Entities 1 through X, inclusive

Respondent

v.

Teresa McWilliams

Appellant, *pro se*

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Appellant, *pro se*

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[14] Supervisor accused Appellant of BEING SLOW about getting an answer regarding "The Good Behavior Game." Supervisor had already spoken directly with the person with the answer. (The person with answer did not respond to the Appellant, because he had already spoken directly with Supervisor.) Supervisor was withholding information and harassing Appellant. These emails and their dates are hard evidence. Exhibit 11 page 82.

[I5] Supervisor accused Appellant of BEING SLOW to switch virtual meetings from SKYPE to TEAMS. Supervisor would not approve the switch. These emails are hard evidence. (And there was no negative consequence, the switch was made with plenty of time for the meeting.) As above, Appellant needs to be allowed discovery.

Without question, all this evidence is minutia and unpleasant to wade through, but it is factual evidence, and Appellant should be able to produce this evidence before a jury, as Appellant has requested.

Issue Three: Order alleges there is no common law; however, South Carolina Code of Laws, SECTION 1-13-80 applies