

STATE OF SOUTH CAROLINA  
COUNTY OF LEXINGTON

FILED

IN THE COURT OF COMMON PLEAS  
FOR THE 11<sup>th</sup> JUDICIAL CIRCUIT

Glenda R. Couram,

Plaintiff,

2011 AUG 18 P 4: 54

CIVIL ACTION NO: 2011-CP-32-01010

vs.

METHA A. CARRIGG  
CLERK OF COURT  
LEXINGTON, SC

Mr. & Mrs. Christopher Hooker, Mr. & Mrs.  
Carl Reibold; All Persons Claiming any  
Legal or Equitable Right, Title, Estate, Lien  
or interest in the Property Described in the  
Complaint Adverse to the Plaintiff's; Cox  
& Dinkins, Inc, Fair Builders/Developers,  
J Donald Rawls and Steve Fair in their  
official and individual capacities, Carolina  
Water Service, Inc., (CWS), Carolina Trace  
Utilities, Inc., & Utilities, Inc., Corporate  
Offices (CWS)

Defendant(s)

MOTION TO AMEND COMPLAINT  
BOUNDARY DISPUTE, TRY TITLE  
CONTINUOUS TRESPASS (CRIMINAL  
CIVIL), ADVERSE POSSESSION  
CONTINUING NUISANCE, PROPERTY  
SLANDER OF TITLE, RECKLESS  
DISREGARD FOR TRUTH, INVASION  
OF PRIVACY, FRAUDULENT  
CONCEALMENT AND QUIET  
TITLE

DEMAND FOR JURY TRIAL

**NOW COME**, plaintiff, *as pro se*, in this second amended complaint and memo of support of the above-named Defendants herein would respectfully allege(s) as follows:

**JURISDICTION AND VENUE**

1. Plaintiff upon information and belief, believes this Court has jurisdiction over the parties and subject matter involved in this controversy pursuant to South Carolina Code §36-2-802, 803; 15-67-210 through 260; Title 19 - §16-11-410 to 620 et.seq; §15, Title Law; §16-7-150; Title 40 Chapter 22; § 15-67-10-770;
2. The Constitution of the State of South Carolina, (US Constitution) and the Court's plenary powers, etc.; South Carolina Tort Laws; South Carolina Quiet Title Law § 12-61-10, et.seq., Adverse Possession Laws § 15-67-210, et seq. 10 yrs. and Color of Title: 10 yrs;
3. And, other applicable laws.