

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas
R. Lawton McIntosh, Circuit Court Judge

13705

Case No.: 2011-CP-32-01010
Appellate Case No.: 2013-002056

Glenda Renee Couram

Appellant,

v

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

Defendants,

Of whom Mr. & Mrs. Christopher Hooker, Mr. & Mrs. Carl Reibold, Cox & Dinkins, Inc., Fair Builders/Developers, Inc., J. Donald "Don" Rawls & Steve Fair in their official and individual capacities are

Respondents.

**APPELLANT'S MOTION FOR LEAVE
TO TIMELY FILE
AN INITIAL REPLY BRIEF**

Glenda Couram
Appellant, *pro se*
104 Macaw Lane
Lexington, South Carolina 29073
(803) 896-7509
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RECEIVED

SEP 29 2014

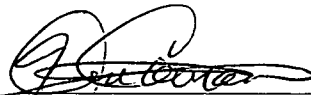
SC Court of Appeals

COMES NOW *pro se* Appellant, Glenda Couram, who submits this, Motion for Leave to file an Initial Reply Brief in order for this Honorable Court to accept her Final Reply and states:

1. Appellant apologizes for failing to note SCACR 208(a)(3), required the Initial Reply had to be filed with the Initial Brief in order to file a Final Reply
2. On or about September 11, 2014, Appellant timely filed the Final Brief along with the Final Reply and the Respondents' Attorney filed an Objection on or about September 22, 2014, stating Appellant did not file an initial reply and therefore cannot file the a final reply
3. The Initial Reply is identical to the Final Reply filed to the Court on or about September 11, 2014, the replies are based on the responses of the Respondents' Initial Brief and just clarify the Appellant's position for the court more succinctly.
4. There would not be any prejudice to the Respondents as the Appellant filed the final reply well before their final brief's has been filed.

WHEREFORE, Appellant, respectfully requests this Honorable Court to grant her leave to file the attached Initial Reply as timely.

Respectfully submitted by



Glenda R. Couram, *pro se*
104 Macaw Lane
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Dated this 28th day of September 2014
Lexington, South Carolina

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Glenda Renee Couram

Appellant,

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Defendants,

Of whom Mr. & Mrs. Christopher Hooker, Mr. & Mrs. Carl Riebold, Cox & Dinkins, Inc., Fair Builders/Developers, Inc., J. Donald "Don" Rawls & Steve Fair in their official and individual capacities are

Respondents.

PROOF OF SERVICE

I hereby certify that on this 28st day of September 2014, I caused to be served a copy of the foregoing INITIAL REPLY BRIEF OF APPELLANT and MOTION FOR LEAVE TO FILE THE BRIEF upon the individuals whose names and addresses are listed below by mailing (or Hand Delivery)k a copy of it in the United States Mail with proper first-class postage affixed thereon.

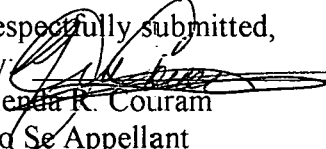
continued next page

Steven A. Fair, *pro se*
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Steve Fair, *pro se*
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100 S. Wrenwood Drive
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Respectfully submitted,
By 
Glenda R. Couram
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104 Macaw Lane
Lexington, South Carolina 29073
Telephone (803) 896-7509
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September 28th, 2014
Lexington, South Carolina

September 27, 2014

Jenny Abbott Kitchings
Clerk of Court
SC Appeals Court
PO Box 11629
Columbia, SC 29211

RE: Glenda Couram v Mr. & Mrs. Christopher Hooker, Mr. and Mrs. Carl Reibold, Cox & Dinkins, Inc., Fair Builders/Developers, Inc., J. Donald "Don" Rawls & Steve Fair in their official and individual capacities
Appellant Case No.: 2013-002056
CA No.: 2011-CP-32-01010

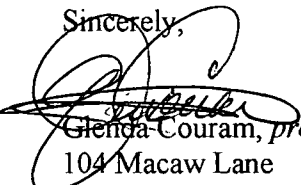
Dear Ms. Kitchings:

As you know, on September 26, 2014, Columbia Printers picked up the 14 copies from the court and replaced the red covers on the Appellant's Final Brief with the blue cover and returned.

In this letter, I am informing the court that corrected full copies of the Final Brief was mailed or hand delivered to the Respondents with correct blue cover. I am also enclosing the Supplement/Appendix to the Record on Appeal (ROA) to add the Defendants' Exhibit 2, 5 and 6 as they request. The Lexington Court (Mona) stated they could not release the actual poster without a court order. Appellant took pictures for Counsel Brown of Defense Exhibit 2 and will file copies and copies for Exhibit 5 and 6.

I am also enclosing a Motion for Leave to file the Initial Reply Brief and Final Reply Brief.

Sincerely,


Glenda Couram, *pro se*
104 Macaw Lane
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grcouram@hotmail.com
803 896-7509

/grc

Encls.: Motion for Leave to file Initial and Final Reply Brief and \$25 fee
14 copies of the Supplement/Appendix ROA not sure if a fee is required

c: Steven Fair, Registered Agent Fair Builders (pro se)
R. Davis Howser, Esq.
Law Offices of Smokey Brown, PC

RECEIVED

SEP 29 2014

SC Court of Appeals

Enclosed are

1. **Letter to the Court**
2. **Motion for Leave to File an INITIAL REPLY BRIEF and attached is a copy of the Brief and \$25 filing Fee (1 loose and bound copy)**
The Final Reply Brief has been filed September ²²~~11~~, 2014
3. **Loose and bound copy of the Supplement/Appendix as request by Attorney Brown in his Motion filed on or about September 22, 2014**
4. **Two proof of services and certificate of counsel**