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THE STATE OF SOUTH CAROLINA
In THE SUPREME COURT OF SOUTH CAROLINA

FEB 29 2016

SC Court of Appeals

Glenda Couram, Appellant,

v

Lula N. Davis, Shirley Rivers, Constance "Connie" Rhett, Marcia Adams, Dottie Blankenship, Tosha Autry, Steven W. Lake, in their official and individual capacities, and the South Carolina Department of Motor Vehicles, Respondents.

Appellate Case No. 2015-001566
Lower Court Case No. 2011-CP-40-01734

NOTICE OF SUBSTITUTION OF ATTORNEY

Petitioner, Glenda Couram, pro se, file this Motion voluntarily relieving Mr. Thomas Jefferson Goodwyn, Esq., as counsel in this matter as of February 17, 2016. The pro se will resume representing herself as she has done since 2010. The address and phone number is below. The pro se has attached e-mails stating the intent of Mr. Goodwyn. This was not intended to be a long term association per our contract.

Respectfully submitted by,



Glenda R. Couram
104 Macaw Lane
Lexington, SC 29073
grcouram@hotmail.com
803 358-0127

Dated this 26th day of February 2016
Lexington South Carolina

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REHEARING TO SC SUPREME COURT

FEB 29 2016

SC Court of Appeals

From: **glen evans** (grcouram@hotmail.com) You moved this message to its current location.

Sent: Fri 2/19/16 11:45 AM

To: Jeff Goodwyn (jgoodwyn@goodwynlaw.com)

Morning

I know you have cut ties with me but I wanted to let (you) know that a rehearing is allowed in the Supreme court, sister courts and in the US Supreme Court. And, in order for you to file to the US Court you have to file a rehearing motion to the SC Supreme Court like in the COA.

Depending on the ruling from the SC Supreme Court after this Motion I will file to the US Court. Just wanted to let you know since your name is involved. (In a ruling by New Chief Judge of SC Supreme Court(sp) he also stated a rehearing is allowed unless he was speaking about something else.

Thank you and bye

Glen

From: JGoodwyn@Goodwynlaw.com
To: grcouram@hotmail.com
Subject: RE: Advance Sheet
Date: Wed, 17 Feb 2016 16:41:52 -0500

Glenda –

Please see the attached letter relating to our opinion on your ability to request a re-hearing.

Thank you -

T. Jeff Goodwyn, Jr.
Goodwyn Law Firm, LLC
2519 Devine Street
Suite A
Columbia, S.C. 29205
Telephone: (803) 251-4517
Facsimile: (803) 251-4527
www.Goodwynlaw.com

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From: glen evans [mailto:grcouram@hotmail.com]
Sent: Wednesday, February 17, 2016 11:58 AM
To: Jeff Goodwyn <jgoodwyn@goodwynlaw.com>
Subject: RE: Advance Sheet

Okay, I called the court and it has been denied. But, I can file a rehearing, I am going to do that and ask about jurisdiction - The clerk implied I could get a reason for the denial.

What is the date on the Order. The clerk implied the 12th, which gives me until the 27th.

Please respond

Glen

From: grcouram@hotmail.com
To: jgoodwyn@goodwynlaw.com
Subject: Advance Sheet
Date: Wed, 17 Feb 2016 16:35:52 +0000

I just looked at the advance sheet from the court as of today, it says my case is still pending, is it wrong? Since you are the attorney I do not know if they will tell me if I call so please respond
Glenda Couram

From: grcouram@hotmail.com
To: jgoodwyn@goodwynlaw.com
Subject: RE: Update please
Date: Wed, 17 Feb 2016 12:06:13 +0000

Oh, and people were giving themselves high 5's today at work so figured and the writ that you wrote pretty much let me know from the start. I am glad they were quick about it.

Glen

From: grcouram@hotmail.com
To: jgoodwyn@goodwynlaw.com
Subject: RE: Update please
Date: Wed, 17 Feb 2016 11:57:19 +0000

I did not expect them to thank you

Glen

From: JGoodwyn@Goodwynlaw.com
To: grcouram@hotmail.com
Subject: RE: Update please
Date: Tue, 16 Feb 2016 15:00:52 -0500

Ms. Evans –

We received in the mail today a response from the Supreme Court denying to accept your case. They provided no explanation as to why they decided not to take the case. I am mailing you a copy of the decision today.

This makes the case final. Please call me if you would like to discuss further.

T. Jeff Goodwyn, Jr.
Goodwyn Law Firm, LLC
2519 Devine Street
Suite A
Columbia, S.C. 29205
Telephone: (803) 251-4517
Facsimile: (803) 251-4527
www.Goodwynlaw.com

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From: glen evans [mailto:grcouram@hotmail.com]
Sent: Tuesday, February 16, 2016 9:41 AM
To: Jeff Goodwyn <jgoodwyn@goodwynlaw.com>
Subject: Update please

I have not heard from you

Thanks

Glen

February 26, 2016

Mr. Daniel E. Shearouse
Clerk of Court
PO Box 11330
Columbia, Sc 29211

RECEIVED

FEB 29 2016

SC Court of Appeals

RE: Glenda Couram v Lula N. Davis, Shirley Rivers, Constance "Connie" Rhett, Marcia Adams, Dottie Blankenship, Tosha Autry, Steven W. Lake, in their official and individual capacities, and the South Carolina Department of Motor Vehicles
Appellate Case No. 2015-001566

Dear Mr. Shearouse:

Mr. Goodwyn¹ and our attorney/client relationship ended on February 17, 2016 after he informed me that the SC Supreme Court "denied" the Writ. This was expected as he was only hired on a limited basis to write the writ petition and is under no further obligation to represent me per our contract. This should allow this court to file and accept my motions and allow them to be presented before the justices under my signature as the only time I had not represented myself was with the Writ.

Mr. Goodwyn notified this pro se via the attached e-mail of the conclusion of the attorney/client relationship (see attached). In the e-mail you would also note that Mr. Goodwyn left the filing of the Motion to Rehear to me as he did not feel I could file a Motion to Rehear/Reconsider further proof of his dropping me as a client per our written agreement.²

Pursuant to the case law this court provided *State v. Stuckey*, 333 S.C. 56, 58, 508 S.E.2d 564, 564 (1998), it appears to say or says "[s]ince there is no right to hybrid representation, substantive documents filed *pro se* by a person represented by counsel are not accepted unless submitted by counsel." However, *Stuckey goes on to state*, "*Nothing in this order shall be construed to limit any party's right to file a pro se motion (form to substitute counsel – added) seeking to relieve his counsel.*" *Id.*, 508 S.E.2d at 565. *The rule against hybrid representation does not bar pro se motions to relieve counsel.*

As the attorney/client relationship was severed on February 17, 2016 also the date remitter was filed after pro se informed the attorney of her intent she also took this to mean the relationship was over due to the coincidence of the filing of the remittuer after pro se informed him of her intentions.

Attached is the substitution of counsel notice formally relieving Mr. Goodwyn³ as counsel his only obligation to this pro se was to write the writ, I made the mistake believing he

¹ Ms. Peavy wrote the Writ for Mr. Goodwyn.

² Please also note that I filed a rule 59 Motion for Reconsideration in the Circuit Court and a Motion for Rehearing En Banc with the Court of Appeals on all issues per *State v Dunbar* all a matter of the Record on Appeal.

³ Ms. Peavy worked with Mr. Goodwyn there was not contract between her and pro se

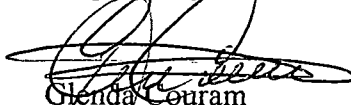
would write based on my information, input and paperwork, it did not work out that way. All the pro se can do at this point is file to the US Supreme Court hoping they will accept the writ. Therefore, she will resume representing herself.

I will use your letter dated February 24, 2016, for the US Supreme Court showing that I complied or attempted to comply with all procedural requirements before filing the writ petition within ninety days of your letter.

At the time, I filed the Motions to this court I was no longer represented by counsel so there was no "hybrid representation" as named in *Miller v State*, 388 S.C. 347, 347, 697 S.E.2d 527, 527 (2010). Mr. Goodwyn was hired just to write the writ petition and additional fee was to be charged for him to continue if the writ was accepted. I had no expectations for him to continue as my counsel once the writ was *denied* so my Motions filed on February 21st, 2016 should be accepted by this court as legitimate and timely filings under my signature.

I thank you in advance for your time and attention to this matter.⁴

Respectfully submitted by,



Glenda Couram
104 Macaw Lane
Lexington, SC 29073
803 358-0127
grcouram@hotmail.com

/grc

Encl.: Substitution of Counsel
Declaration

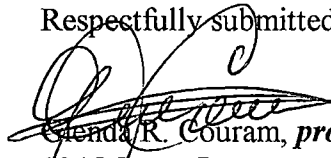
c: Eugene H. Matthews, Esq.
Thomas J. Goodwyn, Jr. Esq.
Jenny Abbott Kitchings, Esq.

⁴240 (i) **Rehearing.** The court will not entertain petitions for rehearing on a motion or petition unless the action of the court on the motion or petition has the effect of dismissing or finally deciding a party's appeal. I suppose since as the attorney stated there was no hearing there cannot be a motion filed to rehear or to reconsider.

DECLARATION

I, the undersigned, declare under penalty of perjury that the statements made in the motions and other documents are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted by;


Glenda R. Couram, *pro se*
104 Macaw Lane
Lexington, SC 29073
803 896-7509
grcouram@hotmail.com

RECEIVED
FEB 29 2016
SC Court of Appeals

Dated this ^{26th} 21st day of February 2016
Lexington County, South Carolina

