

Goldie Grier Reeves
48 Mc Price Court
Greenville ,South Carolina 29615

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AUG 30 2016
SC Court of Appeals

August 17, 2016

Mrs. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office ?Box11629
Columbia ,South Carolina 29211

RE; Goldie Grier Reeves v. Rogers C. Reeves
Appellate CASE No. 2013- 002082

Dear Ms Abbott Kitchings,

I generally corespond with Ms. Monica Cassidy and I in fact ~~from~~ filed information concerning my extention for good cause request.. This summer I know Ms. Cassidy hurt her foot while on on vaction and. "out of pocket" for me to communicate with her I understand it was a situation that could not be helped ,Put I have come to rely on her procedural assistance and that wasimpo posible. given the deilemma in the northwest vacation.I was conc erned about her recovery..

I shared part of my explanation with her and she probably passed it along to you.

That information wasmostly about the symptoms of Lupus as opposed to how i was physically and Neurologically affected.

In this note I want to be specifiabout how I was personnally aff affected.

In1994 I was contacted by a greenville Law firm to fly to New Yo york city to be evaluated for for a diseas called Lupus., which might have affected me because of Breast implants I had recieved for medical reasons after my children were born., I seems their group was involved with a world wide class action lawsuit re- gardinf silicone filled implants was causing lupus in many Indio lafies and the were helping some take part in the claim.

I felt very healthy in general but after completing several ques tionnaires I had many similar poblems.I could be a client.

There were criteria s that had to be met.

I was part of about twenty women from South Carōlina.

werwere given extensive medical evaluations and hve continued to be monitored since that time.

Living With Lupus

- Understanding Your Symptoms
- Talking to Your Doctor
- Taking Control
- Managing Your Healthcare Team
- Real Lupus Stories
- Expert Advice
- FAQs

Tools

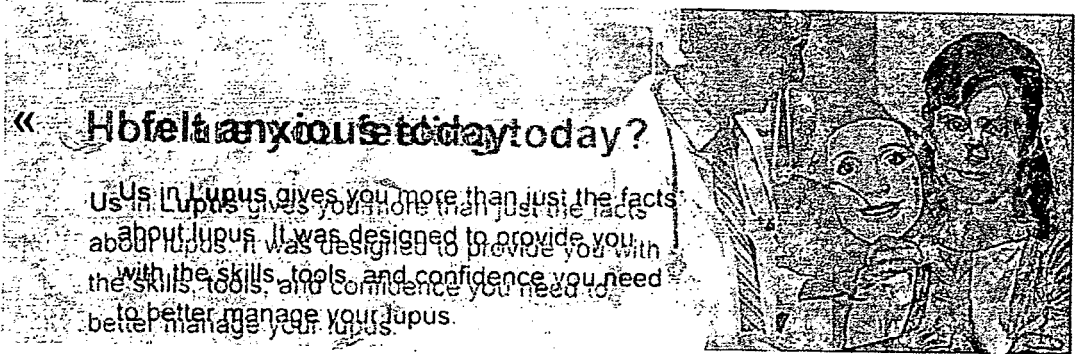
Resources

Get Your Free Lupus Journal

Contact a lupus support specialist toll-free:

1-855-US-IN-LUPUS
(1-855-874-6587)

Monday-Friday,
8:30 a.m.-5:00 p.m. ET



« **Have you felt anxious today?**

Us in Lupus gives you more than just the facts about lupus. It was designed to provide you with the skills, tools, and confidence you need to better manage your lupus.

FAQs

Use the information below to help you better understand lupus, and to spark conversation with members of your healthcare team.

Expand All

Collapse All

Facebook

Twitter

LinkedIn

Email



What is SLE?

Systemic lupus erythematosus (SLE or lupus) is a chronic inflammatory disorder of the immune system.

The immune system is a group of cells, tissues, and organs that protect the body from infection.

A chronic disorder is a health condition that lasts for a long time. Usually it lasts for more than several months.

Are SLE symptoms always the same?

The disease activity of SLE can change. Patients can have periods of increased disease activity called flares. Patients can also have times when disease activity is reduced, called relative remission.

Symptoms of SLE may be different from person to person. They can even be different in the same person over time.

How severe are SLE symptoms?

SLE symptoms can range from mild to very severe, and affect nearly every part of the body.

HOSPITAL FOR SPECIAL SURGERY



Rheumatology Division

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November 24, 2



Patients - Browse by Condition

>> For Patients >> Special Reports and Journal Reviews >>

ACR Special Report: Neuropsychiatric Problems in Lupus

(November 3, 2003)

[Email a Friend](#)

Roberta Horton, ACSW, CSW
 Assistant Director, Department of Patient Care and Quality Management
 Hospital for Special Surgery

Anxiety, headaches, difficulty concentrating, confusion, depression and other mood disorders, peripheral neuropathy (nerve disorders that can cause numbness or pain in hands and feet), problems with memory and thinking, psychosis, seizures, and other problems can all be symptoms of neuropsychiatric disease caused by lupus. **How common are these problems? And how do they affect people with lupus?** Those questions were the focus of a recent study reported at the American College of Rheumatology meeting-

Patients often tell their doctors about such problems, but they have just beginning to be studied carefully by researchers in the last few years. Although they seem to be common problems in lupus, they have not been well-recognized and not well defined by doctors and patients.

A group of Canadian researchers reviewed 107 lupus patients whose average age was 44. They had had lupus, on average, for about 10 years. **They found that 36% had neuropsychiatric symptoms of some type. And 58% of those symptoms could be attributed completely or in part to lupus.**

Interestingly, **those with neuropsychiatric manifestations had higher levels of lupus activity, and they reported more fatigue.** They were also more likely to have received prednisone or immunosuppressive drugs. **They reported a significantly lower quality of life than those who did not have neuropsychiatric problems.** (A lower quality of life was not associated with kidney disease in lupus patients.)

GRAY v. BRYANT
Common Pleas Court of South Carolina, Anderson County. April 01, 1986
...PRIMARY INJURY: Systemic Lupus...

Proposed & Enacted Legislation View all 486

2015 SC H.R. 4101 (NS)
2015 South Carolina House Resolution No. 4101, South Carolina One Hundred Twenty-First Session General Assembly - First Regular Session
April 30, 2015 ; TITLE: A HOUSE RESOLUTION TO RECOGNIZE THE DIRE EFFECTS OF LUPUS ON ITS SUFFERERS AND THEIR NEED FOR PROPER MEDICAL TREATMENT AND TO OBSERVE MAY 2015 AS "LUPUS AWARENESS MONTH" IN SOUTH CAROLINA.
VERSI: Adopted ; Reps. Funderburk, Alexander, Allison, Anderson, Anthony, Atwater, Bales, Ballentine, Bamberg, Bannister, Bedingfield, Bernstein, Bingham, Bowers, Bradley, Brannon, G.A. Brown, R.L. Brown, Burns, Chumley, Clary, Clemmons, Oytum, Cobb-Hunter, Cole, Collins, Corley, H.A. Crawford, Crosby, Daring, Delleney, Dillard, Douglas, Duckworth, Ertokson, Felder, Fintay, Forrester, Gagnon, Gambrell, George, Gillard, Goldfinch, Govan, Hamilton, Hardee, Hardwick, Hart, Hayes, Handerson, Henegan, Herbkersman, Hicks, Hill, Hiott, Hixon, Hodges, Home, Hosey, Howard, Huggins, Jefferson, Johnson, Jordan, Kennedy, King, Kirby, Knight, Limehouse, Loftis, Long, Lowe, Lucas, Mack, McCoy, McEachem, McKnight, M.S. McLeod, W.I. McLeod, Merrill, Mitchell, D.C. Moss, V.S. Moss, Murphy, Nannney, Nest, Newton, Norman, Norrell, Ott, Parks, Pitts, Pope, Putnem, Quin, Ridgeway, Riley, Rivers, Robinson-Simpson, Rutherford, Rynal, Sandifer, Strmli, G.M. Smith, G.R. Smith, J.E. Smith, Sottile, Southard, Spires, Stavrinakis, Stringer, Tribon, Taylor, Theyer, Tindler, Toots, Weeks, Wells, Whipper, White, Whitmore, Williams, Walls and Yow

A HOUSE RESOLUTION TO RECOGNIZE THE DIRE EFFECTS OF LUPUS ON ITS SUFFERERS AND THEIR NEED FOR PROPER MEDICAL TREATMENT AND TO OBSERVE MAY 2015 AS "LUPUS AWARENESS MONTH" IN SOUTH CAROLINA. Whereas, a chronic autoimmune disease can damage any part of the body, including skin, joints, and organs. Because it is chronic, the signs and symptoms tend to last longer than six weeks and often for many years; and Whereas, lupus affects the immune system, the part of the body that fights off viruses, bacteria, and germs. Normally the production of proteins called antibodies by the immune system...

...Whereas, people of all races and ethnic groups can develop lupus, but women of color are two to three times more likely to develop lupus than Caucasians; and...

...Whereas, Lupus Foundation of America is the only national force devoted to solving the mystery of lupus while giving caring support to those who suffer from its brutal impact...

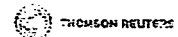
Proposed & Adopted Regulations View all 225

2015 SC REG TEXT 216194 (NS)
Office of the Governor July 24, 2015 Executive Orders

This Executive Order reestablishes the South Carolina Developmental Disabilities Council, which is the State's forum for developmental disabilities matters and will advocate for persons with those disabilities defined herein.

...Of the consumer members, at least one-third shall be persons with developmental disabilities; one-third shall be parents or guardians of children with developmental disabilities or immediate relatives or guardians of adults with developmental disabilities with at least one of these having a family member in an institution; and the remaining one-third shall be representatives from any developmental disabilities consumer category...

...This Executive Order reestablishes the South Carolina Developmental Disabilities Council, which is the State's forum for developmental disabilities matters and will advocate for persons with those disabilities defined herein...



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16837341839

B.

WESTLAW

VIEW:

Overview	13
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Overview (13)

Select all items | 3 items selected clear selected

Did you mean: health disability extension good cause extension/reopen adhd lupus

Cases View all 44

McCutchen v. Pacific Mut. Life Ins. Co.

Supreme Court of South Carolina. December 13, 1929. 153 S.C. 401 151 S.E. 67

Appeal from Common Pleas Circuit Court of Lee County, R. W. McLendon, Special Judge. Action by Thomas E. McCutchen against the Pacific Mutual Life Insurance Company. From a judgment for plaintiff, defendant appeals. Affirmed.

"5. It is therefore necessary for me to tell you the meanings of the words, "disability," "total disability," and "permanent disability."
 "He further alleges that, in consideration of the payment of the annual premium of \$234.80, the defendant issued to him a certain insurance policy, dated on the 7th of March, 1924, whereby it insured his life, and he states that said policy contained a total disability clause, whereby the defendant agreed in the event that the plaintiff should become totally disabled from accident or disease, to pay to the plaintiff a monthly sum of \$75, during the continuance of such total disability, and to waive the payment during such total disability of all premiums thereafter becoming due on said policy or during the continuance of such disability..."

Owens v. Sovereign Camp, W. O. W.

Supreme Court of South Carolina. January 14, 1935. 174 S.C. 514 173 S.E. 125

Appeal from Common Pleas Circuit Court of Pickens County, G. Dewey Outer, Judge. Action by J. L. Owens against the Sovereign Camp of the Woodmen of the World. From a judgment for plaintiff, defendant appeals. Reversed and remanded, with directions.

"[I]f we have held that what amounts to a total disability is a relative matter, and depends largely upon the circumstances of each case, and upon the occupation and employment in which the person insured is engaged" (McCutchen v. Insurance Co., 153 S. C. 401, 151 S. E. 67, 304) and such work as he has only been trained to do, and upon which he must depend for a living" (Taylor v. Insurance Co., 106 S. C. 356, 91 S. E. 326, 327, L. R. A. 1917C, 910); and that the total disability contemplated by contracts of insurance...
 "Total disability" is a relative term, dependent upon occupation of person involved and circumstances of each case, and should not be construed literally, but as used in insurance contracts, "total disability" means inability to do substantially all of the material acts necessary to the prosecution of the insured's business or occupation, in substantially his customary and usual manner. 190...

Key Numbers - Points of Law Found in Cases View all 10

South Carolina

INSURANCE

- 217a-2561(3) Total disability > Substantial or material performance
- 217a-2561(2) Total disability > Regular, customary or ordinary occupation
- 217a-2578 Evidence > Weight and sufficiency
- 217a-2561(4) Total disability > Comparable employment or occupation

Additional Results from All Jurisdictions

SOCIAL SECURITY

356Hb-243 Decisions reviewable > In general

Trial Court Orders View all 21

Outlaw v. Regan & Cantwell

Court of Common Pleas of South Carolina, Charleston, S.C., December 09, 2007. No. 05-CP-19-603

"The medical records discussing the Claimant's former leg, alleged lupus and other physical conditions, do not relate them to her employment..."

"On appeal, the Claimant asserts that the Full Commission erred in finding that she failed to meet her burden of proving that she sustained injuries to multiple body parts and in failing to find that her lupus and fibromyalgia were related to her work..."

Statutes View all 52

§ 44-20-270. Administration of federal funds.

SC ST § 44-20-270. Code of Laws of South Carolina 1976 Annotated

Code of Laws of South Carolina 1976 Annotated
 Title 44. Health

Chapter 20. South Carolina Health Disability, Related Disabilities, Head Injuries, and Spinal Cord Injuries Act
 Article 3. Organization and System for Delivery of Services

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3 S.C. Litig. Forms & Analysis § 41:4
South Carolina Litigation Forms and Analysis
Database updated December 2014
Part XI. Appeals
Chapter 41. Notice of Appeal to Court of Appeals

References

§ 41:4. Proof of service (from Court Form 6, SCACR)

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

[In the Supreme Court]

Appellate

APPEAL FROM Greenville COUNTY

Court of Common Pleas

Daniel L. Vanden [name], Circuit Court Judge

Case No. 2013-CP-002082

[proper name] Respondent, R.C. Leavelle (Attorney for Jerry Chestnut) Attorney

v.
[proper name] Appellant, Beebe Leavelle (Appellant)

PROOF OF SERVICE

I certify that I have served the [pleading name] on Respondent by depositing a copy of it in the United States Mail, postage prepaid, on 8/25/16 [date], addressed to his [his or her or its] attorney of record, Jerry Chestnut [attorney name and address]. [by personally delivering a copy of the same to his (her) (its) attorney of record, [attorney name and address]] on 8/25, 2016.

[Date]

Beebe Leavelle
Attorney
[Attorney name]
[Address]
Attorney for the Appellant

Mr. Jerry Chestnut Esq.
217 E. Park Avenue
Greenville, SC 29601

3 S.C. Litig. Forms & Analysis § 41:4

South Carolina Litigation Forms and Analysis
Database updated December 2014
Part XI. Appeals
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THE STATE OF SOUTH CAROLINA

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SC Court of Appeals

In the Court of Appeals

[In the Supreme Court]

appellate

APPEAL FROM Beeville COUNTY

Court of Common Pleas

J. Verger [name], Circuit Court Judge

Case No. 2013-CP-60207

_____ [proper name] Respondent, R. Powell

v.

_____ [proper name] Appellant, Ernie Powell & Rob

PROOF OF SERVICE

I certify that I have served the 8/25/16 [pleading name] on Respondent by depositing a copy of it in the United States Mail, postage prepaid, on _____ [date], addressed to Mr. [his or her or its] attorney of record, Chester [attorney name and address]. [by personally delivering a copy of the same to his (her) (its) attorney of record, _____ [attorney name and address]] on 8/25, 2016.

[Date]

[Attorney name]
[Address]
Attorney for the Appellant

Mr. Terry Chester Esq.
217 E. Pearl Avenue
Beeville, SC 29168