

THE STATE OF SOUTH CAROLINA
In the Supreme Court

The Honorable James E. Lockemy

The Honorable Alison Renee Lee
Circuit Court Judge

APPEAL FROM RICHLAND COUNTY

Case No. 2017-002289
Case No. 2016-CP-40-02393

Mrs. Miriam Samuel, Pro Se

Appellant

v.

Lynne N. Johnson

Respondent

Appellate Initial Brief

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Table of Contents

Statement of Issues on Appeal	1
Statement of Case	1
Statement of Review	2
Arguments	3
Conclusion	4

Table of Authorities
Cases

Estate of Beatrice Carr V. Circle S. Enterprises V. The of South Carolina In the Court of Appeals (4410)2

David Ray Matthews, Petitioner V. State of South Carolina 25487 (2002)2

State, Respondent v. Kevin Covert, Appellant 4071 (2006)2

The State of South Carolina In the Supreme Court v. Wesley Floyd and John New, Appellants (2559).....2

Statutes

The Supreme Court of South Carolina in the Matter of William E. Walsh (2008-11-18-1-01)

The Supreme Court of South Carolina in the Matter of William James Barnes (24555)

The Supreme Court of South Carolina in the Matter of Walter Bilbro, Jr., Respondent (25239)

Other Authorities

Advisory Committee on Standards of Judicial Conduct Opinion No. 10-1998

SECTION 14-7-1020. JURORS MAY BE EXAMINED BY COURT; IF JUROR IS NOT INDIFFERENT, HE MUST BE SET ASIDE.

THE COURT SHALL, ON MOTION OF EITHER PARTY IN THE SUIT, EXAMINE ON OATH ANY PERSON WHO IS CALLED AS A JUROR TO KNOW WHETHER HE IS RELATED TO EITHER PARTY, HAS ANY INTEREST IN THE CAUSE, HAS EXPRESSED OR FORMED ANY OPINION, OR IS SENSIBLE OF ANY BIAS OR PREJUDICE THEREIN, AND THE PARTY OBJECTING TO THE JUROR MAY INTRODUCE ANY OTHER COMPETENT EVIDENCE IN SUPPORT OF THE OBJECTION. IF IT APPEARS TO THE COURT THAT THE JUROR IS NOT INDIFFERENT IN THE CAUSE, HE MUST BE PLACED ASIDE AS TO THE TRIAL OF THAT CAUSE AND ANOTHER MUST BE CALLED.

HISTORY: 1962 CODE § 38-202; 1952 CODE § 38-202; 1942 CODE § 637; 1932 CODE § 637; CIV. P. '22 § 577; CIV. C. '12 § 4045; CIV. C. '02 § 2944; G. S. 2261; R. S. 2403; 1797 (5) 358; 1986 ACT NO. 340, § 3, EFF MARCH 10, 1986.

STATEMENT OF ISSUES ON APPEAL

DID THE JUDGEMENT NOTWITHSTANDING THE VERDICT?

DID THE PLAINTIFF'S LAWYER ERR BY NOT SUBMITTING ALL ADMISSIBLE RELEVANT EVIDENCE ?

DID THE PLAINTIFF'S LAWYER ERR BY NOT SUBMITTING BEST ORIGINAL EVIDENCE?

DID THE COURT ERR BY NOT ENSURING THAT ALL ADMISSIBLE RELEVANT EVIDENCE?

DID THE JURY HAVE ALL NEEDED EVIDENCED TO RENDER A FAIR AND JUST VERDICT?

DID THE COURT FAIL AND ERR BY LIMITING ADMISSIBLE "RELEVANT EVIDENCE" FOR ONE PARTY AND NOT THE OTHER?

DID THE COURT GIVE CONFUSING, BIAS AND PREJUDICE INSTRUCTIONS TO THE JURY BEFORE DELIBERATION?

DID THE COURT ERR BY DISMISSING JUROR 120, WITHOUT A REPLACEMENT?

DID MR. SALTZMAN NON-CROSS-EXAMINING A WITNESS, CONFUSE THE ISSUES, MISLEAD THE JURY?

DID PLAINTIFF'S LAWYERS GIVE INEFFECTIVE REPRESENTATION?

DID THE PLAINTIFF'S LAWYER ABIDE BY THE RULE OF PROFESSIONAL CONDUCT, COMPETENCE, AND DILIGENCE ?

DID THE PREPAID, LAW FIRM MERRITT, WEBB WILSON & CARUSO, PLLC FAIL MRS. SAMUEL AS THEIR CLIENT? RULES OF: ORDER OF RECEIVERSHIP SUCCESSION PLANNING, PROFESSIONAL CONDUCT, EXPEDITE LITIGATION, AND DILIGENCE ?

STATEMENT OF CASE:

Civil Case Number: 2016 CP4002393

Appeals Court Number: 2017-002289

This case arises out of a motor vehicle accident that occurred on February 5, 2011. Mrs. Miriam Samuel was at a stop at the Rite Aid drive-thru pharmacy at 1501 Board River Road, Columbia, South Carolina. Plaintiff was at a stop at the drive through window the defendant, Lynn Johnson drove into the rear end of the plaintiff's vehicle. The plaintiff's left arm was reaching into the metal drive through drop box at the time of the collision. As a result, the plaintiff suffered a torn rotator cuff to her left shoulder, neck pain and back pain. The plaintiff required medical attention over the course of the next 3 years, which included Corticosteroid Injections to her left shoulder, physical therapy, a surgery to repair the torn rotator cuff and a subsequent surgery to repair the impingement in her left shoulder. The defendant Mrs. Lynn Johnson admit it to causing the accident while playing with "Tickling" her sister while driving. The honorable Judge Lee included on the Verdict Sheet, actual damage as well as punitive damages for the jury to consider. The plaintiff's medical bills were in excess of \$120,000. This Appeal Case has already cost in excess of \$2,500. This does not consider the pain and suffering it has cause me and my family.

The civil court date trial was October 3, 2017. This trial ended on October 5, 2017, the Jury's Verdict found in the favor of the defendant. The plaintiff's lawyer Post-trial motion was heard and denied.

Page 1.

The reason for the plaintiff's appeal the judgment does notwithstanding the verdict. The jury failed in their duties, to render a fair and just verdict. The Trial court, and the lawyers deprived the jury Admissible Relevant Evidence. This "Traffic Ticket" was, mentioned many times during the trial. Mrs. Samuel asked, her lawyers, to submit this into evidence. The Plaintiff's lawyer's failure to listen to Mrs. Samuel proved to be unprofessional and incompetent. The jurors knew that there was a ticket issued to Mrs. Lynne Johnson, the defendant.

The Jurors asked for, Relevant admissible evidence, the police report or ticket. The Jury based their judgement on is there a "traffic ticket in existence" and the opinion on ultimate issue to be decided by the trier of fact. The Court Judge, said, "I am concerned with the existence of this evidence, not the weight."

The Jury lacked evidence that, therefore it caused them fail to carry out their duties. They made an unfair and unjust verdict in favor of the defendant. Court failed Mrs. Samuel under Rule 704 "Testimony in the form of opinion or inference otherwise admissible is not objectionable because it embraces an ultimate issue to be decided by the trier of fact." This caused the jury confusion of the issues, by the presentation of cumulative evidence that they had to consider throughout the trial. The Court Judge instructions to the jury about Expert witnesses Testimony's were not give in a fair manner is only an opinion was the jury, the "ticket" could have added weight to the Evidence of the Defendant's Character and her Credibility would be supported by the evidence. Rule 608 The Court and Lawyer was aware about the Defendant's Traffic Ticket, during Preliminary questioning and throughout the trial. This admissible evidence was never made known or present it to the jurors.

Page 1.

It was not until the Jurors returned from Deliberation, and asked, “who received the Ticket?”

Ms. Lynne N. Johnson has a very bad drivers record; her record reflects many accidents and tickets, including the one on February 5, 2011.

Mrs. Samuel Pleads that the Drivers Record and Ticket of the Defendant is given great consideration by the Appeal Judges as well as the other issues of concern.

STANDRAD OF REVIEW:

The trial court and lawyers were very much aware, during Preliminary questioning and from the defendant's deposition, that the defendant would not be impeached by allowing this evidence.

Transcripts R.P. 233 lines 21-25; R.P. 234 lines 1-25; R.P. 235 line 1; lines 8-12; lines 24-25;

R.P.P. 236-237 look closely at R.P.P.238 lines1-25 R.P. 239 lines1-14; R.P. 240-246 line 11.

Admissible "Relevant Evidence" **evidence of the traffic ticket and police citation along with**

Mrs. Lynn Johnson's 10-year police record. R.P. 281 lines 5-14 287 Ms. Johnson Cross

examination Mr. Lang. To the jury, the ticket could have added weight to the Evidence of the

Defendant's **Character. Rule 608**, SCACR. The Court and Lawyer was aware about the

Defendant's Traffic Ticket, during Preliminary questioning, throughout the trial. This admissible

evidence was never made known or present it to the jurors.

This admissible evidence was never made known or present it to the jurors. There were many

times during the trial where it could have been submitted into evidence for the Plaintiff, Mrs.

Samuel. R.P. 230 lines 6-12 The court asked, Mr. Saltzman, Was there any more evidence to be

submitted at this time. "No, Your Honor." This was gross failure to represent Mrs. Samuel

professionally and effectively. **Rule 1.3** SCACR. A diligent lawyer shall act with reasonable

diligence and promptness representing a client the lawyer should pursue a matter on behalf of the

client despite opposition, personal inconvenience.

The Court failed Mrs. Samuel R.P. 292 lines 9-13 The Court, "You know, I think it's a close

call. I think there again I'm only concerned with the existence of the evidence, not with the

weight. And so, I think that is the jury question for them to decide.

STANDRAD OF REVIEW:

Rule 704, SCACR. "Testimony in the form of opinion or inference otherwise admissible is not objectionable because it embraces an ultimate issue to be decided by the trier of fact."

Mrs. Samuel's Testimony: R.PP. 105-148

The best evidence rule has its origins in the 18th century case *Omychund v Barker* (1745) 1 Atk, 21, 49; 26 ER 15, 33. Wherein Lord Harwicke stated that no evidence was admissible unless it was "the best that the nature of the case will allow". Mrs. Samuel's Lawyers Failed to effectively represent her during this court trial. **David Ray Matthews, Petitioner V. State of South Carolina 25487**

(2002) "Councils failure to object prejudiced his client, she had to prove beyond doubt that her injuries occurred from this car accident. Mrs. Samuel's Lawyers silence May have confused the jurors and compound their duty, they were faced with a confusing decision. Transcript R.P. 247-248 lines 1-19 Ms. Puryear, Palmetto Health was not Cross examined but the plaintiff's attorney.

Councils failure to object Prejudiced the jury. His silence compounded the duty of the jury faced with a confusing and improper admit it evidence. By objections that were not made the council for Mrs. Samuel, rendered ineffective assistance. It may have appeared to the jury, that Mrs. Samuel was not being honest this was an attacked Mrs. Samuel's credibility. The trial court judge even ask Mr. Salzman did he want to cross? He said, "no your honor".

R.P. 288-290 Cross Examination by Mr. Saltzman-Lynn Johnson

Mr. William Saltzman and Mr. Ben Cahill Mrs. Samuel's Lawyers Failed to show Processional Conduct. Rule **102** SCACR. This States, " A lawyer shall abide by a client's decisions concerning to the means by which they are to be pursued." R. P.59 line 25; R.P.60 line 1 He did not listen to my suggestions to enter into evidence my original photographs of the accident scene. I have also begged him to enter into **evidence the ticket and police citation along with Mrs. Lynn Johnson's police record.** Up until the day of trial, I had mentioned

Page 2.

about submitted this admissible "Relevant Evidence" as court exhibits. Mrs. Samuel's Lawyers. Rule 102 SCACR. This States, " A lawyer shall abide by a client's decisions concerning to the means by which they are to be pursued." R. P.59 line 25; R.P.60 line 1 He did not listen to my suggestions to enter into evidence my original photographs of the accident scene. I have also begged him to enter into **evidence the ticket and police citation along with Mrs. Lynn Johnson's police record.** Up until the day of trial, I had mentioned about submitted this admissible "Relevant Evidence" as court exhibits. Mrs. Samuel's Lawyers fail to product and submit this admissible "Relevant Evidence" There are many places within the Transcript where this evidence was spoken about. See: 25329-In the Matter of Walter Bilbro, Jr. The State of South Carolina in the Supreme Court See plaintiff's pictures Photographs of the scene of the accident in question.

Mrs. Samuel was not allowed to submit her Photographs, because Mr. Salzman said, they were not needed. However, Mr. Saltzman chose to use one of the defendant's photographs. This was Unprofessional. By **NOT** submitting into evidence the Actual photographs of Mrs. Samuel's Accident Scene would have provide the best Evidence. The effect of not allowing her photographs, may have prejudice the Jurors. However, the Photographs that the Defendant showed were not taken at the scene. The Defendant's Photographs did not accurately predict what happened to me during that car accident. R. P.282 lines 1-25; R.P. 283 lines 1-25; R.P.284 lines 15-25 These Photographs also caused the Plaintiff to be confused. All of the defendant's photographs were inaccurate and very confusing to me. R.PP. 155-158 ; R.PP. 160-161 Cross-Examination of Mrs. Samuel by Mr. Lang

While I was stopped at the drive-thru window my car gear was still in the drive position, while my foot was on the breaks. This caused my car to move forward with my left arm deep inside the Metal box. When the Defendant's car collided in the back of my car, upon impact my car moved forward, my left arm moved inside the metal drop box as well. The defendant under testimony, said, "Car Bounced off her Car" R.P.288-290 The jury should have understood Ms. Johnson's car hit with was great force. Mrs. Samuel's Car gears still in the drive position, made her care roll forward with her arm in the still in the Rite Aid Metal Drawer caused her injuries.

Best Evidence; Public Records Rule 1008.0 , SCACR. Rule 1005.0, SCACR. See Plaintive Photographs (of the Rite Aid Metal Drawer)

While Mrs. Samuel's left arm was deep within the Metal Drop Box at the drive-thru window, that is when the Defendant, Lynne Johnson drove into the rear-end of the me vehicle. The Defendant, Lynne Johnson drove into the driveway and did not stop until she slammed into the rear end of my car. This driveway has a slight incline; therefore, I felt that she would slow down and stop. (See Plaintiff's photo showing the incline) R.P. 154 line 24-25; R.P.155 line 2-15. Rule 1008 SCACR.

Initially, I noticed her speed as she turned into the Rite Aid driveway, but I knew she would stop. While I am completing my business transaction, with my left arm still in the drive-thru window metal box, she rears ended the back of my car. Moving my car forward with my arm in the metal box. The Plaintiff's left arm was reaching into the drive-thru drop box at the time of the collision.

As a result, the Plaintiff suffered a torn rotator cuff to her left shoulder, neck pain and back pain. The Plaintiff required medical attention over the course of the next three (3) years, which included corticosteroid injections to her left shoulder, physical therapy, a surgery to repair the torn rotator cuff and a subsequent surgery to repair the impingement in her left shoulder.

Transcript R.PP. 240-246 lines 1-11 Did the Court err be Negotiating with the lawyers to keep out the defendant's Ms. Lynne Johnson, Drivers record history and traffic ticket in In exchange the court said, "so I denied it as to neglect proximity cause of damage, I have denied it as to punitive damages with the exception that you cannot discuss the ticket and then I granted the other two." Mr. Lang "thank your Honor". Mr. Lang *negotiated to get impairment and the plaintiff's doctor's disability rating off the table.* All the while Mrs. Samuel's lawyer is not working in the best interest of his client. Transcript R.P.242 lines 1-25

It was as Mr. William Saltzman was my attorney on paper only. He did not listen to my suggestions to enter into evidence my original photographs of the accident scene. I have also begged him to enter into evidence the ticket and police citation along with Mrs. Lynn Johnson's police record. Up until the day of trial, I have mentioned about submitted this "Relevant Evidence" as court exhibits. However, is seeming to have landed on deaf ears. About this point during my trial I had little communicated or been kept involved with Mr. Saltzman. I still had no reason to believe the defendant's drivers record, please citation, and traffic ticket was not admitted into evidence. However, when I asked Mr. Saltzman to enter into evidence, my original photograph of the accident scene, he said they wasn't needed. They were needed as you will see on the reference pages within the transcript.

While I was stopped at the drive-thru window my car gear was still in the drive position, with my foot was on the breaks.

While Mrs. Samuel's left arm was deep within the Metal Drop Box at the drive-thru window, that is when the Defendant, Lynne Johnson drove into the rear-end of the me vehicle. The Defendant, Lynne Johnson drove into the driveway and did not stop until she slammed into the rear end of my car. This driveway has a slight incline; therefore, I felt that she would slow down and stop. R.P. 154 line 24-25; R.P.155 line 2-15.

Initially, I noticed her speed as she turned into the Rite Aid driveway, but I knew she would stop. While I am completing my business transaction, with my left arm still in the drive-thru window metal box, she rears ended the back of my car. Moving my car forward with my arm in the metal box. The Plaintiff's left arm was reaching into the drive-thru drop box still the time of the collision. As a result, the Plaintiff suffered a torn rotator cuff to her left shoulder, neck pain and back pain. The Plaintiff required medical attention over the course of the next three (3) years, which included corticosteroid injections to her left shoulder, physical therapy, a surgery to repair the torn rotator cuff and a subsequent surgery to repair the impingement in her left shoulder.

Complaint: The Most Important Evidences was not submitted into this Case. Mrs. Samuel Thought that these items were admitted into evidences. Mrs. Samuel asked, her Lawyer, Mr. Salzman to present these items into evidences. Lynne N. Johnson's Original Drivers Record and The Ticket of the Accident, on February 5, 2011.

Mrs. Samuel did not realize that the Defendant's Drivers Record and Ticket from February 5, 2011 were not admitted into evidences. It was not until the Jurors returned from Deliberation, and asked, "who received the Ticket?" Mrs. Samuel not allowed to submit her Photographs, because Mr. Salzman said, they were not needed.

Ms. Lynne N. Johnson has a very bad drivers record; her record reflects many accidents and tickets, including the one on February 5, 2011.

Mrs. Samuel Pleads that the Drivers Record and Ticket of the Defendant is great consideration by the Appeal Judges. These items were spoken of doing preliminary questioning and throughout the trial.

By **NOT** submitting into evidence the Actual photographs of Mrs. Samuel's Car with, the exact make and model; did not provide factual or the best Evidence. Mrs. Samuel have reenacted photographs of the accident at the Rite Aid Drive through window. The effect of not allowing her photographs, may have prejudice the Jurors. However, the Photographs that the Defendant showed were not taken at the scene and wasn't the same year and model car. the Outcome of Mrs. Miriam Samuel's Civil Court Jury Verdict may have been different Outcome. I ask that these Photographs be reviewed and admitted into this Appeal.

Certificate of Appellant Transcript of Judgement Page 238 Line 24,25 Page 239 Line 1-14

Page 2.

Page 2.

STANDRAD OF REVIEW:

September 22nd, 2011 Miriam Samuel contact it the prepaid law firm of Merritt, Web, Wilson & Caruso. My first attorney with that firm was Ms. Nancy C. Fennell. The second attorney within the prepaid law firm, was Mr. David Miller. On January 31st, 2014 civil action was taken in the court of common appeals against Ms. Lynn Johnson v. Miriam H. Samuel. This action had to be taken because all negotiations with the law firm Clawson and Staubes LLC. was failing.

In 2015, I received a letter date July 28, 2015, from The Senior Attorney Mr. Jim informing me that Mr. David Miller was no longer with the Prepaid law firm, Merritt, Webb, Wilson & Caruso. I was not very surprised by the change in attorneys, because I have been working my own case for many years. This brought me great anxiety and much stress by providing information to the Prepaid law firm over the years. I have many correspondent letters and emails showing the anxiety and stress, I suffered from doing these Attorneys job. It was as Mr. William Saltzman was my attorney on paper only. He did not listen to my suggestions to enter into evidence my original photographs of the accident scene. I have also begged him to enter into evidence the ticket and police citation along with Mrs. Lynn Johnson's police record. Up until the day of trial, I have mentioned about submitted this "Relevant Evidence" as court exhibits. However, is seeming to have landed on deaf ears. About this point during my trial I had little communicated or been kept involved with Mr. Saltzman. I still had no reason to believe the defendant's drivers record, please citation, and traffic ticket was not admitted into evidence. However, when I asked Mr. Saltzman to enter into evidence, my original photograph of the accident scene, he said they wasn't needed. They were needed as you will see on the reference pages within the transcript.

R.P.59 lines 22-25 R.P. 60 line 1; Mr. Ben Chaill was not there to assist otherwise, he could

Page 3.

Arguments:

The Most Important Evidences was not submitted into this Case. The admissible "Relevant Evidence" of Ms. Lynne Johnson's Driver's Ticket and Citation from this accident. This was the added weight the jury needed to make a fair and unbiased verdict. The evidence of Character, and conduct of the defendant came under question. Ms. Johnson was very untruthful on the stand under oath. The jury needed this Traffic Ticket as a tier to all of the other mounts of evidence heard in the courtroom that day.

Mrs. Samuel feels that you, The Honorably Appellate Court Judges, will look at the facts in this case with the eyes of Lady justice. I the verdict would be reversed.

Submitted for your review are the Original Photographs of the accident scene, Ms. Lynne N. Johnson's Original Drivers Record and The Ticket of the Accident, on February 5, 2011. It was Issued on February 6, 2011.

Then I have correspondence from the prepaid law firm where Mr. William Saltzman is employed. I have Try to the best of my ability to have these correspondences in an orderly manner, so that you can see how negligence and how unprofessional this law firm treated me.

In the eyes and mind of this jury, the ticket was added weight to the Evidence of the Defendant's Character. Rule 608, SCACR.

The Court and Lawyers were all aware about the Defendant's Traffic Ticket, during Preliminary questioning, throughout the trial. At any point during the trial it could have been submitted into court for evidence. However, the Court and lawyers Negotiated a deal keep This vital information from the juror's knowledge. The basic facts of the accident are not in dispute, other than how the Defendant actually came to strike the Plaintiff's vehicle. The primary issue in the

Page 3.

case is the causation of the Plaintiff's injuries. Ms. Johnson Admitted Under oath that her car hit my car so hard that her car bounce back off of mine. I argue that by her own confession that she caused My Personal Injuries, to my Left Shoulder, Neck and Pain. The impact to Vehicles necessarily has nothing to do personal injuries. I have witnessed people walk away from total car loss accidents

My Doctors Expert Professional Opinions testified to that fact, before this Car accident that I did not have any shoulder problems. They are my professional doctors who know me and my physical structure. R.P. 224-236

Yes, I had an x-ray in 2009, with nothing to do with Feb. 5, 2011 car accident,

Yes, my lawyers may have Prejudiced the jury, because he did not cross examine a Defendants witness.

Please, Don't Treat me unfairly for My lawyer's unprofessional behavior.

I live everyday with the affects Ms. Johnson's gross and willful Negligence. When I look at the scars on my arm, I am reminded of how she turned into Rite Aids, driver thru without slowing down. All because she chose to Text or Play "Tickle" with her sister.

Page 3.

Arguments:

The Jury based their judgement on if there was a traffic ticket in “existence”? The Court Judge, said, “I am concerned with the existence of this evidence, not the weight.” References are in the transcript. Rule 403, SCACR said, “ Exclusion of Relevant Evidence on Grounds of Prejudice, Confusion, or Waste of Time.” This is NOT the case with THIS needed evidence that the jury asked for, because it added weight to the fact of how hard Ms. Johnson’s car hit on impact. See Transcript references. Did her negligent and reckless driving cause Mrs. Samuel’s injuries? YES. Did the impact of the Defendant’s car caused Mrs. Samuel’s car to move forward with her left arm in the Rite Drive thru metal box? YES. Did the Defendant’s car “Bounce back off her car”? YES. The Evidence of the Defendant’s Character. Rule 608, SCACR. Goes to Ms. Lynne Johnson’s Character and Conduct. Since, during her testimony under oath, Ms. Lynne Johnson was untruthful, The Jury need to rely on this Crucial Evidence to make a Fair and Just Judgement. The jury were not able to carry out their Sworn duty. The Court and Lawyers was aware about the Defendant’s Traffic Ticket, and Police Citation, during Preliminary questioning, and throughout this trial they talked about this Relevant Admissible Evidence.

The Court, and plaintiff’s Lawyer failed Mr. Samuel, by not allowing the Ticket, Citation and 10-year Driver’s Record, of the defendant, Lynne N. Johnson, in as Relevant Admissible Evidence. Nor did they make it known that this information did existence, to the jury.

The Jury lacked this evidence that made them fail to carry out their duties, to make a fair and just verdict.

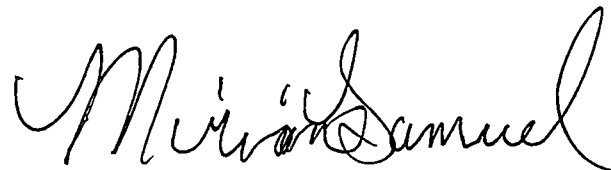
Page 4.

Conclusion:

Mrs. Samuel Pleads for the Appeal Court to overturn a Verdict Notwithstanding the Judgement.

Due to insufficient evidence the Jury asked for and was not allowing to know existed.

I Received an unjust Verdict. I ask for relief for the sum of Medical Bills \$120,583.64. Due to the Defendant Negligence, the Circuit Court Instructed the jury to consider punitive damages.

A handwritten signature in black ink that reads "Miriam Samuel". The signature is written in a cursive style with a large, looping initial "M".

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Appellant

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM RICHLAND COUNTY
The Honorable James E. Lockemy,
Chief Appeal Court Judge

Case No. 2017-CP-40-002289
Case No. 2016-CP-40-02393

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SEP 05 2018

SC Court of Appeals

Miriam H. Samuel, Pro Se
/s/Miriam H. Samuel,

Appellant

v.

Clawson and Staubes
Jescelyn Spitz; E. Dale Lang Jr, as
Personal Representative of
Lynne N. Johnson

Respondent

PROOF OF SERVICE

I certify that I have served the Record on Appeal, Designation of Matter and Initial Brief to be Included in the Record on Appeal be heard. on Lynne N. Johnson by depositing a copy of it in the United States Mail, postage prepaid, on September 5, 2018. Delivered to address of her attorney of record, Jescelyn Spitz; E. Dale Lang Jr., Clawson and Staubes 1612 Marion Street Columbia, SC 29201. [by personally delivering a copy of it to her attorneys Office of record]

September 5, 2018

s/ Miriam H. Samuel, Miriam H. Samuel
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