

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr.
Circuit Court Judge

RECEIVED
FEB 11 2019
SC Court of Appeals

Appellate Case No.: 2018-001134

Glenda R Couram Appellant,

v.

Nationwide Mutual Insurance Company, Titan Indemnity Company, Eugene Matthews in his individual capacity, Sherwood Plumbing Service, LLC, dba, Beatrice T. Tidwell, Rick Skurko in his official and individual capacity and Tracey Peer in her official and individual capacity
..... Respondents

**APPELLANT'S
RESPONSE TO RESPONDENTS'
MOTION TO STRIKE**

The Record on Appeal shall include all matters designated to be included by any party...
The Record shall not, however, include matter which was not presented to the lower court or tribunal." SCACR 210(c)

Please see page 20 of the Record of Appeal Footnote from Judge Cooper

There are no grounds to grant the Respondents' Nationwide Mutual Insurance Company, Titian Indemnity Company, Rick Skurko and Tracey Peer's Motion to Strike because the Record on Appeal is in substantial compliance with the SCACR 210 (c) and complete.

pg 1

1. The Appellant's Designation of Matter filed to the Respondents and this Court clearly states that she would provide the court with emails and other miscellaneous documents to include proposed Orders of the Defendants sent to Judge Cooper at his request and emails which explained her efforts to obtain signed copies of Orders from Judge Cooper, any other hand written information are notes written, Appellant can resubmit cleaned copies of the hand written notes in margins of Matthew's documents pages 260 289 290 293 and 295, if Order by this Court.
2. A – Respondent pro se Matthews' Answer and Exhibits of July 14, 2017 is in the Record on Appeal starting with page 180 and ending with page 296; the Documents requested by Matthew's in the Designation of Matter is the majority of the Record of Appeal over 100 pages; that includes all exhibits he requested, from July 14, 2017 as noted in the lower court files.

NOTE: Matthew's July 14, 2017 Answer was made Moot when Appellant timely filed an Amended Complaint, on July 19, 2017. The Amended Answer filed July 21, 2017 contains the same exact Exhibits as the *Mooted Answer* dated July 14, 2017. To have included this Mooted Answer would have been unnecessary documentation that Rule 210 says should not be included in the Record on Appeal.

3. B: Nationwide Mutual Ins. Co. and Titan Indemnity Co.'s Amended Motion to Dismiss of August 28, 2017 is located on page 132-36 of the Record on Appeal
4. C: Appellant's Response to Amended Motion to Dismiss of September 1, 2017 is located on pages 55-63 of the Record on Appeal
5. D: Order Denying Motion to Reconsider of May 1, 2018; Appellant never to her knowledge received a signed copy of the Order Denying the Motion to Reconsider.

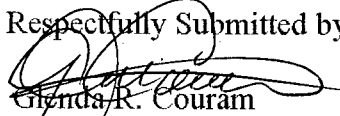
Judge Cooper's Assistant stated that the Judge does not send out a signed copy; Appellant would have to contact the Clerk of Court whose job it was to send the signed copy out; so a copy from this Court's copy obtained off of c-tract. See the attached Emails regarding this issue –Electronic Filing.

6. E: Final Decision of the SC State Grievance Committee – this issue was not before Judge Cooper, Appellant did not include it in the Record on Appeal due to Judge Cooper's comments in the Footnote of his May 16, page 9 Order "Plaintiff's employment is not a matter before this court." See ROA page 20.

In conclusion the Record on Appeal does include all matters designated by the pro se Appellant and Respondents in compliance with the Designation of Matters submitted by each Respondent. Appellant is in substantial compliance with SCACR 210(c). To Appellant's knowledge she has included all matters presented to the lower court and she has excluded matters that was not before the lower (or duplicative information) (ROA p 20).

Therefore, pro se Appellant ask that this Court, with all due respect, deny the Respondents' request for this Court to Strike the Record on Appeal as submitted; and instead force the pro se Appellant to refile, at substantial cost, a new Record on Appeal which would cause continued financial hardship on the Appellant who now lives on disability as a result of their actions.

Respectfully Submitted by:


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

February 6, 2019
Lexington, South Carolina

193

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

Appeal Case No.: 2018-001134

RECEIVED

FEB 11 2019

SC Court of Appeals

Glenda R Couram Appellant,

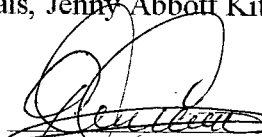
v.

Nationwide Mutual Insurance Company, Titan Indemnity Company, Eugene Matthews in his individual capacity, Sherwood Plumbing Service, LLC, dba, Beatrice T. Tidwell, Rick Skurko in his official and individual capacity and Tracey Peer in her official and individual capacity
..... Respondents

PROOF OF SERVICE

I certify that I, the undersigned, have served the *Appellant's* Response to Respondents' Motion to Strike on all named Respondents' attorneys by depositing copies in the United States Mail, with adequate postage affixed on this 6th day of February, addressed as follows:

1. E. Dale Lang, Jr., Esq., 1612 Marion Street, #200, Columbia, SC 29201;
2. J. R. Murphy, Esq., PA, 4406-B Forest Dr., Columbia, SC 29206;
3. Eugene H. Matthews, Esq., 1900 Barnwell St., Columbia, SC 29201 and
4. The Clerk of Court for the Court of Appeals, Jenny Abbott Kitchings, PO Box 11629, Columbia, SC 29211


Glenda Couram
104 Macaw Lane
Lexington, SC 29073
(803) 358-0127

February 6, 2019
Lexington, South Carolina

February 6, 2019

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: *Nationwide Mutual Insurance Company, Titan Indemnity Company, Eugene Matthews in his individual capacity, Sherwood Plumbing Service, LLC, dba, Beatrice T. Tidwell, Rick Skurko in his official and individual capacity and Tracey Peer in her official and individual capacity.*
Appellant Case No.: 2018-001134

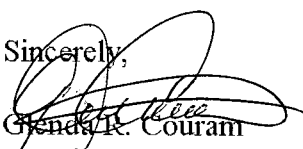
Dear Ms. Kitchings:

Please find *Appellant's Response to the Respondents' Motion to Strike* in the aforementioned matter. I am, by copy of this letter, serving a copy on Respondents along with the Proof of Service.

I am also enclosing a copy of the Amended Proof of Service in response to this Court's Letter dated February 1, 2019 with the corrected date of service.

Please contact me if you have any questions or concerns.

Sincerely,


Grenda R. Couram
Appellant, pro se
104 Macaw Lane
Lexington, SC 29073
803 358-0127
grcouram@hotmail.com

/grc

encls.

c: E. Dale Lang, Jr., Esq.,
J.R. Murphy, Esq.,
Eugene H. Matthews, Esq., pro se Respondent

RECEIVED

FEB 11 2019

SC Court of Appeals

Glen Couram
104 Macaw Lane
Lexington, SC 29073

COLUMBIA SC 290

07 FEB 2019 PM 4 L



RECEIVED

FEB 11 2019

SC Court of Appeals

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

29211-11629

