

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

Appellate 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

**RESPONSE TO RESPONDENTS'
NATIONWIDE MUTUAL INSURANCE, ET. AL.,
REQUEST FOR AN EXTENTION TO FILE
FINAL BRIEF**

Pro se Appellant object to the Respondents' Request for an extension to file the Final Brief in this matter' as the Appellant has filed a substantially complete Record on Appeal in her Response to the Motion to Strike she identified the issues presented by the Respondents' as deficient (See attached Motion filed February 6, 2019 – mailed to the court previously).¹ There is no reason for an extension or the Motion to Strike filed in this matter by Respondents.

The Record on Appeal is in substantial compliance with Rule 210 of SCACR.

¹ This court has also determined previously after several extension granted to the Respondents as a whole that there would be no more extension granted barring extreme circumstances that is not the case.

Also, as the Respondents are more aware than this pro se, their Final Brief cannot be changed in any manner except for cosmetic mistakes. They cannot put matters in the Record of Appeal that was not before the lower court; the pages for what they perceive as missing has been identified and is in the filed Record of Appeal and the Respondents have copies of these documents in their files and they are in the records of the lower Court.

The Appellant cannot produce a signed Order if the lower Court Judge never signed the Order except electronically and she cannot force the Judge's Office, his Assistant or the Clerk of Court to provide a signed Order if they refuse, as her emails clearly show she tried to get a signed copy and was denied several times.

The Answer dated August 28, 2017 is in the Record on Appeal (See Response to Motion to Strike attached) the only issue is that it is not stamped in by the Court but it is the exact copy received by the Appellant.

Appellant did not include the Initial Answer by Matthews because it is a duplicate of the Amended Answer (which made the Initial Answer Moot).

As to the Decision of the SC Grievance Committee as requested by pro se Respondent Matthews is not a part of this action, it was not before the lower court as the lower Court's Order state in the Order's footnote and it is this Appellant's understanding the issues of her grievances for unemployment and to get her job back, etc., are not to part of this type of legal action, it is separate and distinct and before a separate tribunal. SC Department of Motor Vehicles, Appellant's former employer is not a party in this legal action nor is the issues of whether or not she got her job back an issue before the lower court. Nor heard by the lower and according to Rule 210 should not be included in the Record on Appeal.

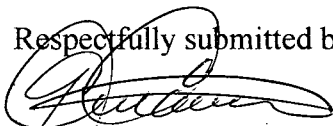
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Attorney Matthews is being sued in his individual capacity not as an employee or attorney for SCDMV for the damages he delivered upon the pro se Appellant after she lost her job and his continued harassment and intentional harmful/damaging actions towards her several months after she was no longer employed in a matter that had nothing to do with the employer.

The Appellant ask that the request for an extension be denied as this court has ruled already that any addition extensions would be denied. Appellant could not find anything in the rules that says that she cannot use personal copies of court documents sent to her by the Respondents filed to the court and in the court record.

Appellant also request that if the court does not find that the Record on Appeal is not substantially in compliance that this court accept the attached Amended Record on Appeal containing the documents Respondents claim are not in the Record on Appeal, the only documents not included are those that were never before the lower court pursuant to well established law and Rule 210 of the SCACR.

Respectfully submitted by,



Glenda R. Couram
104 Macaw Lane
Lexington, SC 29073
(803) 358-0127
Pro se Appellant

February 8, 2019
Lexington, South Carolina

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In The Court of Appeals**

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Glenda R Couram Appellant,

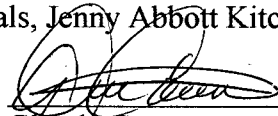
v.

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..... Respondents

**AMENDED
PROOF OF SERVICE**

I certify that I, the undersigned, have served the *this AMENDED/ADDENDUM RECORD ON APPEAL and RESPONSE FOR AN EXTENSION* on the Clerk of Court and all named Respondents via their attorney of record by hand delivering copies on the 8th day of February 2019, 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 8, 2019
Lexington, South Carolina

February 8, 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 enclosed the Amended Proof of Service, Response to Request for Extension and Amended Record on Appeal. I am, by copy of this letter, serving same on Respondents attorneys.

Please contact me if you have any questions or concerns.

Sincerely,


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

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FEB 11 2019

SC Court of Appeals

/grc

encls.

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

Glen Couram
104 Macaw Lane
Lexington, SC 29073



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SC Court of Appeals

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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