

**THE STATE OF SOUTH CAROLINNA  
IN THE COURT OF APPEALS**

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Appeal from Charleston County  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

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Appellate Case No. 2018-001842  
Circuit Court Case No. 2018-CP-10-1163

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Thelma R. Garrick,

Appellant

vs.

Mr. Russell G. Hines of  
Young Clement Rivers LLP  
Law Firm, Attorneys for Dr. George H.  
Khoury and Bon Secours St. Francis,  
West Ashley,  
843-577-4000

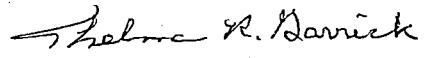
Respondents

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**REBUTTAL**

Respondents Second Extension Request

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Thelma R. Garrick, PRO SE  
195 Crescent Oaks Court  
Orangeburg, S. C. 29114  
803-534-9912

cc: Mr. Russell G. Hines, Young Clement Rivers LLP  
P. O. Box 993, Charleston, S. C. 29402 via U.S.  
Mailed on this day, May 31, 2019

**RECEIVED**  
JUN 03 2019  
SC Court of Appeals

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

RE: Case No.: 2018-001842

Enclosed you will find a copy of the envelope Appellant received from the Attorneys for Respondents in which a Second Request for Extension of Time to file or serve their Brief and Designation of Matter was requested to be moved from May 22, 2019 to June 21, 2019. They also request that the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until this motion is acted upon which, of course, would extend the deadline even further.


Appellant noticed that the envelope, in which the material was forwarded, was stamped by a postage meter on Wednesday, May 22, 2019. However, the U.S. Post Office stamp is dated Friday, May 24, 2019. Appellant received her copies on May 28<sup>th</sup> as indicated by the postal carrier's delivery date that is also noted on the envelope.

As you know, the postage meter's date can be changed at will. Appellant is not making an accusation but wanted you to be aware of these dates in case there is a third request for an Extension of Time to file the Brief and Designation of Matter. If the 22<sup>nd</sup> is accepted and the Brief and Designation of Matter had been forwarded Appellant would have only had three days of the ten to respond.

The Court told appellant that the date of the Post Office was the official date used. Therefore please advise the actual date accepted from the Respondents attorneys. A return self-addressed, stamped envelope is enclosed for your convenience. Thank you.

The Respondents attorney indicates their request is consistent with the interests of Justice. The Appellant can only surmise that the delays are deliberate and are prejudice toward Appellant. The pain the Appellant is in does not go away because of delays by Respondents. Prior to the surgery the Appellant financially could totally support herself by doing all of her housework, yard maintenance, small repairs and worked part time. Would it be possible for the Honorable Judges to set a small stipend per month so that she can hire the help she needs until this case is settled? Appellant's pain is made worse and more consistent by having to do certain things that she is not supposed to do. In fact, puts her down for days at a time.

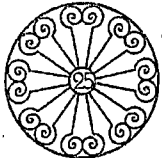
Respectfully submitted,

  
Thelma R. Garrick, PRO SE  
195 Crescent Oaks Court  
Orangeburg, S. C. 29115  
803-534-9912

/tg

Cc: Mr. Russell G. Hines  
Young Clement Rivers, LLP  
P. O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488

Via certified US mail on this 31<sup>st</sup>  
day of May 2019



**YCRLAW**  
Young Clement Rivers, LLP

25 CALHOUN STREET, SUITE 400  
P.O. Box 993  
CHARLESTON, SC 29402

CHARLESTON

SC 294

24 MAY '19

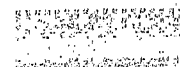
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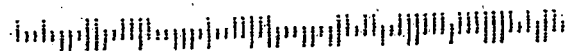
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*Delivered  
5/28/19  
SAC*

Thelma R. Garrick  
195 Crescent Oaks Court  
Orangeburg, SC 29115

29115-338795



**THE STATE OF SOUTH CAROLINNA  
IN THE COURT OF APPEALS**

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Appeal from Charleston County  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

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Appellate Case No. 2018-001842  
Circuit Court Case No. 2018-CP-10-1163

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Appellant

vs.


Mr. Russell G. Hines of  
Young Clement Rivers LLP  
Law Firm, Attorneys for Dr. George H.  
Khoury and Bon Secours St. Francis,  
West Ashley,  
843-577-4000

Respondents

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**PROOF OF SERVICE**

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Thelma R. Garrick, PRO SE  
195 Crescent Oaks Court  
Orangeburg, S. C. 29114  
803-534-9912

cc: Mr. Russell G. Hines, Young Clement Rivers LLP  
P. O. Box 993, Charleston, S. C. 29402 via U.S.  
Mailed on this day, May 31, 2019

**RECEIVED**  
JUN 03 2019  
SC Court of Appeals

May 31, 2019

Ms. Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, South Carolina 29211


RE: Thelma R. Garrick vs. Dr. George H. Khoury and  
Bon Secours St. Francis, West Ashley  
Appellate Case No. 2018-001842  
Case No.: 2018-CP-10-1163

Dear Ms. Kitchings:

Enclosed you will find original and one (1) copy of Appellant's rebuttal to Respondent's Second Motion request for Extension of Time to File/Serve Initial Brief and Designation of Matter together with the original and one (1) copy of the Proof of Service for same. Please file the originals and return a court-stamped copy for my files in the enclosed self-addressed, stamped envelope.

Thank you for your assistance in this matter.

Yours truly,

  
Thelma R. Garrick  
PRO SE

Enclosures

cc: Mr. Russell G. Hines  
Young Clement Rivers, LLP

RECEIVED

JUN 03 2019

SC Court of Appeals

Wilson, Charlotte  
4500 ...  
S.C. 29115

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

**CERTIFIED MAIL**



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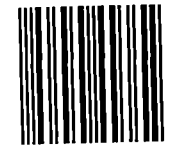
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JUN 08 2019

SC Court of Appeals



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U.S. POSTAGE PAID  
FCM LG ENV  
ORANGEBURG, SC  
29115  
MAY 31, 19  
AMOUNT

**\$4.80**

R2303S103768-27

Mr. James Albert Hatcher  
Head of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211