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OCT 20 2020

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

[In the Supreme Court]

The Honorable James E. Lockemy, Chief Judge

Case No. 2017-002288

Motion

1. Reinstate the Appellant's Relevant Evidence, Not Entered During the Civil Court Trial, Respectively.
2. Politely, Disagree with Attorney Julie Coleman for Striking Record on Appeal.
3. Respectfully, Allow Mrs. Samuel, Appellant, Pro Se, a 15-day Extension to Enter the Revised Record on Appeal

Miriam H. Samuel, Pro Se

Appellant.

v.

Clawson and Staubes, LLC
Ms., Julie A. Coleman, as
Personal Representative of
Lynne N. Johnson,

Respondent,

Monday, October 19, 2020

Reinstate Relevant Evidence That were not included in the civil trial. These were approved twice to have them put in as my evidence.

The honorable Judge James E. Lockemey, Chief Judge
Jenny A. Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201

Dear Ms. Kitchings,

This Motion from Ms. Miriam H. Samuel, Appellant, respectful request for a the review of all The Designation of Matters, that she submitted, along with The Court's corresponding letters concerning these. These will show that Mrs. Samuel repeatedly requested for relevant evidence to be admitted in Appeal Case. Finally, she learned that a MOTION had to be filed, to enter the evidence regarding her Appeal Case. Mrs. Samuel have worked hard to be very conscious concerning the rules as they relate to her appeal case. With all her Extensions, Pleadings and two Motions there are Attached the proof of service notifications. According to the appeal courts rule #209 and I quote, "The designation of matter to be included in the record on appeal which shall set forth with specificity those Parts of the transcript, pleadings, orders, exhibits, or other materials which he proposes to include in the record on appeal." See Rule #209 (b) (c)

This Negated Mrs. Samuel to mention from the beginning of her appeal the need to have these items entered into court as relevant evidence. Reality is that rule # 104 is the Basis of her appeal. See the Designations of Matters entered in her behalf. Throughout her pleadings, her motions, her extensions and in every area of her appeal this is mentioned.

Even though this has been a lengthy trial from the very beginning of September 5th, 2011, when this Motor vehicle accident occurred. Mrs. Samuel have endured a very stressful and unusual past 3 1/2 years in her life. Mrs. Samuel accrued costly bills pursuing this matter for the sake of justice. Mrs. Samuel is forthright when it comes to her private affairs in relation to The Court of Appeal. This have been done at great humility, embarrassment and the lack of expertise in this area. Mrs. Samuel does not want her life experiences to be excuses to quit, but she views them as steppingstones as she becomes a better person, while reaching her goal. Mrs. Samuel's goal is to be heard by The Honorable Judges in the South Carolina Courts.

Mrs. Samuel have been able to provide necessary documents and fees in the timely manner, according to the SC Court of Appeals.

Therefore, I strongly disagree with the attorney for the respondent, Lynne N. Johnson. Attorney Julie Coleman's reason for striking Mrs. Samuel's Record. I sincerely hope this second revised record on appeal will be comprehensible to you. Ms. Julie Coleman, I would like all files Return that are not useful to you respectfully these did cost me money. Including in my request are folders and documents that I've delivered to you, respectively. My supplies were costly. I am disabled and on a Budgeted income therefore my paper clips and rubber bands would also be appreciated. Thank you kindly. You may mail them if you so desire or call for me to pick them up.

This may be close to impossible since according to my enclosed documents you may notice my husband is having a serious surgery this week.

Therefore, the reasoning I've Include in the motion the request for an extension of 15-days even though 30-days

would be better. I really want this Record on Appeal to be as simple and comprehensible as can be.

Mrs. Samuel also request a copy of the Respondent's Record on Appeal. She did not receive this with her Final Brief and motions she filed. I had no Knowledge that I could respond to those filed Motions. Next thing I see is my Record on Appeal was strike.

Mrs. Samuel, Appellant Pro Se, did not have the opportunity to reply to Attorney Coleman's Motions, before the Record on Appeal was struck down.

The appellant, Pro Se Mrs. Samuel Respectfully, ask that the evidence mentioned throughout her appeal would be granted to present her appeal case.

Some of these relevant items of evidence were mentioned during the lower court trial.

The appellant's, Mrs. Samuel requested evidence are as listed....

1. The itemized statements of bills with the total cost from Blue Cross Blue shield subrogation statements.
2. Medicare's invoice billing statement.
3. Mrs. Lynne Johnson's the defendant respondent's 10 years drivers record, police Citation
4. Mrs. Lynn Johnsons the respondents traffic ticket she received from the accident on February 5th, 2011 and the ticket was given to her on February 6th, 2011.
5. Mrs. Samuel, Appellant's Best evidence of original photographs of the scene from the accident.

With all due respect,

Mrs. Miriam Samuel
Appellant, Pro Se



Mrs. Miriam Samuel
Appellanr, Pro Se

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals
In the Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable James E. Lockemy, Chief Judge

Case No. 2017-002289

Clawson and Staubes, LLC
Ms., Julie A. Coleman, as
Personal Representative of
Lynne N. Johnson,

Respondent,

v.

Miriam H. Samuel, Pro Se

Appellant.

Motion

PROOF OF SERVICE


1. Reinstate the Appellant's Relevant Evidence, Not Entered During the Civil Court Trial, Respectively.
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I certify that I have served the Notice for A Motion to allow approved evidences that was not included in the Lower Court to be included in this Appeal.

Appellant, Miriam Samuel, Pro Se deposited a copy of this in the United States Mail, postage prepaid, on October 20, 2020 to Ms. Lynne N. Johnson. This was addressed to her attorney of record, Ms. Julie Coleman at 1612 Richland St. Columbia, SC 29201. [by personally delivering a copy of it to her attorney of record, Ms. Julie Coleman. October 20, 2020.

s/Miriam H. Samuel
4014 Margrave Road
Columbia, SC 29203
(803) 256-7283
The Appellant, Pro Se

Clawson and Staubes
1612 Marion St Columbia, SC 29201
(800) 774-8242
Ms. Julie Coleman, Personal Representative of
Lynne N. Johnson



M. Samuel
Pro SE