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MAR 29 2021

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

MOTION AND PETITION AMENDED (March 25, 2021
Motion and Petition)

TO BE HEARD BY THE COURT OF APPEALS

TO REOPENING / REINSTATE APPELLANT'S CASE/

ASKING FOR AN EXTENTION OF 20-DAY/ TO FILE

A CORRECT RECORD ON APPEAL

REDACT ALL PREVIOUSLY FILED RECORD ON APPEAL

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

Clawson and Staubes
Julie Coleman, Esquire
Lawyer for Lynne N. Johnson, Respondent
1612 Marion St. Columbia, SC 29201
(800) 774-8242

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

In the Supreme Court.

Honorable James E. Lockemy, Chief Judge

South Carolina Court of
Appeals
1220 Senate St.
Columbia, SC 29201

Mrs. Miriam Samuel, Appellate, Pro se
4014 Margrave Rd.
Columbia, SC 29203

Dear Mrs. Kitchings,

I am pleading with this honorable Judges of The Court of Appeals and The South Carolina Supreme Court. Please, grant me your gracious consideration, and allow me, Mrs. Miriam H. Samuel, Pro Se, to complete my Appeal Case Number 2017-002289. My case was recently **involuntary dismissed**. I am disabled and a bit slower than usual. I have failed to meet deadlines and at times just did not know how to do the Record correctly. Thereby, it was not accepted into court. I could not afford an attorney to take this case, non could I find anyone to take this Pro Bono. I am humbly making this Motion and petition for the court to reinstate,

reopen and heard my plead for justice.

I filed my appeal and educated myself on The Rules, Orders, Motions, and other matters concerning this appeal. I know that I have a case. I hope to have my case reinstated. I would like to be heard and to see this case to it is concluded.

Beginning in 2018 up to the present, my life has been tumultuous. I have been straight forward with the court entering our personal family grief and other personal family matters. On January 15, 2018, my disabled Father call me for our help. His health was extremely poor, and he had Parkinson's disease and dementia along with other serious illnesses. I am his only daughter and felt it a privilege taking care of him. We were already taken care of my husband's father. My father and my father-in-law passed away in 2019, a couple months apart. In 2018, I was in an unbelievably bad car accident which caused me to have two major surgeries on my cervical spine. The first surgery was an emergency. I had it done in Charleston, SC on Dec. 2019.

The second surgery was recently done on Jan.15, 2021. I had my post-op check up a little over two weeks ago. According to my neurosurgeon, I am making good progress. However, with other illness that I managed, my doctor feels it may be at least six more months to completely heal. I was admitted into the hospital for both surgeries.

In July 2020, my husband was hit by a careless driver. He later needed his rotator Cuff repaired and Physical Therapy. Throughout, all these family issues, I have worked on my appeal case.

I am begging that the South Carolina Court of Appeal Consider this Motion/Petition.

I have sat up all night at times and worked on my appeal case, in much pain and on many medications. Perhaps, that is why I did not understand completely how to do the Record on Appeal. After talking to Ms. Ann Coleman, the new Lawyer for the Respondent Lynne N. Johnson, I in general mentioned that had neck surgery, all type of Motions and Strike and

demands were entered into court by her. Not to mention that I have been shut in for over two years. I just could not keep up with all the Motions, Ms. Coleman, The Attorney for Ms. Lynne Johnson entered in court.

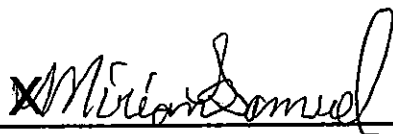
Yet, I have been able to complete everything except the Record on Appeal. Respectfully, I have tried to complete it correctly many times.

I deeply appreciate the Appeal Court Specialists II, Mrs. S. Snell, who was assigned to help me to navigate the system and showed me how to do things within the scope of her limitations. I am incredibly grateful to all of you, for taking such care and assisting me as best you could. Thank you.

I am so positive that I can finish this to completion. Even if I do need more time, please understand, and let me do my case. I am hopeful there are provisions for people with limited abilities and that there may be exceptions to the rules, to allow my case to go forward. Please allow this motion and petition to be heard Favorably. I am asking your honorable judges and clerk of court, Mrs. Kitchings. And all those who have been dealing with me over the last two years to please consider how hard I've been working even through all my issue's. I pray that you all see a way to show me. I am asking for a final 20-day extension to enter a final and correct Record on Appeal.

If I need to be heard by a panel of judges concerning this, I will gladly do so. Ever since Ms. Coleman became the lawyer for Ms. Johnson I've been Struggling to her Demands, Motions and Orders. It has been incredibly stressful on me. Nothing is impossible, with a lawyer's assistant, however I do not have one.

Sincerely yours,

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

miriam Samuel

Mrs. Miriam Samuel

3/29/2021

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APPEAL FROM RICHLAND COUNTY
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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.

PROOF OF SERVICE

MOTION AND PETITION (Amend March 25, 2021 Motion and Petition)

TO REOPEN/REINSTATE APPELLANT'S CASE/

TO BE HEARD BY THE COURT OF APPEALS

ASKING FOR 20-DAYS TO FILE A CORREC RECORD ON APPEAL

REDACT ALLPREVIOUSLY FILED RECORD ON APPEAL

I certify that I have served the Notice for A Motion and Petition to allow my Appeal Case to be reheard and reinstated. The Appellant, Mrs. Miriam H. Samuel, Pro Se deposited a copy of this in the United States Mail, postage prepaid, on March 29, 2021, 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. March 2, 2021.

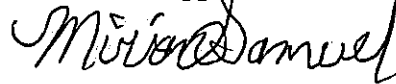
s/Miriam H. Samuel

4014 Margrave Road

Columbia, SC 29203

(803) 256-7283

The Appellant, Pro Se

A handwritten signature in cursive script that reads "Miriam Samuel".

Clawson and Staubes

1612 Marion St Columbia, SC 29201

(800) 774-8242

Ms. Julie Coleman, Personal Representative of Lynne N. Johnson