

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

69780

APPEAL FROM OCONEE COUNTY
Court of Common Pleas
J.C. Nicholson, Jr., Circuit Court Judge

RECEIVED
SEP 16 2013
SOUTH CAROLINA COURT OF APPEALS

2006-CP-37-0030

Scott F. Lawing and Tammy R. Lawing..... Appellants,

v.

Univar USA, Inc., Trinity Manufacturing, Inc.
and Matrix Outsourcing, LLC, Defendants,

Of Whom Trinity Manufacturing, Inc. and
Matrix Outsourcing, LLC, are..... Respondents.

**RESPONDENTS
TRINITY MANUFACTURING, INC. AND
MATRIX OUTSOURCING, LLC'S
MOTION FOR EXTENSION OF TIME TO FILE THEIR RESPONSE TO
APPELLANTS' PETITION FOR REHEARING**

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

Respondents Trinity Manufacturing, Inc. and Matrix Outsourcing, LLC
respectfully move this Court for an Order granting it an additional extension of
time in which to file and serve Respondents' Response to Appellants' Petition for
Rehearing.

Counsel for Respondents Trinity and Matrix have been conscientious in their efforts to prepare Respondents' Return to Appellants' Petition for Rehearing. However, due to preparing for oral argument in the South Carolina Supreme Court, additional time is needed.

The current deadline is September 16, 2013. Appellant requests a brief extension of time to September 20, 2013, in which to file and serve Respondents' Return to Appellants' Petition for Rehearing.

Counsel for Respondents has consulted with counsel for Appellants and there is no objection to this request.

Respondents Trinity and Matrix greatly appreciate the Court's time, attention, and assistance with regard to this request.

Respectfully submitted,
COLLINS & LACY, P.C.



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COUNSEL FOR RESPONDENTS

Columbia, South Carolina
September 16, 2013

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SEP 18 2013
SC Court of Appeals

Scott F. Lawing and Tammy R. Lawing..... Appellants,

v.

Univar USA, Inc., Trinity Manufacturing, Inc.
and Matrix Outsourcing, LLC, Defendants,

Of Whom Trinity Manufacturing, Inc. and
Matrix Outsourcing, LLC, are..... Respondents.

PROOF OF SERVICE

Counsel for Respondents Trinity Manufacturing, Inc. and Matrix Outsourcing, LLC certifies it has served Respondents' Motion for Extension of Time to file their Response to Appellants' Petition for Rehearing on all parties by depositing a copy of it in the United States Mail, postage prepaid, on September 16, 2013, addressed to the following attorneys of record:

COUNSEL SERVED:

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[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

COLLINS & LACY, P.C.



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Counsel for Respondents Trinity
Manufacturing, Inc. and Matrix
Outsourcing, LLC

Columbia, South Carolina
September 16, 2013



A T T O R N E Y S A T L A W
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September 16, 2013

VIA HAND-DELIVERY

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

*Re: Scott F. Lawing and Tammy R. Lawing v. Univar USA, Inc., Trinity Manufacturing, Inc., and Matrix Outsourcing, LLC
Appellate Case No.: 2009-112467
Claim No. 182-083444 / 182-083842
C&L File No. 1-1687*

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of the Respondents Trinity Manufacturing, Inc. and Matrix Outsourcing, LLC's Motion for Extension of Time to File their Response to Appellants' Petition for Rehearing in the above-referenced matter. I am also enclosing a check in the amount of \$25.00 for the required filing fee.

By copy of this letter, a copy of this letter and all enclosures are being forwarded to counsel for service.

Respectfully

Christian Stegmaier

CS:lcc

Enclosures

cc: Robert P. Foster, Esquire
William P. Walker, Jr., Esquire/S. Kirkpatrick Morgan, Jr., Esquire
Larry C. Brandt, Esquire
John S. Nichols, Esquire
Ellis M. Johnson, II, Esquire/Joshua L. Howard, Esquire
Gray T. Culbreath, Esquire

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