

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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

Appellate Case No. 2009-112467

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Op. No. 5166  
Heard June 12, 2013 – Filed August 21, 2013

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**RECEIVED**

NOV 22 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.

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**JOINT  
MOTION FOR EXTENSION OF TIME TO  
FILE PETITION FOR A WRIT OF CERTIORARI**

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TO: THE HONORABLE JUSTICES OF THE SUPREME COURT OF  
SOUTH CAROLINA:

Pursuant to Rule 240, SCACR, Respondents Trinity Manufacturing,  
Inc. and Matrix Outsourcing, LLC and Appellants Scott F. Lawing and  
Tammy R. Lawing respectfully move this Court for an Order granting them

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each of them an extension of time in which to file their respective Petitions for Writ of Certiorari.

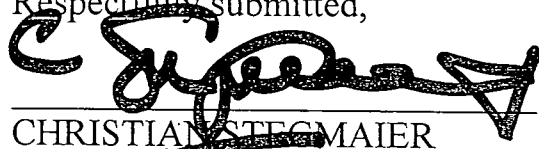
The Court of Appeals denied cross-petitions for rehearing on October 22, 2013. The current deadline for filing and serving Petitions for Certiorari is November 21, 2013.

The parties have scheduled a mediation on December 11, 2013, in an attempt to fully resolve this matter. Therefore, the parties respectfully request an extension of thirty (30) days to file petitions for writ of certiorari to allow the parties the opportunity to resolve the matter at mediation. The new deadline will be December 21, 2013.

Counsel for all parties greatly appreciates the Court's time, attention, and assistance with regard to this request.

*[SIGNATURE PAGE TO FOLLOW]*

Respectfully submitted,



CHRISTIAN STEGMAIER

AMY L. NEUSCHAFER

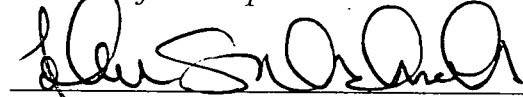
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*Attorneys for Appellants*

Columbia, South Carolina  
November 20, 2013

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

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**PROOF OF SERVICE**

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Counsel for Respondents Trinity Manufacturing, Inc. and Matrix Outsourcing, LLC certifies it has served Respondents' Motion for Extension of Time to File Petition for Writ of Certiorari on all parties by depositing a copy of it in the United States Mail, postage prepaid, on November 20, 2013, addressed to the following attorneys of record:

**COUNSEL SERVED:**

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***[SIGNATURE PAGE TO FOLLOW]***

Respectfully submitted,

COLLINS & LACY, P.C.

A handwritten signature in black ink, appearing to read 'C. Stegmaier', written over a horizontal line.

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Counsel for Respondents Trinity  
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Outsourcing, LLC

Columbia, South Carolina  
November 20, 2013



Christian Stegmaier | Direct Dial: 803.255.0454 | E-Mail: cstegmaier@collinsandlacy.com

November 20, 2013

**VIA HAND-DELIVERY**

The Honorable Daniel E. Shearouse  
Clerk, South Carolina Supreme Court  
Supreme Court Building  
1231 Gervais Street  
Columbia, SC 29201

*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 Mr. Shearouse:

Please find enclosed for filing the original and seven (7) copies of the Joint Motion for Extension of Time to File Petition for Writ of Certiorari in the above-referenced matter. I am also enclosing herewith a check in the amount of \$25.00 for the required filing fee. Please return a clocked copy to me via my courier.

By copy of this letter, I am serving a copy of same upon the South Carolina Court of Appeals and all counsel.

Thank you for your time and attention. Should you have any questions, please do not hesitate to contact me.

Respectfully,

A handwritten signature in black ink, appearing to read "Christian Stegmaier". The signature is stylized and written over the typed name.

Christian Stegmaier

CBS:lcc  
Enclosures

cc: The Honorable Jenny Abbott Kitchings, Clerk  
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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