

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

RECEIVED  
DEC 18 2013  
SC Court of Appeals

Appellate Case No. 2009-112467

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

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

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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**SECOND 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 each of

them a second extension of time in which to file their respective Petitions for Writ of Certiorari.

The parties request this additional extension of time as mediation was conducted on December 11, 2013; however, the parties were not able to reach a settlement and due to the upcoming Christmas and New Year holidays, the parties respectfully request an additional extension of thirty (30) days to file and serve their Petitions for Writ of Certiorari. The current deadline is Friday, December 20, 2013. With the additional thirty (30) day extension, the new deadline will be January 20, 2014.

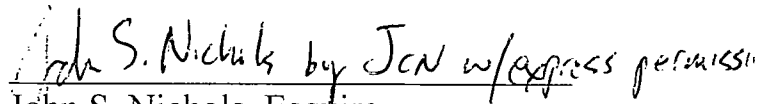
Counsel for all parties greatly appreciates the Court's time, attention, and assistance with regard to this request.

*[SIGNATURE PAGE TO FOLLOW]*

Respectfully submitted,



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Columbia, South Carolina  
December 13, 2013

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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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 the Second Joint 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 December 16, 2013, addressed to the following attorneys of record:

**COUNSEL SERVED:**

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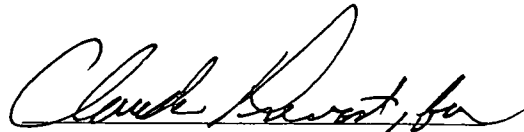
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***[SIGNATURE PAGE TO FOLLOW]***

Respectfully submitted,

COLLINS & LACY, P.C.



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Counsel for Respondents Trinity  
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Outsourcing, LLC

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December 16, 2013



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December 16, 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*

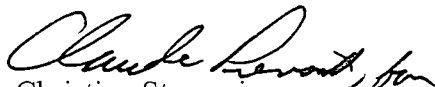
Dear Mr. Shearouse:

Please find enclosed for filing the original and seven (7) copies of the Second 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,

  
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  
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