

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

---

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

---

**RECEIVED**

APR - 3 2014

**S.C. Supreme Court**

Op. No. 5166 (S.C. Ct. App. Filed August 12, 2013)  
Case Tracking No. 2013-002464

---

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

v.

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

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

---

**JOINT MOTION FOR EXTENSION OF  
TIME TO FILE AND SERVE THE PARTIES'  
REPLIES TO THE RETURNS TO  
PETITIONS FOR WRIT OF CERTIORARI**

---

Pursuant to Rule 240, SCACR, Respondents/Petitioners Trinity  
Manufacturing, Inc. and Matrix Outsourcing, LLC and  
Petitioners/Respondents Scott F. Lawing and Tammy R. Lawing respectfully  
move this Court for an Order granting each party an extension of time in

which to file their respective Replies to the Returns to the cross Petitions for Writ of Certiorari pending in this matter.

The parties request this additional extension of time due to the complexity of the issues extant in the instant case. The parties respectfully request an extension of ten (10) days to file and serve their Replies to the Returns to the Petitions for Writ of Certiorari. The current deadline is Thursday, April 3, 2014. With the ten (10) day extension, the new deadline will be April 14, 2014.

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

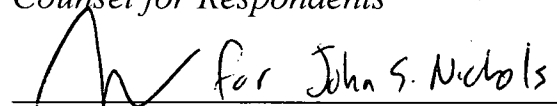
*[SIGNATURE PAGE TO FOLLOW]*

Respectfully submitted



---

Christian Stegmaier  
Amy Neuschafer  
COLLINS & LACY, P.C.  
Post Office Box 12487  
Columbia, South Carolina 29211  
(803) 256-2660 (Voice)  
*Counsel for Respondents*



---

John S. Nichols  
BLUESTEIN, NICHOLS,  
THOMPSON & DELGADO, LLC  
Post Office Box 7965  
Columbia, SC 29202  
(803) 779-7599

Larry C. Brandt  
LARRY C. BRANDT, PA  
Post Office Box 738  
Walhalla, SC 29691  
(864) 638-5406

Robert P. Foster  
FOSTER & FOSTER, LLP  
Post Office Box 2123  
Greenville, SC 29602  
(864) 242-6200

William P. Walker, Jr.  
S. Kirkpatrick Morgan, Jr.  
WALKER & MORGAN, LLC  
Post Office Box 949  
Lexington, SC 29072  
(803) 359-6194  
*Attorneys for Appellants*

Columbia, South Carolina  
April 3, 2014

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

---

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

Appellate Case No. 2013-002464

---

Op. No. 5166

Heard June 12, 2013 – Filed August 21, 2013

---

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

v.

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

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

---

**PROOF OF SERVICE**

---

Counsel for Respondents Trinity Manufacturing, Inc. and Matrix Outsourcing, LLC certifies it has served the Joint Motion for Extension of Time to File and Serve the Parties' Replies to the Returns to Petitions for Writ of Certiorari on all parties by depositing a copy of it in the United States Mail, postage prepaid, on April 3, 2014, addressed to the following attorneys of record:

**COUNSEL SERVED:**

FOSTER LAW FIRM, LLP  
Robert P. Foster, Esquire  
601 E. McBee Avenue, Suite 104  
Greenville, SC 29601

WALKER & MORGAN, LLC  
William P. Walker, Jr., Esquire  
S. Kirkpatrick Morgan, Jr., Esquire  
PO Box 949  
Lexington, SC 29071

LARRY C. BRANDT, PA  
Larry C. Brandt, Esquire  
PO Box 738  
Walhalla, SC 29691

BLUESTEIN, NICHOLS, THOMPSON & DELGADO, LLC  
John S. Nichols, Esquire  
1614 Taylor Street  
Columbia, SC 29201


HAYNSWORTH SINKLER BOYD, PA  
Ellis M. Johnson, II, Esquire  
Joshua L. Howard, Esquire  
Post Office Box 2048  
Greenville, SC 29602

GALLIVAN, WHITE & BOYD, PA  
Gray T. Culbreath, Esquire  
Post Office Box 7368  
Columbia, SC 29202

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

Respectfully submitted,

COLLINS & LACY, P.C.



---

CHRISTIAN STEGMAIER  
cstegmaier@collinsandlacy.com  
AMY L. NEUSCHAFER  
aneuschafer@collinsandlacy.com  
PO Box 12487

Columbia, South Carolina 29211

(803) 256-2660 (Voice)

(803) 771-4484 (Fax)

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

Columbia, South Carolina

April 3, 2014