

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM GREENVILLE COUNTY
Before the Master In Equity

Charles B. Simmons, Jr., Master In Equity

Case No. 2007-CP-23-3206

RECEIVED

JUN 30 2014

SC Court of Appeals

North American Rescue Products, Inc.,.....Appellant,

v.

P. J. Richardson,.....Respondent.

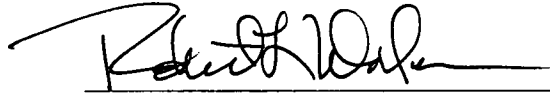
**APPELLANT'S REPLY TO RESPONDENT'S RETURN TO
APPELLANT'S MOTION TO RESCHEDULE ORAL ARGUMENT**

The Respondent opposes the motion to reschedule oral argument by relying on two eleventh-hour motions filed by Respondent: a Motion to Dismiss the present appeal filed in this Court; and a Motion to Transfer this appeal filed in the Supreme Court. Both motions were served and filed on June 19, 2014, making Appellant's Returns to those Motions due on June 30, 2014. Appellant incorporates herein its Returns to these Motions (to be filed on June 30).

As to both motions, there is no need to await a decision on either motion before rescheduling oral argument in this appeal. If either motion is granted, then oral argument can be cancelled. The argument, however, should be rescheduled at this time so that no further delay will be caused if the motions are denied. And delay is the obvious goal here -- Respondent hopes to

delay oral argument in this case until the Supreme Court has ruled on the appeal before it, which will moot the present appeal. This should not be permitted by this Court.

Respectfully Submitted,



Robert L. Widener
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

Bernie W. Ellis
McNair Law Firm, P.A.
Post Office Box 447
Greenville, South Carolina 29602
(864) 271-4940

Attorneys for Appellant

June 24, 2014
Columbia, SC

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM GREENVILLE COUNTY
Before the Master In Equity

Charles B. Simmons, Jr., Master In Equity

Case No. 2007-CP-23-3206
Appellate Case No. 2012-212748

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SC Court of Appeals

North American Rescue Products, Inc.,.....Appellant,

v.

P. J. Richardson,.....Respondent.

CERTIFICATE OF SERVICE

I, Ann Shuler, an employee of the McNair Law Firm, certify that I have served the Appellant's Reply to Return to Motion to Reschedule Oral Argument by depositing a copy of same in the United States Mail, postage prepaid, on June 26, 2014 addressed to the attorneys of record, as follows:

C. Mitchell Brown, Esq.
A. Mattison Bogan, Esq.
NELSON MULLINS RILEY & SCARBOROUGH, LLP
Post Office Box 11070
Columbia, South Carolina 29211-1070

Rivers S. Stillwell, Esq.
NELSON MULLINS RILEY & SCARBOROUGH, LLP
Post Office Box 10084
Greenville, South Carolina 29601



Ann Shuler

MCNAIR
ATTORNEYS

June 26, 2014

Robert L. Widener
SC Bar No. 6089

rwidener@mcnair.net
T 803.799.9800
F 803.753.3278

Honorable Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
JUN 30 2014
SC Court of Appeals

Re: North American Rescue v. P. J. Richardson
Appellate Case No. 2012-212748

Dear Madam Clerk:

Enclosed for filing, please find the original and seven copies of Appellant's Reply to Return to Motion to Reschedule Oral Argument. Please file the motion in your office and return the file stamped extra copy to me in the return envelope provided. By copy of this letter, we are serving counsel for the Respondent with a copy of same.

Respectfully yours,

McNAIR LAW FIRM, P.A.



Robert L. Widener

RLW/as
Enclosures

cc: Rivers S. Stillwell, Esq.
C. Mitchell Brown, Esq.
A. Mattison Bogan, Esq.

McNAIR LAW FIRM, P.A.
1221 Main Street
Suite 1800
Columbia, SC 29201

Mailing Address
Post Office Box 11390
Columbia, SC 29211

mcnair.net