

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

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Appellate Case No. 2013-002464

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**RECEIVED**

OCT 17 2014

**S.C. Supreme Court**

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.

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**RESPONDENTS/PETITIONERS' MOTION FOR EXTENSION OF  
TIME TO FILE RESPONDENTS/PETITIONERS' BRIEF OF  
RESPONDENT**

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

Pursuant to Rule 240, SCACR, Respondents/Petitioners Trinity  
Manufacturing, Inc. and Matrix Outsourcing, LLC respectfully move this  
Court for an Order granting them an extension of time in which to file the  
Respondents/Petitioners Brief of Respondent in the instant case. The

deadline to file and serve Respondents/Petitioners' Brief of Respondent is currently October 17, 2014. Respondents/Petitioners' respectfully request an additional ten (10) days in which to file and serve Respondents/Petitioners' Brief of Respondent, which would make the deadline October 27, 2014. Regarding good cause, in addition to the complexity of the briefing in the instant case, within recent times, counsel has been engaged in trial preparation in the matter of Carolina Chloride v. SC Department of Transportation, which begins on October 21, 2014 before the Richland County Master-in-Equity.

This will be Respondents/Petitioners' one and only request for extension concerning this briefing and is mindful of the Court's admonition concerning any further requests for extension, as outlined in the Court's recent order to the Bar regarding the same.

Counsel for Respondents/Petitioners greatly appreciates the Court's time, attention, and assistance with regard to this request.

**[SIGNATURE PAGE TO FOLLOW]**

Respectfully submitted,



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**RESPONDENTS/PETITIONERS'  
MOTION FOR EXTENSION OF  
TIME TO FILE  
RESPONDENTS/PETITIONERS'  
BRIEF OF RESPONDENT**

Columbia, South Carolina  
October 17, 2014

THE STATE OF SOUTH CAROLINA  
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Of Whom Trinity Manufacturing, Inc. and  
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**PROOF OF SERVICE**

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Counsel for Respondents/Petitioners Trinity Manufacturing, Inc. and Matrix Outsourcing, LLC certifies it has served Respondents/Petitioners' Motion for Extension of Time to File Respondents/Petitioners' Brief of Respondent on all parties by depositing a copy of it in the United States Mail, postage prepaid, on October 17, 2014, 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

**PROOF OF SERVICE –  
RESPONDENTS/PETITIONERS’  
MOTION FOR EXTENSION OF  
TIME TO FILE  
RESPONDENTS/PETITIONERS’  
BRIEF OF RESPONDENT**

Columbia, South Carolina  
October 17, 2014



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

October 17, 2014

RECEIVED

OCT 17 2014

**VIA HAND-DELIVERY**

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

**S.C. Supreme Court**

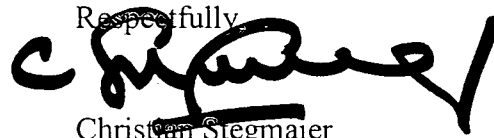
**Re:** *Scott F. Lawing and Tammy R. Lawing v. Univar USA, Inc., Trinity Manufacturing, Inc., and Matrix Outsourcing, LLC*  
**Appellate Case No.:** 2013-002464  
**Claim No.:** 182-083444 / 182-083842  
**C&L File No.:** 1-1687

Dear Mr. Shearouse:

Please find enclosed for filing the original and seven (7) copies of Respondents/Petitioners' Motion for Extension of Time to File Respondents/Petitioners' Brief of Respondent in the above-referenced matter. I am also enclosing a check in the amount of \$25.00 for the required filing fee. Please return a clocked copy of same to me via my courier.

By copy of this letter, a copy of same is being served upon all counsel.

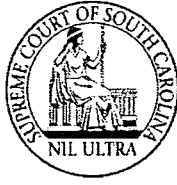
Thank you for your time and attention. Should you have any questions, please do not hesitate to contact me.

Respectfully  
  
Christian Stegmaier

CBS:lcc

Enclosures

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



# The Supreme Court of South Carolina

Christian Stegmaier  
PO Box 12487  
Columbia SC 29211

10/20/2014

## RECEIPT #73893

**Case No:** 2013-002464  
**Case Short Title:** Scott F. Lawing v. Univar USA, Inc.  
**Event:**  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 18568  
**Check/Money Order Date:** 10/17/2014  
**Comments:**