

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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**RECEIVED**

NOV - 5 2014

**S.C. Supreme Court**

Appellate Case No. 2013-002464

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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 TO FILE  
RESPONDENTS/PETITIONERS'  
BRIEF OF RESPONDENTS OUT OF TIME**

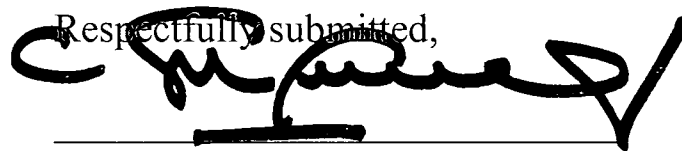
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TO: THE HONORABLE JUSTICES OF THE SUPREME COURT OF  
SOUTH CAROLINA:

Respondents/Petitioners respectfully move this Court for an Order  
granting them leave to file Respondents/Petitioners' Brief of Respondents out  
of time.

Counsel for Respondents/Petitioners represent to this Court that they have been conscientious in their efforts to prepare Respondents/Petitioners' Brief of Respondents; however, because of the number and complexity of the issues extant in the instant case, as well as competing deadlines in other appellate and trial court matters, counsel respectfully requests the Court's permission with regard to this request for leave to file Respondents/Petitioners' Brief of Respondents out of time.

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

Respectfully submitted,  


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Columbia, South Carolina  
November 5, 2014

**RESPONDENTS/PETITIONERS'  
MOTION TO FILE  
RESPONDENTS/PETITIONERS'  
BRIEF OF RESPONDENTS OUT OF  
TIME**

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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 to File Respondents/Petitioners' Brief of Respondents Out of Time on all parties by depositing a copy of it in the United States Mail, postage prepaid, on November 5, 2014, addressed to the following attorneys of record:

**COUNSEL SERVED**

FOSTER LAW FIRM, LLP

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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 TO FILE  
RESPONDENTS/PETITIONERS’  
BRIEF OF RESPONDENTS OUT OF  
TIME**

Columbia, South Carolina  
November 5, 2014



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

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**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 sixteen (16) copies of Respondents/Petitioners' Brief of Respondents in the above-referenced matter. I am also enclosing herewith for filing the original and seven (7) copies of Respondents/Petitioners' Motion to File Respondents/Petitioners' Brief of Respondents Out of Time. A check in the amount of \$25.00 for the required filing fee is also enclosed. Please return a clocked copy of the documents 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:mmm  
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