

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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

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NOV 10 2014

S.C. Supreme Court

Appellate Case 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.

**RESPONDENTS/PETITIONERS' MOTION FOR
AN EXTENSION OF TIME TO FILE
RESPONDENTS/PETITIONERS'
REPLY BRIEF AS TO SCOTT AND TAMMY
LAWING'S RESPONDENTS' BRIEF**

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' Reply Brief as to Scott and Tammy Lawing's Respondents' Brief in the instant case. The deadline to file and serve Respondents/Petitioners' Reply Brief is currently November 10, 2014. Respondents/Petitioners' respectfully request an additional ten (10) days in which to file and serve Respondents/Petitioners' Reply Brief as to Scott and Tammy Lawing's Respondents' Brief, which would make the deadline November 20, 2014.

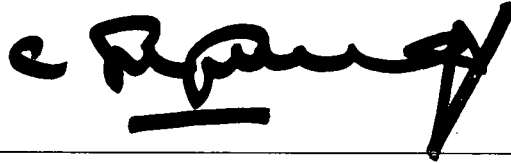
Respondents/Petitioners represent to this Court that they have been conscientious in their efforts to prepare Respondents/Petitioners' Reply Brief as to Scott and Tammy Lawing's Respondents' Brief; however, because of the number and complexity of the issues extant in the instant case, counsel respectfully requests the Court's assistance with regard to this request for an extension of time of ten days until November 20, 2014.

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

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

COLLINS & LACY, P.C.

A handwritten signature in black ink, appearing to read 'C. Stegmaier', written over a horizontal line.

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**RESPONDENTS/PETITIONERS'
MOTION FOR AN EXTENSION OF
TIME TO FILE
RESPONDENTS/PETITIONERS'
REPLY BRIEF AS TO SCOTT AND
TAMMY LAWING'S
RESPONDENTS' BRIEF**

Columbia, South Carolina
November 10, 2014

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and Matrix Outsourcing, LLC, Defendants,

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

PROOF OF SERVICE

Counsel for Respondents/Petitioners Trinity Manufacturing, Inc. and Matrix Outsourcing, LLC certifies it has served Respondents/Petitioners' Motion for Extension of Time to file the Reply Brief as to Scott and Tammy Lawing's Respondents' Brief on all parties by depositing a copy of it in the United States Mail, postage prepaid, on November 10, 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 AN EXTENSION OF
TIME TO FILE
RESPONDENTS/PETITIONERS’
REPLY BRIEF AS TO SCOTT AND
TAMMY LAWING’S
RESPONDENTS’ BRIEF**

Columbia, South Carolina
November 10, 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 seven (7) copies of Respondents/Petitioners' Motion for an Extension of Time to File Respondents/Petitioners' Reply Brief as to Scott and Tammy Lawing's Respondents' Brief 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