

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Appellate Case No. 2013-001102
Case No. 2011-CP-40-04883R

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MAR 23 2015
SC Court of Appeals

Raymond Armstrong Appellant,

v.

Samuel J. Thompson..... Respondent.

**RESPONDENT'S RESPONSE TO APPELLANT'S
PETITION FOR REHEARING**

The Appellant, Raymond Armstrong, has petitioned the court for a rehearing on the basis that there is an issue of material fact regarding whether the Respondent knew or should have known of the hazardous condition and that there was a factual issue regarding the Respondent's negligence in creating the hazardous condition. This court should deny the Appellant's request for a rehearing because the Appellant has failed to present any points which were overlooked or misapprehended by the court. The court correctly ruled in this case and should deny the Appellant's request for a rehearing.

Appellant further moves to be relieved as counsel in this matter. Respondent does not object to counsel's request to be relieved as counsel.



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Attorneys for Samuel J. Thompson

March 18, 2015

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PROOF OF SERVICE

I, Teresa K. Todd, Legal Assistant to Catharine Garbee Griffin, an employee of Baker, Ravenel & Bender, L.L.P., hereby certify that I have, on the date indicated below, served counsel below with a Respondent's Response to Appellant's Petition for Rehearing by mailing a copy of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel at the following address:

Shannon L. Felder, Esquire
The Solomon Law Group
1519 Richland Street
PO Box 1866
Columbia, SC 29201-1866



Teresa K. Todd

March 20, 2015



BAKER RAVENEL BENDER
ATTORNEYS AT LAW

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MAR 23 2015
SC COURT OF APPEALS

Catharine Garbee Griffin
Direct Dial 803.343.3863
cgriffin@brblegal.com

March 20, 2015

The Honorable V. Claire Allen
Deputy Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Raymond Armstrong v. Samuel J. Thompson
Claim No. 36-917-07
C. A. No. 2013-001102
Our File No. 8852.200

Dear Ms. Allen:

Enclosed herein please find the original and one copy of Respondent's Response to Appellant's Petition for Rehearing in the above-referenced case. Please return the clocked copy to me in the envelope provided. By copy of this letter to Ms. Felder, I am serving her with a copy of the same.

If you have any questions concerning this letter, please feel free to call me.

Yours truly,


Catharine Garbee Griffin
CGG/tkt
Enclosures

Cc: Shannon L. Felder, Esquire

8852.200



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ATTORNEYS AT LAW

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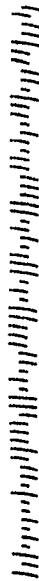
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SC Court of Appeals

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