

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM SOUTH CAROLINA
WORKER'S COMPENSATION COMMISSION

Court of Appeals' Opinion No. 5308
(filed April 1, 2015)

RECEIVED

AUG 31 2015

S.C. Supreme Court

HENTON T. CLEMMONS, JR., EMPLOYEE,.....PETITIONER,

v.

LOWE'S HOME CENTERS, INC.-HARBISON, EMPLOYER, AND
SEDGWICK CLAIMS MANAGEMENT SERVICES, INC.,
CARRIER,.....RESPONDENTS.

**REPLY TO PETITIONER'S REPLY TO
MOTION FOR PERMISSION
TO EXCEED PAGE LIMITATION
FOR RETURN IN OPPOSITION TO
PETITION FOR WRIT OF CERTIORARI**

Pursuant to Rules 240, and 242(f) & (g), SCACR, Respondents Lowe's Home Centers, Inc.-Harbison and Sedgwick Claims Management Services, Inc. hereby respond to Petitioner's Reply to Respondents' Motion for Permission to Exceed Page Limitation for Return in Opposition to Petition for Writ of Certiorari ("Petitioner's Reply"). Although Petitioner claims to have "whittled" his draft Petition from 50 pages down to 25 pages, he does not provide any substantive reasons why this Court should deny Respondents' Motion. Instead, he uses his Petitioner's Reply to argue the substance of his case and to request the right to supplement his Petition. Under Rule 242(g), Petitioner already has the right to reply to Respondents' Return to his Petition, should he choose to

exercise that right. Thus, because he has the right to file a timely Reply, and even request permission to exceed the 15-page limitation contained in Rule 242(g), there is no need for this Court to allow him to supplement his Petition.

Given the complicated presentation of this case by Petitioner, and the importance of the lengthy procedural history below to Respondents' opposition to the Petition, Respondents respectfully request this Court to grant their Motion.

August 27, 2015

Respectfully submitted,
MCANGUS, GOUDELOCK & COURIE LLC



Kelly F. Morrow, S.C. Bar No.: 72909
1320 Main Street, 10th Floor (29201)
Post Office Box 12519, Capitol Station
Columbia, South Carolina 29211-2519
(803) 779-2300

Helen F. Hiser, S.C. Bar No.: 76124
735 Johnnie Dodds Blvd., Suite 200 (29464)
Post Office Box 650007
Mount Pleasant, South Carolina 29465
(843) 576-2900

Attorneys for Respondents

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM SOUTH CAROLINA
WORKER'S COMPENSATION COMMISSION

Court of Appeals' Opinion No. 5308
(filed April 1, 2015)

RECEIVED

AUG 31 2015

S.C. SUPREME COURT

HENTON T. CLEMMONS, JR., EMPLOYEE,.....PETITIONER,

v.

LOWE'S HOME CENTERS, INC.-HARBISON, EMPLOYER, AND
SEDGWICK CLAIMS MANAGEMENT SERVICES, INC.,
CARRIER,.....RESPONDENTS.

PROOF OF SERVICE

I certify that I have served the Respondents' **Reply to Petitioner's Reply to Motion for Permission to Exceed Page Limitation for Return in Opposition to Petition for Writ of Certiorari** on Henton T. Clemmons, Jr. by depositing a copy of it in the United States Mail, postage prepaid, on August 27, 2015, addressed to his attorney of record:

Preston F. McDaniel, Esq.
MCDANIEL LAW FIRM
1315 Elmwood Ave.
Columbia, South Carolina 29201



Jami L. Richards
Legal Assistant to Helen F. Hiser
McANGUS GOUDELOCK & COURIE LLC
735 Johnnie Dodds Blvd., Suite 200
PO Box 650007
Mount Pleasant, South Carolina 29465
(843) 576-2900

Attorneys for Respondents