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ATTORNEYS AT LAW

RECEIVED

OCT 27 2015

S.C. Supreme Court

October 27, 2015

**VIA HAND DELIVERY**

Honorable Daniel E. Shearouse  
Clerk of Court  
Supreme Court of South Carolina  
Post Office Box 11330  
Columbia, South Carolina 29211

RE: Michael Cunningham v. Anderson County  
Case Tracking No: 2013-000678

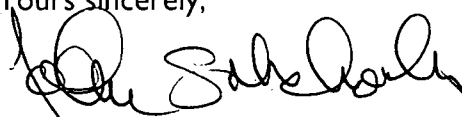
Dear Mr. Shearouse:

I received Anderson County's Return to Mr. Cunningham's Petition for Rehearing in yesterday's mail. This Return is not timely — I filed the Petition for Rehearing on September 17, 2015, and Rule 240(e) provided a 10-day deadline for Anderson County to respond. The filing is nearly a month late, as the deadline was September 27 and it was not served until October 22 or received by me until October 26. The County also made no request that the Court accept the filing out of time, and gave no reason for this lengthy delay.

I request that you not forward this very late Return to the Court. If you intend to accept this Return and forward it to the Court, then pursuant to Rule 240(f), my Reply would be due today — October 27. However, due to previous commitments and a previously scheduled trip out of state, I cannot prepare a Reply until next week. I would, therefore, request a brief extension for an opportunity to file a Reply.

Thank you for your time.

Yours sincerely,

A handwritten signature in black ink, appearing to read "John S. Nichols". The signature is fluid and cursive, with a large initial "J" and "N".

John S. Nichols

BLUESTEIN, NICHOLS, THOMPSON  
& DELGADO, LLC

JSN:emb

cc: Brian P. Murphy, Esquire  
William W. Wilkins, Esquire  
Kirsten E. Small, Esquire