

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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DEC 14 2015

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge
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.

**MOTION FOR EXTENSION OF TIME
TO FILE PETITION FOR REHEARING**

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

Pursuant to Rules 240 and 263, of the South Carolina Appellate Court
Rules, counsel for Respondents/Petitioners Trinity Manufacturing, Inc. and
Matrix Outsourcing, LLC respectfully move for an extension of time to file
their Petition for Rehearing in the above-captioned matter. This Court issued

its opinion in this case on December 2, 2015. Accordingly, the Petition for Rehearing is due on December 17. Counsel for Respondents/Petitioners respectfully requests a fifteen-day extension to file the Petition for Rehearing on January 4, 2016. This new deadline accounts for the New Year's Day holiday when state courts are closed.

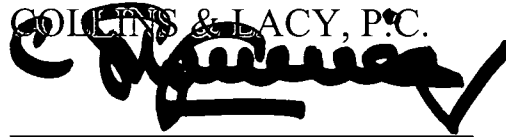
The pursuit of this extension is necessary due to counsel's current case load, including preparation for oral argument before the Court of Appeals that was held on December 7, preparing for and participating in an extended arbitration, and preparing for and participating in a summary judgment argument regarding wrongful death and survival in the Circuit Court.

Counsel for Respondents/Petitioners represents to this Court that he has consulted with counsel for Petitioners/Respondents to seek his consent regarding this motion. Mr. Nichols has graciously consented to the relief sought in the instant motion.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

COLLINS & LACY, P.C.



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Matrix Outsourcing, LLC

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TIME TO FILE PETITION FOR
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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 Petition for Rehearing on all parties by
depositing a copy of it in the United States Mail, postage prepaid, on
December 14, 2015, addressed to the following attorneys of record:

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[SIGNATURE PAGE TO FOLLOW]

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**PROOF OF SERVICE – MOTION
FOR EXTENSION OF TIME TO
FILE PETITION FOR REHEARING**

Columbia, South Carolina
December 14, 2015