

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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

S.C. SUPREME COURT

Appellate Case No. 2013-002464
Op. No. 27594 (S.C. Sup. Ct. filed December 2, 2015)

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 RETURN TO MOTION FOR COSTS**

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 Return to Petitioners/Respondents Scott F. Lawing and Tammy R.

Lawing's Motion for Costs in the above-captioned matter. Petitioners/Respondents filed their Motion for Costs and served it on February 26, 2016. Accordingly, the Respondents/Petitioners' Return to Petitioners/Respondents Motion for Costs is due on Monday, March 7, 2016. Counsel for Respondents/Petitioners respectfully requests a ten day extension to file the Return to Petitioners/Respondents' Motion for Costs on Thursday, March 17, 2016.

Counsel asserts the extension is necessary to gather and compile necessary documentation relating to Petitioners/Respondents' averments concerning costs needed to fully respond to aforesaid motion. This is counsel's first motion for an extension of time to file the Return to Petitioners/Respondents' Motion for Costs.

Counsel appreciates the Court's attention and its accommodation regarding this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.



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**MOTION FOR EXTENSION OF
TIME TO FILE RETURN TO
MOTION FOR COSTS**

Columbia, South Carolina
March 4, 2016

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PROOF OF SERVICE

Counsel for Respondents/Petitioners Trinity Manufacturing, Inc. and
Matrix Outsourcing, LLC certifies he has served Respondents/Petitioners’
Motion for Extension of Time to File Return to Motion for Costs on all
parties by depositing a copy of it in the United States Mail, postage prepaid,
on March 4, 2016, addressed to the following attorneys of record:

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[SIGNATURE PAGE TO FOLLOW]

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Outsourcing, LLC

**PROOF OF SERVICE – MOTION
FOR EXTENSION OF TIME TO
FILE RETURN TO MOTION FOR
COSTS**

Columbia, South Carolina
March 4, 2016