

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

---

APPEAL FROM SOUTH CAROLINA COURT OF APPEALS

---

Opinion Number 5369 (S.C. Ct. App. filed December 9, 2015)

---

Brian Wofford, deceased  
Employee, by and through Boisha  
Wofford, surviving spouse,

Petitioner,

v.

City of Spartanburg,

Employer and Self-Insurer,

and

South Carolina Municipal Insurance Trust Carrier,

Respondents.

**RECEIVED**

MAR 18 2016

**S.C. SUPREME COURT**

---

**PETITIONER'S MOTION TO FILE OUT OF TIME**


---

Kenneth C. Anthony, Jr.  
K. Jay Anthony  
THE ANTHONY LAW FIRM, P.A.  
250 Magnolia Street (29306)  
P.O. Box 3565 (29304)  
Spartanburg, South Carolina  
864.582.2355 p  
864.583.9772 f  
kanthony@anthonylaw.com  
Attorneys for Petitioner

Petitioners understand from the Clerk of the Supreme Court that the time for filing a Reply to Respondents' Return, as provided by Rule 242(g), SCACR, runs from the date of Respondents' Proof of Service and that Petitioner's Reply Brief was therefore filed past the allowed time. Petitioners respectfully request that the Court accept Petitioner's Reply Brief, despite it being untimely, pursuant to 263(b).

Respectfully Submitted,

**THE ANTHONY LAW FIRM, P.A.**



---

Kenneth C. Anthony, Jr., S.C. Bar No.: 0404  
K. Jay Anthony, S.C. Bar No.: 77433  
250 Magnolia Street (29306)  
P.O. Box 3565 (29304)  
Spartanburg, South Carolina  
(864) 582-2355 p  
(864) 583-9772 f

**ATTORNEYS FOR THE APPELLANT**

March 15, 2016  
Spartanburg, South Carolina

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM THE SOUTH CAROLINA  
COURT OF APPEALS

Opinion No. 5369

**RECEIVED**

MAR 18 2016

Brian Wofford , deceased  
Employee, by and through Boisha  
Wofford, surviving spouse,

Petitioner,

**S.C. SUPREME COURT**

v.

City of Spartanburg,

Employer and Self-Insurer,

and

South Carolina Municipal Insurance Trust Carrier,

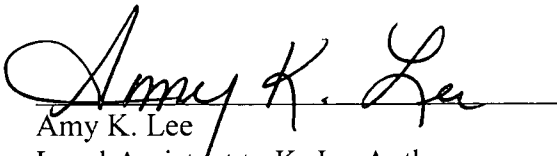
Respondents.

**PROOF OF SERVICE**

I certify that on March 15, 2016, I served the Petitioner's Motion to File Out of Time on Respondents counsel, Stephanie Lamb Pugh and Helen Hiser, by depositing a copy of same in the United States mail, postage prepaid, at the following addresses:

Ms. Stephanie Lamb Pugh  
**McAngus Goudelock & Courie, LLC**  
P.O. Box 2980  
Greenville, SC 29601

Ms. Helen F. Hiser  
**McAngus Goudelock & Courie, LLC**  
P.O. Box 650007  
Mt. Pleasant, SC 29465

  
Amy K. Lee  
Legal Assistant to K. Jay Anthony  
250 Magnolia Street (29306)  
P.O. Box 3565 (29304)  
Spartanburg, South Carolina  
Attorney for Petitioner



**THE ANTHONY LAW FIRM, P.A.**  
**Kenneth C. Anthony, Jr.**  
Attorney At Law  
P.O. Box 3565  
250 Magnolia Street  
Spartanburg, SC 29304

---

The Honorable Daniel E. Shearouse  
**Supreme Court of South Carolina**  
P.O. Box 11330  
Columbia, SC 29211

