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October 31, 2016

The Honorable Daniel E. Shearhouse
Supreme Court of South Carolina
Post Office Box 11330
1231 Gervais Street
Columbia, SC 29211

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Re: Hector Fragosa vs. Kade Construction, LLC
Appellate Case No.: 2016-001941

S.C. SUPREME COURT

Dear Mr. Shearhouse:

Pursuant to Rule 240 (d), SCACR, enclosed for filing, please find one (1) original and six (6) copies of Respondents' **Motion to Allow Late Filing of Return to Petition for Writ of Certiorari and Proof of Service** for the same, in the above referenced matter.

Pursuant to Rule 240(d), SCACR, no filing fee is required as this is being filed on behalf of a Department or Agency of the State of South Carolina.

By copy of this letter and enclosures to Jeffrey Chandler, Esquire and Stephen Samuels, Esquire, counsel of record for Petitioner, we are hereby serving a copy of Respondents' **Motion to Allow Late Filing of Return to Petition for Writ of Certiorari** as indicated by the attached proof of service.

If you have any questions or concerns, please do not hesitate to contact my office. Thank you for your attention this matter.

With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.



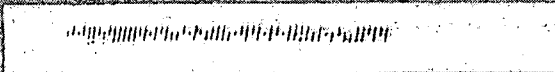
John Gabriel Coggiola

JGC/jgc

Enclosures

cc: Mr. Jeffrey C. Chandler, Esquire

cc: Mr. Stephen B. Samuels, Esquire



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S.C. SUPREME COURT

Leslie L. Leppert
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Columbia, SC 29209

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