

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

---

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

Maite D. Murphy, Circuit Court Judge

RECEIVED

JAN -9 2017

S.C. SUPREME COURT

---

Appellate Case No. 2014-001492

---

Meredith Huffman, ..... Respondent,

v.

Sunshine Recycling, LLC and  
Aiken Electric Cooperative, Inc., ..... Petitioners.

---

REPLY TO RESPONDENT'S RETURN TO PETITION FOR A WRIT OF CERTIORARI OF  
SUNSHINE RECYCLING, LLC

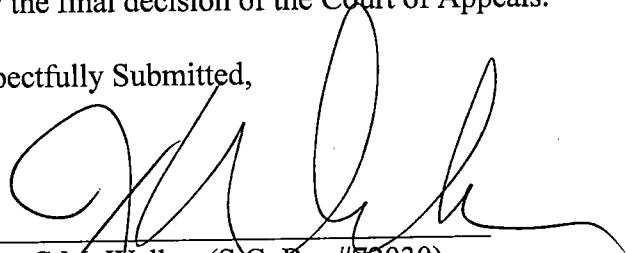
---

Breon C.M. Walker (S.C. Bar #72030)  
Jessica A. Waller (S.C. Bar # 100256)  
GALLIVAN, WHITE & BOYD, P.A  
1201 Main Street, Suite 1200  
Post Office Box 7368 (29202)  
Columbia, SC 29201  
Telephone: (803) 779-1833  
Facsimile: (803) 779-1767

ATTORNEYS FOR PETITIONER SUNSHINE  
RECYCLING, LLC

In the interest of judicial economy, Petitioner hereby submits this Reply and simply incorporates its arguments made in its Petition for a Writ of Certiorari and all other briefings, both appellate and at the circuit court, in support of its Petition. As outlined in detail in the Petition and despite Respondent's contention to the contrary, the Court of Appeals created novel issues and heretofore non-existent duties and liabilities, in addition to misapprehending the summary judgment standard and the record evidence. Petitioner therefore requests that the Supreme Court issue a writ of certiorari to review the final decision of the Court of Appeals.

Respectfully Submitted,



Breon C.M. Walker (S.C. Bar #72030)  
Jessica A. Waller (S.C. Bar # 100256)  
GALLIVAN, WHITE & BOYD, P.A  
1201 Main Street, Suite 1200  
Post Office Box 7368 (29202)  
Columbia, SC 29201  
Telephone: (803) 779-1833  
Facsimile: (803) 779-1767

ATTORNEYS FOR PETITIONER SUNSHINE  
RECYCLING, LLC

January 9, 2017

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

---

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

Maite D. Murphy, Circuit Court Judge

---

Orangeburg County C/A# 2012-CP-38-00672

Appellate Case No. 2016-2080

---

Meredith Huffman .....Respondent

vs.

Sunshine Recycling, LLC and  
Aiken Electric Cooperative, Inc.....Petitioners.

---

**PROOF OF SERVICE**

---

I, the undersigned employee of Gallivan, White & Boyd, P.A., do hereby certify that I have caused the below referenced to be served via U.S. mail, postage prepaid, *or by other delivery as indicated*, to all parties of record at the address(es) shown below.

**DOCUMENT(S) SERVED**

Reply to Respondent's Return to Petition for a Writ of Certiorari  
of Sunshine Recycling, LLC and Proof of Service

*[Continued on Next Page]*

**PARTIES SERVED**

Robert F. Goings, Esquire  
Goings Law Firm, LLC  
PO Box 426  
Columbia, SC 29202-0426

James T. Rutherford, Esquire  
The Rutherford Law Firm, LLC  
PO Box 1452  
Columbia, SC 29202-1452

Pope D. Johnson III, Esquire  
1230 Richland Street  
Columbia, SC 29201

Date: January 9, 2017

  
\_\_\_\_\_  
Legal Assistant