

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BARNWELL COUNTY  
Doyet A. Early, Circuit Court Judge

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RECEIVED

JUL 31 2017

Appellate Case No. 2017-001208  
Case No. 2013-CP-06-0059

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SC Court of Appeals

Lorenda Robinson, Elaine Nix, Archie Patterson,  
and Tami Bollerman, ..... Plaintiffs,

Of Whom, Archie Patterson and Tami Bollerman are ..... Respondents,

v.

South Carolina Department of Employment and Workforce, ..... Appellant.

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**RETURN TO MOTION TO PERMIT LATE FILING**

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Appellant, the South Carolina Department of Employment and Workforce, does not oppose Respondents' Motion to Allow a Late Response to Appellant's Request for Rehearing. Appellant would reaffirm, however, that service by mail was made on all counsel for Appellant at their usual addresses, as used a number of

times in the past in this case. If any of the addresses have changed, Appellant would ask that Respondents' counsel so advise.

Respectfully submitted,

DAVIDSON & LINDEMANN, P.A.

BY: 

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WILLIAM H. DAVIDSON, II #1558  
KENNETH P. WOODINGTON #6213  
1611 Devonshire Drive  
Post Office Box 8568  
Columbia, South Carolina 29202  
(803) 806-8222

*Counsel for Appellant South Carolina  
Department of Employment and Workforce*

Columbia, South Carolina

July 31, 2017

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**CERTIFICATE OF SERVICE**

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The undersigned employee of Davidson & Lindemann, P.A., counsel for the Appellant, does hereby certify that service of the **Reply to Return to Petition for Rehearing, etc., and Return to Motion to Permit Late Filing** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 31st day of July 2017:

Daniel W. Williams, Esquire  
Bedingfield & Williams, LLC  
Post Office Box 616  
Barnwell, South Carolina 29812

C. Bradley Hutto, Esquire  
Williams & Williams  
Post Office Box 1084  
Orangeburg, South Carolina 29115

Alexander D. Pattera, Esquire  
Pattera Law Firm, LLC  
104 South Calhoun Street  
Greenville, South Carolina 29601

Stephen R. Suggs, Esquire  
South Carolina Appleseed  
Legal Justice Center  
Post Office Box 7187  
Columbia, South Carolina 29202



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# DAVIDSON & LINDEMANN, P.A.

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July 31, 2017

Daniel C. Plyler  
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Of Counsel  
Kenneth P. Woodington

Writer's Email: [kwoodington@dml-law.com](mailto:kwoodington@dml-law.com)

**Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RECEIVED

JUL 31 2017

SC Court of Appeals

RE: Lorenda Robinson, Elaine Nix, Archie Patterson, Tami Bollerman, Fred Alexander and Pamela Wooten v. South Carolina Department of Employment and Workforce  
Court of Appeals Tracking Number: 2017-001208  
Civil Action Number: 2013-CP-06-0059  
Our File Number: 79.9168

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Reply to Return to Petition for Rehearing, etc., and Return to Motion to Permit Late Filing** in the above referenced matter. Please file the originals and return clocked-in copies to me by way of my courier. I have not enclosed a the filing fee since the Appellant is exempt pursuant to Rule 203(d)(1)(B)(iii), SCACR.

By copy of this letter, I am serving copies on all counsel of record. Thank you for your assistance in this matter.

With highest regards, I am

Sincerely yours,

DAVIDSON & LINDEMANN, P.A.



Kenneth P. Woodington

KPW/jmb  
Enclosures

The Honorable Jenny Abbott Kitchings  
July 31, 2017  
Page Two

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cc: (w/ Enclosure)

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