

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
G. Thomas Cooper, Jr., Circuit Court Judge

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Appellate Case No. 2014-001373  
Case No. 2007-CP-40-3365

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**RECEIVED**  
DEC 04 2017  
SC Court of Appeals

Estate of Edward James Mims,  
Laura M. Cole, Personal Representative, ..... Appellant,

v.

The South Carolina Department of Disabilities and  
Special Needs, Kathi Lacy, and Stan Butkus, ..... Respondents.

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**RESPONDENTS' RETURN TO  
MOTION TO PUBLISH**

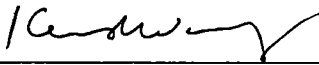
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Appellant has filed a motion requesting that the opinion in this case be published. Citing the part of the opinion that deals with the statute of limitations, Appellant states that "The decision is of great public interest and importance, is of great importance to members of the Bar, and to persons who have intellectual disabilities, their families and disability advocates." Motion, ¶ 4.

Respondents agree that this issue is of great public importance, as are others in the opinion, but would ask that the Court hold in abeyance any decision to publish the opinion until the Court acts on Respondents' Petition for Rehearing.

Respectfully submitted,

DAVIDSON & LINDEMANN, P.A.

BY:   
\_\_\_\_\_  
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 Respondents*

Columbia, South Carolina

December 4, 2017

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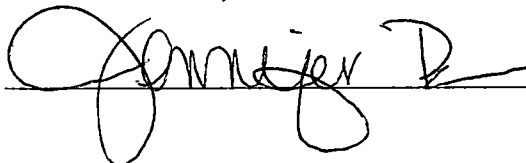
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**CERTIFICATE OF SERVICE**

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The undersigned employee of Davidson & Lindemann, P.A., counsel for the Respondents, does hereby certify that service of **Respondents' Return to Motion to Publish** in the above-captioned matter was made upon Appellant's counsel by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 4th day of December 2017:

Patricia L. Harrison, Esquire  
611 Holly Street  
Columbia, South Carolina 29205

  
\_\_\_\_\_

DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

William H. Davidson, II  
Andrew F. Lindemann\*  
James M. Davis, Jr.†  
Robert D. Garfield  
Michael B. Wren

1611 Devonshire Drive, Second Floor  
Post Office Box 8568  
Columbia, South Carolina 29202-8568  
Telephone: (803) 806-8222  
Facsimile: (803) 806-8855  
www.dml-law.com

December 4, 2017

Daniel C. Plyler  
Joel S. Hughes†  
David A. DeMasters  
Steven R. Spreuwiers  
Brandon M. Briggs  
Ryan J. Patane

\*Also Admitted In North Carolina  
†Certified Mediator

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

DEC 04 2017

SC Court of Appeals

RE: Estate of Edward James Mims, Laura M. Cole, Personal Representative v. The South Carolina Department of Disabilities and Special Needs, Kathi Lacy, and Stan Butkus  
Appellate Case Number: 2014-001373  
Civil Action Number: 2007-CP-40-3365  
Claim Number: 44654  
Our File Number: 104.7785

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of **Respondents' Return to Motion to Publish** in the above referenced matter. Please file the original and return a clocked-in copy to me by way of my courier.

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  
December 4, 2017  
Page Two

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cc: (w/ Enclosure)

Patricia L. Harrison, Esquire  
611 Holly Street  
Columbia, South Carolina 29205