

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

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

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DEC 27 2017
SC Court of Appeals

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

v.

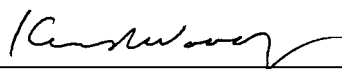
The South Carolina Department of Disabilities
and Special Needs, Kathi Lacy, and Stan Butkus, Respondents.

**RESPONDENTS' RETURN TO MOTION TO FILE
AN AMICI CURIAE BRIEF IN SUPPORT OF APPELLANT**

In response to the motion of Protection and Advocacy for People with Disabilities, Inc., the National Academy of Elder Law Attorneys, and the South Carolina Chapter of the National Academy of Elder Law Attorneys to file an amici curiae brief with regard to the statute of limitations, Defendants-Respondents do not oppose the motion, provided they are given adequate time to respond to the

contentions made in that proposed brief, as SCACR Rule 213 indicates. In view of the holiday period between Christmas and New Year's, Respondents would request until January 12, 2018, in which to respond. The arguments presented by the amici are more detailed than those presented by Plaintiff-Appellant, and therefore require a more detailed response.

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 22, 2017

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CERTIFICATE OF SERVICE

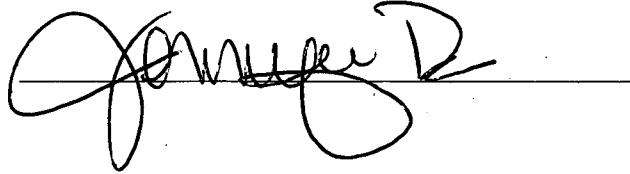
The undersigned employee of Davidson & Lindemann, P.A., counsel for the Respondents, does hereby certify that service of **Respondents' Return to Motion to File an Amici Curiae Brief in Support of Appellant** in the above-captioned matter was made upon Appellant's counsel by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 22nd day of December 2017:

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

Kathleen A. Warthen, Esquire
Protection and Advocacy for
People with Disabilities, Inc.
3710 Landmark Drive - Suite 208
Columbia, South Carolina 29204

Andrew J. Atkins, Esquire
Millender Elder Law LLC
1441 Main Street - Suite 725
Columbia, South Carolina 29201

Franchelle Millender, Esquire
Millender Elder Law LLC
1441 Main Street - Suite 725
Columbia, South Carolina 29201

A handwritten signature in black ink, appearing to read "Franchelle Millender", is written over a horizontal line. The signature is stylized and cursive.

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 22, 2017

Daniel C. Plyler
Joel S. Hughes
David A. DeMasters
Steven R. Spreetowers
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

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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

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Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Respondents' Return to Motion to File an Amici Curiae Brief in Support of Appellant** in the above referenced matter. Please file the original and return a clocked-in copy to me in the enclosed envelope.

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 22, 2017
Page Two

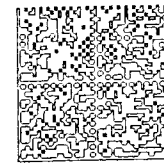
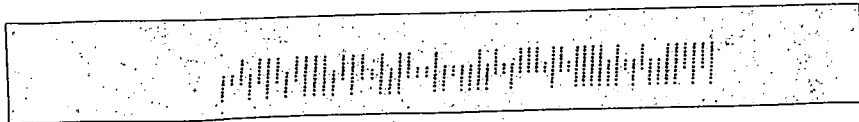
cc: (w/ Enclosure)

Patricia L. Harrison, Esquire
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Columbia, South Carolina 29205

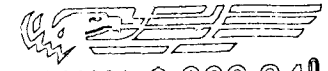
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Attorneys and Counsellors at Law

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