

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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FEB 26 2018

S.C. SUPREME COURT

On Petition for Writ of Certiorari  
Of the Decision of South Carolina Court of Appeals

Appellate Case No.: 2018-000061

*United Auto Insurance Company,*

*Respondent,*

v.

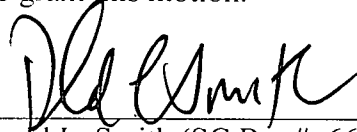
*Willie Freeman, Michael Craft,  
Kimberly Sanford and Antonio Craft,*

*Petitioners.*

**MOTION FOR LEAVE TO ALLOW LATE FILING  
OF PETITIONERS' REPLY TO RESPONDENT'S  
RETURN TO PETITION FOR CERTIORARI**

Petitioners respectfully request this Honorable Court to allow them to file and serve their Reply to Respondent's Return to Petition for Certiorari outside of time. The undersigned counsel was out of the office on work-related matters as he had trials for four (4) cases for all of the two-week period beginning February 5- 16, 2018. Appellants pray that the lack of resulting prejudice to opposing counsel will allow for the Court to grant this motion.

February 21, 2018



Donald L. Smith (SC Bar #: 6699)  
Attorney for Appellants  
122 N. Main Street  
Anderson SC 29621  
Telephone: (864) 642-9284  
Facsimile: (864) 642-9285  
[attorneydonaldsmith@gmail.com](mailto:attorneydonaldsmith@gmail.com)

**PROOF OF SERVICE**  
**MOTION TO ALLOW LATE FILING OF REPLY TO RESPONDENT'S RETURN ON**  
**PETITION FOR CERTIORARI, REPLY TO RESPONDENT'S RETURN ON PETITION**  
**FOR CERTIORARI AND PETITION FOR A WRIT OF CERTIORARI**  
**AND ITS APPENDIX WITH CORRECT CAPTION**

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v.

*Willie Freeman, Michael Craft,*  
*Kimberly Sanford and Antonio Craft,*

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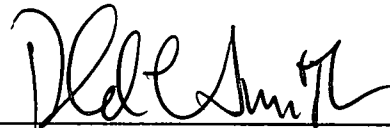
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**PROOF OF SERVICE**

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I certify that I have served a copy of Petitioners' Motion To Allow Late Filing Of Reply To Respondent's Return On Petition For Certiorari, Reply To Respondent's Return On Petition For Certiorari, and Petition For A Writ Of Certiorari And Its Appendix With Correct Caption and Proof of Service , upon The Honorable Daniel Shearouse, Clerk of Court South Carolina Supreme Court, PO Box 11330, Columbia SC 29211, and Respondent, by and through counsel of record, George V. Hanna IV, Esquire and Trevor P. Eddy, Esquire at 1508 Washington St., PO Box 12009, Columbia, SC 29211 by depositing a copy in the United States Mail, postage prepaid, on February 21, 2018.

February 21, 2018



Donald L. Smith (SC Bar#6699)  
122 N. Main Street  
Anderson SC 29621  
Telephone: (864) 642-9284  
Facsimile: (864) 642-9285  
[attorneydonaldsmith@gmail.com](mailto:attorneydonaldsmith@gmail.com)  
*Attorney for Petitioners*

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LETTER TO THE SUPREME COURT CLERK OF COURT  
FILING OF PETITION FOR WRIT OF CERTIORARI

February 21, 2018

The Honorable Daniel Shearouse  
Clerk of Court  
South Carolina Supreme Court  
Post Office Box 11330  
Columbia SC 29211

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FEB 26 2018

S.C. SUPREME COURT

**RE: United Auto Insurance Company v. Willie Freeman, Michael Craft,  
Kimberly Sanford and Antonio Craft  
Appellate case No. 2018-000061**

Dear Mr. Shearouse:

Please find enclosed the following materials for filing:

- 1) Motion to Allow Late Filing of Petitioner's Reply to Respondent's Return to the Petition for Writ of Certiorari;
- 2) Petitioner's Reply to Respondent's Return to the Petition for Writ of Certiorari;
- 3) A check amounting to \$25.00 as motion fee;
- 4) Proof of Service for the same.

Also, per the Honorable Court's instructions, the undersigned is submitting the Petition for Certiorari and Appendix, filed on January 11, 2018, with correct caption.

Sincerely,



Donald L. Smith, (SC Bar#6699)

122 N. Main Street

Anderson SC 29621

Telephone: (864) 642-9284

Facsimile: (864) 642-9285

[attorneydonaldsmith@gmail.com](mailto:attorneydonaldsmith@gmail.com)

*Attorney for Petitioners*

*Willie Freeman and Michael Craft*

cc: George V. Hanna IV, Esquire  
Trevor P. Eddy, Esquire