

THE STATE OF SOUTH CAROLINA**In The 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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MAR 20 2018

SC Court of Appeals

Appellate Case No. 2014-001373

**Appellant's Motion for an Extension of Time to Respond
to Respondent's Second Petition for Rehearing**

By hand delivery, on Wednesday, March 8, 2018, Respondents filed a motion captioned "Second Petition for Rehearing" in this Court, along with a Certificate of Service stating that the motion was placed in the mail that same day. But the envelope shows that the envelope was not processed by the Postal Service until Saturday, March 10, 2018. The motion was received by Plaintiff's counsel on March 12. Exhibit 1.

Plaintiff respectfully requests an extension of time to respond to the motion due to other deadlines and due to the limited time provided to respond, since the motion was not delivered to opposing parties using the same method as Respondents used to deliver the motion to the Court. Based on the date Respondents claim to have mailed the motion, Plaintiff's return would be due on March 19, 2018. But, based on the Postal Service processing mark, the Return would be due on March 20, 2018. Plaintiff respectfully requests that the deadline for filing a Return be extended until March 28, 2018.

This motion is being filed electronically, and by fax to the Court and served by fax to opposing counsel. It is also being served by email to opposing counsel and counsel for amici. A copy is also being deposited in the mail on March 19, 2018, along with a check to cover the filing fee.

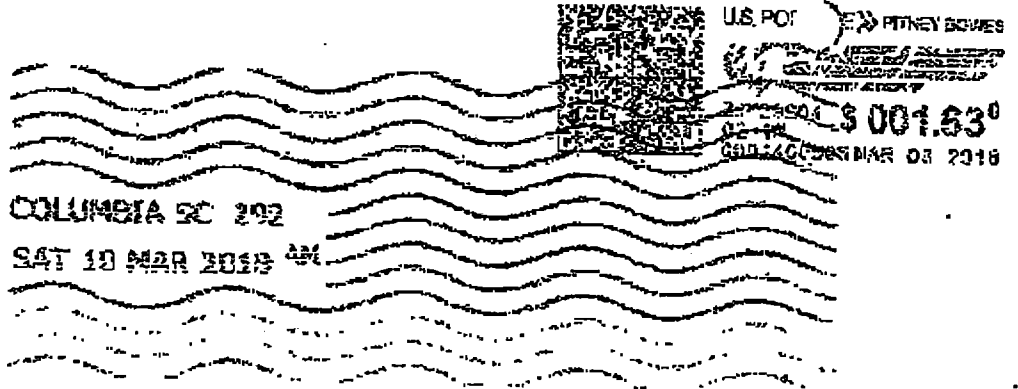
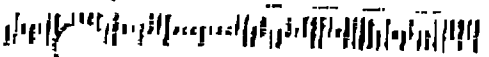
Respectfully submitted,

s/ Patricia Logan Harrison
Patricia Logan Harrison
611 Holly Street
Columbia, South Carolina 29205
pharrison@loganharrisonlaw.com

Attorney for the Appellant

March 19, 2018

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104 2785
DAVIDSON & LINDEMANN, P.A.

Attorneys and Counsellors at Law

Post Office Box 8568
Columbia, South Carolina 29202-8568

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

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Law Office of Patricia L. Harrison

611 Holly Street
Columbia SC 29205
(803) 256-2017
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FAX TRANSMISSION COVER SHEET

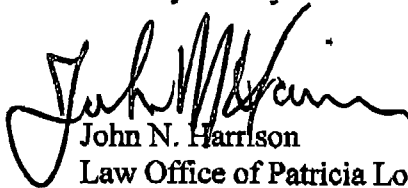
Date: March 19, 2018
To: Mary Caitlyn, SCCA Copy: Kenneth Woodington, Esq.
Fax: 734-1839 806-8855
Re: Estate of Edward Mims v. SCDDSN, Case No. 2014-001373
Sender: John N. Harrison

YOU SHOULD RECEIVE 4 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (803) 256-2017.

Dear Mary Caitlyn:

Paper copies (along with check and Certificate of Service) are being mailed tonight to the Court, Opposing Counsel and Amici Counsel.

Thank you for your assistance.



John N. Harrison
Law Office of Patricia Logan Harrison
256-2017

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SC Court of Appeals

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