

86240

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.

RECEIVED
MAR 21 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

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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MAR 21 2018
SC Court of Appeals

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

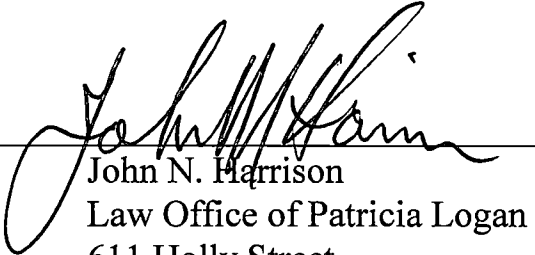
v.

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

CERTIFICATE OF SERVICE

The Appellant's **Motion for Extension to File Return to Petition for Rehearing** was sent to Respondents' Counsel, Kenneth P. Woodington, Esq., Davidson, Wren & Plyler, P.O. Box 8568, Columbia, SC 29202-8568 by fax and First Class United States Mail; and to Amici Counsel: Kathleen Warthen, Esq., Protection & Advocacy for People with Disabilities, 3710 Landmark Dr., Suite 208, Columbia, SC 29204 & Franchelle C. Millender, Esq., Millender Elder Law LLC, 1441 Main St., Suite 725, Columbia, SC 29201 by First Class United States Mail.

March 19, 2018


John N. Harrison
Law Office of Patricia Logan Harrison
611 Holly Street
Columbia, SC 29205

PATRICIA LOGAN HARRISON
ATTORNEY AT LAW
611 HOLLY STREET
COLUMBIA, SOUTH CAROLINA 29205

TELEPHONE (803) 256-2017

FAX (803) 256-2213

March 19, 2018

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, South Carolina 29211 803-734-1890

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MAR 21 2018

SC Court of Appeals

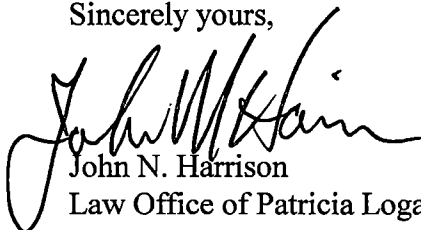
Re: **Estate of Edward Mims v. SCDDSN**
Appellate Case No. 2014-001373

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the Appellant's **Motion for Extension to File Return to Appellee's Petition for Rehearing**. Also enclosed is a check for the \$25.00 filing fee and a **Certificate of Service**. Please clock and return in the enclosed, stamped envelope the copy of this letter, one copy of the **Motion** and the copy of the **Certificate**.

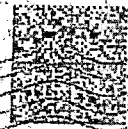
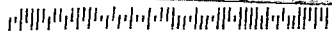
Thank you for your assistance in this matter.

Sincerely yours,


John N. Harrison
Law Office of Patricia Logan Harrison

Enclosures

c: Kenneth P. Woodington, Esq.
Kathleen Warthen, Esq.
Franchelle C. Millender, Esq.



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\$2.05

MAR 21 2018

From 29205

COLUMBIA SC 292

WED 21 MAR 2018 AM

PATRICIA L. HARRISON
ATTORNEY AT LAW
611 HOLLY STREET
COLUMBIA, SOUTH CAROLINA 29205

TO:

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

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MAR 21 2018

SC Court of Appeals