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APR 26 2018

THE STATE OF SOUTH CAROLINA
In The Supreme Court

S.C. SUPREME COURT

APPEAL FROM THE S.C. WORKERS'
COMPENSATION COMMISSION

Opinion No. 2017-UP-443 (S.C. Ct. App. filed Nov. 29, 2017)

Lettie Spencer, Respondent,

v.

NHC Parklane, Employer/Petitioner,

and

Premier Group Insurance Co., Inc. Carrier/Petitioner.

NOTICE OF MOTION AND MOTION TO
FILE REPLY TO RETURN OUT OF TIME

COME NOW THE PETITIONERS and respectfully move before this Court to allow the filing and service of the enclosed Reply to the Respondents' Return to the Petition for Writ of Certiorari in this matter, and outside of the deadline for such filing and service.

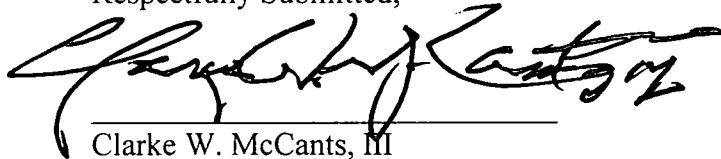
In support of this Motion the Petitioners respectfully show that this Court granted to the Respondent an extension until April 13, 2018 to file a Return to the Respondents' Petition. Counsel for the Respondents calendared the time prescribed by Rule based upon that date and mistakenly overlooked the fact that the Respondent actually filed a Return on April 4, 2018. In addition, Counsel for the Respondents was involved in the jury trial of a civil action in the Court of

Common Pleas for Aiken County on April 23, 2018, was unable to complete and file and serve the enclosed Reply until this date.

Counsel for the Petitioner has consulted with Counsel for the Respondent and he consents to allowing the Petitioner to file this Reply out of time.

For these reasons the Petitioners respectfully pray that this Court grant their Motion and consider the enclosed Reply as part of this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Clarke W. McCants, III", written over a horizontal line.

Clarke W. McCants, III
Nance, McCants & Massey
PO Box 2881
Aiken, SC 29802
(803) 649-6200 Ext. 21
Counsel for Petitioners

Dated: April 24, 2018

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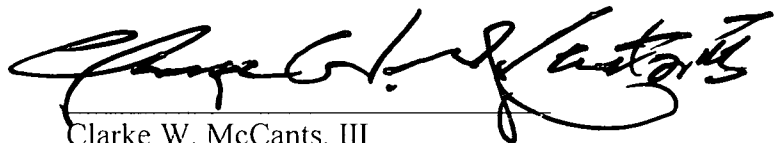
and

Premier Group Insurance Co., Inc. Carrier/Petitioner.

PROOF OF SERVICE

I certify that I have served a copy of the attached Notice of Motion to File Reply Out of Time on counsel for the Respondent, Andrew W. Creech, by depositing a copy of the document in the United States Mail, postage prepaid, on April 24, 2018, addressed to Andrew W. Creech, Elrod Pope Law Firm, P.O. Box 11091, Rock Hill, SC, 29731

April 24, 2018



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April 24, 2018

The Honorable Daniel Shearouse
Supreme Court Clerk of Court
P. O. Box 11330
Columbia, SC 29211

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In Re: Lettie Spencer v. NHC Parklane, Inc., et al
WCC File No. 112078
Appellate Case No.: 2015-002112

S.C. SUPREME COURT

Dear Mr. Shearouse:

Please file in the above-referenced matter the enclosed Notice of Motion and Motion to File Reply Out of Time and the original and six copies of the Petitioner's Reply to Respondent's Return to Petition for Writ of Certiorari, along with Proofs of Service of these documents thereof upon Counsel for the Respondent. Also enclosed is this firm's check for the filing fee for the Motion.

Thank you for your consideration as part of this matter.

With best regards, I remain

Very truly yours,



Clarke W. McCants, III

CWMIII/epe
Enclosures
cc: Andrew W. Creech