

RECEIVED

JUN 19 2018

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA

In the Supreme Court

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

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

Op. No. 5539
S.C. Ct. App. filed February 21, 2018
Rehearing denied April 13, 2018

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

v.

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

Appellate Case No. 2018-000867

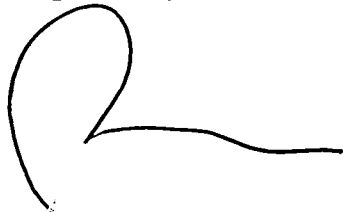
Motion to File
Return in Opposition to Petition for *Certiorari*
Out of Time

The Petition for Certiorari was filed by Petitioners by hand delivery to this Court on May 9, 2018. The Petition was served by mail on the Respondent on May 11, 2018. Respondent filed a Return on Monday, June 11, 2018. Respondent hereby moves for permission to file out of time.

Grounds for this motion are that Respondent's counsel had multiple hearings during that time, in addition to deadlines in the Fourth Circuit and a family illness, while in the process of moving her office to the upstate. In addition, the record is extensive and the issues are complex, requiring considerable time to review to prepare the Return. The deadline for filing the return was accidentally docketed from the date of receipt of the Petition, rather than the date the Petition was hand delivered to the Court.

Respondent prays for an order allowing the filing of the Return three days out of time.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'P. Logan Harrison', written in a cursive style.

Patricia Logan Harrison
611 Holly Street
Columbia, South Carolina 29105
803 360 5555
pharrison@loganharrisonlaw.com

June 15, 2018

THE STATE OF SOUTH CAROLINA

In the Supreme Court

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Certificate of Service

The undersigned does hereby certify that the Motion to File the Return in
Opposition to the Petition for Certiorari by placing copies in the United States

Mail, first class postage prepaid, at the addresses below on this 15th day of June,
2018.



Patricia Logan Harrison

Kenneth Woodington
Davidson, Wren and Pyle
PO Box 8568
Columbia, South Carolina 29202-8568

Andrew J. Atkins
Franchelle Millender
Millender Elderlaw
1441 Main Street, Suite 725
Columbia, South Carolina 29201

Kathleen Warthen
P&A
3710 Landmark Drive, Suite 208
Columbia, South Carolina

Respectfully submitted,
Patricia Logan Harrison
611 Holly Street
Columbia, South Carolina 29105
803 360 5555
pharrison@loganharrisonlaw.com

June 15, 2018