

WILLSON JONES CARTER & BAXLEY, P.A.

ATTORNEYS AT LAW

GREENVILLE CHARLESTON COLUMBIA CHARLOTTE RALEIGH ATLANTA

John Gabriel Coggiola
Direct (803) 227-2889
Fax (803) 782-2527
jgcoggiola@wjlaw.net

3600 Forest Drive, Suite 204
Columbia, SC 29204
www.wjclaw.com

September 20, 2019

Via Hand Delivery

The Honorable Daniel E. Shearhouse
The South Carolina Supreme Court
P.O. Box 11330
Columbia, SC 29211

RECEIVED

SEP 20 2019

S.C. SUPREME COURT

Re: Otis Nero vs. SC Department of Transportation
Appellate Case No. 2015-001277

Dear Mr. Shearhouse:

Pursuant to Rule 242(c), SCACR, please find enclosed for filing one (1) original and six (6) copies of our **Petition for Writ of Certiorari**, and **Proof of Service** for the same, in the above referenced matter. I have also enclosed two (2) copies of the **Appendix**, one (1) bound and one (1) unbound pursuant to Rule 267(d), SCACR.

Please note that pursuant to Rule 242(c), SCACR, no filing fee is required in this case since it is being filed by the State of South Carolina or one of its agencies or departments.

By copy of this letter and enclosures to Stephen Wukela, counsel of record for Respondent, we are serving a copy of our **Petition for Writ of Certiorari** and **Appendix** upon him as indicated by the attached Proof of Service. We are also providing a copy of our **Petition for Writ of Certiorari** to the South Carolina Court of Appeals pursuant to Rule 242(c), SCACR.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your consideration.

Very truly yours,

WILLSON JONES CARTER & BAXLEY, P.A.



John Gabriel Coggiola

JGC/jgc

Enclosure(s)

cc: Mr. Stephen J. Wukela, Esq.
The Honorable Jenny Abbott Kitchings
Ms. Hanna Borne (via email)