

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM OCONEE COUNTY  
Court of Common Pleas  
J.C. Nicholson, Jr., Circuit Court Judge

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SC Court of Appeals

2006-CP-37-0030

Scott F. Lawing and Tammy R. Lawing..... Appellants,

v.

Univar USA, Inc., Trinity Manufacturing, Inc.  
and Matrix Outsourcing, LLC, Defendants,

Of Whom Trinity Manufacturing, Inc. and  
Matrix Outsourcing, LLC, are..... Respondents.

**RESPONDENTS' MOTION TO FILE  
FINAL BRIEF OUT OF TIME**

TO THE HONORABLE JUDGES OF THE COURT OF APPEALS:

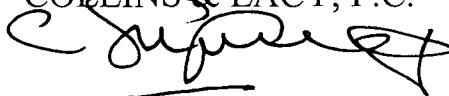
Respondents Trinity Manufacturing, Inc. and Matrix Outsourcing, LLC respectfully move this Court for an Order granting them leave to file their Final Brief out of time.

Counsel for Respondents represent to this Court that they have been conscientious in their efforts to prepare their Final Brief; however, because

Respondents Trinity Manufacturing, Inc. and Matrix Outsourcing, LLC incorporated by reference portions of Univar USA, Inc.'s Initial Brief in their Initial Brief and since that time Univar USA, Inc. has been dismissed from this action, it was necessary for Respondents Trinity Manufacturing, Inc. and Matrix Outsourcing, LLC to amend their Final Brief to include the portions of the brief that were initially incorporated by reference and to prepare a substantial Addendum to the Record on Appeal. Creation of the addendum proved to be very time and labor intensive due to the expansive size of the record.

Appellants would greatly appreciate the Court's time, attention, and assistance with regard to this request for leave to file their Final Brief out of time. Appellants represent to this Court that counsel for Appellants has consented to this motion.

Respectfully submitted,  
COLLINS & LACY, P.C.



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Columbia, South Carolina  
February 8, 2013

Counsel for Respondents Trinity  
Manufacturing, Inc. and Matrix  
Outsourcing, LLC

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**PROOF OF SERVICE**

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Counsel for Respondents Trinity Manufacturing, Inc. and Matrix Outsourcing, LLC certifies it has served the Respondents' Motion to File Final Brief Out of Time on all parties by depositing a copy of it in the United States Mail, postage prepaid, on February 8, 2013, addressed to the following attorneys of record:

**COUNSEL SERVED:**

John S. Nichols, Esquire  
Post Office Box 7965  
Columbia, South Carolina 29202  
*Counsel for Appellants Scott F. Lawing  
and Tammy R. Lawing*

Respectfully submitted,

COLLINS & LACY, P.C.



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