

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Appellate Case No.: 2020-000768

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JUL 02 2020

S.C. SUPREME COURT

Ralph C. Williams, Sr., and Linda Williams, Petitioners,

v.

Patricia A. Johnson, Josette Peppers
and UniHealth Post-Acute Care-Orangeburg, LLC..... Respondents.

**MOTION TO AMEND THE PETITION FOR CERTIORARI TO THE COURT TO
ACCEPT THE CERTIFICATION BY COUNSEL FOR THE PETITIONER IN RULE
242 (d) 1 OUT OF TIME**

The Petitioner omitted the Certification by counsel that the Petition for rehearing was made and finally ruled upon by the Court of Appeals.

The Petitioner would show unto the Court that the substance of the certification requirement in Rule 242 (d) 1 was filed as part of the Appendix in the same date as the Petition for Certiorari. See the Court of Appeals denial of the Petition for Rehearing dated March 27, 2020, (App. p. 880), and Petition for Rehearing, January 30, 2020. (App. pgs. 877 – 879)

While the Petition and Appendix were served and sent to the Clerk of the Supreme Court on May 26, 2020, the Petitioners' Counsel Certification was not.

However, the substance of Counsel's certification was served and mailed to the Court and to Respondents by way of the Appendix.

As a result of the COVID 19 pandemic, our firm has had to change the way we practice law. We have gone mostly to remote work from our homes, without the face to face collaboration with our lawyers and staff, as we had enjoyed before.

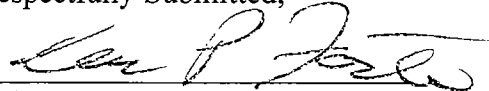
While certainly not making excuses for our mistake, it has been emotionally taxing in these times, and with no end in sight. I take full responsibility for the mistake, and in hopes that the court seeks fit to grant this Motion, and decide the Petition on its merits. The Petitioner apologizes to the Court for the mistake, and is truly sorry for the error.

The Petitioner is informed and believes that Respondents suffer no prejudice from the Petitioner's mistake. None has been alleged.

Petitioner attaches herewith Counsel's Certification that a Petition for Rehearing was made and finally ruled on by the Court of Appeals.

Petitioner believes that justice in the case should be decided by the merits of the Petition, not solely by Petitioner's mistake.

Respectfully Submitted,



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June 29, 2020