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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

CERTIFIED QUESTIONS FROM THE UNITED STATES COURT OF APPEALS FOR THE
FOURTH CIRCUIT

Paul V. Niemeyer, Diana G. Motz, and Henry F. Floyd, Judges for the United States Court of
Appeals for the Fourth Circuit

Appellate Case No. 2018-001124

Crystal L. Wickersham; Crystal L. Wickersham, as Personal Representative of the Estate of
John Harley Wickersham, Jr.,.....Plaintiffs,

v.

Ford Motor Company,Defendant.

PLAINTIFFS' RETURN TO FORD MOTOR COMPANY'S PETITION FOR REHEARING

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ATTORNEYS FOR PLAINTIFFS

Pursuant to the Court’s instruction, Plaintiffs, Crystal L. Wickersham; Crystal L. Wickersham, as Personal Representative of the Estate of John Harley Wickersham, Jr., submit this return to Ford Motor Company’s petition for rehearing of the Court’s decision in *Wickersham v. Ford Motor Co.*, Op. No. 28003 (S.C. Sup. Ct. filed December 9, 2020) (Shearouse Adv. Sh. No. 48 at 36).

Ford petitioned for rehearing for the “limited purpose” of asking the Court to “delete” certain statements about Ford’s argument and the procedure at trial. (Pet. for Rehearing pp. 1, 4). The joint appendix accurately reflects the trial events. The Court’s “no” answer to the second certified question is not challenged on rehearing. The issue Ford raises on rehearing cannot change the answer to the second certified question. Therefore, the petition for rehearing is not relevant to the Court’s opinion and there is no need or purpose for rehearing.

Respectfully submitted,

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December 29, 2020
Hampton, South Carolina

Counsel for Plaintiffs