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Jun 30 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Williamsburg County Court of Common Pleas
Kristi F. Curtis, Circuit Court Judge
Case No.: 2014-CP-45-00132

Case No.: 2021-000835

**South Carolina Farm Bureau Mutual
Insurance Company,**

Plaintiff

v.

**Marion L. Driggers, Shiralee Driggers,
Tammy D. Floyd, Estate of Arthur
McKenzie, The Travelers Home and
Marine Insurance Company, The
United States of America acting by and
through Its agency, The Internal
Revenue Service, and The South
Carolina Tax Commission,**

Defendants

**of whom Marion L. Driggers is the Appellant and The Travelers Home and Marine
Insurance Company is the Respondent.**

**MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF
FOR DEFENDANT-APPELLANT**

AND NOW, comes Defendant-Appellant, Marion L. Driggers, by and through
his undersigned counsel, and in support of this Motion for Extension of Time to File
Reply Brief for Appellant, avers as follows:

1. Appellant's reply brief is currently due on June 30, 2022.

2. The issues in the case are complex and counsel is working diligently to complete Appellant's reply brief. However, Counsel has been out of the office due to a family member's illness, which has hampered counsel's ability to complete the Appellant's reply brief within the time that is presently available.


3. Accordingly, it is respectfully requested that the Court grant an additional 30-day extension of time for the filing of Appellant's reply brief and the Record on Appeal.

4. There will be no prejudice to Respondent in granting this additional extension of time to file the Reply Brief, and Appellant does not believe that any additional extension will be necessary or requested.

5. This Motion is made in good faith, and is not sought for purposes of delay but so that justice may be served.

Accordingly, pursuant to Rule 263(b), Appellant requests that the Court grant an additional thirty (30) days within which to file his reply brief.

Respectfully submitted,



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Attorneys for the Defendant-Appellant,

Dated: June 30, 2022
Myrtle Beach, South Carolina

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CERTIFICATE OF SERVICE

I certify that on this date a copy of the foregoing APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF was served on each party or counsel of record by mailing or hand delivery in the manner prescribed by the applicable Rule of Civil Procedure.

This 30th day of June, 2022.



Catherine Plocinik, Paralegal
Davis & Boyd LLC