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Jun 30 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM WILLIAMSBURG COUNTY
Court of Common Pleas

The Honorable Kristi F. Curtis
Circuit Court Judge

Case No.: 2014-CP-45-00132
(Court of Appeals Case No.: 2021-000835)

South Carolina Farm Bureau Ins. Co. Plaintiff,

v.

Marion L. Driggers, Shiralee Driggers, Tammy D. Floyd, Arthur McKenzie, a/k/a Arther McKenzie, The Travelers Home and Marine Insurance Company, The United States of America acting by and through Its agency, The Internal Revenue Services and The South Carolina Tax Commission, Defendants,

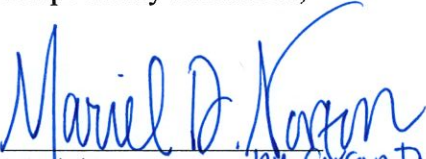
Of whom Marion L. Driggers is Appellant and The Travelers Home and Marine Insurance Company is the Respondent.

**RESPONDENT THE TRAVELERS HOME AND MARINE INSURANCE
COMPANY’S RETURN TO APPELLANT’S MOTION FOR EXTENSION OF
TIME TO FILE REPLY BRIEF**

Respondent The Travelers Home and Marine Insurance Company files this Return pursuant to Rule 240(e), SCACR to Appellant Marion L. Driggers’ (“Appellant”) June 30, 2022 Motion for Extension of Time to File Reply Brief for Defendant-Appellant. Respondent does not object to Appellant counsel’s request for an extension of time to file Appellant’s reply brief given his absence from work due to a family member’s illness. Respondent objects to the length of the extension Appellant requests. Appellant seeks “an

additional thirty (30) days within which to file his reply brief.” Rule 208(a)(3), SCACR provides that the deadline to file a reply brief is just ten days from service of the brief of respondent. Given the age of this case, which started in 2014, and the multiple requests for extensions of time filed by Appellant in regards to his initial brief, Respondent believes that a thirty-day extension is excessive. Respondent respectfully requests that the extension of time granted to Appellant be limited to an additional ten (10) days with any additional extensions to be granted only under extraordinary circumstances.

Respectfully submitted,


Mariel D. Norton *by Susan DuBose*

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June 30, 2022



BAKER RAVENEL BENDER
ATTORNEYS AT LAW

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SC Court of Appeals

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June 30, 2022

E-mail: ctappfilings@sccourts.org
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: South Carolina Farm Bureau Mutual Ins. Co., Appellant v. Marion L. Driggers, et al.
Of Which The Travelers Home and Marine Insurance Company is the Respondent
Appellate Case No.: 2021-000835
Our File No.: 7746.1749

Dear Ms. Kitchings:

Attached for filing in the above-referenced matter please find Respondent The Travelers Home and Marine Insurance Company's Return to Appellant's Motion for Extension of Time to File Reply Brief.

By copy of this letter, the same is being served upon all counsel of record via electronic mail. The Proof of Service thereof via electronic mail will be filed separately.

If you have any questions concerning this letter, please do not hesitate to contact me.

Sincerely yours,


Marisel D. Norton *by Susan D. Bose*
MDN/cdc

Enclosures

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