

**RECEIVED**

**Sep 16 2022**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

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Case No.: 2021-000835

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**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.**

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

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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. Appellants' Reply Brief is currently due on or before September 16, 2022.

2. Undersigned counsel's mother passed away on September 1, 2022 and I have been out of the office. It will therefore be difficult for Appellants' counsel to file the Reply Brief prior to the September 16, 2022 deadline.

3. Accordingly, it is respectfully requested that the Court grant an additional 30-day extension of time for the filing of Appellants' Reply brief.

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,

s/ Reese R. Boyd, III  
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*Attorneys for the Defendant-Appellant,*

Dated: September 16, 2022  
Myrtle Beach, South Carolina

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Of Whom,

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

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PROOF OF SERVICE

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I certify that on this date a copy of the foregoing **DEFENDANT-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 as follows:

By e-mail directed to the address registered with AIS:

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Defendant-Appellant*

Dated: September 16, 2022  
Myrtle Beach, South Carolina