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Oct 03 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 was due on September 30, 2022.

2. With the arrival of Hurricane Ian the Court advised the Appellant that it was closed on September 30, 2022 that the Appellant's Reply Brief could be filed on Monday, October 3, 2022.

3. The arrival of Hurricane Ian forced the closure of the undersigned counsel's office on Friday, September 30, and has also forced counsel to focus on repair and cleanup of his property and counsel therefore requests a brief extension of time which to file Appellant's Reply Brief in the matter.

4. Accordingly, it is respectfully requested that the Court grant an additional 10-day extension of time for the filing of Appellants' Reply brief, making the Appellant's Reply Brief due on October 13, 2022.

5. Appellant does not believe that any Party will be prejudiced by this request, and does not anticipate that any additional extensions of time will be necessary or requested.

6. 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 ten (10) days within which to file his reply brief.

Respectfully submitted,

s/ Reese R. Boyd, III
Reese R. Boyd, III, Esq. (SC Bar# 7151)
Kelly M. Turek, Esq.
Davis & Boyd LLC
Post Office Box 70517
Myrtle Beach, SC 29572
(843) 839-9800

(843) 839-9801 (*fax*)
reese@davisboydlaw.com

Attorneys for the Defendant-Appellant,

Dated: October 3, 2022
Myrtle Beach, South Carolina

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United States of America acting by and
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Carolina Tax Commission,**

Defendants,

Of Whom,

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

PROOF OF SERVICE

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:

J. Dwight Hudson, Esq
Hudson Law Offices
PO Box 70218
Myrtle Beach, SC 29572
HUDSONLAW@HUDSONLAWOFFICE.COM
Attorney for Plaintiff-Appellant

Mariel D. Norton, Esq.
Baker, Ravenel, & Bender, LLP
3710 Landmark Dr. Ste 400
PO Box 8057
Columbia, SC 29204
MNORTON@BRBLEGAL.COM
Attorney for Respondent Travelers

Mr. Edward K. Pritchard, III
Pritchard Law Group, LLC
8 Cumberland St., Ste 200
Charleston, SC 29401
EPITCHARD@PRITCHARDLAWGROUP.COM
Attorney for Defendants Shiralee Driggers and Tammy Floyd

Mr. Daryl James Corbin
PO Box 447
Florence, SC 29503-0447
CORBINLAWFIRM@CORBINLAWSC.COM
Attorney for Defendant Estate of Arthur McKenzie a/k/a Auther McKenzie

Mr. George John Conits
U.S. Attorney's Office
55 Beattie Place, Ste 700
Greenville, SC 29601
GEORGE.CONITS@USDOJ.GOV
Attorney for IRS

Ms. Tasha B. Thompson
S.C. State House Finance and Development Authority
300C Outlet Pointe Blvd.
Columbia, SC 29210
TASHA.THOMPSON@SCHOUSING.COM
Attorney for SC Tax Commission

Vannie Williams, Jr., Esq.
The Law Office of Vannie Williams, Jr., Esq., LLC
PO Box 2027
Columbia, SC 29202
Williams.Vannie@att.net
Attorney for Audrey Graham, as PR of the Estate of Arthur McKenzie

s/ Reese R. Boyd, III
Reese R. Boyd, III, Esq. (SC Bar #: 7151)
Davis & Boyd, LLC
Post Office Box 70517
Myrtle Beach, SC 29572
(843) 839-9800
(843) 839-9801 (fax)
reese@davisboydlaw.com

*Attorney for Marion L. Driggers,
Defendant-Appellant*

Dated: October 3, 2022
Myrtle Beach, South Carolina