

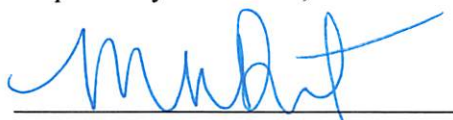


understanding that the Parties will all jointly consent to a 30-day extension to the current submission deadlines for all Respondents in this matter.

4. This Motion is made in good faith, and there is no harm, prejudice, or disadvantage to the parties by this request.

**WHEREFORE**, the Respondent respectfully submits that good cause exists for the Court to extend the time for filing the Initial Brief of Respondent by thirty (30) days, and the Respondent moves that the Court extend the time accordingly.

Respectfully submitted,



---

T. Jarrett Bouchette  
S.C. Bar No. 101122  
[tjbouchette@floydllaw.com](mailto:tjbouchette@floydllaw.com)

Marissa N. Drost  
S.C. Bar No. 104629  
[mndrost@floydllaw.com](mailto:mndrost@floydllaw.com)  
P.O. Drawer 14607  
Surfside Beach, SC 29587  
(843) 238-5141

*Attorneys for Respondent John Strasswimmer*

August 19, 2024  
Surfside Beach, SC

**RECEIVED**

**Aug 19 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM HORRY COUNTY  
Common Pleas

Honorable Alex B. Hyman, Circuit Court Judge

---

Appellate Case No. 2024-000599

---

John Strasswimmer, David  
Vreeland King, and Claudia  
Troyer Miles, Respondents,

v.

Mary Michelle Miles, Appellant.

---

**CERTIFICATE OF SERVICE**

---

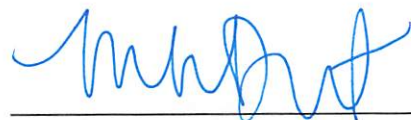
I, Marissa N. Drost, attorney for Respondent John Strasswimmer, certify that I have served Respondent Strasswimmer's Motion for Extension by depositing a copy of same in the United States Mail, postage prepaid, on August 19, 2024, addressed to all Counsel of Record, as indicated below, and via email.

Melody J.E. Breeden  
Turner Padget  
P.O. Box 2116  
Myrtle Beach, SC 29578  
[mbreeden@turnerpadget.com](mailto:mbreeden@turnerpadget.com)

Reese Boyd  
Davis & Boyd, LLC  
1110 London Street, Ste. 201  
Myrtle Beach, SC 29577  
[reese@davisboydlaw.com](mailto:reese@davisboydlaw.com)

Bess Dargan Lochocki  
Waccamaw Law, LLC  
P.O. Box 2307  
Pawleys Island, SC 29585  
[bess@waccamawlawllc.com](mailto:bess@waccamawlawllc.com)

Jessica Ferguson  
200 E. Broad Street, Ste. 250  
Greenville, SC 29601  
[jferguson@turnerpadget.com](mailto:jferguson@turnerpadget.com)



Marissa N. Drost, Esq.



**THE FLOYD LAW FIRM PC**  
*attorneys & counselors at law*

**RECEIVED**

**Aug 19 2024**

**SC Court of Appeals**

Dalton B. Floyd, Jr.\* | Collin R. Jewell | T. Jarrett Bouchette ^  
Patricia H. Anderson | Jonny McCoy • | Fatjon Cake | Marissa N. Drost | Bradley A. Floyd •

August 19, 2024

T. Jarrett Bouchette, Esq.  
[tjbouchette@floydflaw.com](mailto:tjbouchette@floydflaw.com)  
Marissa N. Drost, Esq.  
[mndrost@floydflaw.com](mailto:mndrost@floydflaw.com)

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: John Strasswimmer, David Vreeland King, and Claudia Troyer Miles  
vs. Mary Michelle Miles  
Case No. 2024-000599

Dear Ms. Kitchings:

With regard to the above matter, please find enclosed herewith Respondent's Second Motion for Extension, along with the filing fee of \$50.00 and our Certificate of Service upon all counsel of record.

Thank you for your consideration and assistance in this matter.

Very truly yours,  
**THE FLOYD LAW FIRM PC**

Marissa N. Drost

Enclosures

cc: Melody J.E. Breeden, Esq.  
Jessica Ferguson, Esq.  
Reese Boyd, Esq.  
Bess Lochocki, Esq.

[www.floydflaw.com](http://www.floydflaw.com) | [www.golfllaw.com](http://www.golfllaw.com)

15 Highway 17, South | Surfside Beach, SC 29575-6077 | P.O. Drawer 14607 | Surfside Beach, SC 29587-4607 | (843) 238-5141 | Fax (843) 238-9060