

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.

**RESPONDENT STRASSWIMMER'S SECOND MOTION FOR  
EXTENSION OF TIME TO FILE INITIAL BRIEF**

Respondent John Strasswimmer, pursuant to Rule 240, SCACR, moves the Court to extend the time for filing the Initial Brief of Respondent by thirty (30) days. In support of the Motion, Respondent Strasswimmer shows the following to the Court:

1. The issues in this case are complex and counsel is working diligently to complete Respondent's brief.
2. Due to scheduling conflicts and other professional obligations, Respondent's counsel needs additional time to research and draft an adequate brief on appeal to frame the issues at hand.
3. The undersigned counsel has discussed or communicated this Motion request with all counsel of record, who do not oppose this Motion, and have consented with the

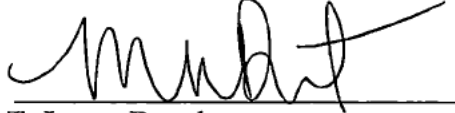
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understanding that the Parties will all jointly consent to a 30-day extension to the current submission deadlines for all Respondents in this matter.

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,



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*Attorneys for Respondent John Strasswimmer*

August 19, 2024  
Surfside Beach, SC

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**CERTIFICATE OF SERVICE**

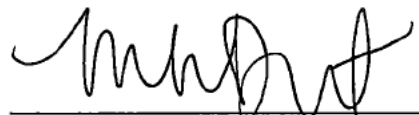
I, Marissa N. Drost, attorney for Respondent John Strasswimmer, certify that I have served Respondent Strasswimmer's Motion for Extension by depositing a copy of same in the United States Mail, postage prepaid, on August 19, 2024, addressed to all Counsel of Record, as indicated below, and via email.

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Marissa N. Drost, Esq.



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Patricia H. Anderson | Jonny McCoy • | Fatjon Cake | Marissa N. Drost | Bradley A. Floyd •

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The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
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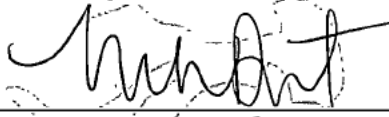
RE: John Strasswimmer, David Vreeland King, and Claudia Troyer Miles  
vs. Mary Michelle Miles  
Case No. 2024-000599

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.

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