

The State of South Carolina  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas  
Benjamin H. Culbertson, Circuit Court Judge

---

Case No. 2020-001291

---

**RECEIVED**

**Jun 28 2021**

**SC Court of Appeals**

Julie Irving,

Respondent,

vs.

Jeanne Poafpybitty, Donald Matthew Rothgeb and Steven Taylor Rothgeb,

Defendants.

Of whom Jeanne Poafpybitty, Personal Representative of the  
Estate of Donald M. Rothgeb is the Appellant,

---

MOTION FOR EXTENSION OF TIME  
TO FILE APPELLANT'S REPLY BRIEF

---

AND NOW, comes Appellant, Jeanne Poafpybitty, by and through her undersigned counsel, and in support of this Motion for Extension of Time to File Appellant's Reply Brief, avers as follows:

1. Appellant's Reply Brief is currently due on June 28, 2021.

2. Due to the complex issues in this case, Appellant has not been able to complete her Reply Brief.

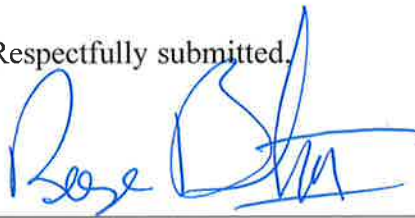
3. Accordingly, it is respectfully requested that the Court grant an additional 10-day extension of time for the filing of Appellant's Reply Brief that is currently pending and due on June 28, 2021.

4. There will be no prejudice to Respondent in granting this additional extension of time to file Appellant's 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 ten (10) days within which to file her Reply Brief.

Respectfully submitted.



Reese R. Boyd, III, Esq. (SC Bar# 7151)

Bret H. Davis, Esq.

**Davis & Boyd LLC**

Post Office Box 70517

Myrtle Beach, SC 29572

(843) 839-9800

(843) 839-9801 (fax)

[reese@davisboydlaw.com](mailto:reese@davisboydlaw.com)

Thomas Rode, Esq.

**Thurmond Kirchner & Timbes, P.A.**

15 Middle Atlantic Wharf

Charleston, SC 29401

(843) 937-8000

(843) 937-4200 (*fax*)

Attorneys for the Defendant/Appellant,

Jeanne Poafpybitty

June 28, 2021

Myrtle Beach, South Carolina

**Jun 28 2021**CERTIFICATE OF SERVICE

I certify that on this date a copy of the foregoing **APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S 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.

This 28th day of June, 2021.



---

Deborah Evans, Paralegal  
Davis & Boyd LLC

**DAVIS & BOYD, LLC**

Attorneys & Counselors at Law

BRET H. DAVIS, JD\*, CPA  
JULIE A. OLIVER, JD, LL.M.

\* Licensed in SC and NC

1110 London Street, Suite 201  
Myrtle Beach, SC 29577

Mailing Address:  
Post Office Box 70517  
Myrtle Beach, SC 29572

REESE R. BOYD, III, JD\*  
KELLY M. TUREK, JD, LL.M.\*\*  
\*Certified Mediator and Arbitrator  
\*\*Licensed in SC and GA

Telephone: (843) 839-9800  
Facsimile: (843) 839-9801  
[www.davisboydlaw.com](http://www.davisboydlaw.com)

**RECEIVED**

June 28, 2021 **Jun 28 2021**

**SC Court of Appeals**

Via fax (803-734-1839) and U.S. Mail

Ms. Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
P.O. Box 11629  
Columbia, SC 29211

**Re: Estate of Donald M. Rothgeb - Irving v. Poafpybitty, et al**  
**Appellate Case Number: 2020-001291**  
**Common Pleas Case Number: 2018-CP-26-06416**  
**Our File Number: 016.017**

Dear Ms. Kitchings:

Enclosed please find the original and one copy of Motion for Extension of Time to File Appellant's Reply in the above-referenced matter. Kindly file the original and return a clocked copy to our office in the envelope provided.

Thank you for your consideration in this matter. If you have any questions, please feel free to contact our office.

Yours sincerely,



Reese R. Boyd, III

RRB/dke  
Enc.

cc: Clifford H. Tall, Esq.