

The State of South Carolina  
In The Court of Appeals

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

**RECEIVED**  
JUL 12 2021  
SC Court of Appeals

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Case No. 2020-001291

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Julie Irving,

Respondent,

vs.

Jeanne Poafybitty, Donald Matthew Rothgeb and Steven Taylor Rothgeb,

Defendants.

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

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

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

1. Appellant's Reply Brief is currently due on July 8, 2021.

2. Due to a delayed opening at the offices of Appellant's counsel and computer issues related to tropical storm Elsa, Appellant has not been able to complete her Reply Brief.

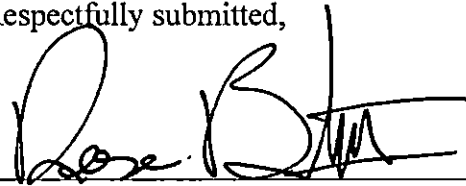
3. Accordingly, it is respectfully requested that the Court grant an additional 10-day extension of time for the filing of Appellant's Reply Brief that is currently pending and due on July 8, 2021.

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.

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(843) 937-8000  
(843) 937-4200 (*fax*)

Attorneys for the Defendant/Appellant,  
Jeanne Poafpybitty

July 8, 2021

Myrtle Beach, South Carolina - - - - -

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CERTIFICATE OF SERVICE

I certify that on this date a copy of the foregoing APPELLANT'S  
**MOTION FOR SECOND 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 8th day of July, 2021.



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Catherine Plocinik, Paralegal  
Davis & Boyd LLC

**DAVIS & BOYD, LLC**

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

Attorneys & Counselors at Law

\*Licensed in SC and NC

REESE R. BOYD, III, JD\*  
KELLY M. TUREK, JD, LL.M.\*\*  
\*Certified Mediator and Arbitrator  
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July 8, 2021

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

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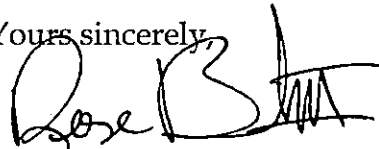
Re: Estate of Donald M. Rothgeb - Irving v. Poafpybitty, et al  
Appellate Case Number: 2020-001291  
Common Pleas Case Number: 2018-CP-26-06416  
Our File Number: 016.017

Dear Ms. Kitchings:

Enclosed please find the original and one copy of Motion for Second 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/cmp  
Encs.

cc: Clifford H. Tall, Esq.

**DAVIS & BOYD, LLC**

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Myrtle Beach, South Carolina 29572

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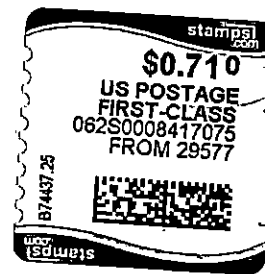
**SC Court of Appeals**

**Ms. Jenny Abbott Kitchings**

**S.C. Court of Appeals Clerk of Court**

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