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Jul 30 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM WILLIAMSBURG COUNTY
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Appellate Case No: 2021-000494

South Carolina Farm Bureau Mutual Insurance
Company,

Appellant

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,

Of Whom,

The Travelers Home and Marine Insurance
Company is the

Respondent.

.....

**MOTION FOR AN EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rules 224 and 234(b) of the South Carolina Appellate Court rules, counsel for the Appellant moves before and requests the Court to grant a thirty (30) day extension of time to file Appellant's Initial Brief and Designation Of Matter to Be Included In The Record On Appeal. The transcript was received by Appellant's counsel on July 19, 2021, making Appellant's Initial Brief and Designation due to be filed and served on or by August 18, 2021. Due to Appellant counsel's current case load and upcoming mediation and deposition schedule, including numerous depositions and several days of mediation in a complex construction case involving fifty (50) or more lawyers, counsel respectfully requests a thirty (30) day extension of time, which would thereby require that Appellant's Initial Brief and Designation of Matter To Be Included In The Record On Appeal be filed and served on or by September 17, 2021.

Dated: July 30, 2021

/s/ J. Dwight Hudson

J. Dwight Hudson, Esquire
SC Bar # 2753
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PO Box 70218
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(843) 692-9889

Attorney For: Appellant

Other Counsel and Parties of Record:

Counsel: By e-mail directed to the address register with AIS:

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Attorney for SC Tax Commission

Pro Se Party: By email to the address used during the course of litigation and by US Mail
First Class, with sufficient postage attached

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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,

Of Whom,

The Travelers Home and Marine Insurance
Company is the

Respondent.

PROOF OF SERVICE

I certify that on July 30, 2021, I served the *Motion For Extension Of Time To File and Serve Appellant's Initial Brief and Designation of Material To Be Included in the Record* on counsel and the Pro Se as noted below:

Dated: July 30, 2021

/s/ J. Dwight Hudson

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Attorney for Defendants Shiralee Driggers & Tammy Floyd

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Attorney for SC Tax Commission

Pro Se Party: By email to the address used during the course of litigation and by US Mail
First Class, with sufficient postage attached

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ADMITTED IN S.C. and N.C.*
United States Supreme Court*
U.S. Court of Appeals 4th Circuit*^
U.S. District Court – South Carolina*^
U.S. District Court – North Carolina*
(Eastern, Middle and Western Districts)
S.C. Supreme Court*^
N.C. Supreme Court*
S.C. Court of Appeals*^
N.C. Court of Appeals*

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July 30, 2021
Via Email

RECEIVED
Jul 30 2021
SC Court of Appeals

The Hon. Jenny Abbott Kitchings
Clerk, SC Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: South Carolina Farm Bureau Mutual Insurance Company v. Marion L. Driggers, et. al.
Trial Court Case No: 2014-CP-45- 132

Dear Ms. Kitchings:

Enclosed for filing are the following:

1. Motion For Extension Of Time To File And Serve Appellant’s Initial Brief and Designation Of Matter To Be Included In The Record On Appeal;
2. Proof of Service of the referenced Motion
3. My check for the filing fee of \$25.00 will follow within five (5) days per the Amended Order Regarding The Operation of The Appellate Courts During The Coronavirus Emergency (5.29.20).

By copy of this letter, the enclosures are served as per the enclosed Proof of Service, with the filing and service in compliance with the Amended Order Regarding The Operation of The Appellate Courts During The Coronavirus Emergency (5.29.20).

With best regards, I remain

J. Dwight Hudson, Esq.
J. Dwight Hudson, Esq.

JDH: mag
Enclosure(s): as stated
cc: Per Proof of Service