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STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**SC Court of Appeals**

Appeal from Williamsburg County Court of Common Pleas  
Kristi F. Curtis, Circuit Court Judge  
Case No.: 2014-CP-45-00132

Case No.: 2021-000835

**South Carolina Farm Bureau Mutual  
Insurance Company,**

**Plaintiff-Appellant,**

**v.**

**Marion L. Driggers,**

**Defendant-Appellant,**

**and**

**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,**

**Defendant-Respondent.**

MOTION FOR EXTENSION OF TIME TO FILE BRIEF  
FOR DEFENDANT-APPELLANT

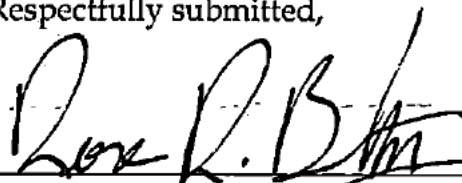
AND NOW, comes Defendant-Appellant, Marion L. Driggers, by and through his undersigned counsel, and in support of this Motion for Extension of Time to File

Brief for Appellant, avers as follows:

1. Appellant's brief is currently due on February 3, 2022.
2. The issues in the case are complex and counsel is working diligently to complete Appellant's brief. However, Counsel and staff have been out of the office with personal or family illness, which have hampered counsel's ability to complete the Appellant's brief within the time that is presently available.
3. Accordingly, it is respectfully requested that the Court grant an additional 30-day extension of time for the filing of Appellant's brief.
4. There will be no prejudice to Respondent in granting this additional extension of time to file the Initial 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 thirty (30) days within which to file his initial brief.

Respectfully submitted,



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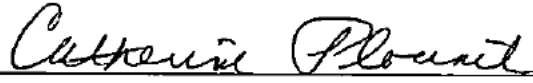
*Attorneys for the Defendant-Appellant,*

Dated: Feb. 2, 2022  
Myrtle Beach, South Carolina

**CERTIFICATE OF SERVICE**

I certify that on this date a copy of the foregoing APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE 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 2<sup>nd</sup> day of February, 2022.



Catherine Plocinik, Paralegal  
Davis & Boyd LLC

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**SC Court of Appeals**

BRET H. DAVIS, JD\*, CPA  
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February 2, 2022

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

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SC Court of Appeals

Re: SC Farm Bureau Mutual Ins. Co. v. Marion L. Driggers et al.  
Case # 2021-000835  
Our File Number: 021.084

Dear Ms. Kitchings,

Enclosed please find Motion for Extension of Time to File Brief for Appellant, in the above-referenced matter, for filing with the Court of Appeals. Kindly file the original and return a clocked copy to my office in the envelope provided.

Thank you for your time and consideration in this matter.

With kind regards, I remain,

Yours sincerely,



Reese R. Boyd, III

RRB/cmp  
Enc.

cc: Counsel of Record (via email only)

**DAVIS & BOYD, LLC**

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Myrtle Beach, South Carolina 29572

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**Jenny Abbott Kitchings, Clerk**

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