

RECEIVED

Feb 18 2022

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 Ins. Co, 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, Defendants,

Of Which The Travelers Home and Marine Insurance Company is the Respondent.

Appellant's Reply Designation Of Matter

To Be Included In The Record On Appeal

The Appellant proposes that the following be included in the Record On Appeal:

1. All matter designated previously by the Appellant.
2. All matter designated previously by the Respondent.
3. Court email of 11.23.20 ruling as to Motions.
4. Appellant's Motion to Alter/Amend/Reconsider And/Or To Clarify dated 1.14.2021

I certify that this Designation contains no matter which is irrelevant to this appeal.

/s/ J. Dwight Hudson

J. Dwight Hudson (SCB# 2753)

Hudson & Graham

PO Box 70218

Myrtle Beach, SC 29572

T: (843) 692-9889; F: 692-9190

HUDSONLAW@HUDSONLAWOFFICE.COM

Dated: February 18, 2022

Attorney For Appellant

RECEIVED
Feb 18 2022
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 Ins. Co, 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, Defendants,

Of Which The Travelers Home and Marine Insurance
Company is the Respondent.

**Proof Of Service of Appellant's Initial Reply Brief
And Reply Designation**

I certify that on February 18, 2022, I served the *Appellant's Initial Reply Brief and Reply Designation on* counsel and the Pro Se party as noted below and as established by the copy of email service enclosed herewith:

/s/ J. Dwight Hudson

J. Dwight Hudson (SCB# 2753)
Hudson & Graham
PO Box 70218
Myrtle Beach, SC 29572
T: (843) 692-9889; F: 692-9190
HUDSONLAW@HUDSONLAWOFFICE.COM

Dated: February 18, 2022

Attorney For Appellant

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

Mrs. Mariel D. Norton
Baker Ravenel & Bender, LLP
3710 Landmark Drive Suite 400
PO Box 8057
Columbia, SC 29204
mnorton@brblegal.com

Attorney(s) For Respondent Travelers

Mr. Edward K. Pritchard, III
Pritchard Law Group LLC
Pritchard Law Group, LLC
8 Cumberland Street, Suite 200
Charleston, SC 29401
epritchard@pritchardlawgroup.com

Attorney for Defendants Shiralee Driggers & Tammy Floyd

Mr. Daryl James Corbin
PO Box 447
Florence, SC 29503-0447
corbinlawfirm@corbinlawsc.co

Attorney For Defendant Estate of Arthur Mckenzie

Mr. George John Conits
U.S. Attorney's Office
55 Beattie Place, Ste. 700
Greenville, SC 29601
george.conits@usdoj.gov

Attorney for IRS

Ms. Tasha B. Thompson
S.C. State Housing Finance and Development Authority
300C Outlet Pointe Blvd.
Columbia, SC 29210
tasha.thompson@schousing.com

Attorney for SC Tax Commission

Reese R. Boyd, III
Davis & Boyd, LLC
1110 London St.
Suite 201
Myrtle Beach, SC 29577
reese@davisboydlaw.com

Attorney for Marion L. Driggers

Also, Service on Marion L. Driggers via e-mail to:

Mr. Marion L. Driggers
3497 Hebron Road
Lake City, SC 29560
mldriggers@yahoo.com

mgraham hudsonlawoffice.com

From: mgraham hudsonlawoffice.com
Sent: Friday, February 18, 2022 1:43 PM
To: Norton, Mariel; epritchard@pritchardlawgroup.com; Daryl J. Corbin Esq. (corbinlawfirm@corbinlawsc.com); Conits, George (USASC); 'Tasha.Thompson@schousing.com'; Reese Boyd III; mldriggers@yahoo.com
Cc: Cathy Plocinik; Kelly M. Turek, Esq.; Jill Corbin; Daryl Corbin; Rosa Raspaldo
Subject: RE: Appellate Case No: 2021-000494; South Carolina Farm Bureau Mutual Insurance Company v. Marion L. Driggers, et. al.
Attachments: Brief, Reply, Full, Appellant.pdf; Designation, Reply.pdf; Proof Of Service, Reply Brief & Reply Designation.pdf

Enclosed and served are the Appellant's Initial Reply Brief and Reply Designation and a Proof of Service as to the same. The enclosures will be e-filed with the Court of Appeals, along with verification of this e-mail service to the parties.

With best regards,

J. Dwight Hudson, Esq.

Hudson & Graham

P.O. Box 70218

2513 North Oak Street

Suite 210, Waverly Centre

Myrtle Beach, SC 29577

T: 843.692.9889

F: 843.936.4776

HUDSONLAW@HUDSONLAWOFFICE.COM

WWW.HUDSONLAWOFFICE.COM



MYRTLE BEACH OFFICE:

2513 N OAK ST, SUITE 210
MYRTLE BEACH, SC 29577
TELEPHONE: (843) 692-9889
FAX: (843) 936-4776

SHALLOTTE OFFICE:

5101 SELLERS ROAD
SHALLOTTE, NC 28459
TELEPHONE: (910) 755-6543

J. DWIGHT HUDSON*
MARY ANNE GRAHAM^

Reply To:
PO Box 70218
Myrtle Beach, SC 29572

TOLL FREE: 1-877-874-5256

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*

Website:

www.hudsonlawoffice.com

Email:

HUDSONLAW@HUDSONLAWOFFICE.COM

February 18, 2022
Via Email

RECEIVED
Feb 18 2022
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. Appellant's Initial Reply Brief
2. Appellant's Reply Designation Of Material To Be Included In The Record
3. Proof of Service of the Same inclusive of email service verification

With best regards, I remain

J. Dwight Hudson, Esq.

J. Dwight Hudson, Esq.

JDH: mag

Enclosure(s): as stated

cc: **Per Proof of Service**