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May 05 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE 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 May 6, 2022.
2. Lead counsel is continuing to manage an ongoing family medical emergency and as associate counsel is still on maternity leave, counsel for Appellant as been unable to complete the initial brief which is presently due.
3. Accordingly, it is respectfully requested that the Court grant an additional 10-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 ten (10) days within which to file his initial brief.

Respectfully submitted,

s/ Reese R. Boyd, III
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Attorneys for the Defendant-Appellant,

Dated: May 5, 2022
Myrtle Beach, South Carolina

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agency, The Internal Revenue Service,
and The South Carolina Tax
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Of Whom,

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Defendant-Respondent.

PROOF OF SERVICE

I certify that on this date a copy of the foregoing **DEFENDANT-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 as follows:

By e-mail directed to the address registered with AIS:

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Dated: May 5, 2022
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SC Court of Appeals

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

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)