

**RECEIVED**

**May 16 2022**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

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Case No.: 2021-000835

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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.

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

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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 15-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 fifteen (15) days within which to file his initial brief.

Respectfully submitted,

s/ Reese R. Boyd, III  
Reese R. Boyd, III, Esq. (SC Bar# 7151)  
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*Attorneys for the Defendant-Appellant,*

Dated: May 16, 2022  
Myrtle Beach, South Carolina

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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.

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PROOF OF SERVICE

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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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*Attorney for Audrey Graham, as PR of the Estate of Arthur McKenzie*

s/ Reese R. Boyd, III  
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*Attorney for Defendant-Appellant*

Dated: May 16, 2022  
Myrtle Beach, South Carolina

# DRIGGERS / South Carolina Farm Bureau v. Driggers et al., Case No.: 2021-000835

1 message

**From:** Reese Boyd III <reese@davisboydlaw.com>

**To:** Dwight Hudson <hudsonlaw@sc.rr.com>, mnorton@brblegal.com, epritchard@pritchardlawgroup.com, corbinlawfirm@corbinlawsc.com, George.conits@usdoj.gov, Tasha.thompson@schousing.com, Williamas.Vannie@att.net

**Cc:** Cathy Plocinik <cathy@davisboydlaw.com>

**Date:** Monday, May 16, 2022 4:22:11 PM

**Subject:** DRIGGERS / South Carolina Farm Bureau v. Driggers et al., Case No.: 2021-000835

Dear Counsel,

Attached please find Amended Motion for Extension which is being filed with the Court of Appeals in the above-referenced matter. It appears that the original filing was improperly served on you via email by my paralegal.

Regards,

Reese

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**Reese R. Boyd, III**

Attorney at Law

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STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appellate Review of Trial Court Decision  
Krisztina E. Gresh, Circuit Court Judge  
Case No. 2021-000055

Case No. 2021-000055

South Carolina Farm Bureau Mutual  
Insurance Company,

Plaintiff-Appellant,

v.

Marion E. Driggers,

Defendant-Appellee.

and

Stivalee Driggers, Tammy D. Lloyd,  
JSTATE 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.

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

ANDY MCWIG, counsel Defendant-Appellant, Marion E. Driggers, by and through

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

\* Licensed in SC and NC

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May 16, 2022

V. Claire Allen, Clerk  
SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

**RECEIVED**

**May 16 2022**

**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. Allen,

Enclosed please find Amended Motion for Extension of Time to File Brief for Appellant, along with Proof of Service and a copy of the email transmission, in the above-referenced matter. Kindly file the originals and return clocked copies to my office in the envelope provided. Also enclosed is our check in the amount of \$50 representing the filing fee for the enclosed Motion.

Kindly advise if the enclosed cures the deficiencies identified in your letter of May 12, 2022.

Thank you for your time and consideration in this matter.

With kind regards, I remain,

Yours sincerely,



/cmp/

Reese R. Boyd, III

RRB/cmp  
Enc.

cc: Counsel of Record (via email only)