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May 16 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.

**AMENDED
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 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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Myrtle Beach, SC 29572
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reese@davisboydlaw.com

Attorneys for the Defendant-Appellant,

Dated: May 16, 2022
Myrtle Beach, South Carolina

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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.

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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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

Reese R. Boyd, III
Attorney at Law
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STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appellate Division of the South Carolina Court of Appeals
K. R. McLeod, Circuit Court Judge
Case No. 2021-00055

Case No. 2021-00055

South Carolina Farm Bureau Mutual
Insurance Company,

Plaintiff-Appellant,

v.

Marion E. Driggers,

Defendant-Appellant.

and

Stivales Driggers, Tammy D. Hurd,
Jude 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 MCLEOD, circuit Defendant-Appellant, Marion E. Driggers, by and through

DAVIS & BOYD, LLC

Attorneys & Counselors at Law

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JULIE A. OLIVER, JD, LL.M.

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***Licensed in SC and GA

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SC Court of Appeals

V. Claire Allen, 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. 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)