

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

96280  
**RECEIVED**

MAY 19 2022

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

**SC Court of Appeals**

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)  
**Davis & Boyd LLC**  
Post Office Box 70517  
Myrtle Beach, SC 29572  
(843) 839-9800  
(843) 839-9801 (fax)  
reese@davisboydlaw.com

*Attorneys for the Defendant-Appellant,*

Dated: May 16, 2022  
Myrtle Beach, South Carolina

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

MAY 19 2022

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

**SC Court of Appeals**

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.

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:

J. Dwight Hudson, Esq  
Hudson Law Offices  
PO Box 70218  
Myrtle Beach, SC 29572  
[HUDSONLAW@HUDSONLAWOFFICE.COM](mailto:HUDSONLAW@HUDSONLAWOFFICE.COM)  
*Attorney for Plaintiff-Appellant*

Mariel D. Norton, Esq.  
Baker, Ravenel, & Bender, LLP  
3710 Landmark Dr. Ste 400  
PO Box 8057  
Columbia, SC 29204  
[MNORTON@BRBLEGAL.COM](mailto:MNORTON@BRBLEGAL.COM)  
*Attorney for Respondent Travelers*

Mr. Edward K. Pritchard, III  
Pritchard Law Group, LLC  
8 Cumberland St., Ste 200  
Charleston, SC 29401  
[EPITCHARD@PRITCHARDLAWGROUP.COM](mailto:EPITCHARD@PRITCHARDLAWGROUP.COM)  
*Attorney for Defendants Shiralee Driggers and Tammy Floyd*

Mr. Daryl James Corbin  
PO Box 447  
Florence, SC 29503-0447  
[CORBINLAWFIRM@CORBINLAWSC.COM](mailto:CORBINLAWFIRM@CORBINLAWSC.COM)  
*Attorney for Defendant Estate of Arthur McKenzie a/k/a Auther McKenzie*

Mr. George John Conits  
U.S. Attorney's Office  
55 Beattie Place, Ste 700  
Greenville, SC 29601  
[GEORGE.CONITS@USDOJ.GOV](mailto:GEORGE.CONITS@USDOJ.GOV)  
*Attorney for IRS*

Ms. Tasha B. Thompson  
S.C. State House Finance and Development Authority  
300C Outlet Pointe Blvd.  
Columbia, SC 29210  
Tasha.thompson@schousing.com  
*Attorney for SC Tax Commission*

Vannie Williams, Jr., Esq.  
The Law Office of Vannie Williams, Jr., Esq., LLC  
PO Box 2027  
Columbia, SC 29202  
Williams.Vannie@att.net  
*Attorney for Audrey Graham, as PR of the Estate of Arthur McKenzie*

s/ Reese R. Boyd, III  
Reese R. Boyd, III, Esq. (SC Bar #: 7151)  
**Davis & Boyd, LLC**  
Post Office Box 70517  
Myrtle Beach, SC 29572  
(843) 839-9800  
(843) 839-9801 (fax)  
reese@davisboydlaw.com

*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

Davis & Boyd, LLC

1110 London St., Suite 201

Myrtle Beach, SC 29577

(843) 839-9800

(843) 839-9801 (*fax*)

(843) 455-9889 (*cell*)

vCard : LinkedIn

The information contained in this electronic message and any attachments is confidential and may also contain privileged attorney-client information or work product. The information is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this message in error, please delete it from your computer and immediately notify the sender by telephone at 843-839-9800. Thank you.

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Willingham County Court of Common Pleas  
Krisi F. Carr, Circuit Court Judge  
Case No.: 2014-CP-45-00117

Case No.: 2015-90833

South Carolina Farm Bureau Mutual  
Insurance Company,

Plaintiff-Appellant,

v.

Marion L. Driggers,

Defendant-Appellant.

and

Shirley Driggers, Tammy D. Hays,  
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

**DAVIS & BOYD, LLC**

Attorneys & Counselors at Law

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

\* Licensed in SC and NC

1110 London Street, Suite 201  
Myrtle Beach, SC 29577

Mailing Address:  
Post Office Box 70517  
Myrtle Beach, SC 29572

REESE R. BOYD, III\*\*  
KELLY M. TUREK, JD, LL.M.\*\*\*

\*\*Certified SC Mediator and Arbitrator  
\*\*\*Licensed in SC and GA

Telephone: (843) 839-9800  
Facsimile: (843) 839-9801  
[www.davisboydlaw.com](http://www.davisboydlaw.com)

May 16, 2022

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

**RECEIVED**  
MAY 19 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,

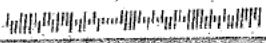


Reese R. Boyd, III

/cmp/

RRB/cmp  
Enc.

cc: Counsel of Record (via email only)



**\$1.560**  
US POSTAGE  
FIRST CLASS  
0623009564395  
FROM 29577  
NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

**DAVIS & BOYD, LLC**  
Post Office Box 70517  
Myrtle Beach, South Carolina 29572

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

**RECEIVED**  
MAY 19 2009  
SC Court of Appeals