

RECEIVED

May 23 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.

PROOF OF SERVICE

I certify that on the 23rd day of May, 2022, I served the Initial Brief of Defendant-Appellant and Designation of Matter 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:

Counsel of Record:

J. Dwight Hudson, Esq
Hudson Law Offices
PO Box 70218
Myrtle Beach, SC 29572
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
Attorney for Respondent Travelers

Mr. Edward K. Pritchard, III
Pritchard Law Group, LLC
8 Cumberland St., Ste 200
Charleston, SC 29401
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
*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
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

s/ Reese R. Boyd, III
Reese R. Boyd, III
Davis & Boyd LLC
1110 London Street, Suite 201
Myrtle Beach, SC 29577
Phone: (843) 839-9800
Fax: (843) 839-9801

*Attorney for Defendant-Appellant,
Marion L. Driggers*

May 23, 2022

DRIGGERS / South Carolina Farm Bureau Mutual Ins Co., Case No.: 2021-00835

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

Date: Monday, May 23, 2022 5:02:06 PM

Subject: DRIGGERS / South Carolina Farm Bureau Mutual Ins Co., Case No.: 2021-00835

Dear Counsel,

Attached please find Initial Brief of Defendant-Appellant, Marion L. Driggers, along with Designation of Matter, which are being filed with the Court of Appeals on this date, and which are hereby served upon you in the above-referenced matter.

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.



Initial Brief DRIGGERS 5-23-2...
2.4 Mb

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,

v.

Plaintiff-Appellant,

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.

DESIGNATION OF MATTER

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,

v.

Plaintiff-Appellant,

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