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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable Diane Goodstein, First Judicial Circuit
Honorable Maite Murphy, First Judicial Circuit

Appellate Case No. 2023-000879

Molly M. Morpew

Appellant

v.

Stephen Dudek and Doreen Cross

Respondents

**APPELLANT’S REPLY BRIEF DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

1. Request for Discovery
2. Motion for Protection from Discovery
3. Motion to Compel Discovery and Response to Defendants’ Additional Memorandum for Protection
4. Motion to Deem Admissions Admitted
5. Additional Memo Supporting Request for Protection
6. Motion for Rule to Show Cause
7. Motion for Summary Judgment
8. 59e motion, Aug. 28, 2021
9. 59e motion, Jan. 2023 including cover letter
10. 59e motion, February 2023 including cover letter
11. 59e motion March 26, 2023
12. Respondent(s) Additional Memorandum for Protection
13. District Court Order
14. Ferro Affidavit

15. Undelivered Letter
16. Addendum B of Purchase Contract
17. Transcript, Original Action June 2014 Case #
18. Transcript, May 26, 2021
19. Transcript November 2022
20. Application Checklist
21. 10-day adverse letter
22. Denial letters
23. Dynamic Damages/Costs Affidavit and Worksheet
24. Rule 15 Motion to Dismiss Amended Complaint
25. Response to Rule 15 Motion to Dismiss Amended Complaint
26. Response to Rule 12(b)(6) Motion to Dismiss the Amended Complaint
27. 12(b)(6) Motion to Dismiss the Amended Complaint
28. Motion in Support of Default
29. Memorandum in support of Default
30. Answer to Appellant complaint
31. Respondents' Complaint
32. Amended Complaint
33. Order, November 6, 2014
34. Order January 2023
35. Order, March 2023
36. Order, April 23
37. Order, Aug. 23, 2021
38. Order, Dec. 30, 2022
39. Order, April 4, 2019
40. Order, June 24, 2019
41. Application for loan
42. Purchase contract
43. Loan Application Requirements Checklist
44. Appellant contract
45. Screenshot
46. Attorney Qualey email

I certify that this designation contains no matter which is irrelevant to this appeal.



Molly M. Morphew, Appellant pro se
285 Wooden Horse Run
Rincon, GA 31326

January 5, 2024

THE STATE OF SOUTH CAROLINA
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APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Honorable Maite Murphy, First Judicial Circuit

Appellate Case No. 2023-000879

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SC Court of Appeals

Molly M. Morphew, Appellant,

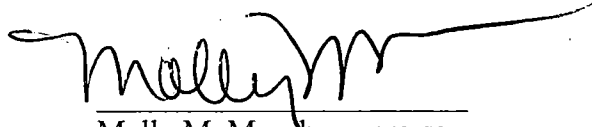
v.

Stephen Dudek and Doreen Cross, Respondents.

CERTIFICATE OF SERVICE

I, Molly M. Morphew, Appellant, pro se for said case, hereby certify that I have, on this date indicated below, served counsel below with an Appellants REPLY BRIEF, CERTIFICATE OF SERVICE, CERTIFICATE OF COMPLIANCE pursuant Rule 208(b), and its DESIGNATION OF MATTER to be included in Record on Appeal, by mailing a copy of same via United States Mail, postage prepaid and return address clearly indicated on said envelope, to counsel at the following address:

Zachary Closser, Esquire
P.O. Box 40578
Charleston, SC 29423-0578
Attorney for Respondents:
Stephen Dudek
Doreen Cross

A handwritten signature in black ink, appearing to read 'Molly M. Morphey', with a long horizontal flourish extending to the right.

Molly M. Morphey, pro se

January 5, 2024

January 6, 2024

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29211

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JAN 09 2024
SC Court of Appeals


Re: Appellate Case No. 2023-000879
Molly M. Morphew v. Stephen Dudek and Doreen Cross

Dear Ms. Kitchings:

Please find enclosed Appellants REPLY BRIEF, the CERTIFICATE OF SERVICE, CERTIFICATE OF COMPLIANCE, and its DESIGNATION OF MATTER to be included in Record on Appeal, to be recorded and filed.

Also enclosed is a copy of above to be kindly recorded and returned in the self-addressed, stamped envelope.

Thank you and very truly yours,


Molly Morphew, pro se

Cc: Zachary Closser, Esq.

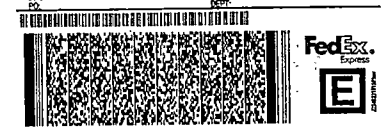
1. Insert shipping document here.

ORIGIN ID: SAVA (843) 514-7299
MOLLY MORPHEW
285 WOODEN HORSE RUN
RIDGELAND, SC 29138
UNITED STATES US

SHIP DATE: 06JAN04
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CAD: 104726038NET4535
BILL SENDER

TO HONORABLE JENNY ABBOTT KITCHINGS
SOUTH CAROLINA COURT OF APPEALS
1015 SUMTER STREET

COLUMBIA SC 29211
(803) 734-1990 REF:



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Extremely Urgent



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