

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 RETURN TO RESPONDENTS' MOTION FOR APPELLATE COSTS

Appellant, Molly Morpew, submits this RETURN to Respondents Stephen Dudek and Doreen Cross' motion for Appellate Costs.

On April 8, 2025, this Court granted Appellant's motion to set aside the order granting Respondents' costs due their failure to serve Appellant their motion. The order also stated that within 10 days of its order the Respondents shall serve the motion for cost, and Appellant may serve and file a return within 10 days of the date of service of the motion for costs.

Appellant was in North Carolina at the time of submission of this Court's order and the Respondents' motion due the death of her father. On April 30th, after receiving notice of both from her daughter, who picked up her mail in Pooler, GA, Appellant immediately called this court.

RECEIVED

MAY 13 2025

SC Court of Appeals

On May 3rd, Appellant both faxed and mailed (via Priority mail) a motion for extension of time/late filing asking permission to file her return late, on or before May 13, 2025, due to her father's death.

Please find below, Appellant's return to Respondents' Motion for Appellate Costs.

After reviewing this court's order, Appellant would agree the appellate costs awarded to the Respondents in the previous order in which this return arose from are fair IF the circumstances and parties' current rights and obligations were not in question.

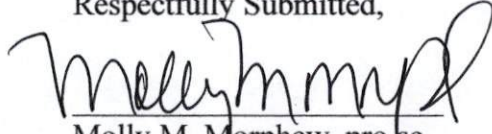
On June 12, 2023, Appellant filed a 59e motion against the lower court's sanction order. The motion is still pending. In its motion, Appellant raises several, very critical issues, including but not limited to, Appellant was not served the motion for sanctions; a hearing for sanctions took place without Morphew in attendance; that discovery is required to obtain proper evidence as the court order raises legal issues not supported by any evidence, validated evidence, or expert testimony; that the court refused Appellant's discovery requests, even court ordered discovery, that would support her cause(s) of action and allegations, and then turned around and granted summary judgment and sanctions to the Respondents based on "lack of evidence produced by Morphew"; that the order includes issues not presented by the Defendants; and the order includes legal issues that require a separate trial.

Further, Appellant has provided evidence that proves the Dudeks' *time is of the essence* sales contract was null and void or had expired on November 30, 2012, and that they had committed acts of fraud in the court, the lower courts committed several material and critical errors in law, all to obtain the property (or servient property in this instant issue), therefore are not bona fide purchasers but actual trespassers (cause of action #6); and that the court(s), even this one, lacked, and still lack, jurisdiction or authority under the circumstances to award anything to the Dudeks in regard to this case, the original case or any subsequent case that arose or may arise, let alone sanctions for an alleged frivolous

complaint. These issues are far from frivolous. In fact, before sanctions or any further aid from the court(s) be given to the Dudeks, there needs to be consideration given the critical issues raised and to the evidence discovered after trial in the original action and now in the record as to the parties' current rights and obligations. (Appellant's 59e Motion, June 12, 2023, Civil Case #2018-CP-18-01661 and Appellate Case No. 2023-000879, Morphew v. Dudeks)

Based on the above, Appellant asks this court to deny the Respondents' motion for appellate costs, or at least until the validity of the Dudek Contract, or lack of, thus the parties' rights and obligations, are specifically adjudicated.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Molly M. Morphew', written over a horizontal line.

Molly M. Morphew, pro se
300 Blue Moon Crossing, Apt. 4201
Pooler, GA 31322

May 7, 2025

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

RECEIVED

MAY 13 2025

SC Court of Appeals

Molly M. Morphew, Appellant,

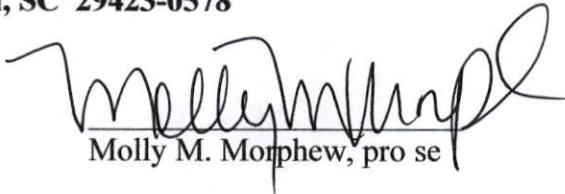
v.

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 Appellant's RETURN TO RESPONDENTS' MOTION FOR APPELLATE COSTS 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**


Molly M. Morphew, pro se

May 7, 2025

May 7, 2025

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

RECEIVED

MAY 13 2025

SC Court of Appeals

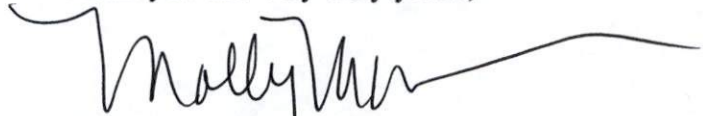
Re: Appellate Case No. 2023-000879
Molly M. Morphew v. Stephen Dudek and Doreen Cross

Dear Ms. Kitchings:

Please find enclosed Appellant's RETURN TO RESPONDENTS' MOTION FOR APPELLATE COSTS and CERTIFICATE OF SERVICE 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,

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

Molly Morphew, pro se

Cc: Zachary Closser, Esq.



PRESS FIRMLY TO SEAL

PRIORITY MAIL
FLAT RATE ENVELOPE
POSTAGE REQUIRED



UNITED STATES
POSTAL SERVICE®

RECEIVED
PRIORITY MAIL
MAY 13 2025

SC Court of Appeals

- Expected delivery date specified for domestic use.
- Domestic shipments include \$100 of insurance (restrictions apply).*
- USPS Tracking® service included for domestic and many international destinations.
- Limited international insurance.**
- When used internationally, a customs declaration form is required.

*Insurance does not cover certain items. For details regarding claims exclusions see the Domestic Mail Manual at <http://pe.usps.com>.

** See International Mail Manual at <http://pe.usps.com> for availability and limitations of coverage.

FLAT RATE ENVELOPE
ONE RATE ■ ANY WEIGHT

TRACKED ■ INSURED



PS00001000014

EP14F October 2023
OD: 12 1/2 x 9 1/2

To schedule free Package Pickup,
scan the QR code.



USPS.COM/PICKUP



FROM:

P

usps.com
\$8.75
US POSTAGE

9405 5301 0935 5148 2701 64 0067 6001 0002 9211

U.S. POSTAGE PAID

05/07/2025

Mailed from 31322 546264758146903

PRIORITY MAIL®

MOLLY MORPHEW
APT 4201
300 BLUE MOON XING
POOLER GA 31322-9746

05/10/2025
Flat Rate Envelope
RDC 03

B012

CLERK SC COURT OF APPEALS
HONORABLE JENNY ABBOTT KITCHINGS
PO BOX 11629
COLUMBIA SC 29211-1629

USPS TRACKING #



9405 5301 0935 5148 2701 64



This packaging is the property of the U.S. Postal Service® and is provided solely for use in sending Priority Mail® and Priority Mail International® shipments. It may be reused for other mailings. This package is not for resale. EP14F © U.S. Postal Service, October 2023; All rights reserved. Misuses may be a violation of federal law.

This package is made from post-consumer waste. Please recycle - again.