

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SALUDA COUNTY  
Court of Common Pleas  
Martha M. Rivers, Circuit Court Judge

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Case No. 2023-CP-41-00232

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SC Court of Appeals

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Sandra Holmwood and Hugh Price.....Appellants,

v.

Lisa Molstad.....Respondent

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APPELLANTS' OPPOSITION TO RESPONDENT'S MOTION  
TO CONTINUE TO HOLD APPEAL IN ABEYANCE AND FOR  
EXTENSION OF RESPONDENT'S INITIAL FILING DEADLINE

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**APPELLANTS' OPPOSITION TO RESPONDENT'S MOTION TO  
CONTINUE TO HOLD APPEAL IN ABEYANCE AND FOR  
EXTENSION OF RESPONDENT'S INITIAL FILING DEADLINE**

Appellants, Sandra Holmwood and Hugh Price, appearing pro se, respectfully oppose Respondent Lisa Molstad's Motion to Continue to Hold Appeal in Abeyance and for Extension of Respondent's Initial Filing Deadline. Respondent seeks to delay briefing indefinitely based on alleged "confusion" that exists only because the Court has not yet ruled on Appellants' pending Motion to Strike Former Counsel's Brief. The proper remedy is not continued abeyance, but an expedited ruling on the Motion to Strike and establishment of a definite briefing schedule. In support of this opposition, Appellants state as follows:

**INTRODUCTION**

Respondent moves this Court to continue holding this appeal in abeyance indefinitely until the Court rules on Appellants' pending Motion to Strike Former Counsel's Brief, and then to grant Respondent an additional sixty days to file her initial brief. This motion should be denied.

The alleged "confusion" about which brief is operative exists only because the Court has not yet ruled on Appellants' straightforward Motion to Strike, filed over five weeks ago on December 16, 2025. Rather than opposing that motion on the merits—or even filing a return within the ten-day period provided by Rule 240(e), SCACR—Respondent now seeks to exploit procedural uncertainty to delay these proceedings further. This uncertainty could have been resolved weeks ago had Respondent engaged with the Motion to Strike. Instead, Respondent waited until after the thirty-day abeyance period expired and now asks for indefinite additional delay.

The proper remedy is not indefinite continuance based on self-created uncertainty, but an expedited ruling on the Motion to Strike and establishment of a definite briefing schedule.

Appellants have been ready to proceed since December 8, 2025, when they filed a

comprehensive pro se initial brief addressing multiple issues on appeal—including the single issue raised in former counsel's unauthorized brief. Respondent can respond to that comprehensive brief regardless of how the Court rules on the Motion to Strike. The Court should deny Respondent's motion, rule on the pending Motion to Strike within fourteen days and set a briefing schedule that brings this long-delayed appeal to resolution without further procedural gamesmanship.

## **STATEMENT OF FACTS**

### *A. Procedural History Through December 2025*

1. Appellants appealed this matter by notice of appeal filed August 11, 2025. Appellants were then represented by counsel, Rolf Mouin Baghdady.
2. Appellants' counsel sought and obtained an agreement from Respondent's counsel for a thirty-day extension of the original deadline for filing of Appellants' initial brief and designation of matter to be included in the record on appeal, thereby enlarging the time for Appellants' initial filing to sixty days. Respondent's counsel agreed, and both counsels mutually agreed Respondent would likewise have sixty days for Respondent's initial filing.
3. This agreement was made by Mr. Baghdady when he was actively representing Appellants, before any motion to be relieved as counsel.
4. On November 28, 2025, Mr. Baghdady filed a "Consent Motion to Withdraw as Counsel for Appellants." Prior to filing this motion, Mr. Baghdady had agreed with Appellants that he would withdraw from representing them in this appeal and had informed Appellants that he would perform no further work on the appeal or even the 1st extension request.

5. On December 8, 2025, Appellants filed a comprehensive pro se initial brief and designation of matter, raising multiple issues on appeal. This brief was filed in good faith reliance on former counsel's representation that he would perform no further work and was withdrawing.
6. Also, on December 8, 2025—after filing the motion to withdraw, after informing Appellants that no further work would be performed, and after Appellants filed their pro se brief—Mr. Baghdady filed a separate initial brief on behalf of Appellant Sandra Holmwood only. This brief raises a single issue on appeal.
7. On December 11, 2025, the Court of Appeals issued an order granting Mr. Baghdady's motion to withdraw. That order stated the appeal would be held in abeyance for thirty days to allow Appellants to obtain new counsel if desired.
8. On December 16, 2025, Appellants filed a pro se Motion to Strike the brief previously filed by their former counsel, Mr. Baghdady, along with a supporting memorandum and affidavits. The motion asks the Court to: (1) strike the initial brief filed by former counsel as unauthorized; (2) confirm Appellants' pro se initial brief as the operative brief; (3) grant Appellants leave to appear pro se nunc pro tunc to the date of filing said brief; and (4) grant any necessary schedule adjustments.

*B. Respondent's Actions (or Inaction)*

9. Under Rule 240(e), SCACR, an opposing party has ten days from service to file a return to a motion. Respondent's deadline to file a return to the Motion to Strike was approximately December 26, 2025. Respondent filed no return.
10. On December 18, 2025—two days after Appellants filed the Motion to Strike—Respondent's counsel contacted the Court of Appeals with questions concerning the two

briefs and the deadline for Respondent's initial brief. According to Respondent's current motion, counsel spoke with Appeals Specialist Lavianca Beckman, who advised that:

- a. Appellants had filed the motion to strike the initial brief filed by their former counsel;
  - b. Counsel would be notified of a new deadline once the Court decided how to move forward; and
  - c. The time for filing Respondent's initial brief had not started to run and would not until counsel received further instructions.
11. To date—over five weeks after Appellants filed the Motion to Strike—the Court has not issued a ruling on that motion, and counsel has not received further instructions concerning the briefing timeline.
12. The thirty-day abeyance period set forth in the Court's December 11, 2025, order expired on or about January 10, 2026.

*C. Respondent's Current Motion*

13. On January 23, 2026—over a month after the Motion to Strike was filed and nearly two weeks after the abeyance period expired—Respondent filed the instant motion seeking to:
- a. Continue to hold the appeal in abeyance until the Court issues an order on Appellants' Motion to Strike; and
  - b. Establish that Respondent's deadline for filing an initial brief will be sixty days following the entry of the Court's order ruling on the motion to strike.
14. Respondent's motion acknowledges the duplicative filings have created "procedural confusion" and asserts that counsel "cannot prepare an initial brief on behalf of

Respondent until he knows which appellant's brief will be the operative brief in this appeal, to which he must respond."

15. Respondent's motion further asserts that if counsel "is currently under an active deadline for the Respondent's initial brief and designation due to the expiration of the 30 days of abeyance set out in the Court's order of December 11, 2025," then counsel "respectfully asks the Court to treat this motion as a motion for extension" and to allow the full sixty days agreed to by Mr. Baghdady.

## **ARGUMENT**

### **I. THE MOTION IS PREMATURE BECAUSE IT SEEKS RELIEF BASED ON UNCERTAINTY THAT WOULD BE IMMEDIATELY RESOLVED BY RULING ON APPELLANTS' PENDING MOTION TO STRIKE**

Respondent's motion rests entirely on alleged uncertainty about which appellants' brief is operative—the brief filed by former counsel Rolf Baghdady on December 8, or the comprehensive pro se brief filed by Appellants on December 8. But this uncertainty exists only because the Court has not yet ruled on Appellants' Motion to Strike, which presents that exact question.

The Motion to Strike seeks to strike the Baghdady brief as unauthorized because it was filed after counsel had agreed to withdraw, informed Appellants that no further work would be performed, filed a motion to withdraw, and after Appellants had filed their own pro se brief. The legal issue is straightforward, the facts are undisputed and established by affidavit, and the governing law is clear.

Rather than opposing the Motion to Strike on the merits, Respondent now seeks to exploit procedural uncertainty of Respondent's own making. Respondent had ten days under Rule 240(e), SCACR, to file a return to the Motion to Strike—either supporting it, opposing it, or taking no position. Respondent filed nothing. Now, over five weeks later, Respondent seeks

indefinite continuance based on the very uncertainty that Respondent could have helped resolve by timely engaging with the motion.

**This is procedurally improper.** Respondent cannot manufacture confusion by failing to respond to a dispositive motion and then cite that confusion as grounds for continuance. The proper course is for the Court to decide the threshold motion that Appellants properly presented over a month ago, not to grant a continuance that assumes the motion will be denied or indefinitely postponed.

Granting Respondent's motion would reward procedural gamesmanship. It would establish a perverse incentive: when faced with a dispositive motion, to simply ignore it, wait for deadlines to pass, and then seek continuance based on "uncertainty" about the very issue the pending motion addresses.

The Court should deny the motion and instead rule expeditiously on the Motion to Strike, which will immediately resolve the alleged confusion.

## **II. THE COURT SHOULD DENY THE MOTION AND RULE ON THE MOTION TO STRIKE, WHICH REPRESENTS A STRAIGHTFORWARD LEGAL ISSUE REQUIRING NO EXTENDED DELIBERATION**

The Motion to Strike presents a clear-cut legal issue that can and should be decided promptly. This is not a complex question requiring extended briefing, research, or deliberation.

### *A. The Undisputed Facts*

The chronology is established by Appellants' affidavits filed with the Motion to Strike and is not disputed by Respondent:

1. Former counsel Rolf Baghdady agreed with Appellants that he would withdraw from representing them in this appeal.

2. Former counsel informed Appellants that he would perform no further work on this appeal.
3. On November 28, 2025, former counsel filed a "Consent Motion to Withdraw as Counsel for Appellants."
4. On December 8, 2025, Appellants—in good faith reliance on former counsel's representations—filed a comprehensive pro se initial brief and designation of matter.
5. Also, on December 8, 2025—**after** filing the motion to withdraw, **after** informing Appellants that no further work would be performed, and **after** Appellants filed their pro se brief—former counsel filed an initial brief purporting to represent Appellant Sandra Holmwood.
6. On December 11, 2025, the Court entered an order granting former counsel's motion to withdraw.

These facts are not in dispute. No further factual development is necessary.

*B. The Governing Law is Clear*

The legal principles governing this situation are well-established in South Carolina law:

1. Attorney's Must Give Unequivocal Notice of Withdrawal

In *Ex parte J.P. Strom, Jr.*, 341 S.C. 63, 68, 533 S.E.2d 242, 245 (2000), the South Carolina Supreme Court held that "[s]trong policy considerations dictate that a client and the court must be unequivocally informed when an attorney intends to withdraw from representing a party, for whatever reason."

Here, former counsel gave unequivocal notice to both Appellants and the Court. Counsel informed Appellants that no further work would be performed and formalized that intent

by filing a motion to withdraw. Any subsequent filing purporting to represent Appellants contradicts counsel's own representations.

2. Strict Compliance with Withdrawal Procedures is Required

The *Strom* Court relied on *Culbertson v. Clemens*, 322 S.C. 20, 24, 471 S.E.2d 163, 165 (1996), which emphasized the need for strict compliance with formal withdrawal procedures to ensure that courts and parties are unequivocally informed who represents the litigant.

Once an attorney takes formal steps to withdraw and represents to the client that the representation has ended, the attorney cannot thereafter continue to file substantive pleadings purporting to bind the client.

3. The Client Controls the Objectives of Representation

Rule 1.2(a), RPC (Rule 407, SCACR), provides that "a lawyer shall abide by a client's decisions concerning the objectives of representation." When counsel represents that the representation is ending and files a motion to formalize that withdrawal, the attorney no longer has authority to make strategic decisions, advance legal arguments, or file documents binding the client.

4. Attorney's Duties Upon Termination of Representation

Rule 1.16(d), RPC, provides that upon termination of representation, a lawyer must take steps to **protect** a client's interests, such as giving reasonable notice to the client, allowing time for employment of other counsel, and surrendering papers and property to which the client is entitled.

The rule imposes affirmative duties to **protect** the client's interests during the transition—not to continue acting on the client's behalf after agreeing to withdraw and

filing a motion to withdraw. Comment [9] to Rule 1.16 makes clear that protective steps do not include continuing to file substantive legal documents after informing the client that no further work will be performed.

*C. Application of Law to Undisputed Facts*

Applying these clear legal principles to the undisputed chronology, the answer is straightforward: former counsel's filing of an initial brief on December 8, 2025—after agreeing to withdraw, after informing Appellants that no further work would be performed, after filing a motion to withdraw, and after Appellants filed a pro se brief—was unauthorized.

The Court need not await further briefing or deliberation. The chronology is admitted. The legal question is whether an attorney who has filed a motion to withdraw and informed the client that no further work will be performed can continue to file substantive pleadings binding the client.

The answer under *Strom*, *Culbertson*, and the Rules of Professional Conduct is clearly "no."

**The Court should rule on this straightforward motion within fourteen days and thereby resolve the uncertainty that Respondent invokes as justification for delay.**

**III. RESPONDENT'S PROPOSED RELIEF IS INTERNALLY CONTRADICTIONARY, UNWORKABLE, AND WOULD CREATE ADDITIONAL DELAY AND UNCERTAINTY**

Respondent's motion seeks two forms of relief that are internally contradictory and would create additional uncertainty rather than resolving it:

1. **First**, Respondent asks the Court to "continue to hold this appeal in abeyance until the Court issues an order on the outstanding *pro se* motion of Appellants."
2. **Second**, Respondent asks the Court to "establish the deadline for the Respondent's initial brief and designation of matter 60 days after the Court's order establishing which brief is the operative appellant's brief in this case."

*A. No Definite Timeline*

If the Court grants the first request without setting a deadline for ruling on the Motion to Strike, briefing could be delayed indefinitely. There is no time limit on how long the Court might take to rule on the motion. This creates precisely the kind of uncertainty that appellate practice seeks to avoid.

Moreover, Respondent's December 18 conversation with Court staff established that "the time for filing the Respondent's initial brief and designation of matter had not started to run and would not until counsel received further instructions." (Resp't Mot. at 3.) If the Court simply continues the abeyance without setting a definite deadline, Respondent will have achieved an indefinite suspension of briefing obligations—exactly the outcome Respondent seeks.

*B. The "60-Day" Agreement Has No Force*

Respondent's request for a sixty-day deadline is based on an agreement between Respondent's counsel and former counsel Baghdady "that Respondent's counsel would have 60 days to file the initial brief of Respondent." (Resp't Mot. at 2.)

**This agreement is not binding on Appellants proceeding pro se.** The agreement was made between two attorneys when Baghdady was actively representing Appellants. Once Baghdady agreed to withdraw, informed Appellants he would perform no further work, and filed a motion to withdraw, any agreements he made on Appellants' behalf ceased to have effect. Appellants, proceeding pro se, never agreed to give Respondent sixty days to respond.

Moreover, **the agreement was premised on Baghdady representing Appellants.** If Baghdady's representation has terminated (as it has), then the quid pro quo underlying the

agreement no longer exists. Respondent cannot claim the benefit of an agreement with an attorney who is no longer authorized to bind the client.

Rule 208(a)(2), SCACR, provides that respondent shall file a brief "within thirty days after service of Appellants' brief"—not sixty days. Respondent has cited no authority for a sixty-day deadline other than the now-void agreement with former counsel.

*C. Uncertainty About Which Brief Triggers the Deadline*

Respondent's motion asks for sixty days "after the Court's order establishing which brief is the operative appellant's brief in this case." (Resp't Mot. at 4.) But this creates additional uncertainty: **sixty days to respond to which brief?**

- If the Court strikes Baghdady's brief, does the sixty-day clock run from that order, even though Appellants' pro se brief was filed on December 8?
- If the Court declines to strike Baghdady's brief, does Respondent have sixty days from the order to respond to **both** briefs?
- If the briefs raise different issues (as they do—Baghdady's brief raises one issue; Appellants' pro se brief raises multiple issues including that same issue), is Respondent required to file two separate responsive briefs?

Respondent's proposed relief creates more questions than it answers. The Court should not adopt a framework that generates additional procedural uncertainty.

*D. Total Delay Could Be Three to Four Months*

Consider the total delay Respondent's proposal would create:

1. **Thirty-day abeyance** from December 11 to January 10 (already expired)
2. **Additional indefinite abeyance** until the Motion to Strike is decided (could be weeks or months)
3. **Then sixty days** for Respondent to file a brief

This could result in Respondent filing an initial brief in March or April 2026—**four to five months** after Appellants filed their comprehensive brief on December 8, 2025, and **eight to nine months** after the notice of appeal was filed in August 2025.

This is unreasonable and unjustified. Appellants' pro se brief has been on file for over six weeks. The issues are joined. Respondent should respond, not seek indefinite delay.

*E. The Remedy for Confusion is to Resolve it, Not Prolong It*

Respondent claims uncertainty about which brief to respond to. The remedy for this uncertainty is not to delay briefing indefinitely, but to **rule on the Motion to Strike** and clarify which brief is operative.

**If the Motion to Strike is granted**, Appellants' pro se brief is the operative brief, and Respondent responds to it.

**If the Motion to Strike is denied**, Respondent may respond to both briefs (or file a single brief addressing both).

Either way, **clarity comes from the Court ruling on the pending motion**, not from continued abeyance.

Respondent's motion asks the Court to extend uncertainty rather than resolve it. This is backwards. The Court should deny the motion and rule on the Motion to Strike.

**IV. APPELLANTS ARE PREJUDICED BY FURTHER DELAY WHILE RESPONDENT SUFFERS NO PREJUDICE FROM PROCEEDING NOW**

*A. Prejudice to Appellants*

Appellants are prejudiced by every day of delay in the resolution of this appeal. The underlying trial court order remains in effect while this appeal pend.

Appellants filed a comprehensive pro se initial brief on December 8, 2025—**over six weeks ago**—and have been ready to proceed since that date. They should not be

penalized for their former attorney's unauthorized filing or for Respondent's failure to oppose the Motion to Strike within the ten-day period provided by the rules.

Every day this appeal remains unresolved denies Appellants their right to appellate review. Respondent's delay tactics compound the harm caused by former counsel's unauthorized filing: first, Baghdady files a brief creating confusion; now, Respondent exploits that confusion to delay proceedings further.

Appellants, proceeding pro se, face particular hardship from indefinite delay. Unlike represented parties with law firms managing multiple cases, Appellants must personally manage this appeal while attending to their personal and professional obligations. Indefinite delay imposes a continuing burden that represented parties do not face.

*B. Respondent Suffers No Prejudice from Proceeding Now*

In contrast, Respondent suffers no prejudice from being required to file a brief now. Respondent's claimed inability to respond is pretextual.

**1. Baghdady's Brief Raises One Issue; Appellants' Pro Se Brief Raises Multiple Issues Including That Same Issue**

According to Appellants, former counsel Baghdady's brief raises a single issue on appeal. Appellants' comprehensive pro se brief raises multiple issues, **including** the single issue raised in Baghdady's brief.

This means there is **no scenario** in which Respondent is required to respond to arguments that appear in Baghdady's brief but not in Appellants' pro se brief. Every argument in the Baghdady brief is contained in the more comprehensive pro se brief.

**Therefore, Respondent can respond to Appellants' pro se brief and will have addressed all arguments regardless of how the Court rules on the Motion to Strike:**

- **If the Motion to Strike is granted:** Respondent will have responded to the operative brief (the pro se brief).
- **If the Motion to Strike is denied:** Respondent will have responded to the more comprehensive of the two briefs, which includes all arguments from both briefs.

There is no prejudice to Respondent either way. Respondent can file now, responding to the comprehensive pro se brief.

## **2. Standard Appellate Practice Involves Responding to Multiple Issues**

Respondents routinely respond to briefs raising multiple issues. That is the nature of appellate practice. Appellants' pro se brief raises multiple issues. Respondent is capable of responding to multiple issues. The existence of a second brief raising a subset of those same issues does not create an impossible burden—it simply means one of Respondent's arguments will address an issue raised in both briefs.

## **3. Respondent Has Known Since December 18 That the Motion to Strike Was Pending**

Respondent's counsel contacted the Court on December 18—two days after the Motion to Strike was filed—and was informed that Appellants had filed the motion. At that point, Respondent could have:

- Filed a return **supporting** the motion (agreeing that Baghdady's brief should be stricken);
- Filed a return **opposing** the motion (arguing that both briefs should stand); or
- Filed a return taking **no position** but requesting expedited ruling.

Instead, Respondent did nothing for over a month and now seeks indefinite delay based on uncertainty that Respondent could have helped resolve weeks ago.

#### **4. The Agreement with Baghdady is Not Binding on Pro Se Appellants**

Respondent repeatedly invokes the "agreement" between Respondent's counsel and Baghdady that Respondent would have sixty days to respond. But this agreement has no legal effect on Appellants proceeding pro se.

The agreement was made when Baghdady was representing Appellants. Once Baghdady filed a motion to withdraw and the Court granted that motion, any agreements Baghdady made ceased to bind Appellants. Appellants, in their pro se capacity, never agreed to give Respondent sixty days.

Respondent cannot claim reliance on an agreement with an attorney who was in the process of withdrawing and who filed a brief after representing to the client that no further work would be performed.

#### *C. Respondent Can File Now and Avoid Any Risk of Waiver or Default*

If Respondent is genuinely concerned about which brief to respond to, **the safe course is to file a brief responding to Appellants' comprehensive pro se brief now.** This eliminates any risk that:

- The thirty-day deadline under Rule 208(a)(2) has already run (if the Court deems the abeyance period to have expired on January 10);
- Respondent might be deemed to have waived arguments by failing to respond timely; or
- The Court might proceed to decision on Appellants' unopposed brief.

Filing now protects Respondent's interests. Seeking indefinite delay creates risk.

#### **V. THE COURT SHOULD DENY THE MOTION AND ESTABLISH A DEFINITE BRIEFING SCHEDULE**

For the foregoing reasons, the Court should deny Respondent's motion and instead:

1. **Rule on Appellants' Motion to Strike Former Counsel's Brief within fourteen days** (or by a date certain);
2. **Establish a definite briefing schedule** as follows: **a. If the Motion to Strike is granted:** Respondent's initial brief and designation of matter to be included in the record on appeal shall be due **thirty (30) days** from the date of the order granting the motion, consistent with Rule 208(a)(2), SCACR. **b. If the Motion to Strike is denied:** Respondent may file a single brief responding to both Appellants' briefs, due **forty-five (45) days** from the date of the order denying the motion (a compromise position accounting for the need to respond to two briefs, while not granting the unsupported sixty-day extension Respondent seeks).

This approach provides:

- **Certainty:** Definite deadlines, not indefinite abeyance
- **Fairness:** Respondent gets a reasonable time to respond (30-45 days from the Court's order)
- **Efficiency:** The appeal moves forward without further delay
- **Judicial economy:** The Court rules on the pending motion and sets a schedule in a single order

**Alternatively**, if the Court is inclined to grant Respondent some additional time beyond the standard thirty-day deadline, the Court could:

1. Grant Appellants' Motion to Strike (confirming the pro se brief as operative);
2. Order that Respondent's brief is due **forty-five (45) days** from the date of the order (splitting the difference between the standard 30 days under Rule 208 and the 60 days Respondent seeks based on a now-void agreement).

Under no circumstances should the Court grant indefinite abeyance with no deadline for ruling on the Motion to Strike. **This appeal has been pending since August 11, 2025.** Appellants filed a comprehensive brief on December 8, 2025. The Motion to Strike presents a straightforward legal issue. **The Court should resolve the threshold issue and establish a definite schedule that brings this matter to resolution.**

## **CONCLUSION**

Respondent's motion seeks to delay briefing based on "confusion" that exists only because the Court has not yet ruled on Appellants' pending Motion to Strike—a straightforward motion that Respondent chose not to oppose despite having ten days to file a return. The remedy for confusion is not indefinite continuance, but an expedited ruling on the motion and establishment of a definite briefing schedule.

Appellants have been ready to proceed since December 8, 2025. Appellants filed a comprehensive pro se brief raising multiple issues, including the single issue raised in former counsel's unauthorized brief. Respondent can respond to that comprehensive brief regardless of how the Court rules on the Motion to Strike. Respondent suffers no prejudice from proceeding now, while Appellants are prejudiced by every day of delay.

The Court should deny Respondent's motion, rule on the Motion to Strike within fourteen days, and set a definite briefing schedule as outlined above.

**WHEREFORE**, Appellants respectfully request that the Court:

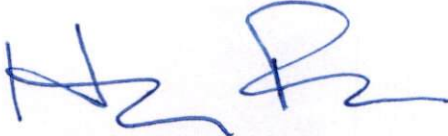
1. **DENY** Respondent's Motion to Continue to Hold Appeal in Abeyance and for Extension of Respondent's Initial Filing Deadline;
2. **RULE** on Appellants' Motion to Strike Former Counsel's Brief on or before **[date 14 days from filing of this opposition]**;

3. **ESTABLISH** a definite briefing schedule as follows:
- If the Motion to Strike is granted: Respondent's initial brief due thirty (30) days from the order;
  - If the Motion to Strike is denied: Respondent's initial brief due forty-five (45) days from the order; and
4. **GRANT** such other and further relief as the Court deems just and proper.

Respectfully submitted,

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2/13/26

Dated: February 13, 2026

**CERTIFICATE OF SERVICE**

I certify that on this 13th day of February 2026, a true and correct copy of the foregoing Initial Brief of Appellants was served upon opposing counsel by U.S. Mail, first-class postage prepaid, addressed as follows:

Christian G. Spradley  
Moore Bradley Myers, PA  
110 S. Main St.  
Saluda, SC 29138  
Attorney for Respondent Lisa Molstad



2.13.26

Sandra Holmwood, pro se  
Hugh Price, pro se

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