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Mar 04 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Charles B. Simmons, Jr.
Master in Equity

Appellate Case No. 2024-002207
Circuit Court Case No. 2017-CP-23-08016

Wells Fargo Bank, N.A., Respondent,

v.

Michelle Hodges, Individually; Michelle Hodges, as the Personal
Representative of the Estate of Ruth Ladson Witherspoon; Stanley
Witherspoon; SC Housing Corp.; and Twin Creeks Homeowners
Association, Inc., Defendants

of which Michelle Hodges, Individually Appellant.

MOTION FOR EXTENSION OF TIME

Respondent Wells Fargo Bank, N.A., pursuant to Rules 240 and 263(b), SCACR,
respectfully moves the Court for an extension of time to file its Respondent’s Brief. In support of
this Motion, Respondent states as follows:

1. Respondent’s Brief and Designation of Matter is due on March 10, 2026.
2. Respondent requests an extension of thirty days, making the proposed new
deadline April 9, 2026.
3. This request is made in good faith and not for purposes of delay. Additional time
is necessary due to counsel’s workload and the need to fully review the Initial Brief and
Designation of Matter and prepare an appropriate response.

4. This is Respondent's first request for an extension of time, and the requested extension will not prejudice Appellant.

5. Wells Fargo is currently coordinating submission of the \$50.00 filing fee associated with this request, which will be paid by check payable to the South Carolina Court of Appeals and delivered as soon as practicable.

WHEREFORE, Respondent respectfully requests that this Court grant this Motion and extend the deadline for filing Respondent's Initial Brief and Designation of Matter to April 9, 2026, and for such other relief as the Court deems just and proper.

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

By: /s/ Jason D. Wyman
S. Sterling Laney, III
Jason D. Wyman
550 South Main Street, Suite 400
Greenville, South Carolina 29601
(864) 255-5400

Attorneys for Respondent Wells Fargo Bank, N.A.

March 4, 2026

PROOF OF SERVICE

I, the undersigned Attorney of the law offices of Womble Bond Dickinson (US) LLP, attorneys for Respondent, do hereby certify that I have served all parties to this appeal with a copy of the pleading(s) specified below via First Class Mail at the address below:

Pleading: Motion for Extension of Time

Parties Served: Michelle Hodges
6 Young Harris Drive
Simpsonville, SC 29681

Pro se Appellant

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By: /s/ Jason D. Wyman
Attorneys for Respondent Wells Fargo Bank, N.A.

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