

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

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

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

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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.

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**MOTION FOR SECOND EXTENSION OF TIME FOR RESPONDENT TO FILE  
INITIAL BRIEF AND DESIGNATION OF MATTER**

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

1. Respondent previously received a first extension of time, and Respondent’s Brief and Designation of Matter is due on April 9, 2026.
2. Respondent respectfully requests an additional extension of thirty days, making the proposed new deadline May 11, 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 thoroughly review the Initial Brief and

Designation of Matter and the extensive history and record of this litigation, which spans nearly a decade.

4. This is Respondent's second 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 May 11, 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  
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(864) 255-5400

*Attorneys for Respondent Wells Fargo Bank, N.A.*

April 6, 2026

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SC Court of Appeals

**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*

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

April 6, 2026