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Apr 28 2026

SC Court of Appeals

In the S. C. Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
2017CP2308016

Perry H. Gravely, Circuit Court Judge
Charles B. Simmons, Jr., Master in Equity Judge

Case No. 2024-002207

Wells Fargo Bank, N. A. Plaintiff – Respondent

v.

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

Of Whom Michelle Hodges, in her Individual capacity,
is the Appellant.

**APPELLANT'S MOTION FOR LEAVE TO FILE
PROPOSED SUBSTITUTE INITIAL BRIEF**

Michelle Hodges
6 Young Harris Dr.
Simpsonville, SC 29681
864-692-3748
Appellant Pro Se

Wells Fargo's Counsel

Mr. S. Sterling Laney, III, Esquire
Mr. Jason D. Wyman
Womble Bond Dickinson
550 South Main ST
#400
Greenville, SC 29601


**MOTION FOR LEAVE TO FILE
SUBSTITUTE INITIAL BRIEF**

The Appellant, Michelle Hodges, respectfully moves this Honorable Court for leave to file the attached Proposed Substitute Initial Brief in place of the brief previously filed in case number 2024-002207.

Good cause exists for the granting of this motion. This request is made to clarify, refine, and present the issues on appeal in a more accurate and organized manner consistent with the record and the Court's briefing requirements. The attached brief does not introduce new issues or expand the scope of the appeal.

This motion is made pursuant to the South Carolina Appellate Court Rules governing motions and the Court's inherent authority to manage its docket. No prejudice will result to Appellee, who has not yet filed a responsive brief. Accordingly, Appellant respectfully requests that this Court grant leave to file the attached.

Respectfully submitted,


Michelle Hodges, Pro Se Appellant
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PROOF OF SERVICE

I hereby certify that on April 28, 2026, I served the the following documents on the counsel of record, as shown below:

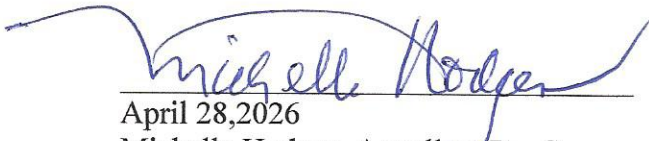
1. Motion for leave to file the attached Proposed Substitute Initial Brief
2. Proposed Substitute Initial Brief

The above document was served, via U.S. First Class Mail with the correct prepaid postage, on opposing counsel, as shown below:

WELLS FARGO'S COUNSEL OF RECORD:

Mr. S. Sterling Laney, III, Esquire
Mr. Jason D. Wyman
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Respectfully,



April 28, 2026
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