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May 08 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 RESPONSE TO RESPONDENT'S
MOTION TO STAY BRIEFING DEADLINES**

RESPONSE TO RESPONDENT'S MOTION TO STAY BRIEFING DEADLINES

Appellant, Michelle Hodges, respectfully responds to Respondent's Motion to Stay the Deadline for Filing Respondent's Brief and Designation of Matter and states as follows:

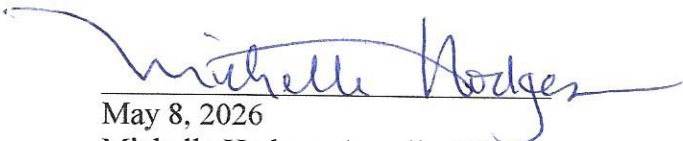
1. Appellant acknowledges Respondent's representation that it has received extensions of time and that its brief and designation of matter are currently due on May 12, 2026. Appellant further notes that Respondent seeks a stay of its briefing deadline pending resolution of Appellant's Motion to Substitute Initial Brief.
2. Appellant does not oppose a limited extension of time for Respondent to file its brief and designation of matter, provided that such extension is narrowly tied to the Court's resolution of the Motion to Substitute Initial Brief and does not result in indefinite delay of appellate proceedings.
3. Respondent's request is based on the assertion that its briefing obligations may change depending on the Court's ruling on the substitution motion. Appellant respectfully submits that the substitute brief does not introduce new claims or expand the scope of the appeal, but instead clarifies, reorganizes, and further develops issues already raised in the original briefing, including issues concerning standing, default notice, deed construction, foreclosure intervention. Additionally, Appellant removed the issue concerning the her Motion to Vacate.
4. Accordingly, Respondent's request for a broad stay is speculative and unnecessary. Any adjustments required by the Court's ruling on the substitution motion can be addressed through a limited extension without suspending the appellate schedule.
5. The interests of orderly appellate procedure are best served by maintaining a defined briefing schedule rather than placing briefing obligations on hold pending resolution of procedural

motions.

To the extent the Court grants any relief, Appellant respectfully requests that such relief be narrowly tailored and structured so that Respondent's time to file its brief runs from the Court's order resolving the Motion to Substitute Initial Brief or such other date as the Court deems appropriate.

WHEREFORE, Appellant respectfully requests that the Court deny Respondent's Motion to the extent it seeks a stay of briefing deadlines, or in the alternative, grant only such limited relief as the Court deems just.

Respectfully submitted,

A handwritten signature in blue ink that reads "Michelle Hodges". The signature is written in a cursive style and is positioned above a horizontal line.

May 8, 2026

Michelle Hodges, Appellant Pro Se

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PROOF
OF SERVICE

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I hereby certify that on May 8, 2026, I served the the following document:

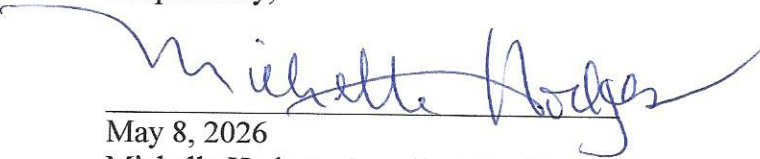
1. Appellant's Response to Respondent's motion to stay briefing deadlines

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:

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Mr. Jason D. Wyman
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Respectfully,



May 8, 2026
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