

**STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

SANDRA HOLMWOOD and HUGH PARKS PRICE,
Appellants,

v.

LISA MOLSTAD,
Respondent.

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MAY 26 2026

SC Court of Appeals

Appellate Case No.: 2025-001596

**APPELLANTS' AMENDED MOTION TO SUPPLEMENT
THE RECORD ON APPEAL**

(Pursuant to Rule 212, South Carolina Appellate Court Rules)

INTRODUCTION

Appellant Sandra Holmwood and co-Appellant Hugh Parks Price, both appearing pro se, respectfully move this Court pursuant to Rule 212, SCACR for an order permitting Appellants to supplement the Record on Appeal to include certain materials that: (1) were before the trial court but were not included in the original designation; (2) arose after the initial Record was compiled and are directly material to the issues on appeal; and (3) bear directly on the conduct of Respondent's counsel in these appellate proceedings.

Appellants previously filed a Motion to Supplement the Record on Appeal in or about December 2025. The status of that motion is not entirely clear from Appellants' records, and Appellants respectfully request that this Court treat this Amended Motion as superseding and incorporating the prior motion, or in the alternative, as a supplemental filing in support thereof.

The materials sought to be added to the Record are not cumulative or tangential. Each is specifically material to one or more of the central issues on appeal, including: (1) the actual closing

date and the documentary basis for challenging Respondent's counsel's repeated misrepresentation of that date in appellate filings; (2) the pattern of obstruction by closing attorney Bradley A. Brodie, Esq. and his refusal to comply with a judicial directive; and (3) newly discovered evidence of coordinated conduct among Respondent, her counsel, and other parties that bears directly on the integrity of the proceedings below and before this Court.

PROCEDURAL BACKGROUND

1. This appeal arises from the Saluda County Court of Common Pleas, Case No. 2023-CP-41-00232. The order appealed is the Order Granting Partial Summary Judgment entered July 29, 2025.

2. The Notice of Appeal was filed December 23, 2025. Former counsel filed an initial brief in November 2025 and withdrew effective December 21, 2025. Appellants filed a pro se initial brief and a Motion to Supplement the Record in December 2025. Respondent's initial brief was filed March 31, 2026.

3. Since the original Record was compiled, significant developments have occurred in related proceedings that are directly material to this appeal, including: an August 11, 2025 hearing before Judge Freeman in related Case No. 2025-CP-41-00100 at which closing attorney Bradley A. Brodie, Esq. was directed to provide written confirmation of rent paid at closing; coordinated motions to quash deposition subpoenas filed on April 15, 2026 by Brodie and Respondent's counsel Spradley; and an April 22, 2026 bond revocation hearing in Aiken County at which Respondent Molstad, her counsel Spradley, and other parties with direct involvement in the underlying transaction appeared together.

4. Co-Appellant Hugh Parks Price was incarcerated on May 4, 2026, which has materially limited Appellants' ability to compile and present these supplemental materials. Appellants

respectfully request that the Court take this circumstance into account in evaluating the timing of this filing.

MATERIALS SOUGHT TO BE ADDED TO THE RECORD

Appellants seek to supplement the Record on Appeal with the following categories of materials, each addressed in turn below:

GROUP A — Closing Documents Bearing Brodie's Notarial Certifications

Respondent's counsel Christian Giresi Spradley, Esquire has repeatedly cited a closing date of "May 31, 2023" in filings before this Court and in related proceedings. Appellants contend that this date is false and is directly contradicted by the closing documents bearing the notarial certifications of closing attorney Bradley A. Brodie, Esq., which reflect an actual closing date of June 1, 2023.

The following closing documents are sought to be added to the Record:

- A-1. The Deed for the subject property at 2465 Pine Grove Road, Ward, South Carolina 29166, executed at closing and bearing Brodie's notarial certification reflecting the actual closing date;
- A-2. The Lease Agreement executed contemporaneously with the Deed at the June 1, 2023 closing, signed by all parties, establishing a two-year lease of Lot D in favor of Appellant Price as essential consideration for the sale;
- A-3. The March 31, 2023 Addendum to the purchase agreement, which simultaneously added Lot D to the sale, increased the purchase price, and mandated the two-year lease — establishing that the lease was integral to the transaction, not separate from it;
- A-4. The Move-Out Agreement executed at closing; and

A-5. Any other closing documents bearing Brodie's notarial certifications reflecting the actual closing date.

These documents are directly material to the central issue on appeal regarding the closing date misrepresentation and the trial court's ruling on the merger of the lease into the deed. They are in existence and were before the parties at the time of the transaction. Their inclusion is necessary to provide this Court with an accurate and complete factual record.

GROUP B — August 11, 2025 Freeman Hearing — Transcript and Order

At the August 11, 2025 hearing in related Case No. 2025-CP-41-00100, the Honorable Judge Freeman directed Appellant Price to obtain a written receipt from closing attorney Bradley A. Brodie, Esq. confirming that rent was paid at the closing as part of the transaction. This directive is directly relevant to: (1) Brodie's role and knowledge as a material witness; (2) Brodie's subsequent refusal to provide that documentation; and (3) the pattern of obstruction that has impaired Appellants' ability to correct the false closing date narrative in these proceedings.

In a recorded telephone conversation following that hearing, Brodie verbally acknowledged to Appellant Price that rent was in fact paid at closing. Despite this acknowledgment and Judge Freeman's directive, Brodie provided no written documentation to the Court or to Appellants.

Appellants seek to add to the Record:

B-1. The transcript of the August 11, 2025 hearing before Judge Freeman in Case No. 2025-CP-41-00100, reflecting the Court's directive to obtain confirmation from Brodie;

B-2. Any written order entered following that hearing; and

B-3. The authenticated recording of the subsequent telephone conversation in which Brodie acknowledged that rent was paid at closing, to the extent it was submitted or offered in related proceedings below.

GROUP C — April 15, 2026 Coordinated Motions to Quash

On April 15, 2026, closing attorney Bradley A. Brodie, Esq. and Respondent's counsel Christian Giresi Spradley, Esquire filed near-identical motions to quash deposition subpoenas issued to Brodie and co-closing attorney Chapel. Both motions were filed on the same day, within hours of each other, and followed the same event: the appearance on the public docket at 9:39 AM on April 15, 2026 of proofs of service reflecting that the subpoenas had been served.

The coordination between Brodie — a non-party witness — and Respondent's counsel in filing near-identical motions to quash on the same day, triggered by the same docket event, is direct evidence of the coordinated obstruction of discovery that has characterized this litigation. It is also directly relevant to the credibility of Respondent's counsel's representations to this Court, including his repeated citation of the false May 31, 2023 closing date.

Appellants seek to add to the Record:

- C-1. Brodie's Motion to Quash, filed April 15, 2026 at 12:19 PM, with timestamp;
- C-2. Spradley's Motion to Quash, filed April 15, 2026 at 2:20 PM, with timestamp;
- C-3. The public docket entry reflecting proofs of service at 9:39 AM on April 15, 2026, establishing the triggering event;
- C-4. Appellants' Oppositions to both Motions to Quash; and
- C-5. Any orders entered on those motions.

GROUP D — April 22, 2026 Aiken County Bond Revocation Hearing Transcript

On April 22, 2026, a bond revocation hearing was held in an Aiken County courtroom in connection with criminal proceedings against Appellant Price. At that hearing, the following individuals appeared together: Respondent Lisa Molstad; Respondent's counsel Christian Giresi

Spradley, Esquire; Sara Filler (the complainant in criminal proceedings against Appellant Price); and Barbara Hughes (the Saluda County Sheriff).

The simultaneous appearance of the civil respondent, civil respondent's counsel, and the criminal complainant at a criminal bond revocation hearing concerning the civil appellant is directly relevant to the coordination and conspiracy argument that runs through both pending appeals. It establishes on the public record a connection between the civil and criminal proceedings that Appellants contend has been used to obstruct their prosecution of civil claims.

Of particular significance is the conduct of Respondent's counsel Spradley at that hearing. Appellants contend that Spradley, a former Assistant Solicitor in the Eleventh Judicial Circuit with continuing connections to law enforcement and county government in the circuit, used references to the civil proceedings in a criminal bond hearing in a manner that further evidences the coordination between the civil and criminal tracks of this dispute.

Appellants seek to add to the Record:

D-1. The official transcript of the April 22, 2026 bond revocation hearing in Aiken County, reflecting the appearances of Respondent Molstad, counsel Spradley, Sara Filler, and Barbara Hughes; and

D-2. Any orders entered at or following that hearing.

Appellants acknowledge that this transcript must be obtained from the Aiken County court reporter and respectfully request that the Court allow a reasonable time — not less than thirty (30) days from the date of this Court's order — within which to obtain and file this transcript as a supplement to the Record.

GROUP E — Appellants' Initial Pro Se Brief and Supporting Filings

To the extent the following documents are not already confirmed as part of the Record on Appeal, Appellants seek to add:

- E-1. Appellants' pro se initial brief filed December 2025;
- E-2. The original Motion to Supplement the Record on Appeal filed December 2025 and any response thereto; and
- E-3. All orders entered by this Court in Appellate Case No. 2025-001596 to date.

LEGAL STANDARD

Rule 212, SCACR authorizes a party to move to supplement the Record on Appeal to correct omissions or add materials that are necessary for a proper determination of the appeal. The decision to permit supplementation rests within this Court's discretion, guided by the interests of justice and the need for a complete and accurate appellate record. See *Judy v. Martin*, 381 S.C. 455, 458, 674 S.E.2d 151, 153 (2009) (appellate courts may supplement record in the interest of justice). The materials sought here are not offered to relitigate matters decided below, but to ensure this Court has before it the complete factual predicate necessary to evaluate the issues on appeal accurately and fairly.

Where, as here, the omissions from the Record were caused in substantial part by the withdrawal of counsel mid-appeal, the pro se status of the remaining Appellants, and the incarceration of co-Appellant Price, supplementation is particularly appropriate. To deny supplementation under these circumstances would be to affirm the partial summary judgment below on the basis of an incomplete record — a result inconsistent with both the interests of justice and the policies underlying Rule 212.

CONCLUSION

The materials sought to be added to the Record on Appeal are not peripheral. The closing documents directly contradict a material misrepresentation that has been made to this Court repeatedly. The Freeman hearing transcript and Brodie's recorded acknowledgment go to the heart of the closing date dispute. The April 15 coordination evidence and the April 22 hearing transcript establish the broader pattern of obstruction that has infected these proceedings at every level. Appellants respectfully submit that a complete and accurate Record on Appeal is essential to a fair determination of this appeal, and request that this Court grant this Amended Motion to Supplement in full.

Respectfully submitted,



/s/Sandra Holmwood
Sandra Holmwood
Appellant, Pro Se
1721 Pinewood Drive
Columbia, South Carolina 29205
sdh4foto@gmail.com

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STATEMENT REGARDING THE RECORD ON APPEAL

Pursuant to Rules 208 and 240, SCACR, Appellants provide the following statement regarding the Record on Appeal:

1. The Record on Appeal in this matter consists of all documents designated by the parties in connection with these appellate proceedings, including: the pleadings, orders, and filings in Saluda County Court of Common Pleas Case No. 2023-CP-41-00232; the Notice of Appeal; all prior appellate briefs, motions, and supplemental filings; and all orders entered by this Court to date in Appellate Case No. 2025-001596.

2. The following appellate filings have been made in this proceeding to date, to Appellants' knowledge:

- a. Notice of Appeal — filed by former counsel;
- b. Appellants' Initial Brief — filed by former counsel in November 2025;
- c. Appellants' Pro Se Initial Brief — filed by Appellants in December 2025;
- d. Motion to Supplement the Record on Appeal — filed by Appellants in December 2025;
- e. Motion to Withdraw as Counsel — filed by former counsel, granted December 21, 2025;
- f. Respondent's Initial Brief — filed by Christian Giresi Spradley, Esquire, on March 31, 2026;
- g. This Proof of Service and accompanying Motion — filed May 26, 2026.

3. Appellants note that compilation of the complete Record on Appeal has been materially complicated by: (a) the withdrawal of former counsel in December 2025, which resulted in Appellants lacking complete copies of all filings made by prior counsel; and (b) the incarceration of co-Appellant Hugh Parks Price on May 4, 2026, which disrupted Appellants' ability to compile the Record within the original deadline. Appellants respectfully request leave to supplement the

Record upon identification of any inadvertently omitted document, in the interests of a complete and accurate appellate record.

4. Appellants further request that this Court confirm the status of the previously filed Motion to Supplement the Record on Appeal (filed December 2025), and that any supplemental materials authorized by that motion be incorporated into the Record accordingly.

NOTE REGARDING CO-APPELLANT'S INCARCERATION

Co-Appellant Hugh Parks Price is currently incarcerated as of May 4, 2026. This Proof of Service is filed by Appellant Sandra Holmwood as lead Appellant. Appellants respectfully request that this Court take notice of co-Appellant Price's incarceration in assessing the circumstances of the late filing, and further request that all future orders and correspondence from this Court be served upon:

Sandra Holmwood, 1721 Pinewood Drive, Columbia, South Carolina 29205

(sdh4foto@gmail.com) Hugh Parks Price, 187 Spruce Road, Ward, South Carolina 29036

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/Sandra Holmwood

Sandra Holmwood
Appellant, Pro Se
1721 Pinewood Drive
Columbia, South Carolina 29205
sdh4foto@gmail.com

Dated: May 26, 2026

CERTIFICATE OF FILING

I further certify that on May 26, 2026, a true and correct copy of this Proof of Service of Record on Appeal was filed with the South Carolina Court of Appeals at Post Office Box 11629, Columbia, South Carolina 29211 / 1220 Senate Street, Columbia, South Carolina 29201, and a copy was served upon counsel for Respondent as set forth above.

/s/Sandra Holmwood

Sandra Holmwood
Appellant, Pro Se

Dated: May 26, 2026

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CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2026, a true and correct copy of the foregoing Amended Motion to Supplement the Record on Appeal was served upon the following by U.S. Mail, First Class, Postage Prepaid:

**Christian Giresi Spradley, Esquire
Moore Bradley Myers Law Firm
110 S. Main Street
Saluda, South Carolina 29138
Telephone: (864) 445-4544**

/s/Sandra Holmwood
Sandra Holmwood
Appellant, Pro Se



Dated: May 26, 2026

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