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Jun 19 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SALUDA COUNTY
Court of Common Pleas
Martha M. Rivers, Circuit Court Judge

Appellate Case No. 2025-001596
Case No. 2023-CP-41-00232

Sandra Holmwood and Hugh Price,

Appellants,

v.

Lisa Molstad,

Respondent.

RESPONDENT'S MOTION TO STRIKE DOCUMENT TITLED "PROOF OF
SERVICE OF RECORD ON APPEAL" FILED MAY 26, 2026

Respondent, Lisa Molstad, respectfully moves the Court to strike the document titled "Proof of Service of Record on Appeal" filed May 26, 2026. On June 4, 2026, Respondent filed a document that included (1) a return to the motions of Appellants filed May 26, 2026; (2) a motion to strike the purported proof of service document filed May 26, 2026; and (3) a motion to dismiss the appeal. By letter dated June 8, 2026, the Court instructed the motion to dismiss must be filed as a separate document. Accordingly, a separate motion to dismiss was filed by Respondent on June 9, 2026. By letter dated June 16, 2026, the Court instructed the motion to strike also was required to be filed separately.

Accordingly, Respondent hereby files this motion to strike the purported proof of service filed May 26, 2026.

The record on appeal in this case was due to be served April 30, 2026, thirty days after the service of the last brief (the initial brief of Respondent) on March 31, 2026. The document at issue in this motion purports to be a proof of service for the record on appeal. In fact, no record on appeal has been served. The document itself so demonstrates, as it leaves blank the date of service and includes a notation that the date of service “will be entered” at a later time. This document is not a valid proof of service, as contemplated by Rule 210, SCACR, which requires that a proof of service be filed contemporaneously with the service of the record on appeal:

Within thirty (30) days after service of the last brief, the appellant shall serve a copy of the Record on Appeal on each party who has served a brief. Proof of service of the Record shall be immediately filed with the clerk of the appellate court. . . .

See Rule 210(a), SCACR. Regardless of the title Appellants placed on the document, it is not in fact a proof of service. A document cannot prove an event that has not occurred.

The combined return and motions document previously filed by Respondent on June 4, 2026 (“the June 4 document”) is properly before the Court, having been accepted by the Court as a return to the Appellants’ May 26 motions, as noted in the Court’s letter dated June 8, 2026. The June 4 document sets out in great detail the procedural background of this case, the misrepresentations of Appellants in their May 26 filings, and the court rules and other authorities applicable to Respondent’s opposition to the May 26 filings, including the sham proof of service document. The June 4 document is incorporated herein by reference in its entirety. For the reasons set forth above and in the June 4 document,

Respondent moves the Court to strike the document titled "Proof of Service of Record on Appeal" filed May 26, 2026.

Respectfully submitted,



Christian G. Spradley
Moore Bradley Myers Law Firm, PA
110 South Main Street
Saluda, South Carolina 29138
Telephone: (864) 445-4544
South Carolina Bar No. 13755

Attorney for Respondent

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Sandra Holmwood and Hugh Price,

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v.

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Respondent.

PROOF OF SERVICE

I hereby certify that I have served the Respondent's Motion to Strike Document
Titled "Proof of Service of Record on Appeal" Filed May 26, 2026 to the *pro se* Appellants
on June 19, 2026, by United States mail, addressed as follows:

Ms. Sandra Holmwood
1721 Pinewood Drive
Columbia, SC 29205

Mr. Hugh Price
187 Spruce Road
Ward, SC 29166

Mr. Hugh Parks Price
c/o Aiken County Detention Center
435 Wire Road
Aiken, SC 29801

Hugh Parks Price
2465 Pine Grove Road, Lot D
Ward, SC 29166

Hugh Parks Price
2465 Lot C Pine Grove Road
Ward, SC 29166

Moore Bradley Myers Law Firm, PA


Karen B. Kaminer

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S. Jahue Moore†
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William B. Fortino
Ralph Nichols Riley, Jr.
John C. Bradley, Jr.
Lester McGill Bell, Jr.

Melissa K. Moore
Sierra D. Carini
Emily E. Collins
Catherine Liscusky Jumper
Joshua S. E. Martin
Madison B. Kelly

Retired

J. Mark Taylor**
C. David Sawyer, Jr.†
Billy C. Coleman (1916-2019)
Stanley L. Myers* (1976-2023)
Robert D. Hazel† (1936-2024)

June 19, 2026

Ms. Sandra Holmwood
1721 Pinewood Drive
Columbia, SC 29205

Hugh Parks Price
2465 Pine Grove Road, Lot D
Ward, South Carolina 29166

Hugh Parks Price
2465 Lot C Pine Grove Road
Ward, SC29166

Hugh Parks Price
C/O Aiken County Detention Center
435 Wire Road
Aiken, SC 29801

Hugh Parks Price
187 Spruce Road
Ward, SC 29166

Re Sandra Holmwood and Hugh Price vs. Lisa Molstad
Appellate Case No. 2025-001596

Dear Ms. Holmwood and Mr. Price:

Please find enclosed Respondent's Motion to Strike Document Titled "Proof of Service of Record on Appeal" filed May 26, 2026, which I am serving upon each of you via U.S. Mail.

Yours Very Truly,

Karen B. Kaminer

Legal Assistant to Christian G. Spradley

/kbk
Enclosures

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