

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.

**MOTION FOR EXTENTION OF TIME TO
FILE REPLY BRIEF**

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Appellant Pro Se

Wells Fargo's Counsel
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Jul 20 2026

SC Court of Appeals

**MOTION FOR EXTENTION OF TIME TO
FILE REPLY BRIEF**

Michelle Hodges, Appellant pursuant to Rules 240 respectfully moves this Honorable Court for an extension of time to file Appellant's Reply Brief, in response to Wells Fargo's Respondent's Brief, filed on July 8, 2026. Appellant's Reply Brief is due today July 20, 2026. Appellant is requesting a 30 day extension of time, making the Reply Brief due on August 19, 2026.

GROUND

Good cause exists for this request.

1. Appellant is diligently preparing the reply brief in a complex foreclosure appeal.

Respondent's Brief invokes multiple procedural doctrines that affect the scope of the appeal, including law of the case, preservation, waiver, remittitur and finality, as well as substantive issues including entitlement to enforce the note at filing, notice of default, construction of the deed and foreclosure intervention and alleged abandonment.

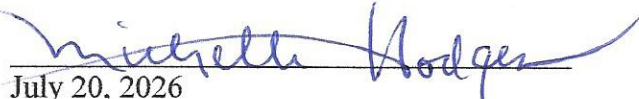
2. Structuring and drafting the Reply Brief requires substantial time in this case, which has been on going for over 8 (eight) and a half years, to ensure that Appellant's issues are clearly framed and properly supported by the record and applicable law, and additional time is needed to complete the brief in a manner that will assist the Court.

3. A brief extension of time will not prejudice Respondent. The appeal will remain on track, and the requested extension is modest relative to the complexity of the issues and the importance of a complete and accurate Reply Brief.

WHEREFORE, Appellant respectfully requests that this court grant this motion, allowing Appellant a 30 day extention to file Appellant's Reply Brief and grant such other relief the Court

deems appropriate.

Respectfully submitted,

A handwritten signature in blue ink, reading "Michelle Hodges", is written over a horizontal line.

July 20, 2026

Michelle Hodges, Appellant Pro Se

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