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Jul 21 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.

CORRECTED
MOTION FOR EXTENTION OF TIME TO
FILE REPLY BRIEF

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

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

CORRECTED
MOTION FOR EXTENTION OF TIME TO
FILE REPLY BRIEF

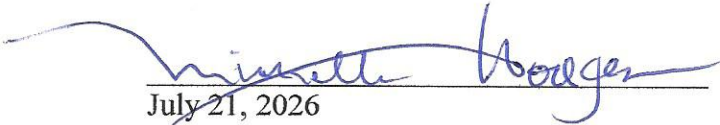
Michelle Hodges Appellant, pursuant to Rules 240, SCACR, respectfully moves this Honorable Court for an extension of time to file Appellant's Reply Brief, in response to Wells Fargo's Respondent's Brief, filed on July 8, 2026. This is Appellant's first request for an extension of time to file the Reply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

GROUND

1. Good cause exists for the granting of this motion, as Appellant is diligently preparing the reply brief in a complex foreclosure appeal. Respondent's Brief invokes multiple procedural doctrines concerning appellate review, including law of the case, preservation, waiver, and finality, along with 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. Appellant makes this motion in good faith and not for purposes of delay. 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 extension to file Appellant's Reply Brief and grant such other relief the Court deems appropriate.

Respectfully submitted,

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

July 21, 2026

Michelle Hodges, Appellant Pro Se

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APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF

I hereby certify that on July 20, 2026, I served the the folLowing document:

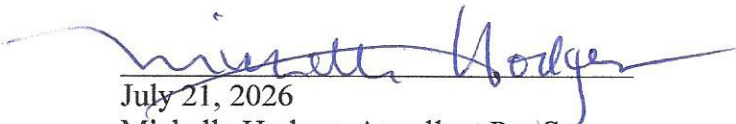
1. Corrected Motion for Extension of Time to File Reply Brief.

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
Womble Bond Dickinson
550 South Main ST
#400
Greenville, SC 29601

Respectfully,


July 21, 2026
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