

THE STATE OF SOUTH CAROLINA
In the Court of Appeals
APPEAL FROM SALUDA COUNTY
The Honorable Donald B. Hocker, Circuit Court Judge

Hugh Parks Price,

Appellant, pro se,

v.

Lisa Lee Molstad,

Respondent.

Appellate Case No. 2025-002567
Lower Court Case No. 2025-CP-41-00100

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SEP 14 2026
SC Court of Appeals

**APPELLANT'S LIMITED OPPOSITION AND RESPONSE TO MOTION FOR
EXTENSION**

Appellant Hugh Parks Price respectfully responds to Respondent's Motion for Extension for Return to Motion for Sanctions. Appellant does not oppose reasonable additional time. He asks the Court to coordinate the extension with his contemporaneous request for leave to amend, clarify who may answer and in what capacity, and ensure that former counsel Christian G. Spradley receives a full opportunity to answer any request for sanctions directed personally against him.

BACKGROUND

1. The original sanctions motion was filed September 3, 2026, and sought sanctions against Christian G. Spradley concerning a motion to strike and motion to dismiss filed while he represented Respondent.
2. Ralph Nichols Riley, Jr. later became counsel of record for Respondent Lisa Lee Molstad. On September 11, 2026, Respondent, through Mr. Riley, requested an extension through September 24, 2026, based on Mr. Riley's trial schedule.

3. Appellant now seeks leave to amend the sanctions motion to correct and clarify its legal standard, caption, contextual record references, and description of the persons against whom relief is sought. The proposed amendment requests sanctions only against Mr. Spradley and expressly excludes Ms. Molstad and Mr. Riley.

REQUEST FOR CLARIFICATION AND COORDINATED EXTENSION

4. Rule 264, SCACR, establishes Mr. Riley as counsel for Respondent. It does not, by itself, establish whether he also represents Mr. Spradley concerning potential sanctions against Mr. Spradley personally. Appellant takes no position concerning any private engagement and asks only that the record identify the capacity in which any return is filed.
5. Because the challenged motions were filed on Respondent's behalf, Respondent may have an interest in defending their legal and factual basis through Mr. Riley. Because the requested sanctions are directed against Mr. Spradley, fundamental fairness also supports permitting Mr. Spradley to answer personally or through counsel authorized to represent him.
6. The pending motion asks for an extension based on Mr. Riley's schedule but does not state whether the requested extension is for Respondent alone or also for Mr. Spradley. Granting an extension without identifying its beneficiary could leave uncertainty concerning Mr. Spradley's response period and the capacity in which a return is submitted.
7. Appellant therefore suggests that the Court grant reasonable interim relief and set the operative response period after ruling on the motion for leave to amend. This approach would allow each appropriate respondent to address one corrected motion and would avoid duplicative returns.

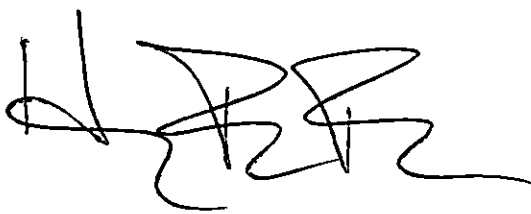
8. No person should be prejudiced by this procedure. Respondent receives the time requested, Mr. Spradley receives clear notice and a personal opportunity to respond, and the Court receives filings that identify the speaker and representative capacity.

PRAYER FOR RELIEF

WHEREFORE, Appellant respectfully requests that the Court:

- a. grant Respondent a reasonable extension or hold the existing response deadline in abeyance until the Court resolves Appellant's motion for leave to amend;
- b. clarify that Respondent Lisa Lee Molstad may file a return through counsel concerning the challenged motions and clarify whether any such return is submitted solely for Respondent or also for Mr. Spradley;
- c. permit Christian G. Spradley to file his own return pro se or through counsel authorized to represent him concerning sanctions directed personally against him;
- d. allow ten days after service of the accepted amended motion, or such other time as the Court finds just, for the appropriate returns;
- e. require any attorney filing on behalf of Mr. Spradley to identify that representative capacity in the return; and
- f. grant such other relief as the Court deems just and proper.

Respectfully submitted,
/s/ Hugh Parks Price
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Email: hughpricesouthcarolina@gmail.com
Dated: September 14, 2026



9/14/20

CERTIFICATE OF SERVICE

I certify that on September 14, 2026, I served a true and correct copy of the foregoing Appellant's Limited Opposition and Response to Motion for Extension upon the persons listed below by the method or methods marked:

☒ C-Track electronic service ☐ United States mail ☒ Certified mail ☐ Electronic mail
☒ Hand delivery

Ralph Nichols Riley, Jr., Esquire

Moore Bradley Myers Law Firm, P.A.

1700 Sunset Boulevard

West Columbia, South Carolina 29169

/s/ Hugh Parks Price

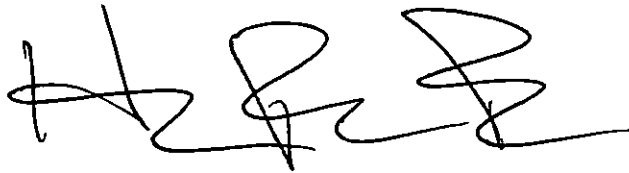
Christian G. Spradley, Esquire

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