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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 MOTION FOR LEAVE TO FILE AMENDED MOTION FOR SANCTIONS

Appellant Hugh Parks Price, appearing pro se, respectfully asks leave to file the attached Proposed Amended Motion for Sanctions Under Rule 269, SCACR, together with its supporting memorandum. Appellant requests this relief to clarify the person against whom sanctions are sought, conform the legal standard to the text of Rule 269, correct clerical and citation errors, and permit an orderly response by every person or party whom the Court determines may respond.

GROUNDS FOR RELIEF

1. Appellant filed the original Motion for Sanctions on September 3, 2026. The Court received and docketed that filing, which expressly identified former counsel Christian G. Spradley as the attorney whose appellate filings were challenged.
2. The original filing gave direct notice to Mr. Spradley by certified mail and electronic mail and served Respondent through current counsel Ralph Nichols Riley, Jr. The amendment does not add a new target or new alleged sanctionable filing.

3. The proposed amendment corrects the original motion's reference to an 'improper purpose' and relies instead on the grounds stated in Rule 269: that an appellate filing is frivolous, taken solely for delay, or not in compliance with the appellate rules.

4. The proposed amendment also supplies the complete appellate caption and contact information required by Rule 267, SCACR, clarifies the limited contextual use of the April 22, 2026 bond-revocation transcript, and notes a related appellate proceeding only for limited procedural comparison. The challenged conduct for Rule 269 purposes remains confined to the identified appellate filings in this case.

5. Respondent has moved for an extension through September 24, 2026. Appellant does not oppose reasonable time for a considered response and asks that the response period be coordinated with the Court's disposition of this motion for leave.

6. Because the amended motion continues to seek sanctions only against Mr. Spradley, Appellant also requests clarification whether Mr. Riley appears solely for Respondent Lisa Lee Molstad or also represents Mr. Spradley concerning potential individual sanctions. Appellant does not ask the Court to decide any private attorney-client issue beyond what is necessary to identify the capacity in which a return is filed.

7. No prejudice should result. Respondent may state her position through counsel, Mr. Spradley may respond personally or through counsel authorized to represent him, and the Court may establish one clear schedule after deciding whether to accept the amendment.

PRAYER FOR RELIEF

WHEREFORE, Appellant respectfully requests that the Court:

a. grant leave to file the Proposed Amended Motion for Sanctions and supporting memorandum;

b. deem the supporting exhibits filed on September 3, 2026, incorporated into the amended filing to the extent permitted, or allow Appellant to refile them with consecutive pagination if the Court prefers;

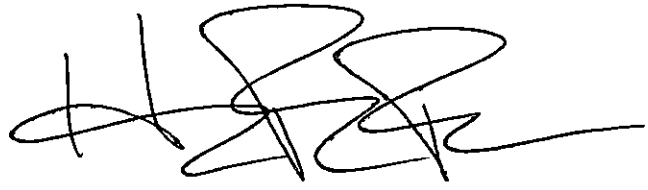
c. preserve the September 3, 2026 notice and service date to the extent the Court deems proper;

d. clarify which person or party may file a return and require any attorney filing for Mr. Spradley to identify that representative capacity;

e. allow Respondent and Mr. Spradley ten days after service of the accepted amended filing, or such other period as the Court finds just, to file any appropriate returns; and

f. grant such other relief as the Court deems just and proper.

Respectfully submitted,
/s/ Hugh Parks Price
Hugh Parks Price, Appellant pro se
2465 Pine Grove Road, Lot D
Ward, South Carolina 29166
Telephone: 864-553-9587
Email: hughpricesouthcarolina@gmail.com
Dated: September 14, 2026



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PROPOSED AMENDED MOTION FOR SANCTIONS UNDER RULE 269 SCACR

Appellant Hugh Parks Price respectfully requests sanctions under Rule 269, SCACR, against former counsel Christian G. Spradley for the motion to strike and motion to dismiss that Mr. Spradley filed in this appeal. No sanctions are requested against Respondent Lisa Lee Molstad or her current counsel Ralph Nichols Riley, Jr. The supporting materials filed with the original motion on September 3, 2026, are incorporated to the extent permitted by the Court.

STANDARD UNDER RULE 269

Rule 269 authorizes the Court, after ten days' notice, to sanction an offending attorney or party when an appeal, petition, motion, or return is frivolous, taken solely for the purposes of delay, or not in compliance with the appellate rules. Appellant asks the Court to apply that standard to the two identified appellate motions and does not request sanctions merely because those motions opposed his position.

GROUNDS

1. The challenged appellate filings should be evaluated against the Court's own file. The file contains written status submissions received on April 27 and June 1, 2026. Appellant contends that dispositive relief based on a materially incomplete account of the filing history lacked a reasonable factual basis, and asks the Court to determine the significance of the actual docket and submissions under Rule 269.

2. The June 30, 2026 motion to dismiss sought dismissal for failures concerning an amended designation of matter and initial brief during a period when Appellant was incarcerated and lacked access to his papers. The Court's April 16, 2026 correspondence had also stated that the appeal would be held in abeyance pending disposition of Respondent's motion to strike and extension request. Appellant asks the Court to evaluate the motion to dismiss in light of counsel's knowledge of the incarceration, the Court's correspondence, and the procedural record then available.

3. Appellant does not contend that an unsuccessful motion is sanctionable merely because it failed. He contends instead that the identified motions, viewed against information available in the Court's file and known procedural circumstances, warrant the Court's determination whether either filing was frivolous, taken solely for delay, or not in compliance with the appellate rules within the meaning of Rule 269.

4. The April 22, 2026 bond-revocation transcript and other previously submitted background materials are offered only for chronology, knowledge, and context. At that hearing, Mr. Spradley addressed Appellant's civil litigation while appearing for Lisa Molstad; the discussion then included whether allegedly frivolous civil filings could bear on the criminal bond condition requiring good behavior. The later revocation order used the broader "good

behavior" ground without specifying which conduct constituted the violation. Appellant does not ask this Court to adjudicate the propriety of the criminal proceeding, to find that the bond was revoked because of civil filings, or to sanction conduct occurring in that proceeding under Rule 269. The Court may draw whatever inference, if any, it finds warranted from the documented chronology.

5. Related Appellate Case No. 2026-001043 provides limited procedural context. That appeal also encountered procedural deficiencies during the period surrounding Appellant's incarceration. On September 9, 2026, this Court granted reinstatement under Rule 260(a), SCACR, and accepted the initial brief and designation as filed. Appellant does not contend that the order expressly found incarceration alone to constitute good cause or that the ruling controls this separate case. He identifies the related proceeding only so the Court may consider the procedural similarity to the extent it deems appropriate.

6. Mr. Spradley was served directly on September 3, 2026, by certified mail and electronic mail. Respondent was served through current counsel. Appellant supports allowing a fresh response period after the Court rules on the requested amendment so that all persons entitled to respond receive a full and fair opportunity to do so.

RELIEF REQUESTED

WHEREFORE, after notice and an opportunity to respond, Appellant respectfully requests that the Court:

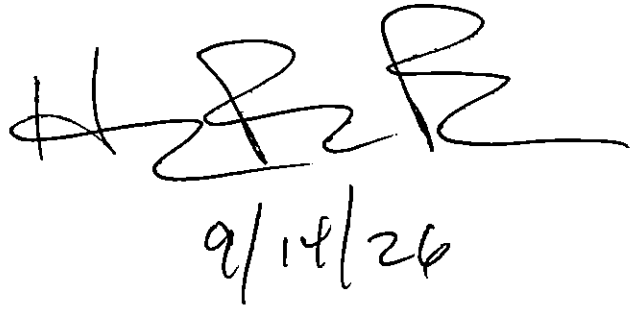
a. determine whether the motion to strike or motion to dismiss filed by Christian G. Spradley was frivolous, taken solely for delay, or not in compliance with the appellate rules;

b. if the Court finds a Rule 269 violation, impose only such sanctions as the circumstances and deterrence of similar conduct require, including documented costs directly occasioned by the challenged motions if recoverable;

c. consider the effect of the challenged filings when resolving any related request for reinstatement or other relief, to the extent procedurally appropriate; and

d. grant such other relief as the Court deems just and proper.

Respectfully submitted,
/s/ Hugh Parks Price
Hugh Parks Price, Appellant pro se
2465 Pine Grove Road, Lot D
Ward, South Carolina 29166
Telephone: 864-553-9587
Email: hughpricesouthcarolina@gmail.com
Dated: September 14, 2026



CERTIFICATE OF SERVICE

I certify that on September 14, 2026, I served a true and correct copy of the foregoing Proposed Amended Motion for Sanctions Under Rule 269, SCACR 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

Christian G. Spradley, Esquire
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
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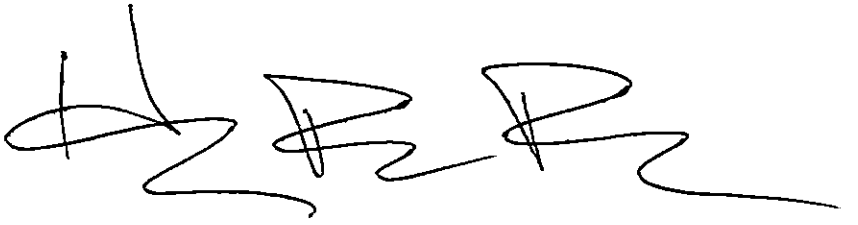
christian.spradley@psc.sc.gov

/s/ Hugh Parks Price



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

[✓] C-Track electronic service [ ] United States mail [✓] Certified mail [✓] Electronic mail [✓] Hand delivery

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/s/ Hugh Parks Price

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