

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

The Honorable James E. Chellis  
Master in Equity

Case No. 2013-CP-18-0183 consolidated with  
Case No. 2013-CP-18-0074

**RECEIVED**  
MAR 02 2015  
**SC Court of Appeals**

Stephen Dudek and Doreen Cross . . . . . Respondents

v.

Thomas M. Ferro and Lorraine B Ferro . . . . . Respondents/Appellants

AND

Molly M. Morphew . . . . . Appellant/Respondent

v.

Stephen Dudek, Doreen Cross, Thomas Ferro and  
Lorraine Ferro, Defendants,

Of Whom

Stephen Dudek and Doreen Cross are . . . . . Respondents.

**DESIGNATION OF MATTER TO BE  
INCLUDED IN RECORD ON APPEAL  
OF  
APPELLANTS  
STEPHEN DUDEK and DOREEN CROSS**

Appellants designate the following for inclusion in the Record on Appeal

1. Order of November 6, 2014
2. Complaint of Stephen Dudek and Doreen Cross
3. Answer of Thomas M Ferro and Lorraine Ferro
4. Complaint of Molly Morpew
5. Answer and Cross Claim of Stephen Dudek and Doreen Cross
6. Email of November 7, 2012 from Susan Nicholson to Dudek and Cross
7. Email of November 12, 2012 from Susan Nicholson to Dudek and Cross
8. Email of December 6, 2012 from Susan Nicholson to Thomas Ferro
9. Email of December 9, 2012 from Thomas Ferro to Susan Nicholson
10. Email from Rick Willis to Susan Nicholson, including Release of Agreement to Buy and Sell Real Estate
11. Transcript of Hearing, June 11 and 12, 2014

I hereby certify that this Designation contains no material which is not relevant to this Appeal.



---

David Athell Collins  
P.O Box 40578  
Charleston, SC 29405-0578  
(843) 760-0220  
(843) 552-2678 facsimile  
Davidacollins2@aol.com  
Attorney for Respondents Doreen Cross and  
Stephen Dudek

2/26, 2015  
Charleston, SC

**LAW OFFICE  
OF  
DAVID A. COLLINS, LLC**

---

DAVID A. COLLINS  
davidacollins2@aol.com

7455 CROSS COUNTY ROAD  
PO BOX 40578  
CHARLESTON, SOUTH CAROLINA  
29423

(843) 760-0220 TEL  
(843) 552-2678 FAX

February 25, 2015

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

**RECEIVED**  
MAR 02 2015  
**SC Court of Appeals**

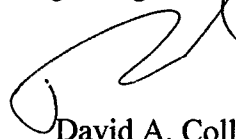
RE: Morphew v Dudek et. al, Case No. 2014-002633

Dear Ms. Kitchings,

Enclosed herewith please find an original and two copies of the following:

1. Initial Brief of Respondents Cross and Dudek
2. Designation of Matter to be Included in Record
3. Certificate of Service

Please file the Brief and return a filed copy to me in the envelope provided.  
Should you have questions regarding this matter please do not hesitate to contact me.



David A. Collins, Esq.

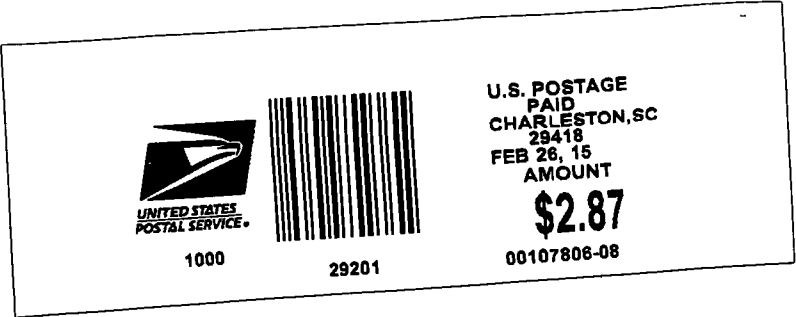
CC/ Molly Morphew  
Thomas and Lorraine Ferro



**RECEIVED**

MAR 02 2015

**SC Court of Appeals**



Law Office of David A. Collins, LLC  
P. O. Box 40578  
Charleston, SC 29423

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201