

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

Appellate Case No. 2017-001393

**RECEIVED**  
FEB 06 2018  
SC Court of Appeals

Stephen Dudek, Doreen Cross,

Respondents,

v.

Thomas M. Ferro and Lorraine B. Ferro,

Respondents,

And

Molly M. Morphew,

Appellant,

v.

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

Respondents

**APPELLANTS MOTION TO DISSOLVE RESPONDENTS**

**MOTION TO DISMISS APPEAL**

Pursuant to Rule 240, SCACR, and for the reasons set for in its memorandum in support of this motion, Appellant Molly Morphew respectfully moves for an Order dissolving or dismissing the Respondents Motion to Dismiss Appeal.



Molly M. Morpew, pro se  
786 E. Butternut Rd  
Summerville, SC 29483  
843-514-7299  
[Morpew926@gmail.com](mailto:Morpew926@gmail.com)

January 31, 2018

Other Parties of Record:

Steven L. Smith, Esquire  
P.O. Box 40578  
Charleston, SC 29423  
Attorney for Respondents:  
Steven Dudek and Doreen Cross

Thomas M. Ferro Lorraine B. Ferro  
76 Elk Range Dr.  
Snowmass, CO 81654  
Respondents

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**APPELLANT'S MEMORANDUM IN SUPPORT OF  
MOTION TO DISSOLVE RESPONDENTS MOTION TO DISMISS APPEAL**

Rule 240(c)(3) states, "*Each motion or petition shall include the following:*" AND  
"*Where the Record on Appeal or Appendix has not been filed, or where the facts relied upon in  
support of the motion are not contained in the Record on Appeal or Appendix, the parties shall  
file affidavits and other documents in support of their positions.*"

Appellant argues, Pursuant to Rule 240(c)(3), Respondents failed to file the required affidavits and other documents in support of their positions in its motion to dismiss, as no record on Appeal or Appendix has been filed, therefore the Respondents ultimately failed to meet the requirement(s) of motions and petitions generally. Rule 240(c)(3).

### CONCLUSION

Due to the Respondents' failure as stated above, Appellant respectfully moves this court for an Order dissolving or dismissing the Respondents' motion to dismiss.



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786 E. Butternut Rd  
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[Morpew926@gmail.com](mailto:Morpew926@gmail.com)

January 31, 2018

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APPEAL FROM DORCHESTER COUNTY  
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Lorraine Ferro, Respondents

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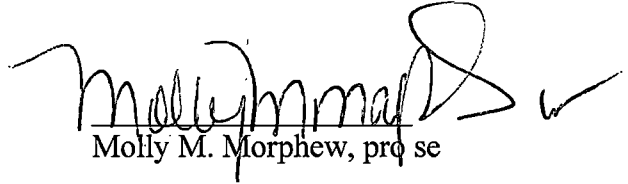
**CERTIFICATE OF SERVICE**

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I, Molly M. Morpew, Appellant [and pro se] for said case, hereby certify that I have, on this date indicated below, served counsel below with Appellant's Motion to Dissolve Respondents' Motion to Dismiss Appeal by mailing a copy of same via United States Mail, postage prepaid and return address clearly indicated on said envelope, to the following:

Steven L. Smith, Esquire  
P.O. Box 40578  
Charleston, SC 29423-0578  
Attorney for Respondents:  
Stephen Dudek and Doreen Cross

Thomas and Lorraine Ferro, Pro se  
76 Elk Range Dr.  
Snowmass, CO 81654  
Respondents



Molly M. Morphey, pro se

February 4, 2018

February 4, 2018

**RECEIVED**  
FEB 06 2018  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29211

Re: Appellate Case No. 2017-001393  
Molly M. Morphew v. Stephen Dudek, Doreen Cross, Thomas Ferro, Lorraine Ferro

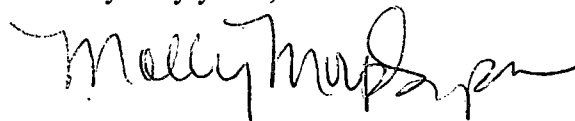
Dear Ms. Kitchings:

Please find enclosed an original and six (6) copies of the Appellant's Motion to Dissolve Respondents Motion to Dismiss Appeal and Certificate of Service, to be recorded and filed.

Also enclosed is a said copy of above to be kindly recorded and returned in the self-addressed, stamped envelope and a filing fee of \$25.00.

Thank you for your assistance. Should you have any questions, please do not hesitate to contact me.

Very truly yours,



Molly Morphew, pro se

Cc: Steven L. Smith, Esq.  
Thomas and Lorraine Ferro

ORIGIN ID:CHSA (843) 574-0697  
MOLLY MORPHEW

SHIP DATE: 05FEB18  
ACTWGT: 0.50 LB  
CAD: 104726038/INET3980

786 E BUTTERNUT RD

SUMMERVILLE, SC 29483  
UNITED STATES US

BILL SENDER

TO HONORABLE JENNY ABBOTT KITCHINGS  
SOUTH CAROLINA COURT OF APPEALS  
1015 SUMTER STREET

RECEIVED

FEB 06 2018

SC Court of Appeals

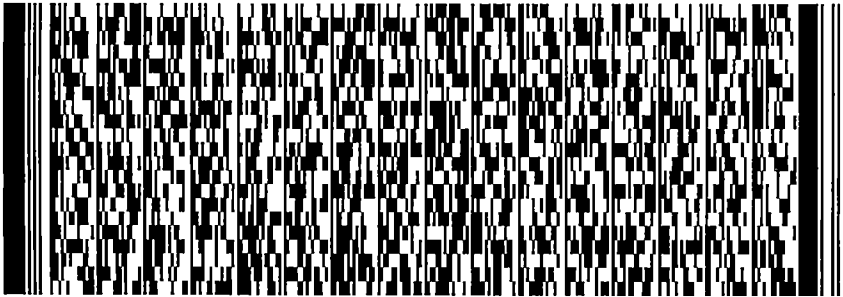
COLUMBIA SC 29211

(803) 734-1890

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