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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
MAY 31 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 NOTICE AND MOTION TO AMEND DESIGNATION
OF MATTER SUBMITTED IN ITS INTIAL AND REPLY BRIEF**

For the reasons set forth below, Appellant Molly Morphew respectfully moves this court to allow an amendment to its Designation of Matter filed with its Initial and Reply Briefs. The Record on Appeal and the final briefs have not yet been served nor filed. This amendment does not add matter, only corrects grammatical or title errors, adds the applicable pages called out in

the briefs, adds case numbers for reference or added clarity, or removes matter not relevant to the appeal. The amended documents are called out below, and provides with specificity each change.

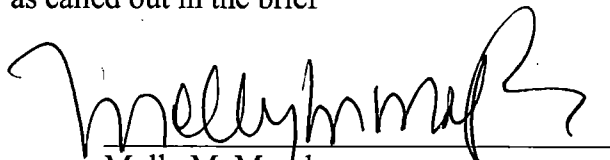
1) **Appellants Amended Designation of Matter (for Initial Brief)** (ATTACHMENT A)

- Line 1: Correct “Closing Order of May 17, 2017” to read appropriately, “Order, Motion 59(e), May 17, 2017, Case No. 2013-CP-18-00183”
- Line 2: Add “Rule to Show Cause” and removed redundant “Order” -- [Line corrected from “Order for Contempt/Ejection/Attorney Fees and Costs Order of June 14, 2017, Case No. 2013-CP-18-00183” to “Order for Rule to Show Cause (Contempt)/Ejection/Attorney Fees and Costs of June 14, 2017, Case No. 2013-CP-18-00183”] -7: Add “Case No. 2013-CP-18-00183”
- Line 8: Correct “May 12, 2017 Hearing Transcripts, pg. 98-100” to read appropriately, “Transcript, Motion 59(e), May 17, 2017, Pgs. 98-100 Case No. 2013-CP-18-00183
- Line 9: Add “Case No. 2013-CP-18-00183”
- Line 11: Remove line completely; it’s a repeat from line 8.
- Line 12: Add “Case No. 2013-CP-18-00183”
- Line 13: Remove line completely; complete transcript is not relevant to the appeal; further only the pages called out in the briefs should be included. No pages called out, therefore removing it from the “Designation of Matter” submitted in the initial brief pursuant (Rule 209).
- Line 14: Add “Case No. 2013-CP-18-00183”

2) **Appellants Designation of Matter (for Reply Brief)** (ATTACHMENT B)

- Line 5: Corrected “Pleading Statement” to “Ferro Petition”
- Line 6: Correct date of email from “2016” to “2014”
- Line 8: Spell out Motion (“Mot.” to “Motion”); Removed “Petition”
- Line 11: Spell out Motion (“Mot.” to “Motion”)
- Line 12: Remove “First” as it’s the only Closing Order

- Line 13: Correct to match 'Designation of Matter' for Initial Brief (for consistency) [From "Morphew/Ferro Answer to Closing Motion, April 6, 2017, Case No. 2013-CP-18-00183" to "Ferro/Morphew Answer to Defendants Motion for Closing/Fees, April 6, 2017, Case No. 2013-CP-18-00183]
- Line 14: Add "pg. 7" as called out in the brief; Correct to match 'Designation of Matter' for Initial Brief (for consistency) [From "Transcript of [59E] Motion hearing Transcript, Motion 59(e), May 12, 2017, Case No. 2013-CP-18-00183" to "Transcript, Motion 59(e), May 12, 2017,, Case No. 2013-CP-18-00183, pg. 7"
- Line 15: Correct "Second Closing Order, May 17, 2017, Case No. 2013-CP-18-00183 " to read appropriately, "Order, Motion 59(e), May 17, 2017, Case No. 2013-CP-18-00183"
- Line 16: Correct to match 'Designation of Matter' for Initial Brief (for consistency) [From "Plaintiff Morphew's Answer in Opposition to Defendants Dudek and Cross' Notice of Motion and Motion For Rule to Show cause (Contempt), Ejectment, and Attorney's Fees, June 8, 2017 Case No. 2013-CP-18-00183" to "Morphew's Answer in Opposition to Defendants Dudek and Cross' Notice of Motion and Motion For Rule to Show cause (Contempt), Ejectment, and Attorney's Fees, June 8, 2017 Case No. 2013-CP-18-00183"
- Line 18: Add "Pgs. 4,5,72, 74, 75, 93" as called out in the brief



Molly M. Morphew, pro se
786 E. Butternut Rd
Summerville, SC 29483
843-514-7299
Morphew926@gmail.com

May 23, 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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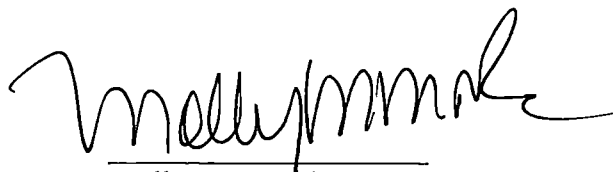
Respondents

CERTIFICATE OF SERVICE

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 and Notice to Amend its Designation of Matter by mailing a copy of same via United States Mail, postage prepaid and return address clearly indicated on said envelope, to the following: (signature on next page)

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

A handwritten signature in black ink, appearing to read 'Molly M. Morphey', written in a cursive style.

Molly M. Morphey, pro se

May 25, 2018

ATTACHMENT A

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

James E. Chellis, Master in Equity

Appellate Case No. 2017-001393

Molly M. Morpew

Appellant

v.

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

Respondents

APPELLANT'S AMENDED DESIGNATION OF MATTER
(INITIAL BRIEF) TO BE INCLUDED IN THE RECORD ON APPEAL

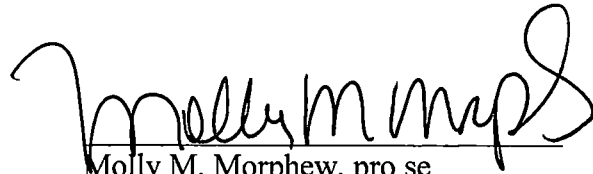
1. Order, Motion 59(e), May 17, 2017, Case No. 2013-CP-18-00183
2. Order for Rule to Show Cause (Contempt)/Ejectment/Attorney Fees and Costs of June 14, 2017, Case No. 2013-CP-18-00183
3. Order for Specific Performance of November 6, 2014, Case No. 2013-CP-18-00183
4. Ferro Petition, September 10, 2014, Case No. 2013-CP-18-00183
5. Ferro Motion to Compel June 14, 2016, Case No. 2013-CP-18-00183
6. Order on Ferro Motion to Compel August 9, 2016, Case No. 2013-CP-18-00183
7. Ferro/Morpew Answer to Defendants Motion for Closing/Fees April 6, 2017, Case No. 2013-CP-18-00183
8. Transcript, Motion 59(e), May 12, 2017, Pgs. 98-100, Case No. 2013-CP-18-00183
9. Morpew's Answer in Opposition to Defendants Dudek and Cross' Notice of Motion and Motion For Rule to Show cause (Contempt), Ejectment, and Attorney's Fees, June 8, 2017 Case No. 2013-CP-18-00183, Pgs. 9-11, 13, , Case No. 2013-CP-18-00183
10. Rule 59(e) Order, para. 13

11. June 1, 2017 e-mail Lorraine Ferro, Case No. 2013-CP-18-00183

12. AFFIDAVIT of Service (Rule to Show Cause (Contempt)), Case No. 2013-CP-18-00183

I certify that this designation contains no matter which is irrelevant to this appeal.

May 23, 2018

A handwritten signature in black ink, appearing to read "Molly M. Morpew". The signature is written in a cursive style with a large initial "M" and a long, sweeping tail.

Molly M. Morpew, pro se
786 E. Butternut Rd.
Summerville, SC 29483
(843) 514-7299

ATTACHMENT B

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

James E. Chellis, Master in Equity

Appellate Case No. 2017-001393

Stephen Dudek, Doreen Cross	v.	Respondents
Thomas Ferro, Lorraine Ferro	And	Respondents,
Molly M. Morpew,	v.	Appellant,
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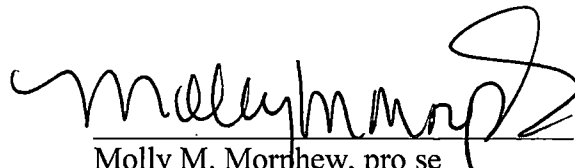
APPELLANT'S AMENDED DESIGNATION OF MATTER
(REPLY BRIEF) TO BE INCLUDED IN THE RECORD ON APPEAL

1. Respondents Summons and Complaint, Case No. 2013-CP-18-00074.
2. Appellants Summons and Complaint, Case No. 2013-CP-18-00183
3. Email dated January 14, 2013 Attorney Qualey to Thomas Ferro
4. Consent Order, September 18, 2013, Case No. 2013-CP-18- 00183
5. Ferro Petition, September 10, 2014, Case No. 2013-CP-18-00183
6. Email dated September 18, 2014 from Ferro to Morpew
7. Specific Performance Order, November 6, 2014, Case No. 2013-CP-18-00183
8. Motion to Dismiss, February 9, 2017, Appellate Case No. 2014-002633
9. Order Granting Dismissal, February 15, 2017, Appellate Case No. 2014-002633
10. Remittitur, February 15, 2017, Appellate Case No. 2014-002633
11. Motion to Set Closing, March 16, 2017, Case No. 2013-CP-18-00183
12. Closing Order, April 3, 2017, Case No. 2013-CP-18-00183

13. Ferro/Morphew Answer to Defendants Motion for Closing/Fees, April 6, 2017, Case No. 2013-CP-18-00183
14. Transcript, Motion 59(e), May 12, 2017, Case No. 2013-CP-18-00183, pg. 7
15. Order, Motion 59(e), May 17, 2017, Case No. 2013-CP-18-00183
16. Morphew's Answer in Opposition to Defendants Dudek and Cross' Notice of Motion and Motion For Rule to Show cause (Contempt), Ejectment, and Attorney's Fees, June 8, 2017 Case No. 2013-CP-18-00183
17. Order Dissolving Rule to Show Cause (Contempt), June 8, 2017, Case No. 2013-CP-18-00183
18. Transcript, Rule to Show Cause/Contempt/Ejectment Hearing, June 12, 2017, Case No. 2013-CP-18-00183, Pgs. 4,5,72, 74, 75, 93
19. Appellate Opinion, January 11, 2017, Appellate Case No. 2014-002633

I certify that this designation contains no matter which is irrelevant to this appeal.

May 23, 2018



Molly M. Morphew, pro se
786 E. Butternut Rd.
Summerville, SC 29483
(843) 514-7299

May 24, 2018

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

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MAY 31 2018

SC Court of Appeals

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

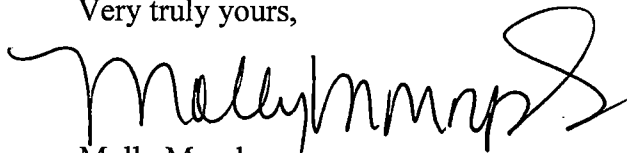
Dear Ms. Kitchings:

Please find enclosed an original and five (5) copies of the Appellant's Motion to Amend Designation of Matter Submitted In Its Initial and Reply Brief 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,

A handwritten signature in black ink, appearing to read 'Molly Morphew', written in a cursive style.

Molly Morphew, pro se

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



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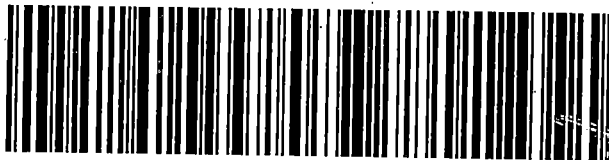
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TO:

HON. JENNY ABBOTT KITCHINGS
SOUTH CAROLINA COURT OF APPEALS
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COLUMBIA SC 29201-3726

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