

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-18-00074
Appellate Case No. 2017-001393

Stephen Dudek, Doreen Cross, Respondents,

v.

Thomas M. Ferro and Lorraine B. Ferro, Respondents,

And

Molly M. Morpew, Appellant,

v.

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

RECEIVED
JUN 04 2018
SC Court of Appeals

**RESPONDENTS' MOTION TO DISMISS APPEAL AND RETURN TO
APPELLANT'S MOTION TO AMEND DESIGNATION OF MATTER**

Pursuant to Rules 207, 209, 210, 240, 260, and 263, SCACR, and for the reasons set forth below, Respondents Stephen Dudek and Doreen Cross respectfully move for an order dismissing the Appellant's appeal. Respondents' would respectfully request that this motion is also considered a return to the Appellant's Motion to Amend her Designation of Matter.

On April 27, 2018, the Appellant served her final initial brief, which was her brief in reply to the Respondents' initial brief. Pursuant to Rule 210, SCACR, her deadline to serve the Respondents' with the Record on Appeal was May 27, 2018, which fell on a Sunday, thus extending her deadline to May 28, 2018, pursuant to Rule 263, SCACR. The Appellant was further required by Rule 210, SCACR, to provide this Court with proof of service of the Record on Appeal. The Appellant has failed to serve the Respondents with a copy of the Record of Appeal, as mandated by Rule 210, SCACR.

Instead of complying with Rule 210, SCACR, the Appellant took a series of actions that are definite proof that she has failed to adhere to numerous South Carolina Appellate Court Rules, requiring this Court to dismiss her appeal pursuant to Rule 260, SCACR.

First, on May 24, 2018, four days prior to her deadline to serve the Respondents with the Record on Appeal, the Appellant wrote an email, a copy of which, along with a response from the undersigned counsel for the Respondents, is attached hereto as Exhibit 1. In that email, she unilaterally concluded, without making any form of motion with this Court, that she would not be including in the Record on Appeal several items listed in the Respondents' Designation of Matter. (Ex. 1). The items that the Appellant indicated that she would not include were a certain pleading and a transcript from a hearing that preceded one of the orders she has appealed in this appeal. (Id.). In their Designation of Matter, the Respondents requested inclusion of three transcripts, in their entirety, from hearings held on March 27, 2017, May 12, 2017, and June 12, 2017. These hearings preceded and gave rise to the orders currently being appealed. As to one of the transcripts listed by the Respondents in their Designation of Matter, the Appellant stated, "if found proper, and you are requiring (any portion of) the March 27th hearing transcript to be included, then you will need to provide those pages to me by COB Friday, May 25, 2018, as I

will be serving the Record within the week.” (Id.). The Respondents’ counsel responded less than three hours later, informing the Appellant that they, in the interest of compromise, were willing to forego inclusion of the discussed pleading but that inclusion of the transcripts was non-negotiable. (Id).

Second, on the same day, May 24, 2018, ostensibly after receiving the above-discussed email response from Respondents’ counsel, the Appellant served a copy of her Motion to Amend her Designation of Matter. (Ex. 2). The Respondents’ received the Motion today and, to date, it is not posted on this Court’s online case tracking portal. Her Motion is filled with instances of her corrections of grammatical or title errors, as she admits is the purpose of the motion. (Ex. 2, p. 1-2). Notably, under “Line 13,” she attempts to eliminate inclusion of a complete transcript from one of the three hearings leading up to this appeal. (Id., p. 2). In other words, she originally included in her Designation of Matter one of the transcript that the Respondents also included in their Designation of Matter.

Based on the Appellant’s May 24, 2018, email and May 24, 2018, Motion, it is evident that the Appellant has not complied with numerous South Carolina Appellate Court Rules and that she has filed an unnecessary motion to afford herself additional time to comply with Rule 210, SCACR. The Appellant’s May 24, 2018, demand that the Respondents supply her with a transcript by “COB Friday May 25, 2018” (i.e., less than one full day) is clear evidence that the Appellant has not complied with several rules. First, the Appellant has not complied with Rule 207, SCACR, as she never “contemporaneously furnish[ed] all parties, the Office of Court Administration, and the clerk of the appellate court with copies of all correspondence with the court reporter.” Rule 207, SCACR. Second, and even worse, it is apparent that she never ordered the transcripts in accordance with Rule 207, SCACR. Otherwise, she would not have

requested that the Respondents provide her with a copy of one of the relevant transcripts. Third, it is the Appellant's responsibility to compile the Record on Appeal, including all items listed by the Respondents. Rule 210, SCACR. It is not the Appellant's place to make such demand of, and place such a deadline on, the Respondents. Compounding her errors, the Appellant demands that the Respondents provide the transcript in less than 48 hours, a task that is not only contrary to the rules but impossible to achieve, considering this Court provides Appellants ten days to order the transcript and sixty days for a reporter to provide a transcript. Rule 207, SCACR. The Appellant makes her demand so that she can stay within the deadlines of the deadlines of the South Carolina Appellate Court Rules.

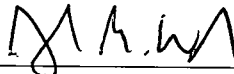
Instead of addressing the supposed issue with the Respondents' inclusion in their Designation of Matter three transcript(s), which are necessary to this appeal, the Appellant filed a Motion to Amend her own Designation of Matter. The motion contains no substance. She readily admits that "[t]his amendment does not add matter, only corrects grammatical or title errors, adds the applicable page called out in the briefs, adds case numbers for reference or added clarity, or removes matter not relevant to the appeal." (Ex. 2, pp. 1-2). As to adding clarity or specificity, this is an unnecessary step. Upon service of the Record on Appeal on the Respondents, it would be their role to examine the Record on Appeal and ensure that the items she and they have listed in their respective Designations of Matter were included in the Record on Appeal. The Appellant could simply add the clarity or edit the grammatical errors in the table of contents in the Record on Appeal, as long as the substance of the Record on Appeal is inclusive of all items listed in both Designations of Matter. As to removing items from the Designation of Matter, the time for filing Designations of Matter has passed. Furthermore, the Respondents indicated in their May 24, 2018, email that one pleading could be omitted but

transcripts from three hearings could not be omitted. This motion is nothing more than an attempt to buy time with this Court.

The time to serve Designations of Matter and the Record on Appeal has expired. The Appellant is attempting to use an untimely motion under Rule 209, SCACR, to afford herself more time to comply with Rule 210, SCACR, to which she has not adhered. In this appeal, the Appellant has also failed to comply with Rule 207. She did not notify the parties and this Court of her communications with the court reporter, and she apparently never ordered at least one of the transcripts relevant to this appeal. Her failure to adhere to the rules dates back to the inception of this appeal.

For all of these reasons, specifically the Appellants continuous failure to adhere to the South Carolina Appellate Court Rules throughout this appeal, this Court should dismiss this appeal.

SMITH | CLOSSER, P.A.



Steven L. Smith (SC Bar No.: 05173)

Samuel M. Wheeler (SC Bar No.: 101008)

7455 Cross County Road, Suite 1

P.O. Box 40578

Charleston, SC 29423-0578

843-760-0220

Attorneys for Stephen Dudek and Doreen Cross

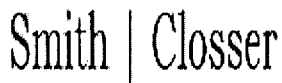
June 1, 2018

Other Parties of Record:

Molly M. Morphew
786 E. Butternut Rd.
Summerville, SC 29483
Appellant

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

Exhibit 1



Corey M. Plis <cplis@scnlaw.com>

Fwd: Record on Appeal Appellate Case No. 2017-001393

1 message

Samuel M. Wheeler <swheeler@scnlaw.com>

Fri, Jun 1, 2018 at 9:49 AM

To: "Corey M. Plis" <cplis@scnlaw.com>

Smith | Closser, P.A.

Attorneys at Law
7455 Cross County Road, Suite One
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----- Forwarded message -----

From: **Samuel M. Wheeler** <swheeler@scnlaw.com>
Date: Thu, May 24, 2018 at 9:12 AM
Subject: Re: Record on Appeal Appellate Case No. 2017-001393
To: Molly Morphew <mollymorphew1@gmail.com>
Cc: "Steven L. Smith" <:ssmith@scnlaw.com>

Ms. Morphew,

I'll respond to your requests in reverse order. In an effort to compromise, I will consent to you not including in the Record on Appeal only your Proposed Amended Complaint from Case No. 2016-CP-18-1706, considering you withdrew your motion to amend.

As to the transcripts from hearings held in Case No. 2013-CP-18-183 on March 27, 2017, May 12, 2017, and and June 12, 2017, I consider their inclusion, in their entirety, non-negotiable. Your appeal is based on the errors committed by the Lower Court in between remittitur by the Court of Appeals and the Lower Court holding you in contempt for failing to vacate the home. In that time frame, the three hearings were held to set closing and determine whether you were in violation of the order setting closing. It is necessary for the Court of Appeals to see this progression, your arguments, our arguments, the Lower Court's rationale, and how it approached this case following remittitur. Inclusion in their entirety is also necessary to combat your desire to include advantageous soundbites from these hearings. So, inclusion is not limited to me proving that you were simply in attendance, as you suggested. Moreover, you have appealed specifically two orders that were preceded by these three hearings, further emphasizing their importance.

The rules are clear that you, as the Appellant, are responsible for compiling the Record on Appeal, including all items listed in the Respondents' Designation of Matter. No one understands the costs associated with this appeal and your other pending actions more than my clients. That said, when you determined that the Lower Court was again in error, and you decided to file this second appeal in this case, you took on the responsibility of compiling the Record on Appeal. Again, it is not the Respondents' role to compile the Record on Appeal, and it is certainly not their responsibility to adhere to deadlines set by the Appellant. The Record on Appeal deadline is set by the Court of Appeals, and you are required to

adhere to it, by providing the complete Record on Appeal for our review within 30 days after service of your final initial brief.

If the three transcripts, in their entirety, are not included in the Record on Appeal, or if any other item from my Designation of Matter is excluded (obviously excluding the above mentioned proposed amended complaint, which I have agreed can be left out), then I will be forced to move the Court of Appeals for dismissal of your appeal, for failure to adhere to the appellate rules.

I'm happy to discuss these issues with you, but our position on the transcripts will not change.

Thank you.

Best,

Sam

Smith | Closser, P.A.

Attorneys at Law
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Confidentiality Notice: This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone 843-760-0220 or reply to this e-mail and delete all copies of this message.

On Thu, May 24, 2018 at 6:20 AM, Molly Morphew <mollymorphew1@gmail.com> wrote:

Good morning, Mr. Smith/Mr. Wheeler-

I'm compiling the Record on Appeal and in its review I found a few instances that are inappropriate or irrelevant as well as overbroad and burdensome, therefore will not be included.

First, there are 3 'entire' transcripts listed on your designation of matter. It appears the entire transcripts are not relevant to the appeal, therefore should not be included in your designation of matter, and only the pages called out in the briefs should be included (see Rule 209). But specifically, the 3 transcripts you call out are grouped together and used only in one instance in your brief, called out generically without setting forth with specificity those parts of the transcript, and more importantly used merely to support your claim "that I attended those hearing(s)", which is a claim I neither have opposed or raised as an issue in my appeal. Therefore, including "entire transcripts" to claim a moot point/issue is inappropriate and/or irrelevant to the appeal, and further would be overly broad and burdensome to submit to the appellate court, let alone the prejudice it causes to myself (costly to produce and mail). Even if appropriate, the complete contents or pages themselves are not necessary to prove I attended the hearings, but instead the page(s) that state who was present would be more appropriate.

Additionally, if found proper, and you are requiring (any portion of) the March 27th hearing transcript to be included, then you will need to provide those pages to me by COB Friday, May 25, 2018, as I will be serving the Record within the week.

Second, I will not be including the Proposed Amended Complaint in the Record, as it was never presented to the lower court (Rule 210), instead I withdrew it along with my motion to amend before any hearing or review; Moreover, the proposed amended version states the same allegations as the complaint on file, but only amended for clarity and to remove those causes of action not to be included in that civil action. Further, just like the entire transcripts, it would be overly burdensome to include such vast and unnecessary pages to file with the appellate

6/1/2018

Smith | Closser Mail - Fwd: Record on Appeal Appellate Case No. 2017-001393

court, and undue costs to print and mail as such. Due to these reasons, the Proposed Amended Complaint is neither appropriate nor relevant, and therefore cannot be included.

Please let me know if you have any questions or concerns.

Regards,

Molly

Exhibit 2

JUN 01 2018

May 24, 2018

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

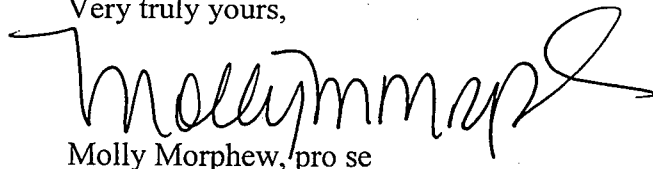
Dear Ms. Kitchings:

Please find enclosed an original and 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', with a stylized flourish at the end.

Molly Morphew, pro se

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

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

Stephen Dudek, Doreen Cross,

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Thomas M. Ferro and Lorraine B. Ferro,

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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.

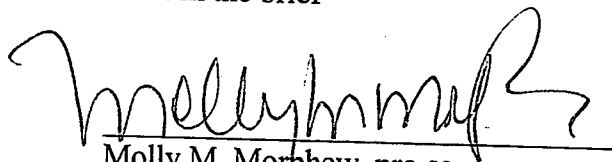
1) **Appellants Amended Designation of Matter (for Initial Brief)** (ATTACHMENT A)

- 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/Ejectment/Attorney Fees and Costs Order of June 14, 2017, Case No. 2013-CP-18-00183" to "Order for Rule to Show Cause (Contempt)/Ejectment/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

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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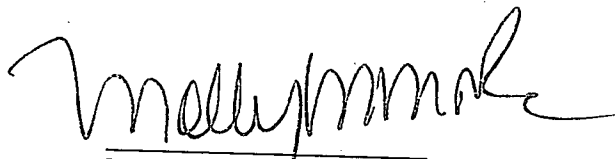
Respondents

CERTIFICATE OF SERVICE

I, Molly M. Morphew, 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', with a horizontal line underneath the signature.

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

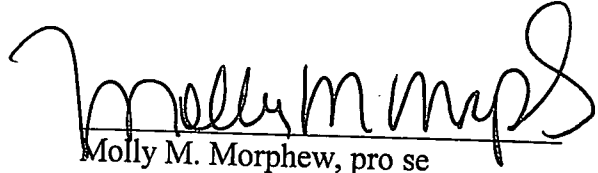
1. Order, Motion 59(e), May 17, 2017, Case No. 2013-CP-18-00183
2. Order for Rule to Show Cause (Contempt)/Ejectment/Attorney Fees and Costs of June 14, 2017, Case No. 2013-CP-18-00183
3. Order for Specific Performance of November 6, 2014, Case No. 2013-CP-18-00183
4. Ferro Petition, September 10, 2014, 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. Morphew', written over a horizontal line.

Molly M. Morphew, 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
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James E. Chellis, Master in Equity

Appellate Case No. 2017-001393

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v.

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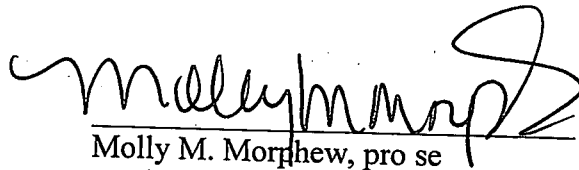
APPELLANT'S AMENDED DESIGNATION OF MATTER
(REPLY BRIEF) TO BE INCLUDED IN THE RECORD ON APPEAL

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 Morphew
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

A handwritten signature in black ink, appearing to read 'molly morphew', with a stylized flourish at the end.

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

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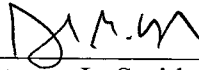
CERTIFICATE OF SERVICE

I certify that, on the date indicated below, I served Respondents' Motion to Dismiss by United States Mail, postage prepaid, on the following:

Molly M. Morphew
786 E. Butternut Rd.
Summerville, SC 29483
Appellant

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

SMITH | CLOSSER, P.A.



Steven L. Smith (SC Bar No.: 05173)

Samuel M. Wheeler (SC Bar No.: 101008)

7455 Cross County Road, Suite 1

P.O. Box 40578

Charleston, SC 29423-0578

843-760-0220

Attorneys for Stephen Dudek and Doreen Cross

June 1, 2018

Smith | Closser, P.A.

Attorneys at Law
7455 Cross County Road, Suite One
Post Office Box 40578
Charleston, South Carolina 29423-0578

Samuel M. Wheeler
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June 1, 2018

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

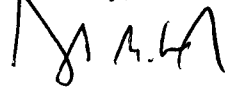
RE: Molly M. Morphew, Appellant v. Stephen Dudek, et al., Respondents
Case No. 2013-CP-18-00074
Appellate Case No. 2017-001393
S/C File No. 17-232

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of Respondents' Motion to Dismiss in the above appeal. Also enclosed are a Certificate of Services and your filing fee of \$25.

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

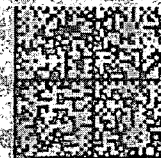
Sincerely,



Samuel M. Wheeler

cc: Molly M. Morphew
Thomas M. Ferro
Lorraine B. Ferro

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