

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

The Honorable James E. Chellis, Master-In-Equity

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Case No. 2013-CP-18-00074  
Appellate Case No. 2017-001393

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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

**RECEIVED**  
AUG 13 2018  
SC Court of Appeals

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**CERTIFICATE OF SERVICE**

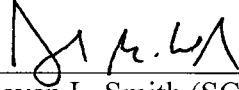
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I certify that, on the date indicated below, I served Respondents' Final Brief by United States Mail, postage prepaid, on the following:

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)

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P.O. Box 40578

Charleston, SC 29423-0578

843-760-0220

*Attorneys for Stephen Dudek and Doreen Cross*

August 10, 2018

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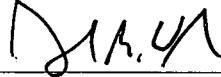
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**CERTIFICATE OF RESPONDENTS STEPHEN DUDEK AND DOREEN  
CROSS**

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The undersigned certifies that the Final Brief of these Respondents complies with Rule 211(b), SCACR.

SMITH | CLOSSER, P.A.



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August 10, 2018

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August 10, 2018

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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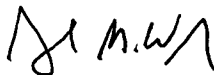
RE: Molly M. Morphew, Appellant v. Stephen Dudek, et al., Respondents  
Case No. 2013-CP-18-00074  
Appellate Case No. 2017-001393  
SJC File No. 16-232

Dear Ms. Kitchings:

Enclosed please find the original (unbound) and fifteen (15) bound copies of Respondents Stephen Dudek and Doreen Cross' Final Brief in the above appeal. Also enclosed is the compliance certificate and certificate of service. Lastly, enclosed is one additional copy of each item, which I respectfully request that you return, clocked-in, in the envelope provided.

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