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August 29, 2018

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

RECEIVED
AUG 31 2018
SC Court of Appeals

RE: Molly M. Morpew, Appellant v. Stephen Dudek, et al., Respondents
Appellate Case Nos. 2017-001393; 2018-000507
S|C File Nos. 16-232; 17-167

Dear Ms. Kitchings:

Please file this letter and enclosures in both of the above appellate cases.

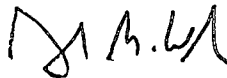
On August 27, 2018, I, along with counsel in all matters brought by Ms. Morpew, received the enclosed email. As you can see, she threatens our clients with criminal prosecution unless we produce a settlement offer, to end her pending cases and appeals, by today, August 29, 2018.

While this email does not directly relate to any of the issues in Ms. Morpew's two pending appeals, I felt the need to put the Court on notice of such activity. For four years, Ms. Morpew has been acting *pro se* in multiple cases and appeals. She has successfully navigated litigation and the appeals process. True, she is not bound by South Carolina's Rules of Professional Conduct, but, at this point, she is not a naïve *pro se* litigant, and she equally should not get a complete pass. If such an email was written by any licensed attorney, then he or she would be sanctioned, suspended or worse.

I have no real forum in which to present this email, other than to the courts presiding over Ms. Morpew's cases and appeals. I have already put the Dorchester County Solicitor's Office on notice of her intentions. To be clear, her allegations are without merit, but that will not stop her from making them and, at minimum, causing a police report to be filed.

Thank you for your assistance. Please do not hesitate to contact me with any questions.

Sincerely,

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

Samuel M. Wheeler

cc: Molly Morpew
Thomas and Lorraine Ferro

Enclosures

(no subject)

1 message

Molly Morphey <mollymorphew1@gmail.com>

Mon, Aug 27, 2018 at 6:32 AM

To: "Samuel M. Wheeler" <swheeler@scnlaw.com>, "Steven L. Smith" <ssmith@scnlaw.com>, Amy Neuschafer <aneuschafer@collinsandlacy.com>, Amy Hill <ahill@gwblawfirm.com>, David Collins <davidacollins2@aol.com>

Mr. Wheeler,

As you are aware, I had previously approached all opposing counsel in an email in regards to an important and time sensitive issue. I requested a conference call to discuss further, but you personally replied you all were too busy during that week. Anyways, I took your suggestion and have decided to put my action in an email or writing as I think this should prevent any future misunderstandings or misrepresentations.

All,

The aim of this communication is to advise you of the action I am about to take and to discuss the ramifications, and a possible out-of-court settlement.

In light of your repeated mention and complaints in the pleadings of how much this is costing your clients, I'm sure your clients want this to be over, as do I. Having said this, please do not take this as a sign of weakness on my part as I am fully prepared to take this case, and any pending case, to its fruition as necessary. And though I'm not obligated to provide a 'heads-up', I felt it is the right thing to do as the ramifications are very serious and once started, irreversible. I do not wish harm upon anyone, even when that harm has been caused by your clients themselves. In this case, I'm protecting my rights, reversing an injustice to myself, and attempting to prevent unlawful and fraudulent actions upon our legal system.

So to get to the point, I have and am about to file criminal charges for perjury, fraud, conspiracy, and obstruction of justice against your clients. Again, my concern is that once filed, is irreversible and cannot be retracted and is out of my hands. I understand that just one count of perjury is a felony and when found guilty must warrant a judgment—and in this case - of up to 5 years in prison and/or \$10,000 in fines. It appears there could be multiple counts of perjury, plus a possible count of forgery, conspiracy, fraud, and/or obstruction of justice. Each a felony in itself. A felony on your client's record (and particularly of perjury, fraud, obstruction of justice or conspiracy) could affect their current employment, future employment, security clearances, government pensions, loans, credit, credibility for the individuals and their employers, internal audits by state auditors, fines and sanctions, damage to reputations, and most important to me, will affect any subsequent, current or pending lawsuits or appeals I have against your clients.

Further, the criminal charges will include obtaining property by false pretenses (another felony due to the value of the property), and I'll be raising the issue of a void Order or judgment.

Please be advised, it appears I have approximately 70 counts of perjury and/or misrepresentation of material facts pertinent to the original case by Doreen Cross and Stephen Dudek, including some by Collins, just in the filing of their complaint, their Answer to my original complaint, in their depositions and at trial. Of those 70 there are at least 20 separate, individual and very material false statements made that, if the truth were told by your clients from the beginning as it should have been, would most definitely have guaranteed a different outcome in the original case. Keep in mind these particular counts are only instances by Dudek, Cross and Collins, and exclude any instances in subsequent pending cases or by any other defendants.

And so, due to the irreparable harm this could be to your clients, let alone the costs to defend against criminal charges, I felt I needed to reach out and see if we could come to an agreement in order to end this for all parties. Please consult with your clients and let me know how you wish to proceed. Unless I hear back directly from each counsel representing their client(s)/defendant(s) by end of business Wednesday, August 29th, 2018, be advised the criminal complaint will be filed.

Thank you, and regards,

Molly Morphew