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STATE OF SOUTH CAROLINA
In The court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable Deadra L. Jefferson, First Judicial Circuit
The Honorable Edgar W. Dickson, First Judicial Circuit
Honorable Maite Murphy, First Judicial Circuit

RECEIVED
MAR 15 2019
SC Court of Appeals

Case No. 2016-CP-18-1706
Appellate Case No. 2018-002185

Molly M. Morpew,

Appellant

v.

Stephen Dudek, Doreen Cross, Carolina One,
Carolina One, Susan Nicholson, Woody Law
Firm, Carrie Boyer, First Federal, Allison
Williams, David A. Collins, Michael Scarafile

Respondents

**APPELLANT'S MOTION FOR PERMISSION TO EXCEED THE
PAGE REQUIREMENT OF ITS INITIAL BRIEF AND REPLY BRIEF**

Appellant, Molly M. Morpew (hereafter "Morpew"), hereby respectfully asks this court to allow it to exceed the page requirement of its Initial Brief, and its Reply Brief, pursuant 208(b)(5), *"Except in cases in which a sentence of death has been imposed, principal briefs shall*

not exceed fifty (50) pages, and reply briefs shall not exceed twenty-five (25) pages. On motion, the appellate court may grant a party permission to exceed those limitations.”

On February 21st, 2019 Morpew filed a Motion to Extend Time for Briefing. Motion is still pending. On March 4th, Morpew issued a letter to this court asking for its guidance, specifically inquiring if only one brief is allowed or does an Appellant file a brief for each Order on appeal since there are 15 Orders.

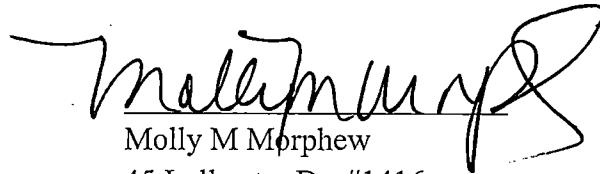
Morpew has assumed only one (1) brief is allowed, therefore since its drafting of its Initial Brief, Morpew has found that filing one (1) brief no longer than 50 pages is unattainable. All in all, there are respectively fifteen (15) Orders on appeal, three (3) transcripts, twenty-four (24) Motions, answers or responses in which those orders were based on, and ten (10) Respondents (one which is self-represented and three (3) individual counsels of record). The Orders include, but not limited to, Orders on Motions to Dismiss, Motions for Summary Judgment and Motions for Default and Default Judgment, some with only one Respondent and some with up to five Respondents included.

The predicament being the South Carolina Appellate Court Rule 208(b)(5) states the length of the initial brief is not to exceed fifty (50) pages, and reply briefs shall not exceed twenty-five (25) pages. It appears this rule has not taken into consideration an appeal of eleven (11) Interlocutory Orders and four (4) Final Orders, for it appears most appeals in the South Carolina Appellate Court are on one (1) or, at most, two (2) Orders, therefore fifty (50) pages is usually more than adequate. As Morpew presented in her letter, in this instance she is more than certain an average of 3.33-pages for each Order will not be adequate or attainable.

Therefore, due to the complexity of this case and the amount of issues and Respondents, Appellant brings this Motion respectfully seeking this Court's approval to grant Appellant

permission to exceed the limitations of Rule 205(b)(5) regarding its Initial Brief(s), and any Reply Brief(s) conversely. Appellant is not sure if providing an *exact* number of pages it is seeking to exceed is fair until formatting is complete, but also understands this court cannot grant permission to exceed if Appellant has not provided a number of pages to approve. Therefore Appellant provides its best estimate and asks for [an average] of thirty-five (35) pages total *per Order* in its Initial Brief (35 pages x 15 Orders), and eighteen (18) pages total *per Order* in its Reply Brief (18 x 15 Orders), or exceeding fifty (50) pages of an Initial brief by 475 pages and exceeding twenty-five (25) pages of a Reply brief by 245 pages.

Morphew respectfully submits this motion on the 10th day of March, 2019



Molly M Morphew
45 Lullwater Dr. #1416
Richmond Hill, GA 31324

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Respondents

PROOF OF SERVICE

I HEREBY CERTIFY that I served the APPELLANT'S MOTION FOR PERMISSION TO EXCEED THE PAGE REQUIREMENT OF ITS INITIAL BRIEF AND REPLY BRIEF on the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on March 11, 2019, addressed to their respective attorney of record or to their last known address on record as indicated below:

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

David A. Collins, pro se
P.O. Box 30052
Charleston, SC 29417
Respondent, pro se

Susan Nicholson
Michael Scarafile
Carolina One

Amy L. Neuschafter, Esquire
Collins & Lacy, PC
11945 Grandhaven Drive, Ste D
Murrells Inlet, SC 29576
Attorney for Respondents:
Carrie Boyer
Woody Law Firm

Amy L. B. Hill, Esquire
Gallivan, White & Boyd, PA
P.O. Box 7368
Columbia, SC 29202-7368
Attorney for Respondents:
Allison Williams
First Federal Bank (aka South State)



Molly M. Morpew, pro se
45 Lullwater Dr. #1416
Richmond Hill, GA 31324
(843-514-7299)

March 10, 2019
Richmond Hill, GA

March 10, 2019

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

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Re: Appellate Case No. 2018-002185
Molly M. Morphew v. Stephen Dudek, et. al

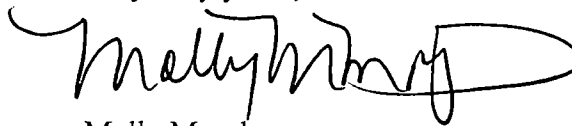
Dear Ms. Kitchings:

Please find enclosed an original and six (6) copies of the APPELLANT'S MOTION FOR PERMISSION TO EXCEED THE PAGE REQUIREMENT OF ITS INITIAL BRIEF 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 \$50.00.

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.
Amy L. Neuschafter, Esquire
Amy L. B. Hill, Esquire
David A. Collins, pro se





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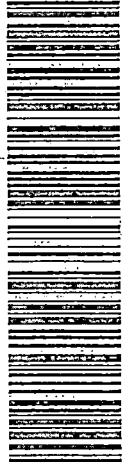
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