

April 19, 2019

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

**RECEIVED**

APR 22 2019

SC Court of Appeals

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

Dear Ms. Kitchings:

I write on behalf of Defendants Allison Williams and First Federal, properly identified as South State Bank, formerly known as South Carolina Bank and Trust, in response to Appellant's letter to the Court dated April 11, 2019. In her letter, Appellant Molly Morhew presumes an extension of time to file her initial brief pending decision on her March 15, 2019 motion requesting an expansion of the page limits of her initial brief from 50 pages to 475 pages. On February 21, 2019, and prior to the outstanding motion detailed above, Appellant filed a motion for extension of time to file her initial brief. On March 22, 2019, the Court granted Appellants motion for an extension of time stating, "The time for serving and filing the appellant's initial brief and designation of matter is hereby extended until April 12, 2019. **No further extensions will be granted absent extraordinary circumstances.**" (emphasis added). In addition to the Court's express language in its March 22 Order, South Carolina Appellate Court Rule 240 states, "Unless otherwise provided by these Rules, or ordered by the appellate court, the time limits imposed by these Rules shall not be stayed by the filing of a motion or petition." Rule 240, SCACR. Therefore, Ms. Morhew has not filed her initial brief within the time limits prescribed by the South Carolina Appellate Court Rules or this Court's order of March 22.

South Carolina Appellate Court Rule 208 states, "Upon the failure of the appellant to file and serve his brief within the time prescribed, the clerk of the appellate court **shall sign an order dismissing the appeal**, and the appeal shall not be reinstated except as provided by Rule 260." Rule 208, SCACR (emphasis added). Appellant's appeal should be dismissed because of her failure to comply with the time limits imposed by the Rules and this Court. Ms. Morhew's only appropriate recourse will be through application under Rule 260, SCACR.

Ms. Morpew has initiated a string of litigation and cases related to the real estate deal at issue in this case – many of which have ended up before this Court. In addition to the instant appeal, Ms. Morpew has two other appeals related to the same or similar subject matter currently pending before the Court<sup>1</sup>. In addition to the three current appeals, Ms. Morpew has two other appeals which have concluded<sup>2</sup>. Ms. Morpew should be expressly and intimately familiar with the South Carolina Appellate Court Rules. Regardless of her extensive experience before this Court, “a *pro se* litigant who knowingly elects to represent himself assumes full responsibility for complying with substantive and procedural requirements of the law.” *State v. Burton*, 356 S.C. 259, 265, 589 S.E.2d 6, 9 n.5 (2003).

Based on the above, this Appeal should be dismissed pursuant to Rule 208, SCACR.

Sincerely,

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GALLIVAN, WHITE & BOYD, P.A.



Jordan M. Crapps

JMC/ljj

cc: Molly M. Morpew  
Steven L. Smith, Esquire  
Amy Lynn Neuschafer, Esquire  
David Collins, Esquire

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<sup>1</sup> Appellate Case Nos.: 2018-000507 and 2017-001393.

<sup>2</sup> Appellate Case Nos.: 2017-001528 and 2014-002633.



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