

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

JUN 20 2019

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

SC Court of Appeals

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 DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

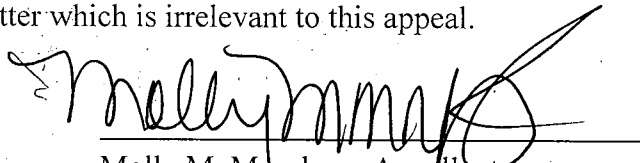
1. Dudek sales contract, October 24, 2012
2. Woody Engagement letter/ Ferro response, November 27, 2012
3. Termination Notice, December 16, 2012
4. Morpew sales contract, December 16, 2012
5. Email-- Attorney Qualey to Ferros, January 15, 2013
6. Lis Pendens, January 11, 2012
7. Dudek Complaint, January 15, 2013 Civil Case No. 2013-CP-180074
8. Morpew Complaint—Original action, Morpew v. Dudeks, Ferros January 31, 2013
Case No. 2013-CP-18-000183

9. Ferro Petition, September 9, 2014
10. Order-- granting specific performance to the Dudeks and Morphew, November 6, 2014
Case No. 2013-CP-18-0183
11. Opinion No. 2017-UP- 019, Filed January 11, 2017 Appellate Case No. 2014-002633
12. Complaint – Trespass Upon Easement-- Morphew v. Stephen Dudek and Doreen Cross
Civil Case No. 2018-CP-18-01661
13. Motion-- Entry of Default and Judgment, November 27, 2017
14. Order granting Summary Judgment-- Stephen Dudek, Doreen Cross, Susan Nicholson,
Michael Scarafile and Carolina One Real Estate, November 15, 2018
15. Order granting Summary Judgment-- First Federal and Allison Williams, November 15,
2018
16. Motion to Deem Admissions Admitted and Affidavit – First Federal February 16, 2018
17. Motion/Compel Discovery Responses - Cross January 30, 2018
18. Motion to Deem Admissions Admitted and Affidavit – Cross February 1, 2018
19. Order granting Motion to Dismiss-- David Collins, November 15, 2018
20. Motion to Dismiss-- Michael Scarafile, Susan Nicholson, Carolina One Real Estate and
David Collins, September 20, 2016
21. Motion to Dismiss - First Federal and Allison Williams September 20, 2016
22. Order denying in part Motion to Dismiss-- Michael Scarafile, Susan Nicholson, Carolina
One Real Estate and David Collins, January 31, 2017
23. Motion for Summary Judgment Michael Scarafile, Susan Nicholson, Carolina One Real
Estate, Stephen Dudek and Doreen Cross, February 14, 2018
24. Plaintiff Response to FF Motion for Summary Judgment, September 27-2018
25. Motion to Dismiss 12(b)(6), Woody Law Firm and Carrie Boyer, September 29, 2016)
26. Amended Order denying in part Motion to Dismiss-- First Federal and Allison Williams,
February 13, 2017
27. Motion for Summary Judgment-- Michael Scarafile, Susan Nicholson, Carolina One Real
Estate, Stephen Dudek and Doreen Cross, February 14, 2018
28. Plaintiff Response to FF Motion for Summary Judgment, September 27-2018
29. Plaintiff Response In Opposition to Stephen Dudek, Doreen Cross, Susan Nicholson,
Michael Scarafile and Carolina One Real Estate Motion for Summary Judgment 3/5/18
30. Motion to Dismiss, Stephen Dudek and Doreen Cross, September 21, 2016
31. Order denying in part Motion to Dismiss-- Stephen Dudek and Doreen Cross, January 31,
2017
32. Plaintiff's Brief in Opposition to Woody Motion to Dismiss, October 31-2016
33. Amended Order denying in part Motion to Dismiss-- Woody Law Firm and Carrie
Boyer, April 3, 2017
34. Amended Motion for Summary Judgment Woody Law Firm and Carrie Boyer, March
12, 2018

35. Order granting Summary Judgment-- Woody Law Firm and Carrie Boyer, November 13, 2018
36. Stephen Dudek and Doreen Cross Complaint, Breach of Contract for Specific Performance, January 15, 2013 Civil Case No. 2013-CP-180074
37. Motion for Default Entry and Default Judgment, November 27, 2017
38. Motion to Strike Def. Collins Answer and Return to Motion, January 30, 2018
39. emails Morphew/Stevens, February 4-February 17, 2018
40. Order denying Appellant's Motion for Default Judgment, February 23, 2018
41. Morphew e-mail dated May 29, 2018
42. Hearing Transcript, May 29, 2018
43. Order, May 31, 2018
44. Plaintiff's 59(e) Motion, June 11, 2018
45. Order, Denying Appellant's 2nd Motion for Entry of Default and Judgment, November 13, 2018
46. Plaintiff's Brief in Opposition to Defendants Scarafile, Collins, et al Motion to Dismiss 12(b)(6) and 12(b)(8), October 4, 2016
47. Email Clerk to parties, October 18, 2018
48. 2nd Motion for Entry of Default and Default Judgment, April 4, 2018
49. Entry Of Default/Damages Hearing Form, Case No. 2016-CP-1801706
50. Collins Answer, December 19, 2017
51. Return to Motion, December 19, 2017
52. Email – Morphew and Stevens January 19, 2018
53. Email Morphew and Stevens, January 23, 2018
54. Emails Morphew/Stevens, February 4-February 17, 2018
55. Hearing Transcript, May 29, 2018
56. Email Clerk to Scarafile, et al. December 19, 2017
57. 59(e) Motion, June 11, 2018
58. Email Chandler Rowh to all parties, October 18, 2018
59. Hearing transcript-- October 1, 2018
60. Order granting in part Collins, Scarafile, Nicholson, Carolina One's Motion to Dismiss, January 31, 2017
61. Fraud/Fraud on the Court Complaint—current action, Morphew v. Dudeks, et al. August 24, 2016 *attachments absent
62. Email-- Ferro, September 9, 2014)
63. Defendants Dudek Motion for Supersedeas Bond and Contempt Civil Case No. 2013-CP-18-00183
64. Email Williams/Mortgage Department, January 18, 2013
65. 10-day adverse letter from First Federal to Dudeks, January 3, 2013
66. Denial Letter(s), Dudek and Cross, January 31, 2013
67. Suspension Notice, David Collins, July 20, 2016

68. Email Williams/Mortgage Department, January 18, 2013)
69. Email, Respondent Scarafile (President and Chief Counsel of Carolina One) , December 18, 2012
70. Order, Constructive Trust – Morpew v. Stephen Dudek and Doreen Cross Pg. 8 Para. 1- Appellate Case No. 2018-000507
71. Morpew Deposition, January 16, 2017 pg. 22, 80. 105-106, 121, 124, 229-231, 232, 298-299,
72. Email Williams to Sandi Steele, January 18, 2013
73. Trial transcript, June 111-12, 2014, pg. 221-222 Civil Case No. 2013-CP-1800183
74. Certificate of Non-Service- Doreen Cross, Dorchester County Sheriff's Dept., December 19, 2018
75. Email, Nicholson/Carrie Boyer/Wooddy Law Firm December 5, 2012
76. Email, Nicholson/Carrie Boyer/Wooddy Law Firm December 12, 2012
77. Wooddy/Boyer Answer to Complaint, Case No. 2016-CP-2185
78. Email Rick Willis/Susan Nicholson, November 27, 2012

I certify that this designation contains no matter which is irrelevant to this appeal.



Molly M. Morpew, Appellant pro se
45 Lullwater Dr. Unit #1416
Richmond Hill, GA 31324

June 18, 2019

THE 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

Appellate Case No. 2018-002185

RECEIVED
JUN 20 2019
SC Court of Appeals

Molly M. Morpew

Appellant

v.

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

Respondents

CERTIFICATE OF SERVICE

I, Molly M. Morpew, Appellant [and pro se] for said case, hereby certify that I have, on this date indicated below, served counsel below with an Appellants 2ND MOTION TO EXCEED PAGE LIMIT OF APPELLANT'S INITIAL AND REPLY BRIEFS, its INITIAL BRIEF, CERTIFICATE OF SERVICE, CERTIFICATE OF COMPLIANCE pursuant Rule 208(b), and its DESIGNATION OF MATTER to be included in Record on Appeal, by mailing a copy of same via United States Mail, postage prepaid and return address clearly indicated on said envelope, to counsel at the following address:

Steven L. Smith, Esquire
P.O. Box 40578
Charleston, SC 29423-0578

Attorney for Respondents:

Stephen Dudek
Doreen Cross
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

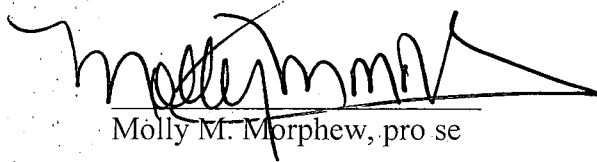
David A. Collins, pro se
P.O. Box 30052
Charleston, SC 29417

Respondent, pro se

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
Bank)



Molly M. Morphew, pro se

June 18, 2019

June 17, 2019

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

RECEIVED
JUN 20 2019
SC Court of Appeals

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

Dear Ms. Kitchings:

Please find enclosed Appellants 2ND MOTION TO EXCEED PAGE LIMIT OF APPELLANT'S INITIAL AND REPLY BRIEFS and its INITIAL BRIEF, the CERTIFICATE OF SERVICE, CERTIFICATE OF COMPLIANCE, and its DESIGNATION OF MATTER to be included in Record on Appeal, to be recorded and filed.

Also enclosed is a copy of above to be kindly recorded and returned in the self-addressed, stamped envelope, and a \$50.00 money order, #17-964894394, dated June 17, 2019 for the motion filing fee.

Thank you and very truly yours,



Molly Morphew, pro se.

Cc: Amy L. Neuschafer, Esq.
Amy B. Hill, Esq.
Steven L. Smith, Esq.
David A. Collins, pro se

RECEIVED

JUN 20 2019

SC Court of Appeals

Delivery specified for domestic use.
PRIORITY MAIL™ included to many major
international destinations.
International Insurance.
Available.
Plies online.
Internationally, a customs
form may be required.

P

usps.com \$7.65 9405 5036 9930 0036 0965 88 0076 5000 0032 9201

US POSTAGE

Legal Flat Rt Env



06/18/2019

Mailed from 31324 062S0000000309

PRIORITY MAIL 2-DAY™

MOLLY MORPHEW
45 LULLWATER DR UNIT 1416
RICHMOND HILL GA 31324-6619

Expected Delivery Date: 06/20/19

Ref#: MOT-A DOM

0004

Carrier -- Leave if No Response

C076

SHIP TO:

HON. JENNY ABBOTT KITCHINGS
SOUTH CAROLINA COURT OF APPEALS
1015 SUMTER ST
COLUMBIA SC 29201-3726

USPS TRACKING #



9405 5036 9930 0036 0965 88

Electronic Rate Approved #038555749