

RECEIVED

NOV 13 2019

SC Court of Appeals

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

THE STATE OF SOUTH CAROLINA COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Perry H. Graverly, Circuit Court Judge
Robin B. Stilwell, Circuit Court Judge

Wells Fargo Bank, N. A.,.....Respondent,

V.

Michelle Hodges,.....Appellant

RETURN IN OPPOSITION
TO RESPONDENT'S MOTION FOR EXTENTION OF TIME

Michelle Hodges, Appellant Pro Se, 11/12/2019
6 Young Harris Dr, Simpsonville, SC 29681
For Certified Mail, Please send to:
PO Box 95
Mauldin, SC 29662
Michellehodges938@gmail.com
864-714-5263


This Return in Opposition to the Respondent's motion for an extension of time, is being filed as the Respondent's motion is in violation of the Rules of Professional conduct 1.16, as Mr. Caldwell is not the attorney of record.

Rule 1.15 Declining or Terminating Representation(d)(1) Mandatory Withdrawal (2) A lawyer ordinarily must decline or withdraw from representation if the client demands that the lawyer engage in conduct that is illegal or violates the Rules of professional Conduct or other law. (3) When a lawyer has been appointed to represent a client, withdrawal ordinarily requires approval from the appointing authority. See also Rule 6.2 Similarly, court approval or notice to the court is often required by applicable law before a lawyer withdraws from pending litigation.

Mr. Laney, of Greenville, SC substituted in the Court of Common Pleas for Rogers, Townsend and Thomas on 2/19/2018 and Mr. Caldwell was not appointed as co-counsel. Attorney-client relationship impliedly stipulates to carry a case to termination. See *Graham v. Town of Loris*, 272 S.C. 442, 42, 248 S.E. 2d 594 599 (1978).

Further, the Respondent's motion does not comply with SCAR Rule 240 (c)(1) (2) or (3).

Respectfully submitted


Michelle Hodges, Appellant Pro Se, 11/12/2019
6 Young Harris Dr, Simpsonville, SC 29681
For Certified Mail, Please send to:
PO Box 95
Mauldin, SC 29662
Michellehodges938@gmail.com
864-714-5263

Respondent's Counsel of Record:
Womble Bond Dickson, S. Sterling Laney III
550 South Main Street #400
Greenville, SC 29601
T - 864-255-5400 F-864-255-5440
Sterling.Laney@wbd-us.com

ATTORNEYS AND PARTIES OF RECORD SERVE

SOUTH CAROLINA COURT OF APPEALS)

Wells Fargo Bank, NA)

RESPONDENT)

v.)

Michelle Hodges, Individually:)

APPELLANT)

) CASE NO. 2019-001565

) CERTIFICATE OF SERVICE

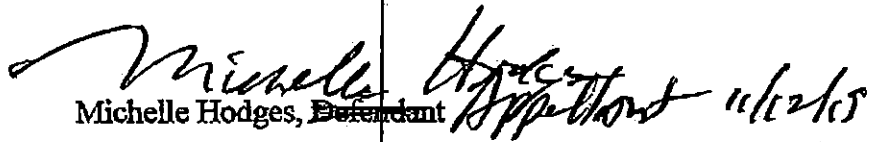
RECEIVED
NOV 13 2019
SC Court of Appeals

I the undersigned defendant, Michelle Hodges, do certify that I have served the below parties, via first class mail as shown below.

Certified Mail
S. Sterling Laney, Attorney
Womble Bond Dickinson
550 S. Main Street #400
Greenville, SC 29601

H. Guyton Murrel, Attorney
Tracey C. Easton, Attorney
SC Housing Corp
300-C Outlet Pointe Blvd
Columbia, SC 29210

Bryant S. Caldwell, Associate
Womble Bond Dickinson
1221 Main ST
Columbia, SC 29201


Michelle Hodges, Defendant

Product	Qty	Unit Price	Price
First-Class Mail® Letter (Domestic) (COLUMBIA, SC 29201) (Weight: 0 Lb 0.60 Oz) (Estimated Delivery Date) (Thursday 11/14/2019) Certified (USPS Certified Mail #) (70190700000122724037)	1	\$0.55	\$0.55
First-Class Mail® Letter (Domestic) (COLUMBIA, SC 29210) (Weight: 0 Lb 0.60 Oz) (Estimated Delivery Date) (Thursday 11/14/2019) Certified (USPS Certified Mail #) (70190700000122724013)	1	\$0.55	\$0.55
First-Class Mail® Letter (Domestic) (GREENVILLE, SC 29601) (Weight: 0 Lb 0.60 Oz) (Estimated Delivery Date) (Thursday 11/14/2019) Certified (USPS Certified Mail #) (70190700000122724020)	1	\$0.55	\$0.55
Total:			\$12.15

Hand of Source

Michelle Hogan

11/12/19

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee \$3.50

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$0.55

Total Postage and Fees \$4.05

Sent To *SE Housing*

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

Postmark Here 0671 04

11/12/2019

PS Form 3800, April 2015 PSN 7530-02-000-904/ See Reverse for Instructions

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee \$3.50

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$0.55

Total Postage and Fees \$4.05

Sent To *Cathy Wolf*

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

Postmark Here 0671 04

11/12/2019

PS Form 3800, April 2015 PSN 7530-02-000-904/ See Reverse for Instructions

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee \$3.50

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$0.55

Total Postage and Fees \$4.05

Sent To *Laney*

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

Postmark Here 0671 04

11/12/2019

PS Form 3800, April 2015 PSN 7530-02-000-904/ See Reverse for Instructions

7019 0700 0001 2272 4013

7019 0700 0001 2272 4037

7019 0700 0001 2272 4020

The UPS Store



Fax Cover Sheet

Date 11/12/19

Number of pages 45 (including this cover page)

RECEIVED

To:

From:

NOV 13 2019

Name Mrs. K. Thomas, Clerk of Court

Name M. Hodges SC Court of Appeals

Company SC Court of Appeals

Company _____

Fax 803-734-1839

Phone 864-714-5263

Comments _____

If you are not the intended recipient, do not disclose, copy, distribute or use this information. If you received this transmission in error, please call immediately to arrange return of the documents at no cost to you.

The UPS Store

3504 Highway 153 • Greenville, SC 29611

Phone: 864.220.5000 Fax: 864.220.0850 Email: store3495@theupsstore.com Website: theupsstorelocal.com/3495