

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

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SC Court of Appeals

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 1.16 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
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PO Box 95
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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](mailto: Sterling.Laney@wbd-us.com)

ATTORNEYS AND PARTIES OF RECORD SERVE

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)
)
)
)
Wells Fargo Bank, NA)
)
RESPONDENT)

V.)

Michelle Hodges, Individually:

APPELLANT) **CASE NO. 2019-001565**
)
) **CERTIFICATE OF SERVICE**

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
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Michelle Hodges
Michelle Hodges, Defendant *Appellant 11/15/19*

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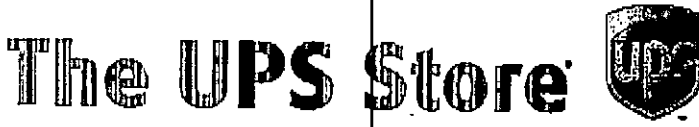
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Name M. Hoggins

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The Honorable Jenny A. Kitchings
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