

STATE OF SOUTH CAROLINA  
In The court of Appeals

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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**  
NOV 15 2019  
SC Court of Appeals

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

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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 Scarafite

Respondents

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

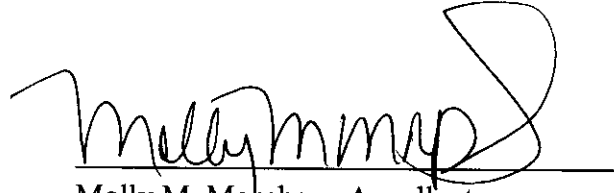
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1. DOM1 Order-- granting specific performance to the Dudeks and Morpew, November 6, 2014 Case No. 2013-CP-18-0183
2. DOM2 2nd Motion Exceed Brief Page Limit with Attachment(s), June 20, 2019 Appellate Case No. 2018-002185
3. DOM3 Dudek sales contract, October 24, 2012
4. DOM4 Woody Engagement letter/ Ferro response, November 27, 2012
5. DOM5 Termination Notice, December 16, 2012
6. DOM6 Ferro Petition, September 9, 2014 (attachments removed)
7. DOM7 Email Williams/Mortgage Department, January 18, 2013

8. DOM8 Email-- Attorney Qualey to Ferros, January 15, 2013
9. DOM9 Order, May 31, 2018
10. DOM10 Entry Of Default/Damages Hearing Form, Case No. 2016-CP-1801706
11. DOM11 Collins Answer, December 19, 2017
12. DOM12 Return to Motion, December 19, 2017
13. DOM13 Email Clerk to Scarafile, et al. December 19, 2017
14. DOM14 Emails Morphew/Clerk of Court Stevens December 2017 through February 2018
- DOM15 Motion to Strike Def. Collins Answer and Return to Motion, January 30, 2018
15. DOM16 Order denying Appellant's Motion for Default Judgment, February 23, 2018
16. DOM17 2nd Motion for Entry of Default and Default Judgment, April 4, 2018 (Summons and Complaint removed)
17. DOM18 Morphew e-mail dated May 29, 2018
18. DOM19 Hearing Transcript, May 29, 2018
19. DOM20 Plaintiff's 59(e) Motion, June 11, 2018
20. DOM21 Email Clerk to parties; Chandler Rowh email to all parties, October 18, 2018
21. DOM22 Motion to Dismiss-- Michael Scarafile, Susan Nicholson, Carolina One Real Estate and David Collins, September 20, 2016
- 22.
23. DOM23 Motion-- Entry of Default and Judgment, November 27, 2017 (Summons and Complaint removed)
24. DOM24 Order, Denying Appellant's 2nd Motion for Entry of Default and Judgment, November 13, 2018
25. DOM25 Plaintiff's Brief in Opposition to Defendants Scarafile, Collins, et al Motion to Dismiss 12(b)(6) and 12(b)(8), October 4, 2016
26. DOM26 Hearing transcript-- October 1, 2018
27. DOM27 Order granting Motion to Dismiss-- David Collins, November 15, 2018
28. DOM28 Order granting in part Motion to Dismiss-- Stephen Dudek and Doreen Cross, January 31, 2017
29. DOM29 Morphew Complaint—Original action, Morphew v. Dudeks, Ferros January 31, 2013 Case No. 2013-CP-18-000183
30. DOM30 Denial Letter(s), Dudek and Cross, January 31, 2013
31. DOM31 Lis Pendens, January 11, 2012
32. DOM32 Opinion No. 2017-UP- 019, Filed January 11, 2017 Appellate Case No. 2014-002633
33. DOM33 Complaint – Trespass Upon Easement-- Morphew v. Stephen Dudek and Doreen September 19, 2018 Cross Civil Case No. 2018-CP-18-01661 (Exhibits removed)
34. DOM34 Order granting Summary Judgment-- Stephen Dudek, Doreen Cross, Susan Nicholson, Michael Scarafile and Carolina One Real Estate, November 15, 2018
35. DOM35 Morphew sales contract, December 16, 2012
36. DOM36 Order granting Summary Judgment-- First Federal and Allison Williams, November 15, 2018
37. DOM37 Motion to Deem Admissions Admitted and Affidavit – First Federal February 16, 2018
38. DOM38 Motion/Compel Discovery Responses - Cross January 30, 2018
39. DOM39 Motion to Deem Admissions Admitted and Affidavit – Cross February 1, 2018
40. DOM40 Motion to Dismiss - First Federal and Allison Williams September 26, 2016

41. DOM41 Motion for Summary Judgment Michael Scarafile, Susan Nicholson, Carolina One Real Estate, Stephen Dudek and Doreen Cross, February 14, 2018
42. DOM42 Plaintiff Response to FF Motion for Summary Judgment, September 27-2018
43. DOM43 Motion to Dismiss 12(b)(6), Woody Law Firm and Carrie Boyer, September 29, 2016)
44. DOM44 Amended Order denying in part Motion to Dismiss-- First Federal and Allison Williams, February 13, 2017
45. DOM45 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
46. DOM46 Motion to Dismiss, Stephen Dudek and Doreen Cross, September 21, 2016
47. DOM47 Plaintiff's Brief in Opposition to Woody Motion to Dismiss, October 31-2016
48. DOM48 Amended Order denying in part Motion to Dismiss-- Woody Law Firm and Carrie Boyer, April 3, 2017
49. DOM49 Amended Motion for Summary Judgment Woody Law Firm and Carrie Boyer, March 12, 2018
50. DOM50 Order granting Summary Judgment-- Woody Law Firm and Carrie Boyer, November 13, 2018
51. DOM51 Stephen Dudek and Doreen Cross Complaint, Breach of Contract for Specific Performance, January 15, 2013 Civil Case No. 2013-CP-180074
52. DOM52 Fraud/Fraud on the Court Complaint—current action, Morpew v. Dudeks, et al. August 24, 2016
53. DOM53 Email-- Ferro, September 10, 2014
54. DOM54 Defendants Dudek Motion for Supersedeas Bond and Contempt March 25, 2015 Civil Case No. 2013-CP-18-00183
55. DOM55 10-day adverse letter from First Federal to Dudeks, January 3, 2013
56. DOM56 Suspension Notice, David Collins, July 20, 2016
57. DOM57 Email, Respondent Scarafile (President and Chief Counsel of Carolina One) , December 18, 2012
58. DOM58 Order, Constructive Trust – Morpew v. Stephen Dudek and Doreen Cross February 21, 2018 Pg. 8 Para. 1- Civil Case No. 2017-CP-0987
59. DOM59 Morpew Deposition, January 16, 2017
60. DOM60 Trial transcript, June 11-12, 2014, pg. 221-222 Civil Case No. 2013-CP-1800183
61. DOM61 Certificate of Non-Service- Doreen Cross, Dorchester County Sheriff's Dept., December 19, 2018
62. DOM62 Email, Nicholson/Carrie Boyer/Woody Law Firm December 5, 2012
63. DOM63 Email, Nicholson/Carrie Boyer/Woody Law Firm December 12, 2012
64. DOM64 Woody/Boyer Answer to Complaint, Case No. 2016-CP-2185 March 22, 2017
65. DOM65 Email Rick Willis/Susan Nicholson, November 27, 2012
66. DOM66 Order granting in part Motion to Dismiss-- Michael Scarafile, Susan Nicholson, Carolina One Real Estate, David Collins, January 31, 2017
67. DOM67 Plaintiff Response In Opposition to Stephen Dudek, Doreen Cross, Susan Nicholson, Michael Scarafile and Carolina One Real Estate Motion for Summary Judgment March 5, 2018

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

A handwritten signature in black ink, appearing to read 'Molly M. Morphew', written over a horizontal line.

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

November 9, 2019

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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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

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SC Court of Appeals

Molly M. Morphey

Appellant

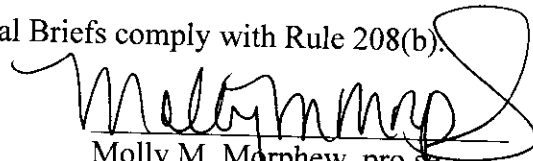
v.

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

CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that its Initial Briefs comply with Rule 208(b).



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

November 10, 2019

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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The Honorable Deadra L. Jefferson, First Judicial Circuit  
The Honorable Edgar W. Dickson, First Judicial Circuit  
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Appellate Case No. 2018-002185

Molly M. Morphew

Appellant

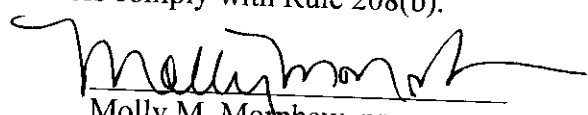
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Richmond Hill, GA 31324  
(843) 514-7299

November 10, 2019

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In the Court of Appeals

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SC Court of Appeals

Appellate Case No. 2018-002185

Molly M. Morphew

Appellant

v.

Stephen Dudek, Doreen Cross, Carolina One,  
Carolina One, Susan Nicholson, Woody Law  
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Respondents

CERTIFICATE OF SERVICE

I, Molly M. Morphew, Appellant [and pro se] for said case, hereby certify that I have, on this date indicated below, served counsel below with an Appellants 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:

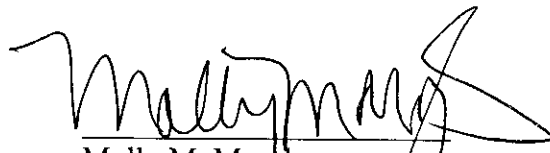
**Steven L. Smith, Esquire**  
**P.O. Box 40578**  
**Charleston, SC 29423-0578**  
**Attorney for Respondents:**

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

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

**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. Morphey, pro se

November 12, 2019

November 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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SC Court of Appeals

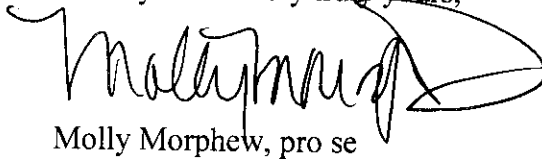
Re: Appellate Case No. 2018-002185  
Molly M. Morpew v. Stephen Dudek, Doreen Cross, et al.

Dear Ms. Kitchings:

Please find enclosed Appellants 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.

Thank you and very truly yours,

A handwritten signature in black ink, appearing to read 'Molly Morpew', with a large, stylized flourish at the end.

Molly Morpew, pro se

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

**P**

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