

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

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

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Molly M. Morphew, Appellant,

v.

Stephen Dudek, Doreen Cross, David Collins, Allison Williams, First  
Federal, Michael Scarafile, Susan Nicholson, Carolina One Real Estate,  
Carrie Boyer, Woody Law Firm, Respondents.

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APPELLANT'S RESPONSE TO RESPONDENTS' MOTION FOR EXTENSION OF TIME  
TO FILE RESPECTIVE INITIAL BRIEFS

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Appellant, Molly M. Morphew (or "Morphew"), hereby responds to Respondents' motion to extend the filing deadline for their Initial brief, and respectfully asks this court to provide guidance and answers to the questions and issues raised in the attached letter provided previously to this court (*See attached*).

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MAY 29 2020  
SC Court of Appeals

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Appellant Morphew does not oppose the Respondents' motion, but only seeks clarification of its' verbiage (see attached letter). Such clarification is necessary to satisfy Appellant's confusion and need to protect its' rights and prevent any prejudice.

Morphew has performed its due diligence but has been unable to locate any case, rule or precedent or any other such guiding documentation in the South Carolina Courts that addresses this issue or would prevent these additional communications and time from this Court.

Consequently, Appellant respectfully asks this Court for its guidance by advising as to each issue raised in the attached letter.

Thank you greatly in advance for your assistance and time.

Most respectfully,

A handwritten signature in black ink, appearing to read "Molly M. Morphew". The signature is written in a cursive style with a large, looping flourish at the end.

Molly M. Morphew, Appellant pro se  
121 Sterling Rd  
Rincon, GA 31326

May 23, 2020

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  
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Molly M. Morphew, Appellant,

v.

Stephen Dudek, Doreen Cross, David Collins, Allison Williams, First  
Federal, Michael Scarafile, Susan Nicholson, Carolina One Real Estate,  
Carrie Boyer, Woody Law Firm, Respondents.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I served the APPELLANT'S RESPONSE TO RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE RESPECTIVE INTIAL BRIEFS on the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on May 23, 2020, addressed to their respective attorney of record or to their last known address on record as indicated below:

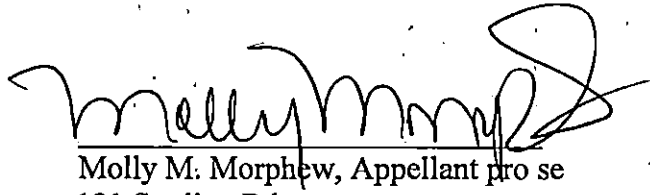
**Steven L. Smith, Esquire**  
P.O. Box 40578  
Charleston, SC 29423-0578  
**Attorney for Respondents:**  
Stephen Dudek  
Doreen Cross  
Susan Nicholson  
Michael Scarafile

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

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)



Molly M. Morphey, Appellant pro se  
121 Sterling Rd.  
Rincon, GA  
(843) 514-7299

May 23, 2020

May 21, 2020

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

**RECEIVED**  
MAY 29 2020  
SC Court of Appeals

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

Dear Ms. Kitchings:

This letter is an important matter asking for specific clarification and/or guidance from this court regarding the briefs filed or to be filed in this court regarding above referenced case.

Specifically, the Respondents have filed a motion to extend the filing time for their 'briefs', stating they "...request a thirty-day (30-day) extension of the deadline for serving the Initial Briefs of Respondents." Based on the verbiage of the Respondents motion, and their reference to 'Briefs' (plural), I'm seeking clarification and guidance so as to prevent any confusion or prejudice.

Could you please provide answers and clarification to each below as I could not find any rule, case or precedence that would provide me with any answers:

1. Are the Respondents required to file one (1) [combined] brief? (as required by Rule 208)
2. If so:
  - a. Is the combined brief required to total no more than 50 pages [also as required by Rule 208], and as I was mandated by this Court to file one (1) brief to include all 10 separate orders and the respective issues on appeal, totaling no more than 50 pages and combining *all* Respondents?
  - b. If its brief is not required to be equal to or less than 50 pages, what rule and/or precedence directs this reasoning? Consequently, what would be the max page count allowed in this instance?
3. If not, and the Respondents are allowed to file separate briefs:
  - a. What rule or precedent guides this?
  - b. Will the total pages of the separate briefs required to be no more than 50 pages together?
  - c. Or are the Respondents going to be permitted to \*each file separate briefs (\*EACH, See 'd' below) up to 50 pages each brief?

d. How would "Respondents" and "briefs" be defined here? There are 10 Respondents (in 4 groups), would they count as 10 Respondents therefore 10 briefs? Or counted as four (4) 'Respondents' therefore four (4) briefs?

In layman's terms, what are the rules and expectation of this Court regarding the Respondents Brief in this instance? Based on Rule 208, I should expect one (1) Brief including all Respondents and not exceeding the rule's 50-page limit.

If the Respondents are permitted to file separate briefs or allowed to exceed the max number of pages of 50, then the Appellant should have been given the same courtesy when filing its initial brief and when it files its reply brief brief(s). To do otherwise would be giving the Respondents much more of an advantage to defend than I was given.

Though Appellant filed 2 separate motions asking to exceed the page limit of its Briefs, which this court could have granted pursuant Rule 208(b)(5) "...principal briefs shall not exceed fifty (50) pages, and reply briefs shall not exceed twenty-five (25) pages. On motion, the appellate court may grant a party permission to exceed those limitations", and which there was no return by the Respondents on either, Appellant was denied without reason and mandated to 50 pages to defend (which included the cover page, table of contents, table of authorities, facts and procedural history, standard of review, references to the Record, and the list of issues on appeal), leaving 39 pages to defend or argue 10 orders and a vast number of rulings divided between 10 Respondents in each.

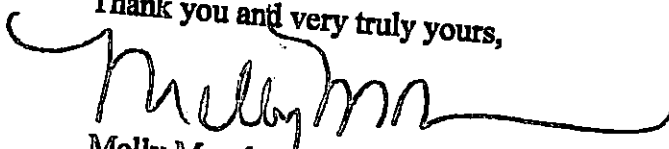
If allowed more than 50 pages total for the Respondents Brief and/or to file separate or multiple briefs, then Appellant should be given the same courtesy and requests the same accordingly.

Again, Appellant is confused by the Respondents' motion or its verbiage and wants to prevent any confusion as to the expectations of this court and the rights of its litigants [i.e., no surprises or prejudice] and has been unsuccessful in discovering any case, rule or guideline regarding this issue. Therefore, seeks specific guidance from this Court.

Please record and file.

Also enclosed is a copy to be kindly recorded and returned in the self-addressed, stamped envelope.

Thank you and very truly yours,

  
Molly Morphey, pro se

May 23, 2020

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

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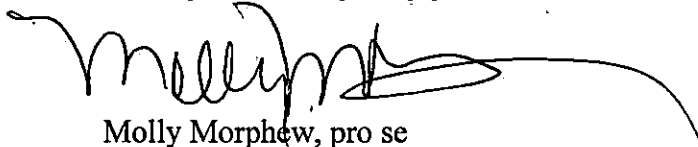
Re: Appellate Case No. 2018-002185  
Molly M. Morphew v. Stephen Dudek, Doreen Cross, et al.

Dear Ms. Kitchings:

Please find enclosed **Appellants Response to Respondents' Motion for Extension of Time to File Respective Initial Briefs of Respondents**, and its' certificate of service, 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 Morphew', with a long horizontal flourish extending to the right.

Molly Morphew, pro se

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

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