

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

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

RECEIVED

Jun 24 2020

SC Court of Appeals

Case No. 2019-001565

Wells Fargo Bank, N. A. Plaintiff – Respondent

v.

Michelle Hodges, Individually and as Personal Representative
of the Estate of Ruth Ladson Witherspoon; Stanley Witherspoon;
SC Housing Corp.; and Twin Creeks Homeowners Association,
Inc. Defendants,

Of Whom Michelle Hodges, in her Individual capacity,
is the Appellant.

**NOTICE AND MOTION TO AMENDED INITIAL BRIEF, AS REQUIRED BY
DEFICIENCY LETTER DATED 6/8/2010**

I Michelle Hodges, request the court accept the attached required corrections for the initial brief,
pursuant to Rule 15 of the SCRCP.

See attached documents: Amended title page, page 10 no signature, new page 11 adding
removed comments from original initial brief, title page.

Michelle Hodges, Pro Se Appellant
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Of Whom Michelle Hodges, in her Individual capacity,
is the Appellant.

**AMENDED TITLE PAGE FOR
APPELLANT’S INITIAL BRIEF**

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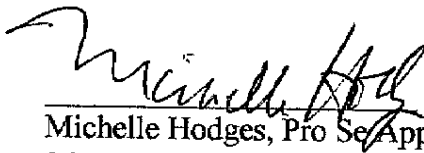
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I initially responded to the order dated 7/24/19 on 8/5/2019 as it stated that that order would become final. I then responded to the order dated 8/7/2019, as there is a substantial difference between the 2, as the Order dated 8/7/19, addresses jurisdiction on 8/1919 I filed another motion to alter/amend. I call this to the court's attention, as the Final order dated 8/22/19 makes note that I addressed both orders. I timely responded to Judge Gravely's signed order dated 8/7/2019 with the Notice of Appeal dated 9/6/2019.

I am proceeding on an individual basis pro se and I cannot legally represent the Estate, nor have I attempted to do so. The clerk of the supreme court changed the caption of the case from what I had on the notice of appeal and referred the case to the court of appeals despite the fact that I am taking an immediate appeal of an interlocutory order pursuant to section 14-3-330, as the case for referred to the Master in equity, changing the mode of trial, affecting my substantial rights to a trial by jury, which will be determined based on my causes of action. The Plaintiff's attorneys have continued to use the Estate in this case, in order to claim that the property is non-owner occupied, despite the evidence. And if the Plaintiff can claim that the property is non owner occupied then the Plaintiff will not have to over home retention options or explain why it didn't. I pray that I am allowed to amend my answer , summary judgment is reversed and allow my claims to proceed and remand for additional testimony, so that claims will be in the pleading and pleadings conform to the evidence, since discovery is not complete; which hopefully will lead to a fair process. The Plaintiff's Attorney Mr. Laney, did not reply to all admissions and he indicated to the court that he would, in the order typed by his office dated 7/24/19.

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I have been aggrieved by all of the orders that I address in this brief, as deception, Fraud upon the court and the filing of sham documents have all occurred and I feel defrauded. I have suffered loss of additional money and time spent on the case.

 10/7/2019

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for Certified mail use PO Box:

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michellehodges938@gmail.com

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Final page of initial brief ~~mb~~

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Case No. 2019-001565

Wells Fargo Bank, N. A. Plaintiff – Respondent

v.

Michelle Hodges, Individually et al..

CERTIFICATE OF SERVICE

1. Notice and motion to amend initial brief, as required by the court
 2. Amended title page
 3. Corrected page 10 no signature
 4. Amended final page 11, adding comments removed from the original title page
- REQUIRED BY THE COURT

RECEIVED

Jun 24 2020

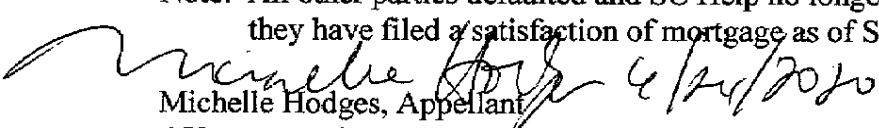
SC Court of Appeals

I hereby certify that a copy of the above mention documents were sent via first-class mail, with property postage and served on the following parties:

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Womble Bond Dickinson
For Wells Fargo Bank, N.A.
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Suite 400
Greenville, SC 29601

Bryant S. Caldwell, Associate
For Wells Fargo Bank, N. A.
1221 Main ST
Suite 1600
Columbia, SC 29201

Note: All other parties defaulted and SC Help no longer has an interest in this case as they have filed a satisfaction of mortgage as of September 2019.


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