

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
Honorable Maite Murphy, First Judicial Circuit

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

Molly M. Morpew, 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.

RECEIVED
JUN 26 2020
SC Court of Appeals

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

Appellant, Molly M. Morpew (or "Morpew"), hereby responds to Respondents
Stephen Dudek, Doreen Cross, Michael Scarafile, Susan Nicholson and Carolina One Real
Estate's [second] motion to extend the filing deadline for their Initial brief, and respectfully asks
this court to deny same for the reasons stated below.

Appellant filed its initial brief in March 2020 making the Respondents' brief(s) due on or about April 24, 2020. A motion to substitute [one (1) of the three (3)] counsel in this case was filed, automatically staying the filing deadline of Respondents' brief(s), though said counsel withdrawing had never appeared in the filings in this court or the lower court. This court granted their motion ordering the initial brief(s) due May 28, 2020. Shortly before the ordered filing date, the Respondents filed a motion requesting to again extend the filing due date of their initial brief(s). This court granted their motion, again extending the filing due date to June 25, 2020.

Now the Respondents' again file a motion requesting yet another extension to the deadline to file their initial brief, but gave no reason, let alone a good reason or cause, for its request.

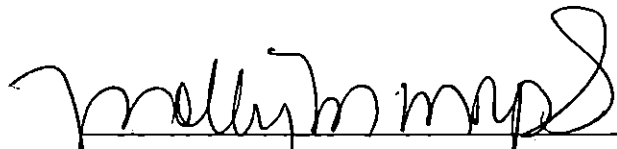
The Respondents have already had two (2) extensions and ample time to file their initial brief. Moreover, without good reason or any justification, such an extension is an unnecessary delay of the proceedings, has caused undue costs, prejudices Appellant, and violates Rule 203 Canon 3(b)(8).

Further, the Respondents' brief is due June 25, 2020, and the filing of its motion does not stay the due date, especially one imposed by a court order (*see* Appellate Court Order, June 4, 2020). SCACR 240(b).

Stay of Time Limits. *Unless otherwise provided by these Rules, or ordered by the appellate court, the time limits imposed by these Rules shall not be stayed by the filing of a motion or petition. A motion to dismiss an appeal or a motion to relieve counsel shall, however, automatically stay the time limits for perfecting the appeal until the motion is decided. Rule 240(b)*

Due to the reasons herein, Respondents' motion requesting another extension of its deadline to file its initial brief, especially without any reason or justification, should be denied. Further, if the Respondents fail to file their initial brief on or before the deadline of June 25, 2020, Appellant asks this court to find them in violation of the rules and contempt of this Court's order, and as a consequence, Respondents' brief should be dismissed or refused.

Respectfully submitted,

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

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

June 22, 2020

THE 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
Honorable Maite Murphy, First Judicial Circuit

RECEIVED
JUN 26 2020
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
Firm, Carrie Boyer, First Federal, Allison
Williams, David A. Collins, Michael Scarafile

Respondents

CERTIFICATE OF SERVICE

I, Molly M. Morphew, Appellant for said case, hereby certify that I have, on this date indicated below, served counsel below with an APPELLANT'S RESPONSE TO RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE RESPECTIVE INTIAL BRIEFS, 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:

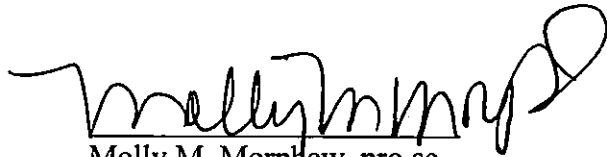
Steven L. Smith, Esquire
P.O. Box 40578
Charleston, SC 29423-0578
Attorney for Respondents:
Stephen Dudek
Doreen Cross

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

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. Morphew, pro se

June 23, 2020

June 21, 2020

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

RECEIVED
JUN 26 2020
SC Court of Appeals

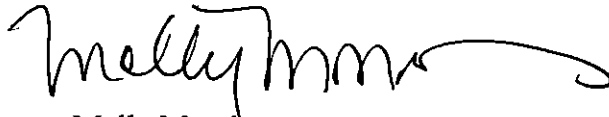
Re: Appellate Case No. 2018-002185
Molly M. Morphew v. Stephen Dudek, Doreen Cross, et al.

Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of APPELLANT'S RESPONSE TO RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE RESPECTIVE INITIAL BRIEFS, and the 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, sweeping 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

TYVEK® IS RECYCLABLE.
HELP! TYVEK® AND TYVEK® ARE TRADEMARKS OF DUPONT.

PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL

WHEN USED INTERNATIONALLY,
A CUSTOMS DECLARATION
LABEL MAY BE REQUIRED.


- ☑ DATE OF DELIVERY SPECIFIED*
 - 📶 USPS TRACKING™ INCLUDED*
 - 💰 INSURANCE INCLUDED*
 - 🚚 PICKUP AVAILABLE
- * Domestic only

PRIORITY®
★ MAIL ★

PS0000000013

EP1A July 2013
OD: 11625 x 15125

VISIT US AT USPS.COM®
ORDER FREE SUPPLIES ONLINE

P	9405 5036 9930 0425 7592 85 0040 8000 0032 8201 \$4.95 US POSTAGE Legal Post Net Cost
	06/20/2020 Mailed from 31376 062500Y000313
PRIORITY MAIL 2-DAY™	
MOLLY MORPHEW 121 STERLING DR RINCON GA 31326-9425	Expected Delivery Date: 06/24/20 Refs. Retn Amt Ex 0004
Carrier -- Leave if No Response	C076
SHIP TO HON. JENNY ABBOTT KITCHINGS SOUTH CAROLINA COURT OF APPEALS 1015 SUMNER ST COLUMBIA SC 29201-3726	
USPS TRACKING #	
	
9405 5036 9930 0425 7592 85	
Electronic Rate Approved #03855749	

RECEIVED
JUN 26 2020
SC Court of Appeals

PRIORITY MAIL
POSTAGE INSURED

UNITED STATES
POSTAL SERVICE

DuPont™ Tyvek®
Protect What's Inside™

This packaging is the property of the U.S. Postal Service and is provided solely for use in sending Priority Mail® shipments. Misuse may be a violation of federal law. This packaging is not for resale. EP1A © U.S. Postal Service, July 2013. All rights reserved.

Please Recycle