

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.

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SC Court of Appeals

APPELLANT'S RESPONSE TO RESPONDENT'S MOTION FOR EXTENSION OF TIME

Appellant, Molly M. Morpew (or "Morpew"), hereby responds to Respondent David Collins' [second] motion to extend the filing deadline for its 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 Respondent's brief 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 Respondent's brief, though said counsel withdrawing had never appeared in the filings in this court or the lower court. This court granted the motion, ordering the initial brief(s) of all Respondents due May 28, 2020. Shortly before the ordered filing deadline, the Respondent(s) filed a motion requesting to again extend the filing due date of their initial brief(s). This court granted the motion, again extending the filing due date to June 25, 2020 (*see* Appellate Court Order, June 4, 2020).

Now, the Respondent again filed a motion requesting yet another extension to the deadline to file its initial brief, but gave no reason, let alone a good reason or cause, for its request, and appears just for delay.

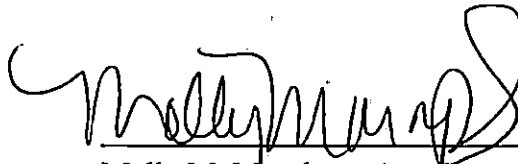
The Respondent has already had two (2) extensions and ample time to file its initial brief. Moreover, without good reason or any justification, such an extension is an unnecessary delay of the proceedings, has caused undue costs, prejudicing Appellant, and violates Rule 203 Canon 3(b)(8).

Further, the Respondent's brief was due June 25, 2020, and the filing of its motion did not stay the due date, especially one imposed by a court order (*see* Appellate Court Order, June 4, 2020). SCACR 240(b). Respondent failed to file its initial brief as ordered by this Court.

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, Respondent's motion requesting another extension of its deadline to file its initial brief, without any reason or justification, should be denied. Further, the Respondent failed to file its initial brief on or before the deadline of June 25, 2020, as ordered by this Court. The Respondent is in violation of the rules and contempt of this Court's order, and as a consequence, Respondent should be sanctioned. Appellant asks this Court deny its motion and dismiss or refuse its initial brief.

Respectfully submitted,

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

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

June 29, 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
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Appellate Case No. 2018-002185

Molly M. Morphew

Appellant

v.

Stephen Dudek, Doreen Cross, Carolina One,
Carolina One, Susan Nicholson, Wooddy 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 RESPONDENT'S MOTION FOR EXTENSION OF TIME, 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:

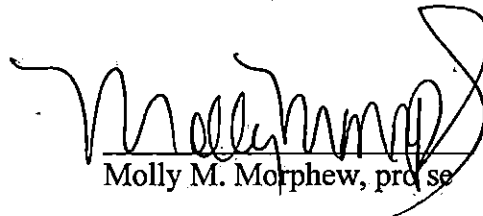
Steven L. Smith, Esquire
P.O. Box 40578
Charleston, SC 29423-0578
Attorney for Respondents:
Stephen Dudek
Doreen Cross

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. Morphey, pro se

June 29, 2020

June 29, 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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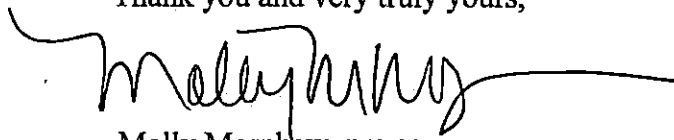
Re: Appellate Case No. 2018-002185
Molly M. Morphew v. Stephen Dudek, Doreen Cross, et al.

Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of APPELLANT'S RESPONSE TO RESPONDENT'S MOTION FOR EXTENSION OF TIME, 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,



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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