

RECEIVED

AUG 31 2020

SC Court of Appeals

**IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

APPEAL FROM DORCHESTER COUNTY
Deadra L. Jefferson, Circuit Court Judge
Edgar W. Dickson, Circuit Court Judge
Maite Murphy, Circuit Court Judge

Case No.: 2016-CP-18-01706
Appellate Case No.: 2018-002185

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, and Woody Law Firm, Respondents

**DESIGNATION OF MATTER OF RESPONDENTS STEPHEN DUDEK, DOREEN
CROSS, MICHAEL SCARAFILE, SUSAN NICHOLSON AND CAROLINA ONE REAL
ESTATE**

In addition to the documents and filings that the Appellant and the other Respondents have designated, the above Respondents request that the Appellant include the following in the Record on Appeal:

1. Case No. 2017-CP-18-987, Order, February 21, 2018
2. Case No. 2013-CP-18-183, Order, June 14, 2017
3. Case No. 2013-CP-18-183, Order, May 17, 2017
4. Appellate Case No. 2017-1393, Opinion No. 2020-UP-151
5. Appellate Case No. 2017-1393, Order Denying Reconsideration, August 24, 2020
6. Case No. 2016-CP-18-1706, Complaint
7. Case No. 2013-CP-18-183, Morphew Complaint
8. Case No. 2013-CP-18-183, Dudeks Complaint
9. Case No. 2013-CP-18-183, Order, November 6, 2014
10. Appellate Case No. 2014-002633, Record, p. 291
11. First Federal File, with Transmittal Letter

12. Case No. 2013-CP-18-183, Pleading Statement, September 10, 2014
13. Appellate Case No. 2014-002633, Final Brief
14. Appellate Case No. 2014-002633, Opinion No. 17-CP-019
15. Appellate Case No. 2014-002633, Pet. to Dismiss Rehearing, Order, February 15, 2017
16. Appellate Case No. 2014-002633, Remittitur, February 15, 2017
17. Case No. 2013-CP-18-183, Order, May 17, 2017
18. Case No. 2013-CP-18-183, Order, June 14, 2017
19. Appellate Case No. 2017-1393, Final Brief
20. Appellate Case No. 2017-1393, Opinion No. 2020-UP-151
21. Appellate Case No. 2017-1393, Order Denying Reconsideration, August 24, 2020
22. Case No. 2017-CP-18-987, Complaint
23. Case No. 2017-CP-18-987, Order, February 21, 2018
24. Appellate Case No. 2018-000507, Final Brief
25. Appellate Case No. 2018-000507, Opinion No. 20-UP-150
26. Case No. 2018-CP-18-1661, Amended Complaint
27. Case No. 2016-CP-18-1706, Order Partially Dismissing Carolina One, January 31, 2017
28. Case No. 2016-CP-18-1706, Order Partially Dismissing Dudeks, January 31, 2017
29. Entire Morphew Transcript, January 16, 2018, including all exhibits
30. Case No. 2016-CP-18-1706, Memo in Support of S.J., May 29, 2018;
31. Case No. 2016-CP-18-1706, Order Granting S.J., November 15, 2018
32. Full transcripts from all hearing held in 2016-CP-18-1706

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

SMITH | CLOSSER | WHEELER, P.A.

s/Samuel M. Wheeler

Samuel M. Wheeler (SC Bar No.: 101008)

7455 Cross County Road, Suite 1

P.O. Box 40578

Charleston, SC 29423-0578

843-760-0220

*Attorneys for Respondents Stephen Dudek, Doreen Cross,
Michael Scarafile, Susan Nicholson, and Carolina One
Real Estate*

August 27, 2020

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

AUG 31 2020

SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Deadra L. Jefferson, Circuit Court Judge
Edgar W. Dickson, Circuit Court Judge
Maite Murphy, Circuit Court Judge

Case No.: 2016-CP-18-01706
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, and Woody Law Firm, Respondents

**CERTIFICATE OF SERVICE OF INITIAL BRIEF AND DESIGNATION OF MATTER
OF RESPONDENTS STEPHEN DUDEK, DOREEN CROSS, MICHAEL SCARAFILE,
SUSAN NICHOLSON AND CAROLINA ONE REAL ESTATE**

I certify that, on the date indicated below, I served the above Respondents' Initial Brief and Designation of Matter by United States Mail, postage prepaid, or via email, where appropriate under current coronavirus standing order, on the following:

MOLLY M. MORPHEW
121 Sterling Drive
Rincon, GA 31326
Appellant

AMY L. NEUSCHAFER, ESQ.
aneuschafer@collinsandlacy.com
LAURA R. BAER, ESQ.
lbaer@collinsandlacy.com
ROBERT M. PEELE, III, ESQ.
rpeelee@collinsandlacy.com
11945 Grandhaven Drive, Suite D
Murrells Inlet, South Carolina 29576
Attorneys for Defendants The Woody Law Firm and Carrie Boyer

AMY L.B. HILL, ESQ.
ahill@gwblawfirm.com
JORDAN M. CRAPPS, ESQ.
jcrapps@gwblawfirm.com
P.O. Box 7368
Columbia, SC 29202
Attorneys for Defendants South State Bank f/k/a SCBT f/k/a SCBT, successor in interest to First Federal and Allison Williams

DAVID COLLINS
davidacollins43@gmail.com
P.O. BOX 30052
Charleston, SC 29417
Pro Se Defendant

SMITH | CLOSSER | WHEELER, P.A.

s/Samuel M. Wheeler

Samuel M. Wheeler (SC Bar No.: 101008)
7455 Cross County Road, Suite 1
P.O. Box 40578
Charleston, SC 29423-0578
843-760-0220

*Attorneys for Defendants Stephen Dudek,
Doreen Cross, Michael Scarafile, Susan
Nicholson, and Carolina One Real Estate*

August 27, 2020

Smith | Closser, P.A.

Attorneys at Law
7455 Cross County Road, Suite One
Post Office Box 40578
Charleston, South Carolina 29423-0578

Samuel M. Wheeler
swheeler@scnlaw.com

Office – 843-760-0220
Fax – 843-552-2678
www.smithclosser.com

August 27, 2020

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RECEIVED

AUG 31 2020

SC Court of Appeals

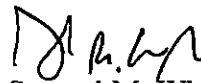
RE: Molly M. Morphew, Appellant v. Stephen Dudek, et al., Respondents
Appellate Case No. 2018-002185
SJC File No. 17-052

Dear Ms. Kitchings:

Enclosed please find the Initial Brief and Designation of Matter of Respondents Stephen Dudek, Doreen Cross, Michael Scarafile, Susan Nicholson and Carolina One Real Estate. Also, enclosed is a Certificate of Service.

Thank you for your assistance. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Samuel M. Wheeler

cc: All parties and counsel of record

Smith Closser, Wheeler, PA
7455 Cross County Rd Ste 1
P.O. Box 40578
Charleston, SC 29423-0578



RECEIVED

AUG 31 2020
SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk, SC Court of Appeals
P. O. Box 11629
Columbia, SC 29211

