

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

Oct 08 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.

Reply in Support of Amended Designation of Record
And Reply to Respondent's suggestion of dismissal

Pursuant to Rules 240 and 15 I have requested to amend my Designation of Record, so that I am providing the court with a record so that it can determine, if an error was made below and this motion is not being imposed for delay, but to seek justice.

I believe the court should impose a judicial estoppel on the Respondent for taking two positions at every state of this case and causing me to have to file motions to compel discovery. I have been struggling with making sure I get this appeal right, as it is my first one ever.

My notice of appeals were timely filed as required by the court and the Respondent has not shown any prejudice that would warrant a dismissal.

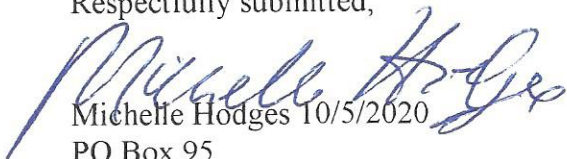
The Motion is the lower can forgone, as the Plaintiff is requesting that everything be handled in this appeal.

The Respondents attachment of the bankruptcy courts order is being challenged as it was obtained by fraud upon the and is currently subject to res judicata, as we currently have final decision on the same issue. I am addressing this order with the bankruptcy court.

1062

I made every effort to get the Bankruptcy case confirmed and spent over \$1,000.00 attempting to do so. I am not interested in filing for any delays, but I am seeking justice.

Respectfully submitted,



Michelle Hodges 10/5/2020

PO Box 95

Mauldin, SC 29662

864-714-5263

262

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is the Appellant.

PROOF OF SERVICE

**REPLY IN SUPPORT OF AMENDED MOTION OF DESIGNATION OR RECORD,
WHICH INCLUDES REPLY TO RESPONDENT'S SUGGESTION OF DISMISSAL**

**MOTION FOR LEAVE TO FILE 2ND AMENDED MOTION TO AMEND
DESIGNATION OF RECORD (AS A MATTER OF RIGHT)**

RECEIPTS

I certify that I served the above, mentioned documents, via certified mail with the correct postage on the attorney at the address listed below by depositing a copy of it in the mail at:

United States Posta Office at 11027 Anderson Rd, Piedmont, SC 29673 on October 5, 2020.

S. Sterling Laney, III, Esquire
Womble Bond Dickinson
For Wells Fargo Bank, N.A.

1763

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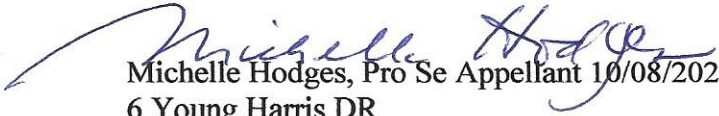
Oct 08 2020

SC Court of Appeals

550 South Main ST
Suite 400
Greenville, SC 29601

Attached

- 1) Reply in Support of Motion to amend Designation of Record, including reply to Respondent's suggestion of dismissal (2 Pages)
- 2) Second Amended Motion for leave to amend Designation of Record(as a matter of right 3 Pages) (certificate of service for the above documents attached) (3 Pages)
- 3) Proof of Service of the above documents, along with receipts (3 Pages)


Michelle Hodges, Pro Se Appellant 10/08/2020
6 Young Harris DR
Simpsonville, SC 29681
864-714-5263

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Mauldin, SC 29662

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303

MICHELLE HODGES
PO BOX 95
MAULDIN, SC 29662
864-714-5263

October 8, 2020

Jenny Abbott Kitchings,
Clerk of Court, of South
Carolina Court of Appeals
1220 Senate ST
Columbia, SC 29201

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Oct 08 2020
SC Court of Appeals

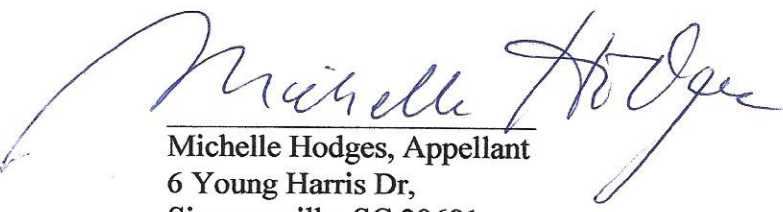
RE: Wells Fargo Bank, N.A. v. Michelle Hodges
Appellate - Case No. 2019-001565

Dear, Ms. Kitchings, Clerk of Court:

Attached is Proof of service, along with documents that were served on the Respondent on October 5, 2020. Below is a list of the documents:

1. Reply in support of Motion for Leave to amend Designation of record, including a reply to the Respondent's suggestion of dismissal.
2. Second amended Motion for leave to amend Designation of record (as a matter of right)

Respectfully submitted,



Michelle Hodges, Appellant
6 Young Harris Dr,
Simpsonville, SC 29681
Mailing Address:
PO Box 95
Mauldin, SC 29662
864-714-5263