

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

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

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.

**MOTION FOR LEAVE TO FILE 2nd AMENDED
DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL
As a matter of right**

Pursuant to Appellant court Rule 240 and Rule 15 I hereby request leave to amend the below Designation of Matter to be included in the record on appeal, so that I am provided this court will all necessary documentation to determine if any errors were made by the hearing court.

Appellant proposes the following be included in the Record on Appeal:

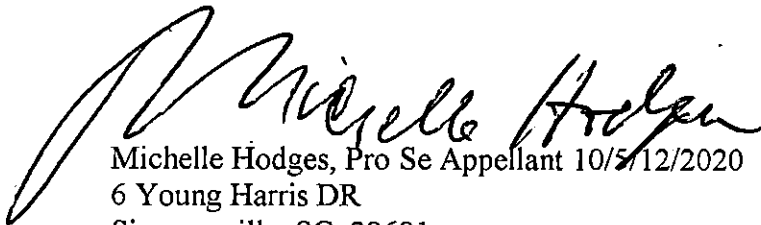
1. Order of 7/24/2019, 8/7/2019, 4/29/2019 and 8/22/2019
2. Plaintiff's Motion for Summary judgment and Exhibits "A, pages 26, 29, 42, 43

143

- 38, 139, 140.
3. Plaintiff's Reply In Support of MSJ
Including, Exhibits "A", "C" "D" Deposition E
 4. Defendant's Memorandum in Opposition to MSJ
 5. Defendant's Affidavit of Opposition of MSJ
 6. Including all 7 Exhibits attached to Affidavit of Opposition of MSJ
 7. 8/5/2019 Exhibit pages Numbers 3, 4, 5,
 8. 8/5/2019 Second Exhibit pages 4, 5, 6, 7 & 8
 9. 4/12/2019 Motion for Leave to Amend Sixth Amended Answer
All 21 pages
 10. 7/30/19 Sixth amended answer
 11. All interrogatories
 12. All admissions
 13. Certificate of Compliance
 14. Assignment of mortgage
 15. Rule 59 Motions 8/6 and 8/15

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

Respectfully Submitted



Michelle Hodges, Pro Se Appellant 10/5/12/2020
6 Young Harris DR
Simpsonville, SC 29681
864-714-5263
Certified mail to: PO Box 95
Mauldin, SC 29662

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SC Court of Appeals

CERTIFICATE OF SERVICE
CONCERNING
WELLS FARGO V. MICHELLE HODGES
APPELLATE CASE NUMBER 2019-001565

2nd Amended Designation of Record (2 pages)

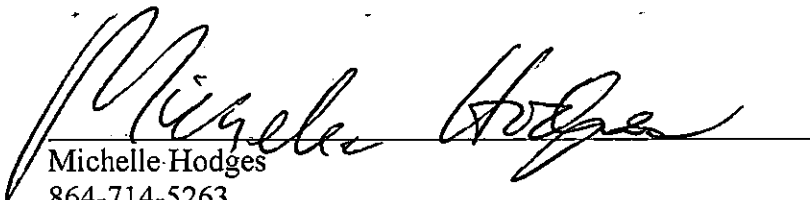
+ Reply in Support of Motion to Amend

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

S. Sterling Laney, III, Esquire
Womble Bond Dickinson
For Wells Fargo Bank, N.A.
550 South Main ST
Suite 400
Greenville, SC 29601

Bryant S. Caldwell, Associate
For Wells Fargo Bank, N. A.
1221 Main ST
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300 C- Outlet Pointe Blvd
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Michelle Hodges
864-714-5263
PO Box 95
Mauldin, SC 29662
10/5/2020

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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.

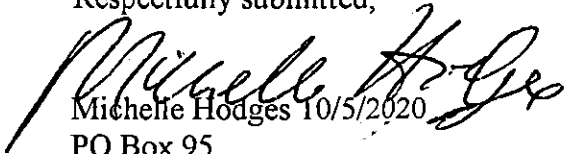
The Motion is the lower can forgone, as the Plaintiff is requesting that everything be handled in this appeal.

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.

①

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



P.O. Box 95
Mauldin, SC 29662

CPU



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South Carolina Court of Appeals
Attn. Clerk of Court 1221 Senate Dr.
Ms. Jenny Abbott Kitchings
Columbia, SC 29201

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