

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.

REPLY IN SUPPORT OF MOTION
FOR EXTENSION OF TIME

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

1 of 3

Attached proof of service
(3 pages) also

In Reply to the Respondent's response to my motion for extension of time filed on 5/21/2021 and in support of the same. I wanted to call the court's attention to the fact that the Respondent's complaint that I had not timely responded to the court with my corrected second amended initial brief, was premature. I had until 5/20/21 at 12:00am and I served a copy on the Respondent on 5/20/21 per my receipt at 11:50 am.

So, I timely served the amended motion on the Respondent, however that evening, when I arrived at home, I became ill and did not send it to the court until approximately 3:00 am, and the Respondent's complaint does not address how my delay in getting this to the court has prejudiced its rights.

The Respondent's counsel referred to my being pro se and that is correct, I have not had any formal training in legal proceedings or as to how to complete a brief and I am trying my very best to keep my Appeal alive and explain to the court the discovery abuse and gamesmanship that I suffered at the hands of the respondent in the lower court. And it has been very difficult for me to explain how the Respondent changed judges, in the 2 issues that I am appealing to get the results that they wanted, which is to be in a position to illegally take away my home. In the lower court, I have suffered an unjust denial of my motion for leave to amend my pleadings, with what appears to be a violation of my constitutional due process rights, as the denial appears an arbitrary ruling. Then the granting of summary judgment in favor of the Respondent, also appears to be a violation of my constitutional due process rights; as it appears that irrelevant evidence was given weight, rather than a determination, as to whether or not we have admissible evidence.

2/6/3

Mr. Caldwell stated that I had other deficiencies which had been timely cured and each time the Respondent benefitted from any delay, as it gave him more time to work his pipeline of cases. In fact when it was time for the Respondent to file its initial brief, if requested an extension of time due to work load. And everything I have read online states that this is not a valid reason for an extension of time and then I filed for bankruptcy and the court put a stay on the appeal; the Respondent had every opportunity to file its initial brief, when the stay was over, but did not do so until the court allowed me to amend my initial brief.

However my point is that I have a very difficult task that is worth my fight. While Mr. Caldwell is a licensed attorney, with legal training has filed a premature complaint without explaining how his client's rights have been prejudiced, when his client was timely served through him.

Respectfully submitted,



Michelle Hodges, Pro Se Appellant 6/1/2021
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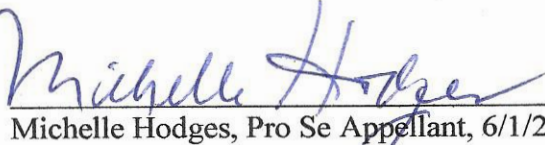
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CONCERNING
WELLS FARGO V. MICHELLE HODGES
CASE NUMBER 2019-001565

I hereby certify that I served this copy of my Reply in support of my motion for an extension of time, which had been filed on 5/21/2021, by depositing it in the mail on 6/1/2021, per the attached receipt, on the following persons:

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
Suite 1600
Columbia, SC 29201



Michelle Hodges, Pro Se Appellant, 6/1/2021

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