

January 22, 2022

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29211

RECEIVED
JAN 26 2022
SC Court of Appeals

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

Dear Ms. Kitchings:

I'm in receipt of this Court's (responsive) letter dated January 14, 2022 (attached) and received on January 20, 2022, advising me to serve an amended record "fully redacted" within 10 days of their letter, but have not yet received Mr. Wheeler's "correspondence dated January 11, 2022" as referenced in your letter.

Based on this Court's letter addressing only Mr. Wheeler in the return address, I'm assuming Mr. Wheeler has made an allegation that the Record is not redacted or fully redacted and this Court has treated his letter as a motion to amend the Record.

Until I receive the alleged data for redaction in specificity (meaning, the specific pages containing personal information requiring redaction), producing and serving another Record appears neither supported nor warranted. Notwithstanding the substantial and undue burden of cost, time and effort to print and mail *another* four (4), 1862-page records with no basis and at a minimum without allowing a pro se party due process to respond to the opposing litigant's issue before advising said party they must perform an action requiring excessive costs and effort.

Regardless, it appears service of another Record is not a requirement for redaction. In fact, pursuant Rule 41.2, even redacting data in a document already filed in the court neither requires an amended document nor the service of, *and* it's the *court clerk* that redacts or removes the data from the filing. Plus, it's any individual that can request the redaction, but only in writing to the clerk *and* when he or she *identifies the document and page number or numbers* that contains data to be redacted. Rule 41.2(e), Rule 41.2(e)(1).

If Mr. Wheeler has found data in the Record served that requires redacting, then I will be more than willing to remove that data before filing the record and in accordance with Rule 41.2(a), but Mr. Wheeler will need to provide those specific page numbers and items.

It's been 19 days since the Record was served and the Record and all final briefs are due in one (1) day, or January 24, 2022. In accordance with this Court's letter, the only issue raised is to redact or remove personal data somewhere in the Record already served. Since redaction only removes certain personal information and does not in any way alter or change any other aspect of the Record, including the index, numbering, order of or the number of pages of the

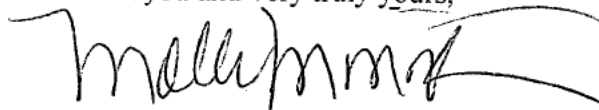
Record, and according to Rule 41.2, neither prevents the filing of nor requires serving an amended record, such would be inappropriate and moot. Further, it appears redacting data from a document does not extend or automatically extend due dates, and in this case, the filing of the Record and all final briefs, nor is there a reason or legal standing to do so.

I'm not being difficult or trying to cause any delay in this case, instead I'm trying to move this case along while preventing undue and unwarranted burden while preserving court processes and my due process. I'm only asking as a pro se party for the appropriate means and full disclosure to address any issue and its relevancy to the service or filing of the Record to prevent non-compliance or having to address, serve or file another "edition" of this massive Record now or in the future.

Regardless of Mr. Wheeler's failure to provide the specific page numbers of the Record in which he asks for redaction, I have taken the time to review the Record previously served and have done so in accordance with the redaction rules and guidelines pursuant Rule 41.2(a). The pages that contain additional redaction have been sent, along with a copy of this letter, to Mr. Wheeler.

Also, please find enclosed, an original of the fully redacted Record and an original of my final Briefs¹ to be recorded and filed. Due to the cost and time to produce and mail, I have not included copies to be recorded and returned to me in this instance.

Thank you and very truly yours,

A handwritten signature in black ink, appearing to read 'Molly Morphey', with a long horizontal flourish extending to the right.

Molly Morphey, pro se

Cc: Samuel M. Wheeler, Esq.
Amy L. Neuschafer, Esq.
Amy B. Hill, Esq.
David A. Collins, pro se

¹ Supreme Court Order, August 25, 2021



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The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

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January 14, 2022

Mr. Samuel Melvil Wheeler, Esquire
23 South Brevard Street, Suite 204
Brevard NC 28712

Re: Molly Morpew v. Stephen Dudek (2)
Appellate Case No. 2018-002185

Dear Counsel:

We are in receipt of your correspondence dated January 11, 2022. Please be advised that if you wish to have counsel for the respondent relieved, a motion to relieve counsel must be served and filed. Furthermore, by copy of this letter, the appellant is advised that she must serve an amended record on appeal that has been fully redacted within ten (10) days of the date of this letter.

Very truly yours,

V. Claire Allen

CLERK

cc: Molly Morpew
Steven L. Smith, Esquire
Amy Lynn Neuschafer, Esquire
Amy L.B. Hill, Esquire
Jordan Michael Crapps, Esquire
Laura Ruth Baer, Esquire
Robert McNair Peele, III, Esquire
David Collins