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Feb 07 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Perry H. Gravely, 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 NOTICE AND MOTION FOR LEAVE TO
AMEND NOTICE OF APPEAL

Michelle Hodges, Pro Se Appellant

6 Young Harris DR

Simpsonville, SC 29681

864-714-5263

Certified mail to: PO Box 95

Mauldin, SC 29662

10/6

In Reply to Wells Fargo's Response to my Notice and Motion for leave to amend the Notice of Appeal. I filed the said motion, to inform the court that I am only appealing the Order of Summary Judgment dated 8/7/2019, instead of the original 4 Orders that I had previously listed in my Notice of Appeal.

I apologize to the Court and the Respondent that some of the wording for my brief was included in this motion, as I had been using the format of a sample that I found online. I do intend to file a new motion on this issue. Nevertheless, I not could find in the Respondent's opposition to my motion where it cited to any authority showing that I am not allowed to amend my Notice of Appeal, therefore I seek sanctions for a frivolous pleading under the South Carolina Code Ann. §15-36-10(4) "An attorney or pro se litigant participating in a civil or administrative action or defense may be sanctioned for: "(a) filing a frivolous pleading, motion, or document if: (i) the person has not read the frivolous pleading,...", (c) "...making a frivolous arguments that a reasonable attorney would believe were not warranted under the existing law.....". And because the respondent used its response to direct the court on what I should not be allowed to do concerning initial and final briefs and communicated in an ex parte manner, by filing its response on 1/31/22 and not serving me until 2/1/22 (see attached post marked envelope); I further seek sanctions under the Rules of Professional conduct 3.5, which provides in relevant part: "A lawyer should not: (a) seek to influence a judge, ... or other official by means prohibited by law: It must have been very upsetting for the Respondent's attorneys, Mr. Laney and Mr. Caldwell, to see the wording for my brief, which shows that I can prove that they do not have a case, as Wells Fargo lacks standing. However there is no need to resort to personal attacks on my filings by likening them to a tennis match, because Mr. Caldwell and Mr. Laney have taken an oath of

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office to uphold justice and from my perspective and to disinterested third parties, it appears that they are using their licenses to steal property through the court system, which should result in disbarment.

Respectfully submitted,



Michelle Hodges, Pro Se Appellant 6/7/22 mlh 2/7/22
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William Egbula
Notary Public
State of South Carolina, County of Greenville
Commission Expires July 2, 2028



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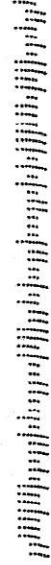
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5006


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

I hereby certify that a copy of the above mention documents were served on the parties below, via certified mail, with the proper postage and deposited at the United Parcel Store, located at: 3504 Highway 153, Greenville, SC 29611

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