

STATE OF SOUTH CAROLINA
COUNTY OF PICKENS

ALAN NIX, PLAINTIFF

V

CHURCHILL PARK HOMEOWNERS'
ASSOCIATION, INC., MCCABE
TROTTER, "CHURCHILL PARK", etc.

COURT OF COMMON PLEAS
THIRTEENTH JUDICIAL CIRCUIT

CASE No: 2024CP3900073

MOTION TO RECONSIDER, RULE, REScind,
CLARIFY AND CORRECT

PLAINTIFF IN THIS CASE SUBMITS THIS MOTION IN RESPONSE TO EIGHT OF THE DEFENDANTS PROPOSED ORDER DATED 3 DEC 2024 AND THEIR ANS JUDGE MORGAN JR.'S "ORDER ON MOTIONS TO DISMISS, FOR A GATEKEEPER ORDER AND FOR SANCTIONS OF DEFENDANTS" ~~REDACTED~~ DATED 5 DEC 2024. PLAINTIFF RECEIVED BOTH OF THESE ORDERS VIA THE STATE OF SOUTH CAROLINA ON 19 DEC 2024. GIVEN PLAINTIFF'S EXTREMELY LIMITED MEANS OF RESPONDING "AT THIS TIME" (5 HOURS OF DAYLIGHT TO SEE, PRIMITIVE WRITING INSTRUMENT, ZERO ACCESS TO NECESSARY INFORMATION, etc.) PLAINTIFF REQUESTS A HEARING TO GO THROUGH MORE THOROUGHLY AND WILL FOLLOW UP WITH ONE OR MORE FOLLOW UP DOCUMENTS AS HE IS ABLE TO DO IN A MEANINGFUL WAY. THIS INITIAL MOTION ATTEMPTS TO DEAL WITH THE MOST OBVIOUS ISSUES AT A SUFFICIENT LEAN WHILE ENSURING HE HAS ENOUGH PAPER, ENVELOPES AND INK TO BASICALLY COMPLETE AND TURN OVER TO THE STATE OF SOUTH CAROLINA TO HANDLE TIMELY DELIVERY. THE ORDER OF ISSUES RAISED IS LIKELY TO BE RANDOM FOR THE MOST PART AND, ONCE AGAIN GIVEN THE PRIMITIVE CIRCUIT STANCES PLAINTIFF IS BEING REQUIRED TO RESPOND UNDER, MAY, AT LEAST ORIGINALLY, HAVE TO GROUP LIKE ISSUES TOGETHER FOR EFFICIENCY'S SAKE.

(1) SURPRISE AND INEVITABLE OPPORTUNITY TO PROVIDE INPUT INTO EIGHT DEFENDANTS' PROPOSED VERSION OF ORDER. - PLAINTIFF IN THIS CASE RECEIVED BOTH THE EIGHT DEFENDANTS' PROPOSED ORDER AND JUDGE MORGAN'S SIGNED ORDER ON THE SAME DAY (19 DEC 2024) FROM THE STATE OF SOUTH CAROLINA. THE DATES APPEAR TO SHOW THAT JUDGE MORGAN SIGNED IT WITHIN 48 HOURS OF THE EIGHT SUBMITTING DEFENDANTS SENDING IT TO JUDGE MORGAN, LIKELY VIA ELECTRONIC COMMUNICATION METHODS, WHILE SENDING IT TO PLAINTIFF VIA U.S. POSTAL SERVICE THROUGH THE STATE OF SOUTH CAROLINA. PLAINTIFF BELIEVES THIS CONDUCT BY THE EIGHT SUBMITTING PLAINTIFF'S WAS PURPOSEFUL AND CLOUTIER MEANT TO DENY PLAINTIFF THE OPPORTUNITY TO PROVIDE INPUT OR OFFER FEEDBACK ON OBVIOUSLY NEEDS CORRECTIONS OR OFFER A MUCH SIMPLER, CONCISE AND RELEVANT ALTERNATIVE ORDER FOR CONSIDERATION. A BRIEF READING REVIEWS SUCH ISSUES WHICH JUDGE MORGAN DIDN'T CORRECT. ONE EXAMPLE IS THE MULTIPLE ASSERTIONS THAT THE PLAINTIFF FILES THIS CASE ON 28 JAN 2024, 28 JAN 2024 WAS A SUNDAY AND IT WOULD HAVE BEEN IMPOSSIBLE FOR PLAINTIFF TO FILE THIS CASE ON A SUNDAY. GIVEN NOT ONE, BUT EIGHT OF THE DEFENDANT'S ATTORNEYS WRITE AND AGREE TO LET SUCH AN INACCURACY BE DOCUMENTED MULTIPLE TIMES SHOULD HAVE BEEN A RED FLAG TO JUDGE MORGAN TO PAY MUCH MORE ATTENTION TO EIGHT DEFENDANTS' HANDWORK AND QUESTION THEIR

*"EIGHT DEFENDANTS" = PG. 2 ORDER MOTION DEFENDANTS

MOTIVES AND OBVIOUS INTENT TO UNDERMINE PLAINTIFF'S RIGHT TO REVIEW AND PROVIDE FEEDBACK. (PLAINTIFF WAS ALSO NOT ARRESTED BY THE COUNTY OF CHARLESTON IN 2023 AS EIGHT DEFENDANTS' ASSERT AS FACT AND WHICH AT LEAST THREE OF THE DEFENDANTS KNOW NOT TO BE TRUE; MACK, ARMSTRONG & SCARLET WILSON)

(2) VENUE: ON PAGES 9 (NINE) THROUGH 11 (ELEVEN) EIGHT DEFENDANTS REITERATE OR COPY FROM SOMEWHERE A LOT OF CASES AND LAWS ABOUT THE LOCATION OF A TRIAL INCLUDING S.C. CODE 15-7-100 (GIVES THE COURT POWER TO CHANGE THE PLACE OF A TRIAL) CONCLUDING THAT THE CASE SHOULD BE DISMISSED OF COURSE. WHILE PLAINTIFF HASN'T HAD THE ABILITY TO USE ANY OF INFORMATION WHICH WAS CURRENTLY AVAILABLE TO DEFENDANTS EIGHT OR MORE ATTORNEYS IN OVER THREE (3) MONTHS, PLAINTIFF REMEMBERS SEEING A TLE OR SOMETHING SIMILAR WHICH STATES THAT IF VENUE/LOCATION IN WHICH A CASE WAS FILED IS INCORRECT, THE CASE SHOULD NOT BE DISMISSED BUT THE JUDGE SHOULD CHANGE IT TO THE PROPER LOCATION. PLAINTIFF ASSUMES AT LEAST ONE OF THE NUMEROUS ATTORNEYS INVOLVED WITH THIS ORDER IS AWARE OF WHAT PLAINTIFF IS DESCRIBING.

(3) ON PAGE 24 DIRECTLY UNDER "CONCLUSION", THE EIGHT DEFENDANTS FROM PAGE 2 (TWO) WRITES "THE COURT GRANTS THE DEFENDANTS' MOTIONS TO DISMISS THIS CASE AND HEREBY DISMISSES THE COMPLAINT WITH PREJUDICE AS TO ALL DEFENDANTS. PLEASE CLARIFY IF THE LAST WORD OF THIS SENTENCE ("DEFENDANTS") REFERS TO THE EIGHT (8) DEFENDANTS LISTED ON PAGE 2 (TWO) OR THE LIST OF DEFENDANTS ON PAGE 1 (ONE). IF IT REFERENCES PAGE ONE, PLEASE CHANGE TO REFERENCE PAGE 2 DEFENDANTS OR PROVIDE BASIS FOR THIS APPLYING TO ALL DEFENDANTS LISTED ON PAGE 1 (ONE)

(4) SERVICE OF PROCESS: PAGE 14-17 GO INTO A LOT OF DETAIL ABOUT SERVICE OF PROCESS ISSUES WITH (a) AND (b) MOVING INTO CHARLESTON COUNTY AND COUNTY OF CHARLESTON SHERIFF DEPARTMENT AND A LIST OF 13 COUNTY OF CHARLESTON EMPLOYEES. THE EIGHT DEFENDANTS, DESPITE RAISING THE ISSUE THAT NATALIE HAIN IS NOT THE CHIEF EXECUTIVE OF CHARLESTON COUNTY OR ATTEMPTED SERVICE ON THE COUNTY OF CHARLESTON SHERIFF DEPARTMENT, SEEMS TO CHOOSE TO WILLFULLY NOT ADDRESS THE FACT THAT THIS COMPLAINT WAS SERVED ON ALAN WILSON, THE SOUTH CAROLINA ATTORNEY GENERAL, FIRSTA PLAINTIFF BELIEVES THE SERVICE ON THE SOUTH CAROLINA ATTORNEY GENERAL COVERS ALL OF THE PERSONS LISTED IN (b) AS WELL AS THE COUNTY OF CHARLESTON SHERIFF DEPARTMENT AND CHARLESTON COUNTY. AS TO THE EIGHT DEFENDANTS ASSERTION THAT THERE IS NOTHING IN THE RULES THAT PROVIDES FOR SERVICE BY FED EX GROUND. PLAINTIFF ALLEGES THAT FED EX IS A COMMERCIAL SHIPPER, WHETHER AIR OR GROUND, AND IS THE SAME AS USPS FOR PURPOSES OF SERVICE. PROOF OF DELIVERY ON ALAN WILSON WAS MAILED TO THE CLERK SHERIFFS OFFICE DELIVERY TO 1000 ASSEMBLY STREET, COLUMBIA. LASTLY, AS TO DEFENDANTS SMITH AND SCARBOROUGH,

THE EIGHT DEFENDANTS CLEARLY LIKE TO CITE DEFENDANT HASLEBEN'S 26 JAN 2021 BOND ORDER NUMEROUS TIMES THROUGHOUT THEIR ORDER IN REFERENCE TO A COURT ORDER PREVENTING PLAINTIFF FROM COMING WITHIN FIVE MILES OF HIS FAMILIES' HOME (EXAMPLE ON PG. 15; "IT ALSO APPEARS NU IS UNDER COURT ORDER NOT TO COME WITHIN FIVE MILES OF THE ADDRESS,") BUT THEN CURIOUSLY FAILS TO MENTION THAT VERY SAME ORDER FROM HASLEBEN ALSO FORBIDS THE PLAINTIFF FROM COMING WITHIN A BLOCK OF MIKEL SCARBOROUGH OR CHRISTINE SMITH, OR COMMUNICATING WITH THEM VIA ANY METHOD, INCLUDING THROUGH A THIRD PERSON. BASED ON THESE CLEARLY IMPROPER RESTRICTIONS, THE EIGHT DEFENDANTS THEMSELVES MAKE IT IMPOSSIBLE FOR THE PLAINTIFF TO SERVE SCARBOROUGH OR SMITH WITHOUT VIOLATING HER BOND ORDER AND BEING SUBJECT TO ANOTHER ARREST AND LENGTHY DETENTION. THE EIGHT DEFENDANTS INTENTIONAL NON DISCLOSURE OF THIS OBVIOUS FACT IS JUST ONE EXAMPLE OF THEIR DECEITFULNESS AND IMPROPER PURPOSE IN CREATING THIS DOCUMENT.

⑤ PLAINTIFF'S MAILING ADDRESS: THE EIGHT DEFENDANTS RAISE THIS ISSUE MULTIPLE TIMES IN THEIR DOCUMENT AS A SUPPOSED ISSUE WORTHY OF THEIR DISINGENUOUS COMPLAINTS. ALL OF THESE PARTIES KNOW WHAT THE ISSUE ACTUALLY IS AND WHY THE PLAINTIFF CONTINUES TO USE 1401 DENSHORE CIRCLE, MT. PLEASANT AS HIS LEGAL ADDRESS. THE SHORT ANSWER IS BECAUSE 1401 DENSHORE CIRCLE IS HIS LEGAL HOME ADDRESS. BUT, TO ENSURE JUDGE MOREN IS NOT CONFUSED, PLAINTIFF WILL EXPLAIN IN VERY EASY TO UNDERSTAND TERMS: (A) THE SC SUPREME COURT ISSUED AN ORDER IN MAY 2020 RELATED TO FORECLOSURES AND EVICTIONS IN SOUTH CAROLINA DURING THE COVID 19 PANDEMIC (B) THAT ORDER REQUIRED A PARTY SEEKING A FORECLOSURE OR EVICTION TO FILE A CERTIFICATE OF COMPLIANCE WITH THE COURT CASE BEFORE CONTINUING WITH THE FORECLOSURE. IN THE ABSENCE OF FILING SUCH A CERTIFICATE, THAT ORDER SPECIFIED THAT THE CASE ENDED AND NO FURTHER ACTION WAS TO BE TAKEN. (C) McCABE TROTTER, AND BY EXTENSION, "CHURCHILL PARK", WAS AWARE OF THIS ORDER BEFORE AUGUST 2020. (D) McCABE TROTTER NOR "CHURCHILL PARK" FILLED THE REQUIRED CERTIFICATE OF COMPLIANCE WITH CASE 2017-CP-10-04031 ON OR BEFORE 21 AUG 2020. THUS, CASE 2017-CP-10-04031 ENDED NO LATER THAN 21 AUG 2020. (E) SCARBOROUGH KNEW ABOUT THIS ORDER BEFORE 21 AUG 2020 AND KNEW THAT IT SPECIFICALLY ORDERED MASTERS IN EQUITY TO NOT HOLD A FORECLOSURE SALE IF NO CERTIFICATE OF COMPLIANCE HAD BEEN FILED. (F) DUE TO THE ABOVE VERY EASY TO UNDERSTAND AND PROVEN FACTS, THE 6 OCT 2020 FORECLOSURE SALE WAS INVALID AND ANY SUCH RESULTING DEED IS ALSO VOID AS A MATTER OF LAW. (G) THUS, STATE STREET HOLDINGS CO, LLC'S LATE OCT 2020 MASTER IN EQUITY DEED IS VOID AND ANY DEED BASED ON SCARBOROUGH'S AND STATE STREET HOLDING CO, LLC'S DEED IS ALSO VOID, INCLUDING BUT NOT LIMITED TO, MICHAEL AND TARYN LACROFF'S 2021 DEED. (H) THE OTHER

THE JULY 2001 DEED FROM C. RICHARD DOBSON BUILDERS, INC., A DIVISION OF D.R. HORTON, TO ALAN AND NORMA NIX, WHICH COVERED 1401 DENSMORE CIRCLE TO THEM FOR \$215,000 IS THE LAST VALID DEED AND, AS SUCH, STILL OWNED BY ALAN NIX AND THE ESTATE OF NORMA NIX. SO, WHILE IT WAS LIKELY TRUE THAT AMANDA HASKARDEN'S HIGHLY UNUSUAL 26 JAN 2021 BOND ORDER "PRECLUDED" PLAINTIFF "FROM COMING WITHIN FIVE MILES" OF 1401 DENSMORE CIRCLE UP UNTIL ABOUT SEVEN WEEKS AGO AND IT IS LIKELY TRUE THAT MICHAEL AND TARYN LAZROFF ARE STILL LIVING THERE WITHOUT MY PERMISSION OR PAYING RENT, LEGALLY IT IS INDISPUTABLE THAT 1401 ~~1401~~ DENSMORE CIRCLE, MT. PLEASANT, SC HAS BELONGED TO / BEEN OWNED BY ALAN NIX AND NORMA NIX SINCE JULY 2001, OVER 23 YEARS. CONSEQUENTLY, 1401 DENSMORE CIRCLE, MT PLEASANT, SC IS ALAN NIX'S LEGALLY OWNED RESIDENCE, HIS LEGAL MAILING ADDRESS AND ANY ISSUES THESE EIGHT DEFENDANTS, OR ANYONE ELSE FOR THAT MATTER, HAS SENDING MAIL TO PLAINTIFF AT 1401 DENSMORE CIRCLE, MT. PLEASANT, IS A PROBLEM OF THEIR OWN INTENTIONAL MAKING AND OF NO FAULT WHATSOEVER OF THE PLAINTIFF. GIVEN THESE FACTS, NONE OF THESE EIGHT DEFENDANTS COMPLAINTS ARE VALID OR ANYTHING MORE THAN HYPOCRITICAL COMPLAINING. AS SUCH, ANY COMPLAINTS OF THESE EIGHT DEFENDANTS ABOUT PLAINTIFF USING HIS LEGAL ADDRESS ARE NOT VALID AND SHOULD NOT BE CONSIDERED.

(6) RULE 11: THESE EIGHT DEFENDANTS ALLEGED THE PLAINTIFF VIOLATED RULE 11 ~~11~~ "FOR FAILING TO INCLUDE HIS ADDRESS ON THE SUBJECT PLEADINGS." THIS IS CLEARLY AN INVALID CLAIM. SEE PARAGRAPH "5" ABOVE FOR DETAILS. THESE EIGHT DEFENDANTS ALSO CITE "THE FACIALLY DEFICIENT COMPLAINT AS ANOTHER ISSUE BUT THEN OBJECT TO HIS JULY 2024 REQUEST TO AMEND ONCE HE CAN GET ACCESS TO HIS FILLS AGAIN. THEN THESE EIGHT DEFENDANTS AGAIN SAY "NIX" FAILS TO TAKE MEASURES TO SERVE THE SUMMONS AND COMPLAINT" BUT FAIL TO STATE THAT THEY ALL RESERVED THE SUMMONS AND COMPLAINT WITH ALMOST 600 PAGES OF EXHIBITS VIA FED EX. THESE EIGHT DEFENDANTS AGAIN GRIBE ABOUT "INCLUDE SUBSTANTIVE ALLEGATIONS RELATED TO CAUSES OF ACTION" BUT AT THE SAME TIME HYPOCRITICALLY ~~OBJECT~~ OBJECT TO PLAINTIFF AMENDING IT. THE EIGHT DEFENDANTS FINAL ARGUMENT IS THAT PLAINTIFF MIGHT "RESPOND TO THE SUBJECT MOTION". FIRST, PLAINTIFF HAS ONLY SERVED ONE MOTION WHICH WAS LIKE TWO PAGES LONG AND BEST HE CAN REMEMBER DOESN'T STATE ANY OF THIS. MUCH MORE HYPOCRITICALLY, HOW WOULD THESE EIGHT DEFENDANTS RATIONALLY EXPECT PLAINTIFF TO RESPOND GIVEN A NUMBER OF THESE DEFENDANTS HAVE HAD HIM LOCKED UP FOR OVER THREE MONTHS WITH NO VALID WAY TO RESPOND. NONE OF THESE DEFENDANTS COMPLAINTS, APPARENT FACTS AND GRIBES FROM "THIS LITIGANT" WAS "FOR THE PURPOSES OF DEBAR AND OTHER DIALOGUE PURPOSES". NO VALID RULE 11 VIOLATION HAS OCCURRED BASED ON THESE EIGHT

DEFENDANTS' CLAIMS.

(7) Why Was Plaintiff's Motion For Extra Time To Amend Denied? Given All Of The Time And Effort And Superfluous Arguments Made In Support Of These Eight Defendants' Positions, It Appears Only Three Sentences Are Included On This Subject In Over Twenty Five Pages. Two At The Bottom Of Page Six, Essentially That I Filed It And The Point That They Has Objected To It, And The Unexplained Denial On Page Twenty Five. (25). This Unexplained Denial Is Even More Perplexing Given (A) So Much Time And Effort Is Expended In The More Than Twenty Pages Of This Document Battering The Plaintiff For The Issues With The Complaint But Then Biasedly Also Doesn't Want The Plaintiff To Try To Amend To You All's Satisfaction (B) The Opportunity To Amend Is Supposed To Be Liberally Granted, Especially During The Early Stages Of Litigation (C) I Needed To Get My Laptop Fixed Or At Least The Data On It Retrieved To Do Properly (D) I Was Having To Deal With A Sudden Crisis Related To McCabe, Twitter And "Churchill Park" Trying To Steal Money Out Of My Navy Federal Accounts & 2017 CP1004031 Bond Insurance (E) I Had Essentially Provided Them All Of The Discovery When I Sent The Complaint, (See Page Six, Paragraph Two, Last Sentence, "The Complaint... Includes Nearly 600 Pages Of Exhibits". As Far As Plaintiff Knows, These Eight Defendants Had All Filed Similar Sweet, High Level Motions And Would Not Have Been Prohibited In The Least If He Had Done As He Intended And Filed An Amended ~~Complaint~~ Complaint By Or Before 4 Oct 2024. Of Course Several Of These Eight Defendants Made That Impossible With Their 16 Sep 2024 Bench Warrant Quickly Executed On 19 Sep 2024 And Subsequent Refusal To Release Him. Please Clarify Why You Denied Plaintiff's Motion For Extra Time To Amend, Especially Given You All's Continual Bashing Of Plaintiff About The Complaint.

(8) Not A Single Mention Of 17 Oct 2024 Request To Delay/Reschedule Hearings
On 17 Oct 2024, Plaintiff Requested A Delay Of The Hearing For Several Very Valid Reasons. Several Of These Reasons Are As Follows:

(A) Plaintiff Had Been Incarcerated By A Number Of These Very Same Defendants (For Example: Scarlett Wilson, Sheriff Graziano, Benjamin Mack, County Of Charleston, etc.) For The Past 27 Days On A Highly Suspicious Bench Warrant (B) Because Of This Bench Warrant And Subsequent Arrest At Sea Point In Newberry Three Days Later On 19 Sep 2024, Plaintiff Thought/Hoped He Had Been Called To The County Of Charleston Detention Center In Time To Finally Be Released Or Have A Hearing Or Something About His Ongoing Incarceration. (C) Stated That The County Of Charleston Sheriff Had Not Allowed Him To Bring Anything With Him To

HER INTAKE AREA. THAT DAY, (1) STATED THAT HE HAD NOT RECEIVED ANY OF THE DOCUMENTS THAT THESE EIGHT DEFENDANTS CLAIMED TO HAVE SENT HIM ~~WHILE~~ ^{WHILE} BEING INCARCERATED BY DEFENDANT SCARLETT WILSON IN DEFENDANT SHARLENE GIZZIANO'S JAIL; WHO CONTROLLED PLAINTIFF'S MAIL ~~AND~~ DURING THE PERIOD OF 19 SEP 2024 AND 17 OCT 2024. (PLAINTIFF DID SEND A LETTER TO THE COURT IN PICKENS ACKNOWLEDGING HE RECEIVED A LETTER FROM SOMEONE IN GREENVILLE OR GREENWOOD OR SOMETHING SIMILAR IN LATE OCTOBER). THE EIGHT DEFENDANTS LACK OF INCLUDING ANY OF THIS IN THEIR ORDER IS VERY TELLING. JUDGE MORGAN ACKNOWLEDGED THIS UNFAIR SITUATION AND ASKED IF ANYONE OBJECTED TO THIS ~~ORDER~~ REQUEST, WHICH OF COURSE AT LEAST A FEW OF THESE EIGHT DEFENDANTS OBJECTED TO. PLAINTIFF STATED HE WOULD RESPOND TO THESE DEFENDANTS' COMPLAINTS AS SOON AS POSSIBLE AFTER HE WAS RELEASED AND STATED AGAIN HIS INTENT TO MOVE IT TO FEDERAL COURT. GIVEN THE CIRCUMSTANCES, OF WHICH THE PLAINTIFF WAS UNDER THE CONTROL OF A NUMBER OF THE DEFENDANTS, AND BECAUSE OF AT LEAST THREE OF THE DEFENDANTS, A CONTINUANCE SHOULD HAVE BEEN GRANTED TO GIVE THE PLAINTIFF A SEMBLANCE OF A FAIR CHANCE TO BE PREPARED AND ARGUE AGAINST SO MANY PEOPLE GANGING UP ON HIM ~~AND~~ SO ^{WHILE} VULNERABLE. PLEASE CLARIFY WHY THIS IMPORTANT ISSUE IS NOT EVEN MENTIONED IN OVER 20 PAGES OF WRITING AND RULE ON THIS REQUEST.

(9) AT LEAST ONE LAWSUIT IS MISSING FROM THESE EIGHT DEFENDANTS' LIST.

(WHILE INTERESTINGLY) THE EIGHT DEFENDANTS' FAIL TO LIST A FEDERAL LAWSUIT PLAINTIFF FILED AGAINST CHRISTOPHER CRAWEN (ALSO A DEFENDANT IN THIS CASE) ON 9 SEP 2024 ALLEGING MALICIOUS PROSECUTION FOR THE TWO FALSE ARREST WARRANT AFFIDAVITS HE SIGNED ON 21 JAN 2024 AND THEN AGAIN ON 22 JAN 2024 IN WHICH HE ACCUSED PLAINTIFF IN THIS CASE OF INTIMIDATING COURT OFFICIALS, WITNESSES OR JURORS (SEE PAGE 3, LAST PARAGRAPH) AND DESCRIBED THE VICTIM AS BEING AT 4045 BRIDGE VIEW DR. NORTH CHARLESTON ON 21 JAN 2024 AND A WITNESS TO HIS ALLEGED VICTIMIZATION. THE VICTIM WAS ONE "JOE DALSON", WHO CRAWEN LISTED AS BEING "AN ATTORNEY THAT REPRESENTS THE COUNTY OF CHARLESTON", WHICH WAS NOT TRUE GIVEN "JOE DALSON" HAD NOT BEEN THE COUNTY OF CHARLESTON ATTORNEY SINCE BREXIDE CHRISTMAS 2020. (SEE FEDERAL LAWSUIT ALAN NIX V CHRISTOPHER CRAWEN FILED 9 SEPT 2024) PLAINTIFF KNOWS AT LEAST TWO DEFENDANTS IN THIS CASE KNOW ABOUT THIS LAWSUIT, WITH THOSE TWO BEING SCARLETT WILSON AND BENJAMIN MACK. PLAINTIFF SENT A COPY TO SCARLETT WILSON ON 11 OR 12 SEP 2024 AND TOLD BENJAMIN MACK ABOUT IT ON 4 NOV 2024, AFTER HE WAS IN APPROPRIATELY MADE NIX'S ATTORNEY IN THE CASES THESE DEFENDANTS SPEND COPIOUS TIME ^{MATTERS} LAYING OUT ON PAGE 4, FOR A MALICIOUS PROSECUTION SUIT TO BE FILED THE CASE DISMISSED.

(10) IMPROPRIETLY INCLUDING INFORMATION THAT COULDN'T POSSIBLY HAVE BEEN KNOWN ON OR BEFORE 17 OCT 2024

THESE EIGHT DEFENDANTS AND A JUDGE GO ON AT LENGTH ON THE TOP

PAGE FOUR (4) ABOUT EVENTS WHICH OCCURRED ON 7 NOV 2024, WHICH IS AT LEAST THREE WEEKS AFTER 17 OCT 2024. PLEASE CLARIFY HOW THIS IS PROPER? IN THE ABSENCE OF A SOLID REASON BEING GIVEN IN WRITING, PLEASE REMOVE. IF SUCH AN EXPLANATION IS PROVIDED, PLEASE CLARIFY THAT DEFENDANT IN THIS CASE, SCARLETT WILSON, WAS PROSECUTING THOSE CASES, THAT DEFENDANT IN THIS CASE, BENJAMIN MACK, WAS DEFENDING THOSE CASES, THAT PLAINTIFF IN THIS CASE WAS ONLY ARRESTED ON 23 OCT 2024 (AS IN NOT 2023), RELATED TO ARREST WARRANT 2023GS1005003 BY SCARLETT WILSON AND THAT IT WAS ONLY REVEALED ON 4 NOV 2024 THAT CHRISTOPHER CRAMER WAS SCARLETT WILSON'S ALLEGED ~~AND~~ PUBLIC OFFICIAL VICTIM.

(11) SANCTIONS VS. GATEKEEPER; ARE THEY ACTUALLY SEPARATE AND DISTINCT?

THESE EIGHT DEFENDANTS SUGGEST THAT A GATEKEEPER ORDER IS NOT A SANCTION, WHEN BASED ON PLAINTIFF'S KNOWLEDGE, DESPITE NOT BEING AN ATTORNEY LICENSED TO PRACTICE LAW, NOT ONLY IS A GATEKEEPER ORDER A SANCTION, BUT IS CONSIDERED ONE OF THE MOST SEVERE, IF NOT THE MOST SEVERE, SANCTIONS AS IT CLEARLY IMPAIRS A PERSON'S ACCESS TO THE COURTS AS IS A GUARANTEED RIGHT IN THIS COUNTRY. PLEASE CLARIFY HOW THE COURT'S "ACT OF GRACE" IN DECLINING TO AWARD SANCTIONS ON PAGE 22 CAN OCCUR BUT THEN TURN RIGHT AROUND ON PAGE 25 AND GRANT THE DEFENDANTS' REQUEST FOR A GATEKEEPER ORDER.

(12) THE BASIS FOR A GATEKEEPER ORDER: ONCE THE COURT PERFORMS ITS "ACT OF GRACE" IN DECLINING TO AWARD SANCTIONS ON PAGE 22, THERE IS NO REMAINING BASIS FOR A GATEKEEPER ORDER. THE GATEKEEPER ORDER, IF EVER PERMITTED, IS NOT REMOVED AFTER THE COURT'S ~~AND~~ IMPLICIT "ACT OF GRACE". IT (THE GATEKEEPER ORDER) MUST BE REMOVED.

(13) HOW DID THESE EIGHT DEFENDANTS KNOW ABOUT THE COURT'S FUTURE "ACT OF GRACE"?

THESE EIGHT DEFENDANTS SUBMIT A ORDER ON OR ABOUT 3 DEC 2024 STATING THAT "THE COURT DISMISSES THE COMPLAINT, BUT IN AN ACT OF GRACE, DECLINES TO AWARD SANCTION AT THIS TIME." AND THEN, IN AN APPARENT MIRACLE, THE COURT (EG. G. D. MORGAN) DELIVERS THESE EIGHT DEFENDANTS FRENCHED "ACT OF GRACE". PLAINTIFF SUGGESTS THAT UNLESS AT LEAST ONE OF THESE EIGHT DEFENDANTS HAS A PAST DOCUMENTED RECORD OF CLAUSTRANCE OR SOMETHING SIMILAR, THIS APPARENT MIRACLE RAISES THE DISTINCT POSSIBILITY OF MISCONDUCT BETWEEN SEVERAL PRCTICES.

(14) HOW DOES A CONDITIONAL "ACT OF GRACE" WORK EXACTLY?

SO THESE EIGHT DEFENDANTS ALSO APPARENTLY ACCURATELY PREDICT THAT JUDGE MORGAN'S FUTURE ACT OF APPARENT GRACE WAS NOT A COMPLETE ABSOLUTION OF NIX, BUT ONLY A PRUVE IN TIME. EG. "IN AN ACT OF GRACE, DECLINES TO AWARD SANCTIONS AT THIS TIME". PLAINTIFF NIX IS, BESIDES BEING IN COMPLETE AWE OF THESE EIGHT DEFENDANTS APPARENT CLAUSTRANCE, QUITE CONFUSED ON HOW ANY JUDGE, INCLUDING JUDGE MORGAN, ^{CAN} THREATEN FUTURE UNDOCUMENTED SANCTIONS IF THEY ARE DISMISSING THE COMPLAINT WITHOUT AWARDING SANCTIONS.

PLEASE CLARIFY IF SUCH A THREAT OF UNDOCUMENTED FUTURE SANCTIONS IS ACTUALLY ALLOWED ONCE A CASE IS DISMISSED.

(15) IS SUCH A THREAT OF FUTURE CONDITIONAL SANCTIONS POSSIBLY A VIOLATION OF FEDERAL AND POSSIBLY STATE LAW? THESE EIGHT DEFENDANTS AND JUDGE MORGAN FINALLY GOT AROUND TO CLARIFYING THE LIMITS OF THEIR APPARENT ACT OF GRACE UNDER "CONCLUSIONS", THIRD PARAGRAPH, ON PAGE 23 WHERE THEY THREATEN THEIR UNSPECIFIED SANCTIONS IF NIX "FILES (FILING) ADDITIONAL ACTIONS BASED ON THE SAME FACTS AGAINST THE PARTIES INVOLVED IN THIS CASE," WHICH PLAINTIFF REELS THIS CONDITION, AMONG OTHER THINGS, IT SEEMED LIKELY THAT THESE EIGHT DEFENDANTS WERE LIKELY THREATENING NIX FROM DOING AS HE PREVIOUSLY STATED HE WOULD DO AND PURSUE THESE PARTIES IN FEDERAL COURT. A THREAT AGAINST A WITNESS OR SIMILAR PARTY RELATED TO A PENDING OR PLANNED FEDERAL CASE IS A SERIOUS VIOLATION OF LAW, AND EVEN MORE DISTURBING WHEN ATTORNEYS DO SO BY USE OF SUCH MEANS. PLEASE THOROUGHLY CLARIFY THE INTENT OF YOUR ALL 5 UNSPECIFIED FUTURE THREATS GIVEN YOUR PLAINTIFF'S AWARENESS OF NIX'S PLANNED FEDERAL & FEDERAL COURT COMPLAINTS.

(16) COMBINATION OF A NUMBER OF THESE ISSUES RAISES THE SUBSTANTIAL APPEARANCE OF IMPROPRIETY, BIAS AND CONFLICT OF INTEREST BETWEEN JUDGE MORGAN AND THESE EIGHT DEFENDANTS.

(A) AS RAISED EARLIER, HOW DID THESE EIGHT DEFENDANTS KNOW THAT JUDGE MORGAN WAS APPARENTLY GOING TO SPONTANEOUSLY DELIVER AN APPARENT ACT OF GRACE BEFORE HE DID SO? THE MOST SIMPLE EXPLANATION IS INAPPROPRIATE EX PARTE COMMUNICATIONS BETWEEN JUDGE MORGAN AND THESE EIGHT PARTIES.

(B) HOW WOULD INFORMATION (VERY DENIED) ABOUT NIX ~~BE OBTAINED~~ FROM NOVEMBER 2024 ~~END UP~~ IN THIS ORDER IF THE LAST THING THAT SUPPOSEDLY OFFICIALLY HAPPENED IN THIS CASE WAS FROM AT LEAST THREE WEEKS EARLIER?

THE EASY ANSWER IS THAT ONCE JUDGE MORGAN SAW PLAINTIFF LOCKED UP IN THE CHARLESTON COUNTY DETENTION CENTER ON 17 OCT 2024, AND WEARING THEIR JAIL GARB, JUDGE MORGAN THEN STARTED KEEPING TABS ON NIX AND INSERTED SUCH EXTRANEOUS AND IMPROPER INFORMATION TO FURTHER DISPARAGE NIX.

(C) WHY WOULD AN IMPARTIAL JUDGE SIGN SUCH AN ORDER GIVEN THE NUMBER OF EASILY KNOWN MISREPRESENTATIONS AND MATERIAL OMISSIONS? THE EASY ANSWER IS THAT JUDGE MORGAN WANTED TO IMPROPERLY ASSIST THESE DEFENDANTS IN THIS CASE AND LIKELY FUTURE FEDERAL COMPLAINTS WHICH HE WAS ON NOTICE OF.

(D) WHY WOULD A COMPETENT JUDGE MAKE UNSPECIFIED THREATS OF FUTURE SANCTIONS WHICH HE ALMOST CERTAINLY COULD NOT LEGALLY ACT ON ~~ONCE~~ ONCE HE DISMISSED THIS CASE? THE EASY ANSWER IS TO FURTHER ASSIST THESE DEFENDANTS IN INTIMIDATING AND THREATENING NIX INTO ^{NIX} PURSUING THESE DEFENDANTS WITH THE FEDS AND FEDERAL COURT, WHICH HE WAS AWARE WAS PLANNED.

(E) Why Would A Fair And Impartial Judge Not Give Plaintiff The Opportunity To Provide These Much Needed Corrections, Context And Feedback Before Signing This Highly Questionable Order Almost Surely Created For Additional Purposes? The Easy Answer Is That They/He (Morgan) Knew There Were Multiple Objectionable And Inappropriate Issues Included And Didn't Want Such Questionable Conduct On The Record; Once Again Assisting These Eight Defendants, Without Any Publicly Available Objections Which Would Require Him To Explain Or Change These Numerous Issues And Improperly Included Statements.

(F) Why Would A Fair, Impartial And Truth Seeking Judge Not Grant Plaintiff A Continuance Of These Eight Defendants' 17 Oct 2024 Motion Hearing Given:
(i) Some Of These Defendants Had Had Him Arrested Almost A Month Earlier;
(ii) Some Of These Defendants Had Had Him Incarcerated For The Past 27 Days Causing Plaintiff To Be Without Any Of His Documents To Refer To (~600 Pages);
(iii) Despite Being Incarcerated By Some Of These Defendants, Who Also Controlled His USPS Mail, Plaintiff Had Not Received Any Of The Documents These Eight Defendants Said They Had Sent Him At The County Of Charleston Detention Ctr.
(iv) Plaintiff Thought He Had Been Brought To The County Of Charleston Detention Ctr Booking + Bond Court Area To Finally Be Released.
→ The Easy Answer Is That Judge Morgan Had Already Decided To Assist All Of These Parties And The Video Conference Was Only Meant To Create The Appearance Of Fairness.

(G) Why Would A Fair And Impartial Judge Deny Plaintiff The Right To Amend A Complaint, Without Providing Any Justification Whatsoever, And Then Berate Them Repeatedly For A Lacking Complaint? While Plaintiff Is Not Sure If This Is The Entire Reason For Judge Morgan's Unexplained Denial, Plaintiff Believes A Substantial Part Of The Reason Is Found On Page 21, To Wit: "Nix Has Alleged Numerous Causes Of Action That Are Complex And Which Will Require Many Hours And Costs To Litigate If Allowed To Proceed." Clearly These Eight Defendants Didn't Want To Litigate Anything Whatsoever, Whether Complex Or Not, And Judge Morgan Improperly Assisted Them To Avoid These ~~many~~ "Many Hours And Costs", Most Of Which Were Likely Being Paid By Insurance Companies, By, Without Any Explanation Whatsoever, Denying Plaintiff's Very Reasonable Motion To Amend.

(H) Why Would An Impartial And Competent Judge Grant An Unqualified, Blanket Gatekeeper Order, Arguably The Most Significant Sanction, Which The Judge Had Just Pronounced A Couple Of Pages Prior, They Were Delivering An Apparent "Act Of Grace" By Declining "To Award Sanctions At This Time"? Plaintiff Admits To Being Completely Baffled As To

BEING ABLE TO FIND ANYTHING COMPELLING ABOUT THIS SITUATION BUT ASSUMES THAT JUDGE MORGAN ABANDONED ALL LOGIC AND REASON WHATSOEVER TO GRANT ALL OF THESE DEFENDANTS, AS WELL AS ANY AND ALL FUTURE PLAINTIFFS AND DEFENDANTS, THE ULTIMATE JUDICIAL PROTECTION WHILE AT THE SAME TIME COMPLETELY DENYING HIS RIGHTS TO THE COURT.

(I) ~~THE~~ WAS JUDGE MORGAN'S "ACT OF GRACE" BY DECLINING TO AWARD SANCTIONS AT THIS TIME, EXCEPT OF COURSE FOR THE ULTIMATE SANCTION OF THESE EIGHT DEFENDANTS MUCH SOUGHT ULTIMATE SANCTION OF THEIR BLANKET GATEKEEPER ORDER, BEING GRACIOUS TO THE PLAINTIFF IN THIS CASE OR THE DEFENDANTS? PLAINTIFF CAN THINK OF AT LEAST FIVE REASONS JUDGE MORGAN'S "ACT OF GRACE", SO ACCURATELY PROMPTED BY THESE EIGHT DEFENDANTS, WAS MORE GRACIOUS TO THESE DEFENDANTS ~~THAN~~ THAN TO THE PLAINTIFF.

BASED ON THE ABOVE MULTIPLE DOCUMENTED INSTANCES OF BIAS AGAINST THE PLAINTIFF AND IN FAVOR OF THESE EIGHT DEFENDANTS, JUDGE MORGAN SHOULD HAVE CLEARLY REFUSED HIMSELF FROM THIS CASE RATHER THAN SIGN THIS ORDER.

PLAINTIFF REQUESTS JUDGE MORGAN TO; FOR ALL THE ABOVE CITED REASONS, AS WELL OTHERS THE PLAINTIFF WILL SET FORTH IN A FOLLOW UP RESPONSE;

(1) RESCIND THIS ORDER

(2) GRANT PLAINTIFF'S REQUEST FROM 17 OCT 2024 FOR A CONTINUANCE

(3) GRANT PLAINTIFF'S JULY 2024 MOTION TO AMEND THE COMPLAINT

OR, IN THE ALTERNATIVE;

(1) EXPLAIN IN DETAIL, IN A FILED ORDER, HOW AND WHY ALL OF THESE NUMEROUS ISSUES OCCURRED WITHOUT JUDICIAL BIAS AND POSSIBLY MISCONDUCT BEING INVOLVED.

(2) STRIKE THE OVERLY BROAD GATEKEEPER ORDER IN ~~FAVOR~~ ^{FAVOR} OF REASONABLE ATTORNEY'S FEES AND COSTS (I'M SURE THIS WAS REVIEWED PRIOR TO "ACT OF GRACE") AND ANY OTHER RELIEF THAT'S REQUIRED AND JUST GIVEN THESE MULTIPLE ISSUES

25 Dec 2024

RESPECTFULLY SUBMITTED,

Alan Nix

ALAN NIX

C/O THE STATE OF SOUTH CAROLINA

4344 BROAD RIVER RD.

COLUMBIA, SC 29210

(NO PHONE AVAILABLE)

NOTICE THIS ADDRESS IS NOT

1401 DOWNSHIRE CIRCLE

MT. PLEASANT, SC 29466

"AT THIS TIME"

* "EIGHT DEFENDANTS = PG. 2" MOTION DEFENDANTS

MOTION COVER SHEET

CASE No: 2024CP390073

ALAN NIX V. CHURCHILL PARK HOMEOWNERS' ASSOCIATION, INC.; "CHURCHILL PARK", etc.

PLAINTIFF: ALAN NIX

C/O THE STATE OF SOUTH CAROLINA

4344 BROAD RIVER RD.

COLUMBIA, SC ~~29210~~ 29210

DEFENDANT: CHURCHILL PARK HOMEOWNERS'

ASSOCIATION, INC.; ALSO KNOWN

AS "CHURCHILL PARK"

C/O STEPHANIE TRUITER

4500 FORT JACKSON BLVD.

COLUMBIA, SC 29209

MOTION TYPE: RECONSIDER, RULE, RESCIND, CLARIFY, CORRECT

45 MINUTE HEARING REQUESTED IF NOT RESCINDED / COURT REPORTER REQUESTED

\$25.00 FEE BEING SENT SEPARATELY AS SOON AS POSSIBLE

SUBMITTED: ~~25~~ 25 DEC 2024 BY: Alan Nix

Ex. B

7 Jan 2024

Dear Judge Morgan.

Please find enclosed a copy of the original motion which I hand wrote while incarcerated and a typed version which I just typed to make your reading of it easier. Given the State of South Carolina did not allow me to mail the handwritten version between 26 Dec 2024 and 30 Dec 2024, I had to mail it after my release. The key point here is that your employer prevented me from timely mailing it as I made sure it was complete and ready to be mailed on 25 Dec 2024 (Christmas Day) and would have mailed it the next business day (26 Dec 2024) if your employer had allowed me access to the mail system. Any and all delays starting on or after 26 Dec 2024 are specifically due to your employers conduct.

I mailed copies of the handwritten version to Mark Arnold (Town of Mount Pleasant Police Dept), Andrew Countryman, Stephanie Trotter, Nicole Comer (South State), and Bill Tuten (County of Charleston) last week and the original copy should have been delivered to the clerk of court last Friday. I am mailing a check for that motion at this time now that such is available.

As you read this motion Mr. Morgan you should recognize a consistent theme of multiple obvious instances of unethical conduct with what is included and, in at least one instance, a substantial allegation of premeditated illegal conduct by the parties involved in this order. (see paragraph 15). It is my informed belief that almost none of this is remotely coincidental or accidental and for the most part, you either had to be aware of such or certainly should have been sufficiently suspicious to remove. One clear example of such misconduct is cited in paragraph 10, which I assert you had to have recognized as both clearly improper and highly unethical given this information could not have possibly been in the record of this case on or before 17 Oct 2024, since, as I point out in paragraph 10, it had not yet occurred. Consequently, including such was clearly improper and unethical.

Lastly Judge Morgan, please understand that while I am in no way an expert in all the ways attorneys use judges (and vice versa) to further their goals and objectives, something which I believe is unfortunately much more the norm than the exception, I have seen enough such conduct / misconduct to typically recognize such rather quickly when reading such overtly improper orders such as this one. I tell you this not to provide you with an excuse for this egregious and clearly improper conduct, but to clarify to you that (a) I understand enough about how this works / is abused by both attorneys and judges alike and (b) that judges must be held accountable for enabling and furthering such misconduct, regardless of the reason. To clarify, I believe almost all judges know that attorneys do not spend hours writing orders for them out of the goodness of their hearts, but rather because they want to introduce inappropriate information or threats into a order which they (correctly) assume a judge will sign rather than do the work which they are paid to perform themselves. As I assume you have to know, this order is a case study in such abuse and misconduct.

With the above said, I hope that you prove me wrong at least to some degree about this situation and trust that you will now take all necessary actions to correct these issues immediately as well as hold these attorneys and their clients responsible for participating in such overt misconduct. Also, please be advised that by way of your receipt of this letter, you are required to ensure that all such evidence related to this case, and especially this order, is preserved as it will be sought in future complaints, likely Federal in nature, involving these same parties and their attorneys

Thank you for your time and prompt and thorough attention to these numerous issues.

Sincerely,

Alan Nix

cc.

Office of Disciplinary Counsel
1220 Senate St.
Columbia, SC 29201

State of South Carolina)
County of Pickens)
)
Alan Nix, Plaintiff)
 v.)
Churchill Park Homeowners')
Association, Inc., McCabe Trotter,)
"Churchill Park", etc,)

Court of Common Pleasant
Thirteenth Judicial Circuit

Case No.: 2024CP3 900 073

Motion to Reconsider, Rule,
Rescind, Clarify and Correct

Plaintiff in this case submits this motion in response to Eight of the Defendants proposed order dated 3 Dec 2024 and their and Judge Morgan Jr.'s "Order on Motions to Dismiss, For a Gatekeeper Order and for Sanctions of Defendants" dated 5 Dec 2024. Plaintiff received both of these Orders via The State of South Carolina on 19 Dec 2024. Given Plaintiff's extremely limited means of responding at this time (5 hours of daylight to see, primitive writing instrument, zero access to necessary information, etc.) Plaintiff requests a hearing to go through more thoroughly and will follow up with one or more follow up documents as he is able to do in a meaningful way. This initial motion attempts to deal with the most obvious issues at a sufficient level while ensuring he has enough paper, envelopes and ink to basically complete and turn over to the State of South Carolina to handle timely delivery. The order of issues raised is likely to be random for the most part and, once again given the primitive circumstances plaintiff is being required to respond under, may, at least originally, have to group like issues together for efficiencies sake.

1. Surprise and inequitable opportunity to provide input into Eight Defendants' preferred version of Order.: Plaintiff in this case received both the Eight Defendants'* preferred and Judge Morgan's signed order on the same day (19 Dec 2024) from the State of South Carolina. The dates appear to show that Judge Morgan signed it within 48 hours of the Eight submitting sending it to Judge Morgan, likely via electronic communication methods, while sending it to Plaintiff via U.S. Postal Service through the State of South Carolina. Plaintiff believes this conduct by the Eight submitting Plaintiff's (Corrected to Defendants') was purposeful and clearly meant to decline Plaintiff the opportunity to provide input or offer

feedback on obviously needed corrections or offer a much simpler, concise and relevant alternative Order for consideration. A brief reading reveals such issues which Judge Morgan didn't correct. One example is the multiple assertions that the Plaintiff filed this case on 28 Jan 2024. 28 Jan 2024 was a Sunday and it would have been impossible for Plaintiff to file this case on a Sunday. Given not one, but Eight of the Defendants' attorneys wrote and agreed to let such an inaccuracy be documented multiple times should have been a red flag to Judge Morgan to pay much more attention to Eight Defendants' handiwork and question their motives and obvious intent to undermine Plaintiff's right to review and provide feedback. (Plaintiff was also not arrested by the County of Charleston in 2023 as Eight Defendants' assert as fact and which at least three of the Defendant's know not to be true. (eg. Mack, Armstrong & Scarlet Wilson)

2. Venue.: On pages 9 (nine) through 11 (eleven) Eight Defendants regurgitate or copy from somewhere a lot of cases and laws about the location of a trial including S.C. Code 15-7-100 (gives the court power to change the place of a trial) concluding that the case should be dismissed of course. While Plaintiff hasn't had the ability to use any of information which was clearly available to Defendants' eight or more attorneys in over three months, Plaintiff remembers seeing a rule or something similar which states that if venue/location in which a case was filed is incorrect, the case should not be dismissed but the judge should change it to the proper location. Plaintiff assumes at least one of the numerous attorneys involved with this Order is aware of what Plaintiff is describing.

3. On page 24 directly under "Conclusion", The Eight Defendants from Page 2 (two) writes "The Court GRANTS the Defendant's Motion to Dismiss this case and hereby dismisses the complaint with prejudice as to all Defendants. Please clarify if the last word of this sentence ("Defendants") refers to the Eight (8) Defendants listed on Page 2 (two) or the list of Defendants on Page 1 (one). If it references page one, please change to reference page 2 defendants or provide basis for this applying to ALL Defendants listed on page 1 (one).

4. Service of Process: Page 14-17 go into a lot of detail about service of process issues with (a) and (b) delving into Charleston County and County of Charleston Sheriff Department and a

list of 13 County of Charleston employees. The Eight Defendants, despite raising the issue that Natalie Ham is not the Chief Executive of Charleston County or attempted service on the County of Charleston Sheriff Department, seems to choose to willfully not address the fact that this complaint was served on Alan Wilson, The South Carolina Attorney General, first. Plaintiff believes the service on the South Carolina Attorney General covers all of the persons listed in (b) as well as the County of Charleston Sheriff Department and Charleston County. As the Eight Defendants' assertion that there is nothing in the rules that provides for service by FedEx Ground, Plaintiff alleges that FedEx is a commercial shipper, whether Air or Ground, and is the same as USPS for purposes of service. Proof of Delivery on Alan Wilson was mailed to the Clerk shortly after delivery to 1000 Assembly St., Columbia. Lastly, as to Defendants Smith and Scarborough, the Eight Defendants clearly like to cite Defendant Haselden's 26 Jan 2021 Bond order numerous times through their Order in reference to a court order preventing Plaintiff from coming within five miles of his family's home (example on page 15; "*It also appears Nix is under court order noth to come within five mile of that address*") but then curiously fails to mention that very same order from Haselden also forbids the Plaintiff from coming within a block of Mikel Scarborough or Christine Smith, or communicating with them via any method, including through a third person. Based on these clearly improper restrictions, the Eight Defendants themselves made it impossible for Plaintiff to serve Scarborough or Smith without violating her bond order and being subject to another arrest and lengthy detention. The Eight Defendants intentional non disclosure of this obvious fact is just one example of their deceitfulness and improper purpose in creating this document.

5. Plaintiff's Mailing Address:: The Eight Defendants raise this issue multiple time in their document as a supposed issue worthy of their disingenuous complaints. All of these parties know what the issue is and why the Plaintiff continues to use 1401 Densmore Circle, Mt. Pleasant as his legal address. The short answer is because 1401 Densmore Circle is his legal home address. But, to ensure Judge Morgan is not confused, Plaintiff will explain in very easy to understand terms: (a) The SC Supreme Court issued an order in May 2020 related to foreclosures and evictions in South Carolina during the COVID 19 pandemic. (b) that Order

required a party seeking a foreclosure or eviction to file a certificate of compliance with the court case before continuing with the foreclosure. In the absence of filing such a certificate, that Order specified that the case ended and no further action was to be taken. (c) McCabe Trotter, and by extension, "Churchill Park" was aware of this Order before August 2020. (d) McCabe Trotter nor "Churchill Park" filed that required certificate of compliance with case 2017-CP-10-04031 on or before 21 Aug 2020. Thus, case 2017-CP-10-04031 ended no later than 21 Aug 2020. (e) Scarborough knew about this Order before 21 Aug 2020 and knew that it specifically ordered Masters in Equity to not hold a foreclosure sale if no certificate of compliance had been filed. (f) due to the above five easily understood and proven facts, the 6 Oct 2020 foreclosure sale was invalid and any such resulting deed is also void as a matter of law. (g) Thus, State Street Holdings Co., LLC's late Oct 2020 Master in Equity deed is void and any deed based on Scarborough's and State Street Holding Co. LLC's deed is also void, including but not limited to, Michael and Taryn Lazroff's 2021 deed. (h) Therefore, the July 2001 deed from C. Richard Dobson Builders, Inc., a division of D. R. Horton, to Alan and Norma Nix, which conveyed 1401 Densmore Circle to them for \$215,000 is the last valid deed and, as such, still owned by Alan Nix and the Estate of Norma Nix. So, while it was likely true that Amanda Haselden's highly unethical 26 Jan 2021 bond order "precluded" Plaintiff "*from coming within five miles*" of 1401 Densmore Circle up until about seven weeks ago and it is likely true that Michael and Taryn Lazroff are still living there without my permission or paying rent, legally it is indisputable that 1401 Densmore Circle, Mt Pleasant, SC has belonged to / been owned by Alan Nix and Norma Nix since July 2001 , over 23 years. Consequently, 1401 Densmore Circle, Mt. Pleasant, SC is Alan Nix's legally owned residence and his legal mailing address and any issues these Eight Defendant, or anyone else for that matter, has sending mail to Plaintiff at 1401 Densmore Circle, Mt. Pleasant is a problem of their own intentional making and of no fault whatsoever of the Plaintiff. Given these facts, none of these Eight Defendants' complaints are valid or anything more than hypocritical complaining. As such, any complaints of these Eight Defendants about Plaintiff using his legal address are not valid and should not be considered.

6. Rule 11: The Eight Defendants allege that Plaintiff violated Rule 11 “for failing to include his address on the subject pleadings.” This is clearly an invalid claim. See paragraph “5” above for details. These Eight Defendants also cite the facially deficient complaint as another issue but then object to his July 2024 request to amend once he can get access to his files again. Then these Eight Defendants again say “*Nix’s failure to take measures to serve the summons and complaint*” but fail to state that they all received the summons and complaint with almost 600 pages of exhibits via FedEx. These Eight Defendants again gripe about “*include substantive allegations related to causes of action*” but at the same time hypocritically object to plaintiff amending it. The Eight Defendants final argument is that Plaintiff didn’t “*respond to the subject motion*”. First, Plaintiff has only seen one motion which was like two pages long and best he can remember doesn’t state any of this. More hypocritically, how would the Eight Defendants rationally expect Plaintiff to respond given a number of the Defendants have had him locked up for over three months with no valid way to respond. None of these Defendants’ complaints, apparent facts and gripes prove “this lawsuit” was for the purposes of delay and other dialatory reasons”. No valid Rule 11 violation occurred based on these Eight Defendants’ claims

7. Why was Plaintiff’s motion for extra time to amend denied? Given all of the time and effort and superfluous arguments in support of the Eight Defendants’ positions, it appears only three sentences are included on this subject in over twenty five pages, two at the bottom of page six, essentially that I filed it and the point that they had objected to it, and the unexplained denial on page twenty five (25). This unexplained denial is even more perplexing given (a) so much time and effort is expended in the more the twenty pages of this document berating the Plaintiff for the issues with the complaint but then biasedly also doesn’t want the Plaintiff to try to amend to you all’s satisfaction. (b). The opportunity to amend is supposed to be liberally granted, especially during the early stages of litigation. (c) I needed to get my laptop fixed or at least the data on it retrieved to do properly. (d) I was having to deal with a sudden crisis related to McCabe Trotter and “Churchill Park” trying to steal money out of my Navy Federal Accounts and 2017CP1 004031 bond insurance. (e) I had essentially provided them all of the discovery when I sent the complaint (see page six,

paragraph two, last sentence, “*The complaint....includes nearly 600 pages of exhibits.*”) As far as Plaintiff knows, they Eight Defendants had all filed similar short, high level motions and would not have been prejudiced in the least if he had done as he intended and filed an amended complaint by or before 4 Oct 2024. Of course several of these Eight Defendants made that impossible with their 16 Sep 2024 bench warrant quickly executed on 19 Sep 2024 and subsequent refusal to release him. Please clarify why you denied Plaintiff’s motion for extra time to amend, especially given you all’s continual bashing of Plaintiff about the Complaint.

8. Not a single mention of 17 Oct 2024 request to delay / reschedule hearing . On 17 Oct 2024, Plaintiff requested a delay of the hearing for several very valid reasons. Several of these reasons are as follows: (a) Plaintiff had been incarcerated by a number of these very same Defendants (for example: Scarlet Wilson, Sheriff Graziano, Benjamin Mack, County of Charleston, etc.) for the past 27 days on a highly suspicious bench warrant. (b) because of this bench warrant, and subsequent arrest at gun point in Newberry three days later on 19 Sep 2024, Plaintiff thought / hoped he had been called to the County of Charleston Detention Center intake to finally be released or have a hearing or something about his ongoing incarceration. (c) Stated that the County of Charleston Sheriff had not allowed him to bring anything with him to her intake area that day. (d) stated that he had not received any of the documents that these Eight Defendants claimed they sent him while being incarcerated by Defendant Scarlet Wilson in Defendant Sheriff Graziano’s jail; who controlled Plaintiff’s mail during the period of 19 Sep 2024 and 17 Oct 2024. (Plaintiff did send a letter to the court in Pickens acknowledging he received a letter from someone in Greenville or Greenwood or something similar in late October). The Eight Defendants’ lack of including any of this in their order is very telling. Judge Morgan acknowledged the unfair situation and asked if anyone objected to this request, which of course at least a few of these Eight Defendants’ objected to. Plaintiff stated he would respond to these Defendants’ complaints as soon as possible after he was released and stated again his intent to move it to Federal Court. Given the circumstances, of which Plaintiff was under the control of a number of these Defendants, and because of at least three of the Defendants, a continuance should have been granted to

give the Plaintiff a semblance of a fair chance to be prepared and argue against so many people ganging up on him while vulnerable. Please clarify why this important issue is not even mentioned in over 20 pages of writing and rule on this request.

9. At least one lawsuit is missing from these Eight Defendants' list. Quite interestingly, the Eight Defendants fail to list a Federal lawsuit Plaintiff filed against Christopher Craven (also a Defendant in this case) on 9 Sep 2024 alleging malicious prosecution for the two false arrest warrant affidavits he signed on 21 Jan 2021 and then again on 22 Jan 2021 in which he accused Plaintiff in this case of intimidating court officials, witnesses or jurors (see page 3, last paragraph) and described the victim as being at 4045 Bridge View Dr. , North Charleston on 21 Jan 2021 and a witness to his alleged victimization. The victim was one "Joe Dawson", who Craven listed as being "*an attorney that represents the County of Charleston*", which was not true given "*Joe Dawson*" had not been the County of Charleston attorney since before Christmas 2020. (See Federal lawsuit Alan Nix v. Christopher Craven filed 9 Sep 2024) Plaintiff knows at least two Defendants in this case know about this lawsuit, with those two being Scarlet Wilson and Benjamin Mack. Plaintiff sent a copy to Scarlet Wilson on 11 or 12 Sep 2024 and told Benjamin Mack about it on 4 Nov 2024, after he was inappropriately made Nix's attorney in the cases these Defendant's spend copious time laying out on page 4. For a malicious prosecution suit to be filed the case must be dismissed.

10. Improperly including information that couldn't possibly have been known on or before 17 Oct 2024. These Eight Defendants and a Judge go on at length on the top page (4) about events which occurred on 7 Nov 2024, which is at least three weeks after 17 Oct 2024. Please clarify how this is proper? In the absence of a solid reason being given in writing, please remove. If such an explanation is provided, please clarify that Defendant in this case, Scarlet Wilson, was prosecuting those cases, that Defendant in this case, Benjamin Mack, was defending these cases, that Plaintiff in this case was only arrested on 23 Oct 2024 (as in not 2023) related to arrest warrant 2023GS1 005 003 by Scarlet Wilson, and that it was only revealed on 4 Nov 2024 that Christopher Craven was Scarlet Wilson's alleged public official victim.

11. Sanctions vs. Gatekeeper; are they actually separate and distinct? These Eight Defendants suggest that a gatekeeper order is not a sanction, when, based on Plaintiff's knowledge, despite not being an attorney licensed to practice law, not only is a gatekeeper order a sanction but is considered one of the most severe, if not the most severe, sanctions as it clearly impacts a person's access to the courts as is a guaranteed right in this country, Please clarify how the Court's "*Act of Grace*" in declining to award sanctions on page 22 can occur but then turn right around on page 25 and GRANT the defendants' request for a gatekeeper order.

12. The basis for a gatekeeper order? Once the Court performed its "*Act of Grace*" in declining to award sanctions on page 22, there is no remaining basis for a gatekeeper order. The gatekeeper order, if ever proper, is not remotely so after the Court's inexplicable "*Act of Grace*" It (the gatekeeper order), must be removed.

13. How did these Eight Defendants' know about the Court's future "*Act of Grace*"? These Eight Defendants' submit an Order on or about 3 Dec 2024 stating that "*The Court dismisses the complaint, but in an Act of Grace, declines to award sanctions at this time.*" and then, in an apparent miracle, the Court (eg., G.D. Morgan) delivers these Eight Defendants' predicted "*Act of Grace*". Plaintiff suggests that unless at least one of these Eight Defendants' has a past documented record of clairvoyance or something similar, this apparent miracle raises the distinct possibility of misconduct between several parties.

14. How does a conditional "*Act of Grace*" work exactly? So these Eight Defendants also apparently accurately predict that Judge Morgan's future act of apparent grace was not a complete absolution of Nix, but only a pause in time. Eg. "*in an Act of Grace, declines to award sanctions at this time*". Plaintiff Nix is, besides being in complete awe of these Eight Defendants' apparent clairvoyance, is quite confused on how any judge, including Judge Morgan, can threaten future undocumented sanctions if they are dismissing the complaint without awarding sanctions. Please clarify if such a threat of undocumented future sanctions is actually allowed once a case is dismissed.

15. Is such a threat of future conditional sanctions possibly a violation of Federal and State law? These Eight Defendants and Judge Morgan finally get around to clarifying the limits of their apparent *Act of Grace* under “*Conclusions*”, third paragraph on page 23, where they threaten their unspecified sanctions if Nix “*files (filing) additional actions based on the same facts against the parties involved in this case*”. When Plaintiff read this condition, among other things, it seemed likely that these Eight Defendants were likely threatening Nix from doing as he previously stated he would do and pursue these parties in Federal court. A threat against a witness or similar party related to a pending or planned Federal case is a serious violation of law, and even more disturbing when attorneys do so by use of such means. Please thoroughly clarify the intent of you all’s unspecified future threats given your previous awareness of Nix’s planned Federal & Federal court complaints.

16. Combination of a number of these issues raises the substantial appearance of impropriety, bias and conflict of interest between Judge Morgan and these Eight Defendants.

(a) As raised earlier, how did these Eight Defendants’ know that Judge Morgan was apparently going to spontaneously deliver an apparent “*Act of Grace*” before he did so? The most simple explanation is inappropriate ex parte communications between Judge Morgan and these Eight parties.

(b) How would information (very detailed) about Nix from November 2024 end up in this order if the last thing that supposedly officially happened in this case was from at least three weeks earlier? The easy answer is that once Judge Morgan saw Plaintiff locked up in the Charleston County Detention Center on 17 Oct 2024 and wearing their jail garb, Judge Morgan then started keeping tabs on Nix and inserted such extraneous information to further disparage Nix.

(c) Why would an impartial judge sign such an order given the number of easily known misrepresentations and material omissions? The easy answer is that Judge Morgan wanted to improperly assist these defendants in this case and likely future Federal complaints which he was on notice of.

(d) why would a competent Judge make unspecified threats of future sanctions which he almost certainly could not legally act on once he dismissed the case? The easy answer is to further assist these defendants in intimidating and threatening Nix into not pursuing these Defendants with the Feds and Federal Court, which he was aware was planned.

(e) why would a fair and impartial judge not give plaintiff the opportunity to provide these much needed corrections, context and feedback before signing this highly questionable Order almost surely created for additional purposes? The easy answer is that they/he (Morgan) knew there were multiple objectionable and inappropriate issues included and didn't want such questionable conduct on the record; once again assisting these Eight Defendants. Without any publicly available objections which would require him to explain or change these numerous issues and improperly included statements.

(f) why would a fair, impartial and truth seeking judge not grant plaintiff a continuance of these Eight Defendants' 17 Oct 2024 motion hearing given:

(I) some of the Defendants had had him arrested almost a month earlier;

(ii) some of these Defendants had had him incarcerated for the past 27 days causing plaintiff to be without any of his documents to refer to (almost 600 pages)

(iii) despite being incarcerated by some of these defendants, who also controlled his USPS mail, Plaintiff had not received any of the documents these Eight Defendants said they had sent him at the County of Charleston Detention Center.

(iv) Plaintiff thought he had been brought to the County of Charleston Detention Center Booking and Bond Court area to finally be released. The easy answer is that Judge Morgan had already decided to assist all of these parties and the video conference was only meant to create the appearance of fairness.

(g) why would a fair and impartial judge deny Plaintiff the right to amend a complaint, without providing any justification whatsoever, and then berate them repeatedly for a lacking complaint? While Plaintiff is not sure if this is the entire reason for Judge Morgan's unexplained denial, Plaintiff believes a substantial part of the reason is found on page 21, to

wit: “*Nix has alleged numerous causes of action that are complex and which will require many hours and costs to litigate if allowed to proceed.*” Clearly these Eight Defendants’ didn’t want to litigate anything whatsoever, whether complex or not, and judge Morgan improperly assisted them to avoid these “*many hours and costs*”, most of which were likely being paid by insurance companies, by, without any explanation whatsoever, denying Plaintiff’s very reasonable motion to amend.

(h) Why would an impartial and competent judge grant an unqualified blanket gatekeeper order, arguably the most significant sanction, when the judge had just pronounced a couple of pages prior that they were delivering an apparent “*Act of Grace*” by declining “*to award sanctions at this time*”? Plaintiff admits to being completely baffled as to being able to find anything competent about this situation but assumes that Judge Morgan abandoned all logic and reason whatsoever to grant all of these Defendants, as well as any and all future plaintiffs and defendants, the ultimate judicial protection while at the same time completely denying Nix his right to the courts.

(i) Was Judge Morgan’s “*Act of Grace*” by declining to award sanctions “*at this time*”, except of course for the ultimate sanction of their blanket gatekeeper order, being gracious to the Plaintiff in this case or the Defendants? Plaintiff can think of at least five reasons Judge Morgan’s “*Act of Grace*”, so accurately predicted by these Eight Defendants, was more gracious to these Defendants than to the Plaintiff.

Based on the above multiple documented instances of bias against the Plaintiff and in favor of these Eight Defendants, Judge Morgan should have clearly recused himself from this case rather than sign this Order.

Plaintiff requests Judge Morgan to, for all the above cited reasons, as well as others the Plaintiff will set forth in a follow up response:

1. rescind this Order
2. Grant Plaintiff’s request from 17 Oct 2024 for a continuance
3. Grant Plaintiff’s July 2024 Motion to Amend the complaint

OR IN THE ALTERNATIVE

1. Explain in detail, in a filed order, how and why all of these numerous issues occurred without judicial bias and possibly misconduct being involved.
2. Strike the overly broad gatekeeper order in favor of reasonable attorneys fees and costs. (I'm sure this was reviewed prior to "Act of Grace")
..... and any other relief that's required and just given these multiple issues.

25 Dec 2024

Respectfully submitted,

(Notice this address is not
1401 Densmore Circle,
Mount Pleasant, SC 29466
"at this time")

Alan Nix
c/o The State of South Carolina
4344 Broad River Rd.
Columbia, SC 29210
(no phone available)

* Eight Defendants = Pg. 2 "Motion Defendants"