

MOTION FOR EXTENTION OF TIME AND PAGES ON APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

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May 01 2025

SC Court of Appeals

Judges: Rivers Lawton McIntosh, Robert Scott Sprouse,
Jesse Cordell Maddox, Jr., Heath Preston Taylor

CASE NO. 2022-CP-0400592

Dr. Linda Kennedy, *Pro Se filing jointly*

&

Dr. Marsha Fink, *Pro Se filing jointly*,

Appellants,

v.

Lake Hartwell RV Resort and Cabins, LLC., with alias names listed,

Christopher Vellanti, Corporately, as the Sole Member, Manager Employee, and Individually,

Yvonne Goldman, as General Manager Employee and Individually,

Marsha Stamm, as Co-Assistant manager, and Individually,

Allen Riha, as Co-Assistant Manager, and Individually,

Jennifer Burdette, as Employee, and Individually,

Frank Pellegrini, as Employee, and Individually,

Fritzie Maroto (Moroto, married 2023, Pellegrini),

Ray Grenier, as Independent Contractor, Individually,

Grant Ferrendelli, as Independent Contractor, and Individually,

Charles Carpenter, as Employee, and Individually,

Respondents.

MOTION FOR EXTENTION OF TIME AND PAGES ON APPEAL IN A CIVIL CASE

Written but not proofed due to vision and limb issues along with other disabilities affecting Plaintiffs at this time.

Few exhibits are included as they will be supplied more on appeal for interest of time and space in this Motion

COMES NOW APPELANTS, Dr. Linda Kennedy, JD, BA, BS, age 66, and Dr. Marsha Fink, JD, BA, age 75, Pro Se and filed jointly in the underlying 10th Circuit Common Pleas Court and are bringing same in this Appeal, as their Causes of Action were created through the same Transactions and Occurrences that began in the 2021 and following, that continues to this day.

Plaintiffs/Appellants make respectful demand per law by demanding Reasonable Accommodations defined by the American's with Disabilities Act, under 42 U.S. Code § 12101, 12131-12134, Title II, (hereinafter, "ADA"),¹ and, also request same in accordance with the courts discretion to bring forth justice per Rule 208(5), and Rule 240 of the Appellate Rules of Procedure (SCACR) that give the Appellate Court discretion to grant such requests as needed in the interest of justice.

Plaintiffs/Appellants bring this joint motion on this Appeal, regarding the Unconstitutional , Procedural Manipulation, and deceit of the process in order to Dismiss Plaintiffs case by any means, other than by a SCRCR process like a 12(b)(6), Summary Judgment or Motion to Dismiss on the Pleadings, (or other normal way that allows for dismissal of Plaintiffs Meritorious case that past muster on Defenses' 12(b)(6) attempts, by extremely

¹ The Americans with Disability Act (hereinafter, "ADA"), defines a "disability" is defined as a physical ...impairment that substantially limits one or more major life activities. This includes a wide range of conditions, affecting various bodily functions and major life activities like seeing, hearing, walking and learning. The ADA also protections individuals with a record of disability or who are regarded as haring a disability. Physical Impairments include conditions affecting the musculoskeletal, neurological, respirator, cardiovascular, and other body systems. Examples, that are illustrative only, include: blindness or low vision, Deafness or hearing loss, Orthopedic impairments, Cancer, heart disease, Genetic Kidney Stones, Seizures/Epilepsy...etc.

inappropriate means, much of which was Sua Sponte, due to inappropriate action by the listed presiders and their agents in the underlying case, their Financial and Personal Interests Judges, other State Actors, Lawyers/Firms, Allianz and so forth listed herein, regarding Plaintiffs/Appellants otherwise extremely meritorious case. Because of these and other reasons described herein, Plaintiffs did not receive any due process or redress of grievance at all, where Plaintiffs were punished further for not giving up, and for their Americans with Disabilities physical health issues, and other reasons given herein, and where these procedural manipulations and other bad acts in the process was not perpetrated by Plaintiffs/Appellants, but their Constitutional Rights were trampled upon, abridged and infringed upon by State Actors and their agents, in spite of the rules, laws, ethics, canons, and Constitutional Law and through their qualified disabilities under the ADA. The lower court ignored and then targeted Plaintiffs physical disabilities for further abuses, intentionally causing more injuries sustained by Plaintiffs/Appellants that were foreseeable disabilities sustained by their actions, and the Courts actions were the intentional, proximate cause, created and exploited by the Court and fellow agents of the Court to further weaken their Plaintiffs/Appellants ability to read and write and operate at their best, and for more punishment inflicted to try to force Plaintiffs to give up, with the Judges exercising Arbitrary Power and Usurping its power and ignoring the law, where they had financial and personal interests in Plaintiffs case, substantiated by witnesses, and Defendants/Appellees own written admissions of secret and unilateral meetings they had with the Judges, and other State Actors and more, regarding Plaintiffs/Appellants underlying case being appealed herein. And these Defendant friendly meetings with Common Pleas Judges and others occurred about **7 months or more BEFORE Plaintiffs even filed their case in Common**

Pleas Court, involving **Financial and Vengeful Interests** of Judges and other State Actors and more. This made Plaintiffs extremely meritorious case supported by Defendants own admissions of liability, a “Must Lose” case for the State Actors and others involved secretly in the underlying case and still insisting upon presiding over Plaintiffs case herein, which are obvious conflicts calling for recusals and disqualifying and based on the facts presented partially herein, make the State Actors and others RACKETEERS in Plaintiffs underlying case, without Judicial Immunity to protect them.

Further, Plaintiffs had several other ADA qualifying Disabilities where Reasonable Accommodations were necessary that were not reasonable and not overly burdensome that were affecting Plaintiffs abilities beyond the injuries they sustained by the Judges malicious acts against them that were also ignored in violation of the law and directly affecting Plaintiffs ability to meet an incredibly Unconstitutional workload, and short time frames/deadlines to make sure Plaintiffs could not address the issues and bring forth issues to the best of their ability. In spite all this, Plaintiffs were repeatedly able to win their case against Defense, but for the Judges not entering several judgments for Plaintiffs to end the case legally. In this case, the Judges and others needed to make sure Plaintiffs lost and never were able to discovery or depose anyone due to the Judges and other’s own involvement in Plaintiffs underlying facts, secretly behind the scenes, while continuing to preside over the case, in a very big RACKETEERING SCHEME much like the MURDAUGH CASE(S), with those truths of the totality of the crimes and participants

involved is still kept from the public,² that points to a Legal Machine Criminal Enterprise in SC, under color of law.

In addition to the underlying case with 11 Defendants, all of these other issues that led directly to the Unconstitutional and Unconscionable dismissal of Plaintiffs case on nonsense, In addition, Plaintiffs must argue all these other dirty tricks and illegal RACKETEERING tactics by the Legal Machine Criminal Enterprise in SC and in VA, that were exposed as taking part in the crimes and torts against Plaintiffs and many schemes to have their meritorious and properly pled case dismissed through any means necessary, like the steering of Judge Taylor to Plaintiffs case once the other Judges were exposed, and steered by lawyer-legislator Justin Bamberg, with neither the Judge nor Bamberg would normally have any interest or partake in Plaintiffs case, but where Bamberg was an alleged lawyer in the Murdaugh cases, and was overly concerned with the fact that Plaintiffs case was beginning to be called Murdaugh 2.0, which would lead to

²Plaintiffs Judges and all the lawyers were mimicking the Murdaugh scams in Plaintiffs cases, that were perpetrated on other innocent victims in SC, and these 10th Circuit Judges actually lived and or trained in Murdaugh Country, Clerked in Murdaugh Country, Practiced in Murdaugh Country and/or some are actually relatives and/or partners/friends of the Murdaugh's, in an aristocratic group of families and family/friend ties that join the aristocrats for generations along with many of the Judges/lawyers being members of the Masons (Lewis Masons), who swear oaths of loyalty to their brethren Masons over any other loyalty, to include Constitutional loyalty, and where they purposely exclude women from these groups of misogynistic men who further abuse women litigants in their Courts even beyond what Plaintiffs otherwise endured, based on gender, and other Discriminatory tactics to force litigants not favored in their Courts to give up their meritorious cases to those favored who then plunder the case through Government theft. Further, this Appeal will include some of the Murdaugh tactics that are not known to the public, but well known in the legal industry, LMCE, the in FBI Circles, as very elaborate scams run by groups of lawyers and others in association together with carriers, Judges and others, to default litigants of their personal injury awards, probate inheritances and other similar areas of law where the money is prevalent and the money laundering is created through the case, and, in the case of insurance carrier crimes, these scams awards or other moneys are in abundance and can be stolen from the litigants through these fraudulent schemes using the insurance carrier's Insurance Reserve Accounts as the laundering medium, just like Murdaugh seems to have done with Nautilus and Lloyds of London. This is what is being perpetrated against Plaintiffs, with the Carriers, judges/lawyers/firms/others/their trust accounts/alleged "loans" never repaid/real estate scams and Insurance Reserve Accounts and more, can be used by the perpetrators in the LMCE to hide the money they steal, plus money from many other scams for ill-gotten gain, much like seen in the Murdaugh case. This is all extremely inappropriate and unacceptable.

public exposure of this LMCE, that is far bigger than Murdaugh Country and a few rogue elites being sloppy in their crimes. This is an example of lawyer-legislators being the employers of the Judges, which is one of many checks and balances being ignored by SC, no matter how many more LMCE government agents one appoints to make Judicial selections.

The Court's unconscionable outward hostility toward Plaintiffs from day 1, and obvious bullying of Plaintiffs/Appellants attempting to force Plaintiffs/Appellants to give up their case under duress from the Court and its agents from day 1, was evident from the Courts first interactions with Plaintiffs, to the last writings of Judge McIntosh, with Judge Sprouse, Maddox and Taylor also taking part in the bullying and great bias and RACKETEERING with others. In these last writings, after an unprecedented and obvious, procedural manipulation that forces the SC Courts to approve the erasing of the SC Rules of Procedure, the Constitution, and all rules of ethics and Canons to allow, Judge McIntosh then wrote his celebration Order, that was so personally hateful and out of line by any Judge or lawyer, that it was shocking for Plaintiffs/Appellants to even read the obvious hatred and extreme bias and abuse and arbitrary power exercise by an obvious participant in the suit with something to lose if he and his fellow RACKETEERS allowed Plaintiffs to continue to repeatedly win in spite of the Sua Sponte actions of the Judges. It was as if the Defense didn't exist. The case was brought by the Judges, because the lawyers kept failing in spite of the predetermined outcome awaiting them.

Plaintiffs are long-time whistleblowing attorneys calling for Legal Reform in the Courts, to provide fair and inexpensive access to the Courts for the People, without having to use attorneys or complex concepts that are too difficult for the untrained to be able to represent themselves or have others they trust help them. The present system amounts to purchasing

Constitutional Rights, and even having these rights/laws ignored for a price through arbitrary power of the Judges, which is Unconstitutional of course. The Courts must be held to honor and follow those Unalienable Rights, that cannot be granted nor denied by government that are only partially listed in the Constitution as illustrative, that are available for all, without such high bars to entry.

Plaintiffs also represented many whistleblowers with very important information to tell the public to protect it, which cases and litigants were not favored by the system either, making Plaintiffs, especially Dr. Kennedy, a target of the Legal Machine Criminal Enterprise (LMCE). This case illustrates this vengefulness of the system that had no intention of allowing justice to prevail for Plaintiffs and schemed in heinous ways in the underlying case for financial and vengeful reasons against Plaintiffs/Appellants, that were deadly to Plaintiffs described better in the summary of the facts.

Further, the extreme hostile and abusive Court tried to force Plaintiffs/Appellants into making mistakes that could lead to dismissal of their case not on the merits, based on Plaintiffs/Appellants existing and especially their newly-acquired qualifying disabilities inflicted upon them by a knowing Court, where mere common sense would convince a reasonable person that the Court's actions would physically and greatly harm Plaintiffs, and weaken their ability to perform and bring forth their case. Judges Sua Sponte, expanding workloads, and shortening time against their targets is not a new trick for these judges/lawyers as Plaintiffs/Appellants have interviewed some other victims of the 10th Circuit and many of the same or similar story as to the Legal Abuse sustained like what is described herein, although not as severe as Plaintiffs treatment. These bad acts described herein are not the exception, but

the rule in how government steals justice from innocent victims who enter in for Justice, much like Murdaugh Country lawyers/judges exploited their victims for years, with the help of the LMCE to protect them.

This summary of facts and arguments below, will clearly show that Plaintiffs case was extremely meritorious with all pled elements based on evidence pled, including, but not limited to, actual Defendants own written admissions in their Defendant Group Texts, (hereinafter, Defendant, "Group Texts"),³ planning, implementing and celebrating their intentional perpetrations of the torts, crimes and other wrongs against Plaintiffs. Beyond the defaults of Defendants several times that would not be entered by the Judges, Plaintiffs finally, after three years of stonewalling by Defense/Judges, filed a Motion to Dismiss on the Pleadings, and the matter was ripe for Judgment on the Pleadings with entry for Judgment for Plaintiffs on all matters. The Judges refused and broke the rules of SCCRP to make up a new way to dismiss Plaintiffs without using the Rules/Laws/Spirit of the Laws/Constitution/Canons/Ethics and so forth.

This summary of facts below will also prove why so many more pages and more time will be necessary to even try to appeal this matter as Plaintiffs case has become several parts

³ Defendant Group Texts are about 2,000 pages of multi-texts per page, between Defendants during the attacks against Plaintiffs/Appellants that were admissions of the crimes and torts Plaintiffs/Appellants claimed, and fulfilled the requirements of the elements of each Cause of Action, all pled in sufficient detail to pass a Motion to Dismiss and Summary Judgment as Plaintiffs included many of the quotes of the actual Defendants in their Complaint, which are admissions and not just claims by Plaintiffs. There was much more in these Group Texts, that Plaintiffs did not understand the full effect of these Group Texts that implicated Judges, Lawyers, the Solicitor General, Allianz, and even the Virginia State Bar/Judges, and others named directly by some Defendants and then in private, recorded and other statements from some Defendants recorded interviews with Plaintiffs, in RACKETEERING and a Murder-for-hire Plot against Plaintiffs, for financial gain in a scheme called Insurance Reserve Fraud combined with Insurance Fraud (hereinafter, "IRF/IF"), used by the alleged, Murdaugh gang corruption in the system case, and to exact vengeance against Plaintiffs for years of their Attorney whistleblowing against the Legal Machine Criminal Enterprise in Virginia and now in SC also.

of a continuous attack by the LMCE against Plaintiffs through Defendants and associates, as there were so many deceitful tricks played on procedure, and the manipulation of same, and Defendant frivolous filings, Judges ignoring filings, Judges and Defense stonewalling, Judge, Defense, Allianz ex parte planning to even make up facts that never happened, to try to dismiss Plaintiffs/Appellants on deceitfully created reasons that were not even true or a part of the case and could dismiss Plaintiffs outside of the SCRCF 12(b)(6) motion they could not seem to win through their own procedural mistakes and other scheming that backfired, using all attorneys, including Plaintiffs hired/fired attorney who was also colluding, proven on Plaintiffs tape recordings of their attorney's attempts to throw Plaintiffs/Appellants case to Defense/Judges, with Judges participating in the predetermined outcomes, and even prosecuting the case themselves through Sua sponte obstructions, rather than the lawyers bringing forth their case in good faith, if they had one.

Plaintiffs hired this attorney after filing suit and Discovery, on March 17, 2022 and April 12, 2022, respectfully, and they fired him after he was caught colluding and using Judges to help ruin Plaintiffs case. Interestingly, the Plaintiffs Attorney and Defense continued to focus on Plaintiffs attorney hiring date, even though Defense attorneys SHOULD have no knowledge of same, trying to move the documented hiring date of April 12, 2022, which is the hiring date documented in writing and proven by performance, and trying to move that hiring date several months later to as late as June 27, 2022, in order to erase obvious collusion Plaintiffs and Defense Attorneys were involved in together to ruin Plaintiffs case, with such frivolous argument trying to claim that Plaintiffs attorney was not even hired during the collusion period, so how could there be collusion during that time. These are bad faith lies that liars

and deceivers use to attempt to erase the facts documented in so many different ways and through different media, that it is ridiculous to attempt such lies, without knowing a friendly judge will be assisting in the lies, as all made sure Plaintiffs/Appellants could not win their case, and that they could never get Discovery, Depositions, Subpoenas, Subpoena Duces Tecums, and Defendants and hostile witnesses that all turned on each other and were helping Plaintiffs get evidence before the lawyers became involved, were then bribed through “Speak No Evil” bribes, that quieted them for cash by Allianz/Defense, and maybe Plaintiffs attorney also..

Even with the Court and other opposition slow-rolling and stonewalling Plaintiffs for three years to ignore Plaintiffs/Appellants legal and rightfully submitted and mailed Discovery Requests for Defendant Answers and Defendant Production, and Plaintiffs/Appellants requests for Defendant and witness Depositions were all ignored/denied by the Opposition and ignored by the Court and Plaintiffs own lawyer who continued to lie to Plaintiffs about acquiring efforts he was making, all on recording, when he made a secret agreement with Defense to not pursue Discovery Answers, showing great collusion with Plaintiffs’ lawyer helping Defense throw Plaintiffs/Appellant’s case to Defendants for a predetermined win, for very deceitful reasons as briefly described herein, and more on appeal as the Court and other State Actor/Agents goals in stonewalling Plaintiffs were to protect their own various financial and personal interests they had in Plaintiffs and in them losing their case at all costs, including State Actors and Agents, actual underlying involvement in Plaintiffs/Appellants case at least 7 months before Plaintiffs ever filed this underlying complaint in Common Pleas Court in March 2022. This was a Murdaugh Country Scheme being played out in Plaintiffs case, as Murdaugh 2.0.

This Unconscionable and Unconstitutional RACKETEERING by the Courts, Judges, Attorneys, other State Actors, Allianz Corporate and Specialty, Law-Legislator(s), and others were the direct reason why Plaintiffs/Appellants case is on appeal herein, and was illegally dismissed by the 10th Circuit Judges, who are hiding this RACKETEERING, through Sua sponte presiding over their own liability and guilt, with Plaintiffs/Appellants receiving a complete miscarriage of Justice and experiencing unfathomable distress and disgusts from the lower Courts and their accomplices, who had these interests that caused them to dismiss Plaintiffs case for any reason at all, true or not, when not only was the entire handling of the case totally improper and illegal as to any rule, Canon, Ethical violation, law, statute, the entirety of the SC Rules of Civil Procedure, or alleged Constitutional protections/rights, without Plaintiffs even being able to Discovery for three years (issued on April 12, 2022), so the opposition could keep the secrets of the RACKETEERS in tact and never put on the record with Depositions, Discovery, Production, further Admissions and so forth through any means.

Plaintiffs/Appellants finally are before a different venue/jurisdiction, by their own efforts, in this Appeal, and demand that justice is finally done in their meritorious case, without any further procedural manipulation, ex parte communications, and other bad acts that permeated the lower courts and its RACKETEERS, denying any chance at justice for Plaintiffs/Appellants as Plaintiffs/Appellants who are finally able to bring forth their meritorious case, even though it is an appeal and not the alleged right to redress their grievances in an underlying jury trial and fair and impartial process before their peers, that is guaranteed via their unalienable rights and the Constitution as one of the many illustrative rights of We the People which rights are not all listed in any documents but given by God according to

Government history. A Jury is the final check and balance on usurping Government and must be a right for civil and criminal cases (John Jay agreed). Due to all the deceitful and Unconstitutional stonewalling and processes Plaintiffs/Appellants have had to endure and survive in the lower Courts, on appeal are many matters that directly affected the bringing forth of Plaintiffs/Appellants otherwise meritorious case without Government and their agents' constant Obstruction of Justice, including them bribing Defendants and witnesses according to same, which Plaintiffs/Appellants case deserved Entries of Judgment for Plaintiffs/Appellants, several times over since Defendants repeatedly defaulted, and Plaintiffs deserved an Entry of Judgment on the Pleadings, and for the Unconscionable and criminal behavior of the Defendants, Defense (all attorneys and others on the Defense who were obstructing justice, to include Plaintiffs fired attorney), but for the RACKETEERING involved in shocking behaviors by those appointed to protect and abide by the law and protect Plaintiffs/Appellants right to a fair and impartial hearing/jury trial (see John Jay intent that all trials have a right to a jury to keep the Courts' honest, An Address to the People of the State of New York on the Subject of the Constitution, April 12, 1788, and other writings to England and the U.S.), but instead used the color of law to again, **"...put on parade South Carolina's tradition of laws designed for corruption." [Emphasis added].**⁴ Further, the author stated, **"[a] public office isn't a gilt-edged invitation to public plunder. As this case [Murdaugh, but also Plaintiffs/Appellants case] demonstrated, not all South Carolinians [state actors and agents] are clear on that point.**

⁴ "Bootlegging Saga Put Spotlight on Legal Practices of the Day and Stirred Calls for Reforms," By David Lauderdale Special to The Island Packet and The Beaufort Gazette May 19, 2022 9:11 AM, <https://www.islandpacket.com/news/state/article261335987.html#storylink=cpy>

Because some South Carolinians have tolerated law breaking, winked at it or worse, the federal government [tried] to clean up the mess [in 1956]. The conditions are a shame on the state.”

Plaintiffs/Appellants bring this case to this Court of Appeals because the mess was not corrected by the Federal Courts and Judge Hoffman in 1956, nor the state of SC, and the news outlets exposing the corruption, nor the people reporting these rogue judges and lawyers to the SC Bar and Judicial Committee on Discipline, nor the Judicial Merit Selection Committee, have not yet been able to force corrections, if the Courts/Government won't clean up themselves and protect the public, to this day, as is obvious in Plaintiffs/Appellants and other reviewed cases in SC and the 10th Circuit, and so the corruption continues until it is outright Judged and halted by the upper Courts, or the People themselves, in all legal, nonviolent ways, and those involved are publicly punished and humiliated/shamed so the People know they are going to be protected in the future and can go to court for redress of grievances and Justice and not be brutalized and stolen from by those appointed to protect the People as Constitutional Judges under enforceable oaths, to include protecting Plaintiffs/Appellants NOW, who need to receive their long-awaited FULL award from Allianz and Defendants, AND with compensation from the State/those involved in the Conspiracy/RACKETEERING, and further, Solicitor Micah Black, and Attorney General Wilson must be forced to finally step forward and do what they were allegedly elected to do, and part of that is to clean up their territory of responsibility, Anderson, and Oconee County, and the state respectively, whether it means turning on their own underlying problems and/or past prosecutors, and other law enforcement or not.

These Constitutional positions in Government are not an exclusive club, and not meant to be used as a Legal Machine Criminal Enterprise to protect fellow criminal members under color of law in performing or protecting government theft, murders, trafficking of all types and other heinous crimes, against the People. These are meant to be Constitutional offices, sworn to be protected by Constitutional Oaths, and cannot be run as a tax-evading, for-profit, free-for-all, LEGAL MACHINE CRIMINAL ENTERPRISE (hereinafter, "LMCE"), like in Murdaugh Country where most of the 10th Circuit was trained, not coincidentally, and where a constant and even now, continuing and manipulative blind eye is being turned in that direction, as it has been done in the 10th Circuit also, to Plaintiffs great detriment and a complete waste of Plaintiffs/Appellants time and money.

The *real* Murdaugh victims, like victims in the 10th Circuit, are not the only ones being victimized as exploited public cash cows by the LMCE, like Plaintiffs/Appellants/Others in the 10th Circuit as this Appeals Court well knows, from Plaintiffs/Appellants review and interviews with other "victims" of these Judges and their agents, with some cases heard by this Court even recently. This Court has heard of Judge McIntosh and a Magistrate Judge incarcerating a court journalists for no legitimate cause, with no case numbers and using double jeopardy and gag Orders with no release papers given, to hide/cover up crimes in a Probate Court Fraud case in Oconee County (10th Circuit) and elsewhere by these Judges/lawyers/firms, just like in Plaintiffs case of Judicial and other State Actors and agents RACKETEERING, and other litigant abuse in other cases reviewed/interviewed, like personal injury fraud through Insurance Reserve Fraud.

The Murdaugh case was not the precipitating event that caused the flood gates to open against government corruption in SC, but is clearly the last straw in State Corruption at the

expense of the People, and the People are fed up! Even now the State continues to cover up the real Legal Machine Criminal Enterprise involvement in Murdaugh, using fraudulent appealable issues given Murdaugh by generational family friends like Beck “Heir” Hill and her ancestors who helped Buster Murdaugh in his Criminal Corruption case and got him off to continue the Murdaugh Dynasty in SC causing many more deaths and destruction for profit by the LMCE.

As can be seen here there are many issues and relevant facts in this matter requiring appeal and argument, and Justice finally received for Plaintiffs/Appellants. Plaintiffs/Appellants respectfully request, (1) the number of pages to file on their behalf **be increased by 200 pages per submission** if and when they find it necessary for reasons stated herein, and *increased by doubling the times to write or respond/reply to or with any writing or preparation*, be expanded per Reasonable Accommodations defined by the American’s with Disabilities Act, under 42 U.S. Code § 12101, 12131-12134, Title II, (hereinafter, “ADA”),⁵ and, also in accordance with the courts discretion to bring forth justice per Rule 208(5), and Rule 240 of the Appellate Rules of Procedure (SCACR) that give the Appellate Court discretion to grant such requests as needed in the interest of justice.

Plaintiffs further request that if they find they need more time or pages than requested, that a notification to the Court will be honored since they are not prophets who can know the

⁵ The Americans with Disability Act (hereinafter, “ADA”), defines a “disability” is defined as a physical ...impairment that substantially limits one or more major life activities. This includes a wide range of conditions, affecting various bodily functions and major life activities like seeing, hearing, walking and learning. The ADA also protections individuals with a record of disability or who are regarded as having a disability. Physical Impairments include conditions affecting the musculoskeletal, neurological, respirator, cardiovascular, and other body systems. Examples, that are illustrative only, include: blindness or low vision, Deafness or hearing loss, Orthopedic impairments, Cancer, heart disease, ...epilepsy,” and so forth.

pages and time needed in advance, but know that there are too many issues caused by no fault of their own, and health issues requiring more time through no fault of their own, and will not know until they get closer to the finish line on each work whether they need more time or pages, and that these requests are made in good faith in accordance with the statements made in this writing and for good causes shown. Plaintiffs make these request just for themselves as the Defense does not have the same reasons or rationale that Plaintiffs have and that they be held to the rules in place for good cause, unlike what happen in the lower courts where the favored Defense was given many more pages and time to do anything they wanted, through ex parte communications and ruling without Plaintiffs able to know or argue otherwise before the Order was immediately signed by these RACKETEERING Judges to make sure Plaintiffs case was dismissed without discovery as described herein.

Plaintiffs/Appellants summarily introduce these laws/rules below with justification for granting same, and provide argument thereafter so this Court can see that these requests are legitimate, fair, and do not prejudice the other parties, nor unduly burden any person or entity involved or the Court, and provides Plaintiffs/Appellants with the much needed Due Process they have never experienced in the lower Court for some of the very bizarre and unconscionable and extremely Unconstitutional reasons State Actors, including, but not limited to some Judges, and their agents⁶ have perpetrated against Plaintiffs/Appellants for financial

⁶ Alleged Plaintiffs' Attorney supporting criminal and unethical acts against Plaintiffs, are from **a) The Dodd Law Firm**, **b) Michael Dodd**. Defense Attorneys supported in these criminal and unethical acts against Plaintiffs, by **c) McAngus Goudelock & Courie, LLC**, (MGC), who are **d) Elizebeth McDaniel McMillan**; **e) Elizabeth Anne Moore** (Liz) of MGC and Eller, Tonnsen, Bach, LLC (ETB); **f) Alan G. Jones**; **g) Michael J. Neubauer**, and **h) Robert L. Mebane**. Also, supporting criminal and unethical acts against Plaintiffs is the firm **i) Grier, Cox & Cranshaw, LLC** (GCC) and their attorneys, **j) James Cox (Trey)**, **k) G. Robert DeLoach** and **l) Trevor Marc Hughey**. **j) Mediator Robert W. Hasshold**, and **Robert W. Hasshold Jr, LLC**. All attorneys are referred to by last name, and collectively, with all other Colluders/RACKETEERING still being identified, are "Defense" and with Dodd's inappropriate alliances with

Defense, "Dodd/Defense." Other colluders identified as a part of the Collusion are Allianz Corporate & Specialty Insurance ("Allianz"), Claims Adjuster Barbara Robedee, and Allianz' Patrice Deaner, SIU Specialist at Allianz, with the latter protecting these criminal and unethical acts perpetrated against Plaintiffs by Allianz and their agents, rather than investigate Allianz claims adjuster reported fraud, and law makers providing Allianz special privileges to abuse SC residents, by making bad faith claims almost impossible to bring against Allianz, where this lack of protection starts the process of abuses against Plaintiffs and the public, in violation against the Public's due process and equal protection rights. Further, all Defendants, Judge Lawton McIntosh, Judge R. Scott Sprouse, Judge Jesse Cordell Maddox, Jr., Judge Heath Preston Taylor, and other State Actors to include Judges, including some Magistrate Judges, the Attorney General's Office, the SC State Bar, the Solicitor General's office and Solicitor General until recently, David Wagner, the State Bar of Virginia and some Virginia Judges (hereinafter, VSB and VAJudges), lawyers connected to the VSB, and more that are being identified and named as the collusion/RACKETEERING continued to reveal itself as a large conspiracy has been identified through admissions of Defendants, Judges, Sheriffs Department (hereinafter, "Police"), lawyers to included Dodd/Defense, 10th Circuit Clerk of Court Loureena Thomason, and Scheduling Clerk, Elizabeth Beasley, and so forth. State Actors listed and more from other states joined together, along with lawyers, and others are continuing to be discovered and being named, as the full number of the "Defense" continue to come to light, involving Barratry, Rico, Criminal Fraud, Misprision of Felonies, Civil Rights violators, and so much more. The collusion/RACKETEERING is clear and unfortunately a large number are involved.

Judges are State Actors are sometimes listed separately for emphasis, but Judges are a subset of, and included with "State Actors" whenever just "State Actors" are used in this document. Judges and other state actors and outsiders listed here, in this collusion and conspiracy/RACKETEERING involved thus far have been initially reported to the Judicial Committee, and ignored, and lawyers reported to the Bar and clear wrong doing, and unethical behavior deserving of Plaintiffs receiving a Judgement against all these RACKETEERS have been ignored by William Blitch, also reported. The Lawyer-Legislators, Governor, Attorney General, and others are also on certified notice record, repeatedly, and have ignored Plaintiffs/Appellants. If not in writing, on tape, in texts, and heard from Judges and Police who have helped Plaintiffs, along with Plaintiffs many years of experience in State Actor corruption, Plaintiffs themselves would be shocked at the narrative because it is so dark, twisted and unconscionable.

Truth is stranger than fiction in this situation, to include your Judges and your lawyers being in collusion with other state actors, Allianz, Defendants, and other state/federal actors and the Virginia State Bar/Judges, and companies, outside of SC, who perpetrated crimes and torts against Plaintiffs basic rights and Plaintiffs wellbeing and health also, along with their interests in a very meritorious case where the Defense (Defense is herein lawyers and others using Defendant representation to cover for their own criminal involvement against Plaintiffs have openly risked prison time for their actions, as if they know that their criminal activity will be protected from prosecution). Defense effort to win at any price, have engaged in too much open and obvious criminality, for this matter to just be about the underlying case. It is financial, and personal, and Plaintiffs have learned how and why, this hijacking of Plaintiffs meritorious case didn't just settle for a very minimum demand given by Plaintiffs/Appellants to Allianz before the case was ever needing to be filed in Court, when Plaintiffs had overwhelming evidence against Defendants that Allianz was aware of and knew by law, their clients had admitted in writing, everything they did to Plaintiffs. Although summarized, it is still lengthy for Plaintiffs to give the reader a good summary of this true, but shocking, expansive narrative with more shocking discoveries coming the longer Plaintiffs investigate to include the present.

⁶ The collusion between Allianz, Dodd/Defense, to include State Actors who are also Judges, involved later, Judge McIntosh, Judge Sprouse, and Dodd/Defense, Defendants in collusion together for Retaliation, Collusion and Financial Interests that Plaintiffs were learning about during the Dodd alleged representation of Plaintiffs and much more. Judge McIntosh was actively and openly colluding with Dodd/Defense to gift them with a Dismissal of Plaintiffs meritorious case in and obvious predetermined outcome, by Unconstitutional and bizarre means beginning with his irrational and punitive Sua Sponte Notice on October 27, 2023, contradicting another Judges Order June 9, 2023), discussed herein and more on appeal. Since then, Judge Sprouse and the other RACKETEERING judges, and their agents picked up where McIntosh left off with the same Unconstitutional attempt

and personal reasons amounting to RACKETEERING using a Legal Machine Criminal Enterprise (hereinafter, LMCE),⁷ under color of law, provided some detail herein and in the briefs on Appeal that obstructed Justice against Plaintiffs on their otherwise and properly pled Complaint that could not be dismissed legally.

PAGE AND TIME EXPANSIONS REQUESTED:

As will be seen to be more than justified, Plaintiffs request an additional 200 pages to deal with these additional appealable issues that were entirely created to ruin Plaintiffs chance at a fair and impartial trial before a jury of their peers, and for other reasons stated below, and 2 times the amount of days for each writing/submission (so if 30 days, then Plaintiffs request 60 days with right to revisit these numbers when/if necessary), or action taken (such as preparing the record), when and if Plaintiffs find they need these times and pages, to include, but are not limited to, the initial listing of Designation of Matters, and Initial Brief, Plaintiffs/Appellants, preparation of the record, Motions, Responses, Replies and so forth, since Plaintiffs/Appellants are and were greatly hindered by physically qualifying illness/injuries/handicaps/disabilities

to gift Plaintiffs meritorious case to Defense in a predetermined outcome based on frivolous and Unconstitutional law and facts made up by McIntosh, Allianz, and Plaintiffs' and Defense lawyers and Court Clerks, with changed transcript by state actors, in another Unconstitutional practice where the Court Reporters are controlled by the State, even when the State's honesty and integrity is in question. There are many documented changed transcript cases cited by victims in SC (and Virginia and elsewhere also).

⁷ The LEGAL MACHINE CRIMINAL ENTERPRISE (LMCE) is a partial or entire legal machine of a state, that inappropriately and criminally uses its positions of limited authority and approved government office(s), to acquire tax-evading, illegal profits and other benefits for itself and other members of the machine, under color of law, as they dishonestly undercut their performance of its duties, which duties are authorized by Constitutional authority, and its crimes are often described under the RICO ACT, used originally against the Mafia to go after its leadership rather than just the figurative "trigger man" who is nothing more than a figurative "hired gun," leaving the perpetrators to continue their crimes against the victims of its illegal actions, innocent victims/litigants, due to the leadership not ever being exposed or prosecuted. In RICO Actions, the leaders and its members and organization, the Legal Machine Criminal Enterprise (LMCE), are referred to generally as RACKETEERS.

under the ADA that affect their ability to comply timely, and because there are so many additional issues that obstructed Plaintiffs Justice, through bribery and many other illegal and unconscionable avenues of hinderance and blocking justice all together that must be raised on this appeal, that were totally unnecessary and illegally perpetrated against Plaintiffs, by the RACKETEERS, that hindered Plaintiffs efforts and outcomes during the alleged hearings in the 10th Circuit Common Pleas Court, but that entirely affected Plaintiffs case in these predetermined outcomes.

Plaintiffs tried everything they could do in the time allotted to stop the abuse of discretion by the Court, and outright outlandish RACKETEERING that occurred at that lower level with the Court, to obstruct justice, bribe, and stop Plaintiffs meritorious case from going forward due to inappropriate financial and personal interests of the Court, Lawyers/firms, other State Actors and Allianz Corporate and Specialty, and Defendants,⁸ that caused Plaintiffs meritorious underlying case, become of very little importance or consequence to the Court/Defense, busy in criminality to hijack Plaintiffs meritorious case into other made up chaos to create non-existent issues, that have to be addressed to even try to plead the abuses of discretion/power, *Usurpations*,⁹ and RACKETEERING, under color of law by Defense, to keep

⁸ The PROPER STYLE OF THE CASE and Defendants/Appellees in the styled case, Dr. Linda Kennedy, and Dr. Marsha Fink, v. Lake Hartwell RV Resort and Cabins, LLC, et. al,# 2022-CP-04-00592, filed 3/17/22 with 2nd and 3rd Amendment relating back, along with approved continuance updates thereafter, in Anderson Common Pleas Court, 10th Circuit, Anderson County, (hereinafter, "LHRVRC"), Christopher Vellanti (hereinafter, "Vellanti"), Yvonne Goldman (hereinafter, "Goldman"), Marsha Stamm (hereinafter, "Stamm"), Allen Riha (hereinafter, "Riha"), Jennifer Burdette (hereinafter, "Burdette") Frank Pellegrini (hereinafter, "Pellegrini"), Fritzie Maroto, (hereinafter, "Maroto" but eventually married Pellegrini in 2023), Ray Grenier (hereinafter, "Grenier") Grant Ferrendelli, (hereinafter, "Grant"), and Charles Carpenter (hereinafter, "Carpenter").

⁹ Usurpation: Treason, Invasion, Conquest...those are just a few of the ways alleged "Founders" and old revolutionaries described Usurpation. In usurpation, power is *stolen* from the People, not delegated. This is a fundamental but often ignored/forgotten principle that was behind the American Revolution and describes the

alleged “Founders” intent in going to war in 1776, and in the documents they wrote around the Revolutionary War to protect the People from further Government infringements and oppressions that they had fought against. John Locke, Algernon Sidney, Thomas Paine and Adams, Jefferson, Mason, and many others that fueled the spirit of 1776 according to government history, because when Government goes beyond the limits of the Constitution, these are not just some innocent mistake or bad policy or politics as usual, according to many alleged Founders in government history, it is Government waging a war against the sovereignty of The People, using the color of law as their Legal Machine Criminal Enterprise to protect these RACKETEERS abridging and infringing upon the People’s unalienable and Constitutional Rights. St. George Tucker, View of the Constitution of the United States, Indianapolis: Liberty Fund 1999. If in a limited government, the public functionaries exceed the limits, which the Constitution prescribes to their powers every such act is an act of usurpation in the government and as such treason against the sovereignty of The People, which is thus endeavored to be subverted and transferred to the usurpers.” Tucker. Thomas Paine, in “Rights of Man Part the Second, 1792, London, Feb. 9, 1792, explained the foundation of where all power comes from. He said, “All power exercised over a nation must have some beginning. It must either be delegated or assumed. There are no other sources. All delegated power is trust, and all assumed power is usurpation.” The People are the source of all government Power, and government exists only as the People’s agent and servant entrusted. When government violates the trust they have been given....the rules they have been entrusted with, are null and void. These are long-standing principles in Tucker and Thomas Paine’s day, and not new concepts by time of their writings. Over a century earlier, Algernon Sydney laid the same foundational principles when he summarized, in “Discourses Concerning Government,” 1680, Indianapolis: Liberty Fund 1996. that “the making of laws coronation inauguration and all that belongs to the choosing and making of Kings or other magistrates is merely from the people and that all power exercised over them which is not so is usurpation and tyranny. John Locke, in Two Treatises, 1689, a few years later took the same idea a step further and he explained that usurpation is a “theft of power” that belongs to The People who hold sovereignty and final authority. The People are only delegating certain things to government, but if government does whatever it wants anyway, beyond those limits, this is a theft and usurpation of power from the holder of this power, The People. A long, bloody war was fought to free The People from such usurpations, described in the Declaration of Independence itself, The Unanimous Declaration of the Thirteen United Sates of America, 1774 making the laws of God and Nature, self-evident as unalienable rights of the People. Thomas Jefferson had similar writings in 1774, , as did other respected figures in government’s version of history. Jefferson said we are not declaring these acts void because of the impacts of them, we’re saying so because you have no right to exercise these powers over us and these acts are usurpation of power and therefore null and void, as described further in the Declaration of Independence. All of this was further emphasized by the first Chief Justice of the U.S. regarding Federal and State government being merely an agent of the People and nothing more, An Address to the People of the State of New York on the subject of the Constitution, April 12, 1788. The government agents of The People, “are to receive that business to manage nor to themselves and as their own, but as agents and overseers for the people to who they are constantly responsible and by whom only they are to be appointed.” They saw usurpation not as a legal or political problem, but something far more dangerous and they repeatedly talked about this and there are many other people who emphasized likewise. This is theft of power, stealing from the People, as in a coup as a form of war on The People. Benjamin Franklin, in a speech at the Philadelphia Convention, stated, “as all history informs us there has been in every state and kingdom a constant kind of warfare between the governing and the governed.” Benjamin Franklin, Philadelphia Convention, June 2, 1787. And at the height of the American Revolution this, 1775, Samuel Adams had almost the same take in a letter to Arther Lee, he called, Violations of Rights and Liberties: Invasions is an Act of War, March 4, 1775” Adams called anyone who does not defend these acts of war on The People’s Liberty, a Treason also. Alderton Sydney, “if he be justly accounted an enemy to all who injures all he above all must be the public enemy of a nation who by usurping a power over them does the greatest and most public injury that a people can suffer.” Id. John Locke, stated that usurpation isn’t just theft it’s a form of domestics conquest again a term of war he said as conquests may be called a foreign usurpation that puts them in a state of war with The People.

Plaintiffs/Appellants Demand for a Jury trial, and even their demanded Discovery from ever occurring or being received even after three years of Plaintiffs efforts to bring forward their case, which frustration of Plaintiffs/Appellants legal and just purpose, are of no fault of Plaintiffs/Appellants, but intentional acts of the presiders and their RACKETEERING partners, many named herein, which is clearly describing Defense RACKETEERING and Obstruction of Justice under color of law. Judge McIntosh in Plaintiffs case, and spoken out loud in the journalists abuse probate matter he wasn't even a party in, McIntosh claimed that a Judges can be Judge, prosecutor, witness, moving party, investigator, and jury in the same case, and if he really believes this, which Plaintiffs/Appellants know he doesn't, that would make him a King, in a Devine Right of Kings Feudal System which is entirely Unconstitutional and Treasonous, which this country allegedly threw off such a yoke to gain alleged independence, in spite of McIntosh and the others supporting him in the 10th Circuit, as they exercise "Arbitrary Power," which is 100% Unconstitutional.¹⁰ but what he did in Plaintiffs/Appellants case to get them dismissed on his unconscionable and Unconstitutional alleged Evidentiary hearing where there could be no such hearing. Judges relying on judicial immunity to exercise arbitrary power no matter

¹⁰ Devine Right of Kings, takes the U.S. and SC back to the many years before the American Revolution where the alleged Founders and those who followed them threw off such a Despotic, Tyrannical idea as a Devine Right of Kings to rule over people. See, *Divine Right of Kings vs. Individual Rights*, by Algernon Sydney, 1692, where Unalienable Rights and the Constitutions of the Federal and State Governments, which power is delegated by the People as the agents of The People, make any Monarch to rule against man's natural rights Treasonous and no such Judge should hold any position in The People's government. See Robert Filmer's opposing, "*Patriarcha*" (1680), a classic defense of royal absolutism and Rights of the King to never be wrong and have absolute control of all of humanity in all ways. Also see, Thomas Gordon, Cato's Letters No. 25, April 15, 1721, Cicero, Treatise on the Commonwealth, 54 BC., Patrick Henry, Virginia Resolves, May 29, 1765 and many other writings from our government history on the matter. It is clear that Plaintiffs rights were usurped and arbitrary power was in full force and effect as the Courts are not overseeing the Common Pleas Courts, like the Murdaugh Country and now the 10th Circuit is also under great scrutiny that needs this mess finally cleaned up with Plaintiffs/Appellants receiving full award, by Allianz, and the State for all they have been put through in refusing to give up on their meritorious case that past procedural scrutiny and could not be dismissed by arbitrary power, and had to be granted a victory, as they won their case, but for usurpation by the Judges and their RACKETEERING associates.

whether against one litigant or One-Billion litigants is equally unconstitutional for the very reasons evident in this case of Arbitrary Power to create a Legal Machine Criminal Enterprise in a fake checks and balance scheme that creates a closed loop of corruption where Murdaugh real victims, and Plaintiffs/Appellants and others have zero chance of Justice and redress of grievances, Constitutional and unalienable protections of their rights, and do not have to fear for their lives or safety, if they choose to fight a very unfair and obvious series of government violations against them using some of the most base, criminal types available to do the government's bidding to attack Plaintiffs/Appellants for financial and personal vengeance gain against two older cancer patients with physical disabilities just because they have adopted these Unconstitutional laws to protect their LMCE, under color of law, which is a war on the People, according to the alleged Founding fathers, and are government acts of Treason in exercising criminal usurpation and arbitrary power as the servants overthrow The People who rule over it by law. Overthrowing the People is illegal since The People oversee government and government is/are mere agent(s) of The People and nothing more, whether Federal or State Government according to the alleged Framers according to government told history for those who pay attention to the writings preserved in history.

For these and many other reasons with explanation of the complexity and collusion/Racketeering by those appointed to protect justice, as the 10th Circuit Judges presided over their own guilt and liability for them and their fellow RACKETEERS, with no remedy for Plaintiffs/Appellants, Plaintiffs/Appellants have given more than enough good cause and requests for reasonable accommodations herein and below, as to why the page and time limits must be extended for Plaintiffs, with good faith extensions of time/pages when Plaintiffs get

closer to attempting this almost impossible task due to the purposeful chaos and illegal actions of all those opposing Plaintiffs, including State Actors. Plaintiffs finally need to receive Due Process and proper redress of grievances without infringing on Plaintiffs other rights of free speech and so forth that will become obvious in appeal and maybe a bit herein, and receive these rights for the first time in this matter and in other matters involving the LMCE and the Courts, that began in this case, in 2021, with dirty tricks and obstruction of justice, bribes, and other unconscionable actions, with the Courts and other RACKETEERS doing whatever was necessary to get rid of Plaintiffs/Appellants and their troubling case, that involved them as underlying and continuous RACKETEERS as they insisted on continuing to preside over the case they were a nefarious part of, which shocks the conscience of a civilized society run allegedly by the Rule of Law, to say the least.

Plaintiffs also request that the Court stay open and cooperative to additional time and pages needed if Plaintiffs/Appellants notify as such in good faith, when they get closer to these limits and perhaps cannot finish within these limits due to the reasons given herein and more.

Finally, Plaintiffs have several disabilities that qualify under the ADA, and some rear their ugliness unexpectedly and there is nothing Plaintiffs can do about it, but seek medical attention. An example is Dr. Kennedy usually has several kidney stone attacks per year, with one or two needing medical intervention, and the others requiring pain killers of various strength which may affect her performance if having to take pain killers or have surgery and have to sit for about 10 days after surgery, until healing. These types of issues, Plaintiffs cannot control and will need the Courts understanding, as they are DETERMINED to finally receive justice in this matter and will not quit until they do, using all legal, nonviolent means, in and out of court to

get his matter properly resolved as it should have been long ago, before Plaintiffs even learned about the RACKETEERING and other crimes and vicious acts of the LMCE, that will no longer be able to hide if it rears its head again as it is an illegal, criminal act of epic proportions that no government will be able to survive the truth and the evidence that it exists is no longer going to be shocking but an answer to what the Public sees as a very corrupt government needing major changes, again, with Plaintiffs, only by legal and nonviolent means, which is all Plaintiffs teach and support.

Plaintiffs need full payment by Allianz, and they don't care how much Allianz misappropriate on bribes, payoffs and however else they spent Plaintiffs award, which is Allianz and the other RACKETEERS' problem, not Plaintiffs/Appellants. Plaintiffs also need settlement by the state for all that these criminal, state actors have done to them as well. With other assurances provided to Plaintiffs to make them completely whole and those that protect them and their colleagues, from further abuses in the future, Plaintiffs will then consider this matter resolved and be on their way. Plaintiffs sent a settlement offer to all of these RACKETEERS in about December 2023, that of course the RACKETEERS tried to twist into a Hybrid accusation, when it was very clear Plaintiffs were talking about this entire matter and not just the 11 Defendants who by then, had become secondary to the abuses against Plaintiffs, in a hi-jacked case by the opposition as they already DEFAULTED in the underlying case several times, but were saved by the Courts anyway.

FACT SUMMARY

(there is much more than being summarized herein)

**Illustrating Just Some of the Reasons Why an Extension of Time/Pages is Constitutionally
Necessary, in Line with Due Process and the Right to Plaintiffs/Appellants
Redress of Grievances, and More.**

**SOME UNDERLYING VERY MERITORIOUS FACTS IN PLAINTIFFS/APPELLANTS CASE IN RELATION
TO THE EXTREMELY UNCONSCIONABLE AND UNCONSTITUTIONAL HANDLING OF PLAINTIFFS
CASE BY RACKETEERING JUDGES AND OTHERS WHO WERE INVOLVED AS FACTUAL
PERPETRATORS IN THE UNDERLYING CASE WIHTOUT RECUSAL, THAT HAS BECOME A PRIMARY
ISSUE ON APPEAL:**

1. **REASONS FOR RACKETEERING BY STATE ACTORS AND OTHERS:** Plaintiffs/Appellants, Dr. Linda Kennedy, J.D., B.A., B.S., 66 and Plaintiff/Appellant, Dr. Marsha Fink, J.D., B.A., 75 (hereinafter, “Dr. Kennedy” and “Dr. Fink,” or together “Plaintiffs/Appellants”) are attorneys who practiced in Virginia, where Dr. Kennedy was a whistleblower against this same Legal Machine Criminal Enterprise (LMCE) in Virginia, as in SC. Dr. Kennedy also took whistleblower cases against the Federal Government also.

2. Some were national security cases, where the Government of the U.S. didn’t want the information known to the public, not because of any National Security issues, but because the U.S. Government was committing crimes against the People of the U.S. and Internationally as well.

3. **Representing Congressman James Traficant, Trying to Stop the U.S. from Aiding China in Human Trafficking into the U.S.:** Dr. Kennedy represented the Congressman James Traficant case, after his conviction and before his sentencing, and helped him protect a U.S. spy from Canada, who helped the U.S. prosecute a huge human trafficking ring out of China and the

Asian countries nearby, sending the victims of this trafficking through Canada, then through Michigan and then into the U.S. to places unknown for heinous crimes to be perpetrated against these trafficked Asians, through government assistance. The operation was called, “Operation Squeeze Play” and the spy had gotten 4 conviction and 11 indictments (Pgs 111-117), when the U.S. Attorney General decided to help the Chinese head of the military, General Feng Wei (spelled many different ways...Fhang, Feng, etc.), escape his Crimes Against Humanity, and outted the spy and his family while the spy was still in China.

4. Congressman Traficant saved the spy, with Dr. Kennedy being Traficant’s confidant and lawyer, advising him.

5. This and another project of Congressman Traficant’s, stopping the IRS from stealing the individual’s money without first notice and a right to be heard, made Congressman Traficant and those who helped him public enemy #1.

6. The Idaho Observer News Source told this story after hearing Dr. Kennedy’s story and her interview with the Spy, who was safe but in hiding after Congressman Traficant got involved.

7. The Idaho Observer writes from their Article of October 2002, “Traficant expulsion and ‘Operation Squeezeplay’. . . *The following has been adapted from the correspondence of Rep. Traficant’s attorney Linda Kennedy who is putting herself in grave danger by continuing to fight for her client. The danger is not the fight itself but who is waiting at ringside in the shadows.*”

They were very right, Idaho Observer, October 2022, by Hardin, and Dr. Kennedy continues to pay for affirming her oath with great commitment and not compromising on it to please or be a part of the corrupt LMCE.

8. Whistleblower Kawaja (pgs 118-124), and the U.S. Using the WMD, and testing on U.S.

Troops in Joint Venture with International Terrorists in the U.S.: Further, Dr. Kennedy took a case, that was already improperly dismissed long before, involving a Security expert, hired by the Military without taking bids, to guard what was called a flavoring plant, where the formula was top secret. Instead, this flavoring plant was bringing in through its doors, international terrorists, and strange experiments and so forth that caused the whistle blower much concern. He contacted all these alphabet agencies to tell them that he thought their might be international terrorists on Boca Raton, FL soil and they were doing some unusual experiments not conducive with a flavoring plant. Instead of cups of liquid to be tasted and tested, the conveyor belts were transporting military MOPP Gear and Gas Masks.

9. There were many more indicators from the structure of the building, to the statements of local government, and a lot of foreigners of great wealth, and the military hierarchy that told or showed Dr. Kennedy's client that this was no flavor testing plant and something much more nefarious going on in this highly secure building that also had operations in Texas, Oklahoma and New York that Dr. Kennedy's client was providing security.

10. Dr. Kennedy's client started researching and found pictures of various terrorists on the U.S. watch list who were frequenting the Boca Raton and other locations, and finally got U.S. Customs involved, after all the agencies pointed the client to other organizations and would not investigate. Customs told the client to keep a close eye on the situation, and gave him a spy code number to use to identify himself in the future. The client, a high-tech security man with his own company, wired/bugged all the phones and offices, and offices at all the locations and learned that the U.S. Military was in joint venture with a group of international terrorists, to

include Ishan Barbouti .(Pg 118) and his company IBI Engineering, an international gun runner, but also, a U.S. listed terrorist, who built the Rabta Plant in Libya, eventually called “Pharma 150”, that Reagan had bombed on April 15, 1986/ and had it lit on fire in 1990, calling it a chemical weapons plant (Operation El Dorado Canyon and other names). This bombing in Libya and the fires set, also allegedly, killed Muammar Gaddafi child.

11. Further into the story, Libya had Ishan Barbouti Engineering and other Barbouti recruited companies built another Rabta Plant with two other plants also around the world, and a fire was started in it with Libya blaming the U.S. for starting the fires. This is a very generalized summary, but suffice it to say, Dr. Kennedy was not liked by crooked government types keeping the truth of their crimes against humanity away from the public eye, which had nothing to do with National Security to protect the people.

12. With all of this information and the First Gulf War starting soon thereafter, the client was starting to ask too many dangerous questions as to why this and other terrorists including Barbouti’s son, Heider Barbouti, were involved in a flavoring plant, with Mopp Gear and Gas Masks being tested along with other very shady operations.

13. The client realized from his tape recordings, where Congress and other U.S. authorities were caught on tape discussing this PIT Plant and their intentions for it, that these were indeed terrorists and they were working within the U.S. and with the U.S. Military and contacted newspapers, George Bush, James Baker, and many others, trying to protect the U.S.

14. Instead, Dr. Kennedy’s client got raided at gun point, with an illegal War Powers Act Subpoena, not to be used against U.S. citizens, and a gun to the client’s head by the NSA, who aggressively confiscated all of the clients evidence at the particular locations, that showed the

U.S. was in joint venture with international terrorists, and against the U.S. government, who was indeed involved with working with the alleged terrorists.

15. The Boca Raton, alleged flavoring plant called the Products Ingredient Technology Plant ("PIT Plant)," was an exact replica of the Rabta, Libya Plant where Libya was allegedly making chemical weapons outlawed after the Geneva Convention and International agreements, and in 1990, just before the First Gulf War, two key developments significantly impacted the global ban on chemical and biological weapons: The 1990 Chemical Weapons Accord and the Biological Weapons Anti-Terrorism Act of 1989, that led to the Biological Weapons Convention, and established penalties for violations and criminal penalties for their use, both signed by the U.S. This deceit by the U.S. caused many people to die unnecessarily by creating more war on the fake search for WMD.

16. The experiments run in the PIT plant were to be further run on the U.S. Military as the First Gulf War was being set up by our "leaders" not to be named here for brevity sake.

17. The experiments were indeed run on U.S. soldiers without their knowledge, and the entire "Weapons of Mass Destruction" claim by the U.S. was the U.S. using chemical weapons and then releasing biological weapons made elsewhere on our own soldiers as one of a series of tests in making a super soldier through the chemical created at the alleged flavoring plant in Boca Raton, FL on the MOPP Gear and Gas Masks which story goes into much greater detail than here.

18. This lie, shown by General Swartzkopf's own Nuclear, Biological and Chemical Reports, (NBC), allegedly lost, but acquired by the whistleblower, showed that it was indeed the U.S. using chemical and biological weapons in the First Gulf War and the entire hunt for WMD's and

the U.S. starting of more wars was based on this lie that Dr. Kennedy's client proved through his extraordinary evidence and effort to protect Americans from its own government. It also shed a different light on what really happened on 9-11, and the prior attack against the World Trade Center in 1993.

19. In subsequent interrogations of Dr. Kennedy's client, the Government let the terrorists sit across from the client, and make threats about his wife, and the government asked who else knew, and named people like Gordon Liddy, James Baker, and about other U.S. government agents and other recordings and documents the client still had, that Dr. Kennedy now has, in spite of the documents sealed as National Security to keep this information from The People, while the U.S. started more wars on fake WMD searches they knew didn't exist because they were the perpetrators and not those the U.S. was bombing.

20. Traficant and Kawaja were killed and fake evidence floods the stories making government look innocent and the whistleblowers crazy, where Kennedy knows these false narratives are fake propaganda and damages control, because she has the evidence and refused to give it to the government, and she was involved as the attorney in these and other cases.

21. Dr. Kennedy National Security evidence from these and other cases is/are safely tucked away with friends and legal reform associates, and these are safe outside of SC, VA, FL and anywhere else Dr. Kennedy has lived, where she represented clients such as these and has taught on these schemes against the People often, to show how the LMCE works in the U.S., and around the world.

22. Plaintiffs/Appellants semi-retired in 2010 due to them believing they did what they could to act in good character and good faith and still believe they have clean hands and did the right

thing no matter the cost in the past and now the present. Now they believe everyone needs to bury their old, dull, rusty hatchets and move on and leave Plaintiffs alone as they leave the LMCE alone, and others involved alone, which the proper ending to this matter will do so, as long as any final resolution where Plaintiffs are made whole, also, includes these terrorists will leave Plaintiffs alone.

23. Terri's Fight: These and other cases, like Terri's Fight, the Terri Schindler Schivo scam, also involving Insurance Reserve Fraud and Judge Greer in Florida, where a song was written about Judge Greer for his corruption, called Silence is Consent. Plaintiffs took on other such nasty cases in the LMCE, where the honest whistleblower was trying to protect the public and got smashed by the LMCE for it, and caused Dr. Kennedy severe retribution, where the VSB is obviously still sore that Dr. Kennedy did them such damage that even the Supreme Court Justice wrote Dr. Kennedy and admitted to their lynching on false grounds and apologized, as so many lost their jobs and were exposed by Dr. Kennedy's work. A book on Terri's Fight, was dedicated to Dr. Kennedy and her tireless work to help Terri. Dr. Kennedy was single-handedly responsive for getting Terri's feeding tube re-inserted after the hoards tried to starve and dehydrate her because she was disabled, claiming she was a vegetable when recordings Dr. Kennedy and other smuggled out, showed a disabled lady full of life, but who represented attempts at murdering her for the IRF/IF scam to be most effective and hidden from the public. It was Kennedy who made public the IRF scam, that leveraged the entire government of FL to reinsert her tube, and then the government showed up as a fake white knight to fool the family who was warned by Kennedy, not to believe them. Terri was dead in 6 six months due to the scheme of the LMCE in

Florida destroying the evidence...Terri was cremated to leave obvious questions of corruption unanswered (evidence available on request).

24. **Dr. Kennedy and the VSB/Federal Retaliation:** Dr. Kennedy was informed by a VSB insider that the VSB was told by the Federal Government to help them go after Dr. Kennedy and destroy her, which the VSB was happy to do as Plaintiffs were not cooperating with the VA LMCE anyway, so they did all they could to destroy Dr. Kennedy and even promised her that she would never be able to do business again. The Unconstitutional proceedings were almost identical to McIntosh and the other Judges plan...an evidentiary type hearing, where Plaintiffs got no discovery, no clear points to address, moving targets, protection to the VSB who could not win legally, changed transcripts, and all types of illusions of justice that were not really there in a predetermined outcome and smear campaign on the Order. They used an FBI agent to try to set up Dr. Kennedy and when that didn't work, the VSB just set her up with fake claims and hearings, with the Judge becoming the prosecutor when the VSB got unraveled when Dr. Kennedy caught the head of ethics, James McCauley perjuring himself under oath with Dr. Kennedy having the recording of what was really said and done all that resemble the McIntosh/Maddox/Spouse/ Taylor/Murdaugh strategy today as nothing has changed even between alleged separate jurisdictions that are colluding together now, after 20 plus years of LMCE attacks against Plaintiffs/Appellants. Pages 125-127 with 8 volumes of evidence and more, and it is ready and waiting if necessary). Plaintiffs have tape recordings of the real hearings, changed transcripts Plaintiffs dug from the trash, with handwriting of the bar and Judges directing entire rewrites of the transcript, and a letter from the now, late, Chief Justice Hassell telling Dr. Kennedy that they conspired against her, and apologizing, on his death bed.

Plaintiffs instructed the Supremes of VA to disbar her if they think that a case could be so compromised by Judges and VSB crimes to make a fair hearing even possible as she could never tell her clients to go to court for justice if this is the case. Plaintiffs worked on the American Bar Associate to comment but they remained silent as to the proven facts of the case and altered and illegal acts documented in the real record. Pgs 125-127 are samples.

25. The VSB continued interest in Dr. Kennedy about 22 years later, and all along the way, shows that they are still interested in ruining anything Dr. Kennedy is involved in, even this suit, which has much larger ramifications than it first appeared to have in 2021, when the dispute started in a small campground in Townville, SC with 11 small time criminals who became Defendants in the underlying case.

26. And the LMCE lost its perception of public trust so it could no longer easily scam the Public, which is what happened in SC when the Murdaugh case, even the watered-down version, came out. It tells on the LMCE, and Plaintiffs/Appellants case crosses the T's and dots the I's of the corruption in SC, through the acts of these RACKETEERS going after IRF and vengeance in the most despicable fact pattern by using these criminal Defendants to kill Plaintiff with the VSB/Judges still involved, now with the State Actors/lawyers and Allianz to run this same scam on Dr. Kennedy and Dr. Fink, who know about the scam so could identify it.

27. Plaintiffs, during and after exposing the government protecting Feng Wei and Terrorism, and protecting the Congressman as a part of her representations by Dr. Kennedy and her work with Terri's Fight to protect the disabled, and her general work and disdain for lying Government that was not protecting the People or respecting the People's rights, and committing crimes under color of law, was then set up by VSB Paul Georgiadis and James

McCauley, who were recorded by Dr. Kennedy during the set ups and the information came out of these set up and more. See Kennedy's first ever harassment hearing approved by the Federal Courts, to be heard in Federal Court. (Pgs 12-127).

28. Before Dr. Kennedy's harassment hearing against the VSB could occur (pg 125), the Federal court was ex parte spoken to most likely by the Feds and VA, and decided to step back and let the VSB lynching occur and read in the VSB accusations to make it look like a hearing occurred and findings were made when no trial ever happened, documented in other Federal Transcripts Plaintiffs have kept for her new book through her biography, that may be coming out soon to get final justice if she cannot get it in Court, where the transcripts were then rewritten after Dr. Kennedy got McCauley, the head of ethics for the VSB to perjure himself on the record and caught by recordings. Further, the Plaintiff/Appellants also dug out the changed transcripts from the Court Reporters abandoned trash, with Judges and the Bar instructing the reporter what to change in the transcripts and how to rewrite the changes. McIntosh has done this in another case, and Sprouse has done this in his presiding over his own liability and crimes in this underlying case also.

29. The FBI confirmed that these VSB people are changing transcripts as they interviewed many other lawyers in Virginia. But it didn't matter as the VSB thought it would be a good idea to set up Dr. Kennedy anyway, along with Dr. Kennedy acquiring many other documents showing that the Bar set Dr. Kennedy up and the complainant was an FBI agent lying to help them get rid of Dr. Kennedy.

30. From this, Plaintiffs can see that this was not a good decision since the VSB/Judges are still chasing after Plaintiffs 22 years later, because Plaintiffs made sure that the public knew all

about their Legal Machine Criminal Enterprise. It recently got them fired and distanced also from the VSB as Dr. Kennedy filed a bar complaint against them for Barratry and champerty in this matter they have no business being involved in, but are, based on Defendants own admissions and the fingerprints Dr. Kennedy and Dr. Fink can easily identify as their handiwork.

31. So, Plaintiffs/Appellants have seen the LMCE up close and personal in SC, VA, in the Federal system and in many other states they have operated from. They know what it looks like and how it works. The fact that the Defendants in the underlying case are admitting speaking to the VSB/Judges, and SC Judges and so forth and the VSB getting involved in this entirely simple, and unrelated matter 22 years later, with no prior contact for 22 years, speaks for itself...RACKETEERING....res ipsa loquitor!

32. Dr. Fink worked in Dr. Kennedy's firm, and is very familiar with these and other cases, and later, worked as a Deputy Public Defender, and then quit the law all together in 2010 as she had seen enough of the LMCE and its exploitation of the Public. She was a big donor to the Legal Reform Movements in the U.S. knowing that the system had to change in order to protect People and their rights against a Government acting criminally and as it wished, in secret through deception.

33. Years later, Plaintiffs/Appellants Travel to SC for a Life or Death Medical Emergency:

Years after retiring and working now with International Communities to better their quality of life, in late, 2020, Plaintiff/Appellant Dr. Linda Kennedy, J.D., B.A., B.S., 66 and Plaintiff/Appellant, Dr. Marsha Fink, J.D., B.A., 75 (hereinafter, "Dr. Kennedy" and "Dr. Fink," or together "Plaintiffs/Appellants"), came to South Carolina (hereinafter, "SC") from their residences' in Florida to help Dr. Kennedy save herself from a second bout with Cancer, a Stage

IV Cancer that was terminal by time she reached the operating table, to get a very difficult, painful, radical and rare surgery to try to save her life.

34. Dr. Kennedy was not supposed to survive the surgery, but did, with no chemotherapy and no radiation used, but by treating herself with natural healing plants and a lot of prayer.

35. Dr. Fink, her sister in-law, who lived a couple hours away in Florida, agreed to take Dr. Kennedy to SC with Dr. Kennedy's beloved dogs, and then Dr. Fink came down with her third bout of cancer, fortunately caught at an earlier stage. Both have been in recovery and trying to hang on to remissions by following doctor's Orders and continuing treatment.

36. **Plaintiffs Move to Defendants' Appellees Campground for Further Alleged Healthy Recovery and Healing:** In the summer of 2021, Plaintiffs eventually moved to Lake Hartwell RV Resort and Cabins, LLC (LHRVRC), in Townville, SC, to heal in an outdoor, healthy setting rather than continue in hotels which were much less healthy environments for them and for Dr. Kennedy's beloved Dogs.

37. It was Dr. Kennedy who was just returning to physical action of any kind, at the end of June 2021, and so had to take life and physical activity very slowly, and needed to keep her cortisol levels (stress) very low for her best chance to fully heal from this deadly Cancer without its return.

38. **Plaintiffs/Appellants Accept Simple, No-brainer-type Jobs from Vellanti and Goldman at LHRVRC While Healing:** Plaintiffs/Appellants also got onsite oversight jobs at LHRVRC, that were not too challenging for their illnesses with all of their experience they could rely upon, using Brain rather than Braun to help the owner, Christopher Vellanti, (hereinafter, "Vellanti") and his General and Property Manager, live-in transactional girlfriend, Yvonne Goldman,

hereinafter, "Goldman"), run the campground, where Vellanti and Goldman were Floridians with dual residency in Florida and SC-Townville, were often absent from Townville.

39. Vellanti and Goldman stated they believed Property Managers Defendant/Appellees, Marsha Stamm and Allen Riha (hereinafter, "Appellee(a)," "Stamm or Riha" or "Stamm/Riha") and their other employees at LHRVRC and some resident associates friends of Stamm/Riha were stealing from them and involved in other devious behavior and unauthorized activities to make money, and needed an onsite presence to keep everyone honest.

40. Vellanti and Goldman had been relying on Defendants/Appellees, Assistant Property Managers, to run the campground but stated they were having trouble with keeping Stamm/Riha and their staff of employees accountable while away, and just needed onsite mature presence who did not take a management role, as per Dr. Kennedy/Fink's insistence not to be property managers, or directly involved in the day to day operations.

41. Dr. Kennedy was to make $\$15/\text{hr} \times 3 \text{ days/week} \times 8 \text{ hrs/day} = \$360/\text{week}$, and also received full free lot rent to include all utilities (hereinafter, "lot rent credits), and Dr. Fink received $\$10/\text{hr} \times 3 \text{ days/week} \times 8 \text{ hrs/day} = \$240/\text{week}$, and paid no lot rent nor utilities either. Plaintiffs/Appellants agreed to this assignment with their primary focus to get Dr. Kennedy well again, since she had the severe challenge with the cancer she had faced and was trying to overcome, and then to return to their homes in Florida. Plaintiffs/Appellants filed their W-4's shortly after agreement by phone. Neither Plaintiffs/Appellants were ever paid for their products/services, nor given their lot rent credits.

42. Plaintiffs soon learned that none of the other employees were paid or hired under legal conditions other than Plaintiffs/Appellants who insisted on filing out W-4's, and all others were paid under the table, and had terrible business practices when they had any at all.

43. **Plaintiffs/Appellants Simple Job was Actually for the Purpose of Vellanti and Goldman to Redirect Hate for Them, with Transferred Hate to Plaintiffs so Vellanti and Goldman Could Sell Quietly and Leave their Fellow Criminal Element Who Were all in a Turf War with Each Other Attacking the Triangulated and Perceived Enemy, Plaintiffs/Appellants Instead as a Distraction:** Vellanti and Goldman were partially right in that there were several illegal businesses being run through LHRVRC by Stamm/Riha and other employees and resident associates at LHRVRC, but they didn't bother to tell Plaintiffs that all of the employees of LHRVRC, including Vellanti (sole owner and employee) and Goldman were involved together in mutual criminality, and blackmailing of each other to gain control of these unauthorized businesses, and Vellanti and Goldman needed to redirect Stamm/Riha and the others against Plaintiffs who were the new onsite presence, rather than against co-criminals, Vellanti and Goldman, while Vellanti and Goldman were secretly trying to sell LHRVRC and get out of state with all the money they gained through ill-gotten gain while excluding their other colleagues from receiving any of the money, and leave Stamm/Riha and staff behind for the new owners to deal with and direct the retaliation by Stamm/Riha and the others, directed at Plaintiffs who had no idea of the bad acts of Vellanti and Goldman until about a month after they started working for Vellanti and Goldman.

44. Obviously, Plaintiffs/Appellants being an onsite presence was very threatening to Stamm/Riha and the others under these unknown circumstances to Plaintiffs/Appellants at the

time, where violence and blackmail were being carried out behind the scenes, with Drug Manufacturing, distribution, prostitution, a RV/Camper theft and forgery ring, and many other serious crimes were occurring under the cover of the LHRVRC name, which was merely an alter ego business for Vellanti. Some were arrested off site in other jurisdictions, and imprisoned for some of these crimes, that Anderson County seemed to ignore.

45. **Vellanti and Goldman Triangulation to Create Chaos for Plaintiffs/Appellants and Redirected Anger Against Plaintiffs/Appellants:** As a part of this Vellanti/Goldman scheme to deflect the anger and attention to Plaintiffs/Appellees as the onsite presence, all the LHRVRC personnel became angry and hateful at Plaintiffs/Appellants, because Plaintiffs/Appellants were the onsite threat that saw too much, and Plaintiffs/Appellants were starting to learn of the criminality going on at LHRVRC, and didn't want to be a part, even though it took them a little longer to realize that Vellanti and Goldman were also involved. Plaintiffs/Appellants quit working for LHRVRC and wanted to sell and leave quietly and peacefully as soon as possible.

46. **Vellanti and Goldman Involved in the Crimes at LHRVRC and Leading and Encouraging Others in Attacks Against Plaintiffs/Appellees:** Shortly after Plaintiffs/Appellants discovery that Vellanti and Goldman were a part of the scam(s), but still not knowing of the black mailing and triangulation schemes to get the employees mad at Plaintiffs/Appellants on purpose, misdirecting their anger from Vellanti and Goldman, Vellanti and Goldman joined in the attacks, stalking, physical attacks, property damage and attempts to kill Plaintiffs, which is written and repeatedly admitted, in Defendants/Appellants own Defendant Group Texts to each other as they planned, implemented, and celebrated their attacks against Plaintiffs/Appellants, and held contest to see who could hurt Plaintiffs/Appellants worse as the hatred for Plaintiffs/Appellants

was built up by Vellanti and Goldman in a triangulation against Plaintiffs/Appellants, by all Defendants/Appellees. Plaintiffs/Appellants obviously quitting such a dangerous job, were quickly looking to get out safely and quietly while selling their property to mitigate the financial loss.

47. **Defendants/Appellees Afraid Plaintiffs/Appellants Would Take Them to Court with a Judge Not Involved in their Crimes:** Defendants/Appellees were very concerned, that Plaintiffs/Appellants would blow the whistle on their criminality at LHRVRC, as they learned that Plaintiffs/Appellants were whistleblowers against the legal system in past years, and promoted legal reform as attorneys for many years in the past, and the Defendants ignorantly believed that whistle blowing was something Plaintiffs/Appellants were looking forward to doing, which is not true. Defendants/Appellees discussed this in their Group Texts.

48. Before Plaintiffs could sell their property and leave, they had to fight for notice and a right to be heard, to give them time to sell and they hoped protection from self-help ejectment by bullying from Defendants/Appellants, who were willing to do anything not to allow Plaintiffs/Appellants to get a hearing in front of Judge Mullikan who already knew some questionable actions were taking place at LHRVRC by other complaints, to include Lanier Heating and Air, LLC, et. al, (hereinafter, “Lanier(s)”) ¹¹

¹¹ The Lanier case, 2021-CP-0402230, 3/17/21, inappropriately settled in October 2023, by Dodd/Defense while Plaintiffs/Appellants were shelved by this fraudulent withdrawal claim and waiting for a hearing date while Dodd was lying to the Laniers, in spite of the contract to not settle either case without the other, to isolate Plaintiffs/Appellants in this matter further. The Laniers had also been attacked by the Defendants, but to a much lesser degree, and filed a case with the 10th Circuit Common Pleas Court on or about November 17, 2021, using Attorney Michael Dodd, who would later become Plaintiffs lawyer also, in a case that all wanted to join the cases and fight and settle together.

49. Defendants/Appellees Try to Lie to State Actors to Get Rid of Plaintiffs Quickly Without Court Through an Unconstitutional Summary Ejectment Statute that has Since Been Changed

Based on Plaintiffs/Appellants Arguments: Defendants/Appellees lied to the Sheriffs'

Department (hereinafter, "police") trying to get them to remove Plaintiffs summarily under an Unconstitutional law, under Title 45 (law as stated in 2021, South Carolina Code of Laws, Title 45 - Hotels, Motels, Restaurants and Boardinghouses, Chapter 2, Lodging Establishment Act, which was changed due to its Unconstitutionality in 2022) by claiming Plaintiffs didn't pay rent, where Plaintiffs showed receipts and proved they worked at LHRVRC and were also supposed to receive lot rent.

50. The police did not agree with LHRVRC's claims that Plaintiffs were late on rent and told them to file for an eviction and give notice if they had a problem and if they really thought they could prove Plaintiffs/Appellants didn't pay rent when the police were shown they had computer generated receipts from LHRVRC that showed they timely paid in full each month, and also other facts dictated that LHRVRC had to provide Notice and a Right to be heard, due to several Constitutional reasons in Plaintiffs circumstances described more in the Appeal. Magistrate Mullikan also agreed with the police and told LHRVRC to file for a hearing after Notice, and do not harass or try to get the police to summarily remove Plaintiffs again. They reminded Defendants that self-help was not legal in SC.

51. Thereafter, Defendants/Appellants were looking for any other way to get Plaintiffs/Appellants off the property without having to give notice and a right to be heard, as Mullikan was one of the straight shooters who was very concerned about what was really going on at LHRVRC due to many complaints and calls to his office by other potential litigants claiming

similar, but not as extensive and dangerous problems they were having perpetrated against Plaintiffs/Appellants. Plaintiffs/Appellants were the primary focus of the attacks by LHRVRC.

52. **Illustrative List of Constant Attacks on Plaintiffs/Appellants**: In addition to more of the same, Defendants/Appellants then went on a terrorizing plan to put Plaintiffs under seize, where Plaintiffs had to keep their heads on a swivel to protect themselves.

53. Defendants/Appellees even made up a fake Court Order and shopped for an officer not familiar with the situation who was fooled and tried to summarily eject Plaintiffs/Appellees based on this fake Order, until Plaintiffs saw the alleged Order and showed the embarrassed officer, it was a fraud and not even issued by a Court, signed by Vellanti; they tried various ways to greatly harm and kill Plaintiffs described in their Group Texts Admissions; they tried stalking, towing Plaintiffs/Appellants van, stealing Plaintiffs/Appellants camper; planting children in front of Plaintiffs/Appellants camper and then calling the police saying Plaintiffs “snatched a child,” which would be the child of one of the Defendants. This was disclosed to Plaintiffs by Group Texts and by recorded interview of two of the Defendants who admitted the scam to try to get Plaintiffs arrested for child crimes which is disgusting; they isolated and made up false and extremely disgusting rumors against Plaintiffs to make others grow to hate Plaintiffs and join in the hate of Plaintiffs and help attack Plaintiffs also, while rewarding all who sided with them; they stole Plaintiffs license plates and tried to have the police arrest them; they keyed Plaintiffs van, and put roofing nails under the tires; they tried to put cloudy liquid into Plaintiffs gas tank; they tried to steal Dr. Kennedy’s beloved dogs and hold them hostage; they tried to kidnap (their words) Plaintiffs dog and camper sitter and assaulted the sitter; they broke in and robbed Plaintiffs camper of all its valuable contents; they tracked Plaintiffs at all times, admitted

through Group Texts and in other interviews, even following Plaintiffs/Appellants up to Greenville from Townville; tried to get Dr. Kennedy's beloved dogs taken on false claims set up through Group Text admissions; they purposely hired someone to stage a construction accident that cut off Plaintiffs electricity for 35 days in the hottest record setting days in 2021; they staged crimes and tried to get Plaintiffs to walk into the scene of the crime innocently so they could blame Plaintiffs/Appellants and get them arrested; and this kind of crazy behavior went on constantly until Plaintiffs left, and others could pick up the harassment on Vellanti and Goldman's commands to continue to express great hatred for Plaintiffs, as these grudge holders are plentiful in this case and all joined in their attacks of Plaintiffs. There were many more outrageous and dangerous acts against Plaintiffs also.

54. **Defendant/Appellees Eventually Turned on Each Other:** Eventually, months after Plaintiffs had escaped from LHRVRC on September 16, 2021, Defendants turned on each other and reported each other to the police for many of these criminal acts as their blackmailing, turf war caused a meltdown amongst them without having one enemy they could rally around and attack (Plaintiffs), and all were trying to beat the others to tell their story their way to the police, to try to convict the others rather than have the truths about themselves come out. See Police Files/Reports, November 2021-February 2022 especially.

55. **To Harm Vellanti and Goldman Who Would Not Pay Stamm/Riha and others Blackmail Money Stamm/Riha turned over to Plaintiffs/Appellants About 2,000 multi-texts per Page Defense Group Texts to Each Other Talking about their Crimes, Torts and Wrongs they Perpetrated Against Plaintiffs that Plaintiffs Claimed in their Suit and More.:** Stamm and Riha were very upset, and acted as victims, but in actuality, they tried to blackmail Vellanti and

Goldman for money to keep quiet about all the crimes and wrongs that Vellanti and Goldman were involved in. Vellanti and Goldman were trying to do likewise to Stamm/Riha also. As a part of Stamm/Riha payback and vengeance against Vellanti and Goldman for not complying with the blackmail, they turned over to Plaintiffs about 2,000 pages of Defendant Group Texts, after Plaintiffs/Appellants filed their first, rushed complaint filing on March 17, 2021, that disclosed and admitted to the harms, crimes, wrongs they perpetrated against Plaintiffs/Appellants and much more.

56. Plaintiffs already hurriedly filed their first complaint in Common Pleas Court, so hired the Lanier Attorney, Michael Dodd (hereinafter, "Dodd"), late in the day on April 12, 2022, who was going to join the Lanier and Plaintiffs/Appellants cases, and made other agreements with all the litigants, including Plaintiffs to assure that Plaintiffs case would be pled with the new after-acquired evidence and that the cases would only be settled together or not at all, as Plaintiffs had the much stronger case and didn't want to be used to settle the other case and then be left on their own with part of their case and strategy exposed and compromised beyond what was necessary for the benefit of the other litigants. All litigants and the lawyer agreed to this stipulation.

57. **Plaintiffs/Appellants also filed Discovery earlier in the day on April 12, 2021, before hiring Dodd as their lawyer to make sure those answers were quickly returned before the Defendant story continued to change as that was Defendants M.O., and they altered and made-up evidence for presentation to State Actors, right in the Group Texts in order to completely change the narratives in spite of enormous amounts of evidence showing otherwise.**

58. RACKETEERING/Collusion was Discovered with the Plaintiffs/Appellant and Defense

lawyers and then with the Judges/Courts/State Actors and others in April 2023, and

November 2023 respectively, due to Defendant Group Texts admissions combined with

Bizarre Behavior by the Judges and others: In the time Plaintiffs were at LHRVRC, (June 30,

2021-September 16, 2021, *long before filing suit*, on March 17, 2022, the involvement of

Judges, lawyers/firms, Allianz, and others, through nepotism with the old Solicitor General

David Wagner (hereinafter, “Wagner”) and Defendant/Appellee Jennifer Burdette (hereinafter,

“Burdette”) became exposed¹² through Defendant Group Texts Plaintiffs received from two

Defendants, Stamm/Riha, admitting secret, unilateral meetings were taking place between

¹² Nepotism is one of the precipitating events that caused Sheriff Chuck Wright of Spartanburg to take a leave of absence while being investigated for all his crimes and those under him, going through the Sheriffs’ Office, where witnesses are claiming the government was acting like mafia against them. That is the LMCE and just the nepotism alone is investigation worthy because it became obvious, rather than the 20 years of mafia style operation being run through the Sheriffs’ Office. What Plaintiffs are claiming is not unusual in SC. Instead, it is unusual when the actions become public, and then are forced to be investigated (like Murdaugh, although the truth of the crimes of Murdaugh and the LMCE involvement has not been told to the people, and the appealable issues were provided to Murdaugh and his legislative and otherwise connected lawyers who are also a part of the LMCE). This investigation sounds very similar to Clerk of Court Loureena Thomason’s step grandfather, Duck Cooley, Anderson County Sheriff running a Cocaine operation out of the Sheriffs’ Office, for years, and elections being controlled by King Henry “Bud” Campbell, who was an extremely connected old world Aristocratic Campbell Family member, who was in cahoots with Sheriff Cooley and also running a car theft ring out of Michigan through relative Sosebee Auto Sales business in Anderson using Cooley’s new ownership of the business by Campbell setting up a marriage within the family blood line, to Sosebee’s niece, June Sosebee Cooley. Clerk Loureena Thomason, who is very involved as a RACKETEER in Plaintiffs/Appellants case, received the inheritance from these crimes and ill-gotten gain, and was appointed by the Governor, to the Clerk’s position to keep the government as insider traders, and keeping the money in the family. These aristocratic connections working together with government are not the exception, but are an extremely prevalent problem in SC who ignore and protect LMCE corruption, and create a closed system so that there is no way for the public to get justice in it (See Reuters Article on how hard it was to even crack open the Judicial Committee on Discipline to get statistics on Judicial misconduct and discipline in SC). The Murdaugh Country Old World Family/friends Dynasty and 100 plus years of SC turning its government head from the crimes, to allow such corruption to continue in SC at the expense of the People, is the rule that Plaintiffs/Appellants are trying to overcome in this matter. See Murdaugh Dynasty relation to Jefferson Davis, and also to Judge McIntosh through the Old World Varn connection. Corruption on any level needs rooted out and consequences should be extremely severe for any such breach of trust of the People and the heinous exploitation it perpetrates on the People. Plaintiffs/Appellants are suffering from and tired of the results of such illegal businesses running out of the Courthouse and the rest of the LMCE, under color of law, in both SC and in Virginia, as they have seen the exact same tricks in Virginia as they have through these RACKETEERING Judges and their RACKETEERING colleagues through the Old World First Families of Virginia (FFV), under color of law.

Defendants and the Common Pleas Court Judges, Solicitor General Wagner, the VSB/VAJudges, and others that would not have any reason to meet with Defendants, but for the nepotism and concern that Defendant/Appellee Burdette and fellow Defendants had committed crimes against Plaintiffs/Appellants, and needed help from State Actor friends to protect the criminals behavior against Plaintiffs and make sure Plaintiffs/Appellants didn't expose the LHRVRC illegal operations by presenting to the Magistrate or any other Court, all based on further harming Plaintiffs/Appellants and protecting Defendants through improper means.

59. Stamm/Riha giving these 2,000 pages of Defendant Group Texts to Plaintiffs/Appellants, proving what Plaintiffs had been claiming, and more, were giving in response to Defendant blackmailing attempts of other Defendants that did not work, intended to go on the attack before Stamm/Riha were blackmailed themselves, by Vellanti/Goldman and other Defendants, and claimed they wanted to help Plaintiffs/Appellants win their case, because Stamm/Riha were claiming they were also victimized by Vellanti and Goldman, when in fact, were providing the Defendant Group Texts to Plaintiffs out of spite against the other Defendants and to play the victim.

60. **At the time, Plaintiffs Still Didn't Understand the Meaning of Some of the Texts, until they Discovered Further Proof that Brought More Truths to Light About What Actually happened at LHRVRC that Caused Plaintiffs to be so Severely Attacked and Have to Save their own Lives from Extreme Danger They were Exposed to by these Irrational and Extremely Dangerous Defendants.** Burdette's Father, Jody McCuley, (hereinafter, "McCurley"), is a former Vice and Robbery Detective for Anderson County Sheriff's Department, who then became the Solicitor General's Private Investigator. McCurley wanted to protect his daughter from her own

criminal behavior and that of her friends/Defendants/Appellees. He was able to set up a secret, unilateral meeting between Burdette, several other Defendants, including Vellanti, Goldman, Stamm, Riha, Burdette and a few others, even though Plaintiffs/Appellants were not involved in criminal activity but were the recipients of it by Burdette and the others sued and more.

61. The Solicitor General does not meet with the public generally, but did so as a favor for McCurley, and they secretly and unilaterally met with Wagner, without Plaintiffs/Appellants knowledge.

62. McCurley told Goldman and Stamm he knew Judges and could get meetings for them with these Judges, and also was hired to find the “dirt” on Plaintiffs/Appellants, but could not and had to give Goldman most of her money back because he could not find “dirt” on Plaintiffs/Appellants to be used against them by Defendants in another blackmail scheme. This is in the Group Texts of Defendants/Appellees and disclosed in recorded Interviews and other discussions with Stamm/Riha, and the Burdettes.

63. **Wagner the Arranged More Secret, Unilateral Meetings Between the Judges of the 10th Circuit Common Pleas Court, the Virginia State Bar, some of the Allianz lawyers, Allianz and Defendants, 7 months or more BEFORE Plaintiffs case was ever filed in Common Pleas Courts and with No Crimes Plaintiffs Committed According to Police in Meetings Plaintiffs Since Had with them.** By now, the RACKETEERS had decided to implement their IRF/IF scheme with Allianz and needed the Defendants to do the dirty work to create either catastrophic injuries against Plaintiffs, or kill Plaintiffs outright, to create the claim Allianz needed to open the scam of IRF/IF. These secret, unilateral meetings with Defendants and the others were to figure out a

way to further harm and exploit Plaintiffs on an unlawful ejectment attempt where there were no crimes, wrongs nor laws broken, by Plaintiffs, but where Plaintiffs saw too much crime going on at LHRVRC, and where they were enemies of the LMCE for whistleblowing against it many years earlier as briefly described above with many more examples not given.

64. The VSB had not been in touch with Plaintiffs nor Plaintiffs with them for about 22 plus years, so their involvement had nothing to do with anything legal, yet they were part of the RACKETEERING that was developing in the LHRVRC case in Townville.

65. These secret, unilateral meetings led to the 10th Circuit Judges and Wagner to order the Sheriff's office to stand down any kind of protection of Plaintiffs and allow Defendants to attack them without protection from the police.

66. At the same time, the 10th Circuit Judges were telling the Magistrate Judge to stall and ignore any of Plaintiffs/Appellants issues, who had ordered LHRVRC to file for an ejectment, if Plaintiffs really didn't pay their rent, in spite of receipts paid timely and in full. This was to stall any proceedings that may come about that would help and protect Plaintiffs/Appellants and help them protect themselves and their property, while trying to sell, and so forth against the Defendant/Appellees, in a very incredible group of admissions by Defendants in their Group Texts they made to each other, and recorded interviews by some of the Defendants and witnesses, through Plaintiffs investigation before lawyers were involved, without any Discovery being granted by the Judges or pursued by their Attorney, when Plaintiffs had already filed the Discovery and just needed the answers to stop Defendants from changing the story and evidence.

67. All of these unilateral and secret meetings with Defendants and State Actors and others was long *before* Plaintiffs/Appellants even filed their suit in Common Pleas Court.

68. Further, the Common Pleas Judges called an unofficial meeting of Judges the week of September 7 and September 14, 2021, to further scheme Plaintiffs/Appellants demise, and cover only Plaintiffs situation where they decided to have the police work against the Constitution and justify Defendants/Appellees actions no matter what the facts just to harm Plaintiffs further and gain more revenge.

69. Defendants were by then creating and trying to find different reasons they could summarily eject Plaintiffs, since it was too obvious Plaintiffs/Appellants paid rent in full and timely each month, and were even due lot rent credits they didn't receive.

70. Defendants were continually making up more and different documents and narratives and destroying evidence to try to change the story about their attack on Plaintiffs/Appellants through their Group Texts, where they were admitting to everything Plaintiffs are claiming now and were claiming in the law suit, except Plaintiffs still didn't understand the full RACKETEERING in the underlying case that started even before Plaintiffs ever filed suit in Common Pleas Court. That would take more action on the part of the lawyers, and Judges and others to see clearly what those Group Texts meant.

71. Plaintiffs/Appellants private investigation and Burdette recorded interview, later admitted that these secret and unilateral favors for she and the other Defendants, happened and the government participants assured Defendants protection from any bad acts they perpetrated against Plaintiffs/Appellants, and encouraged them to do more of them, while the police stood down any assistance they would otherwise give.

72. In one interview Burdette threatened Plaintiffs/Appellants in this recorded interview also, that she would have this entire collusion with State Actors repeated again, and call on more favors from government nepotism, against Plaintiffs, if Plaintiffs didn't drop she and a few other Defendants from this suit (Burdette, Stamm, Riha, Grenier). **It's on tape and there is RACKETEERING with Judges presiding over their own liability and guilt and helping their fellow RACKETEERS who also got caught!** Burdette didn't mind if Plaintiffs sued LHRVRC, Vellanti, Goldman, Pellegrini, Maroto, Ferrendelli, and Carpenter, but the others had to be dropped or more RACKETEERING would surely occur and it certainly has in this case.

73. **Plaintiffs/Appellants Completely Pled many Causes of Action in their suit with Admissions by Defendants/Appellees Listed as Quoted Statements From Defendants in the complaints:** The Causes of Action Defendants admitted to in their Group Texts and otherwise, that Plaintiffs filed against Defendants, without understanding that there was RACKETEERING in this case with these same Judges and others, until later, include Causes of Action for: Breaches of Contracts; Breaches of Contracts by Fraudulent Acts; Fraudulent Inducement; Fraudulent Misrepresentation; Promissory Estoppel; Negligence/Gross Negligence; Negligence Per Se; Negligence/Gross Negligence in Hiring, Supervision/Training, Retention; Defamation Per Se; Defamation; Right to Privacy Causes of Action: Wrongful Publication Of Private Affairs (Wppa); Wrongful Intrusion Into Private Affairs (Wipa); Violation of the SC Unfair Trade Practices Act, SC CODE SECTION 39-5-10 ET SEQ. (SCUTPA); Vicarious Liability/Respondeat Superior; Unlawful Ouster/Retaliatory Conduct/Violation of SC Landlord Tenant Act/Wrongful Eviction; Civil Conspiracy; In the Alternative to Civil Conspiracy, Conversion; Piercing the Corporate Veil; and Abuse of Process. Plaintiffs used Defendant/Appellees own quotes from their Group Texts to

prove by admission that these laws were violated, and texts with dates, time, place and so forth were included in these facts discussed in the Fact section and in the Cause of Action section. Economic and Noneconomic Damages were demanded along with uncapped, partially capped and capped Punitive Damages with all proper language included to justify each.

74. Further, Plaintiffs not only won their underlying case several times, during Defenses' attempts to dismiss Plaintiffs/Appellants under SCRCF 12(b)(6), even though Plaintiffs pled more than a mere scintilla of evidence and all elements pled completely, with Defendants' quoted admissions, and other evidence, but Defendants defaulted on their answer several times, by not giving one, in their actual Responsive Pleadings they claimed they filed, and Plaintiffs filed proper Entries of Judgment several times based on these Defaults that the Judges continually ignored and lied about. Stamm/Riha defaulted by 3 months even though they were given 30 extra days by Plaintiffs to answer/motion.

75. Plaintiffs also filed a Motion for Judgment on the Pleadings recently, which was also ignored and then denied by Judge McIntosh who had already had an ex parte plan to dismiss Plaintiffs no matter what.

76. **Retaliation Against Plaintiffs by the Courts and VSB and others:** Whistle blowing is one of the hardest things and toughest choices one can do/make against a power system that has its tenacles firmly entrenched in money making and control of the populace to make even more money, through deception and otherwise, where the system will go to great lengths to retaliate against the whistleblower and save its system and status quo, maybe for the rest of the whistleblower's life, as in this case, as proven and seen herein and elsewhere. Dr. Kennedy was

promised by the VSB that she would never be able to do business again and they have done outrageous acts in the past, with this series of crime no different involving SC and VA LMCE.

77. The whistle blower commits professional suicide when he/she decides to stand up for what is right rather than join in with the system and be rewarded for selling ones soul to that system devoid of morals for the benefits it offers for this lifetime.

78. Dr. Kennedy and Dr. Fink whistle blew against the legal system because it was the right thing to do, and would not sell their souls for ill gotten gain against the people of the U.S. no matter what benefits they had to pass up.

79. However, to be sure, Dr. Kennedy and Dr. Fink didn't care about these little criminals in a campground, other than for the honest people stuck in the campground who also had permanent structures and were being threatened and for Plaintiffs/Appellants property and safety. Plaintiffs/Appellants made sure to help and protect the elderly and poor innocent people trapped in this environment, who had to keep their heads down or end up being bullied and stolen from also. Plaintiffs also did their best to protect themselves and their property until they could sell and leave.

80. Otherwise, they did not feel it was their job to stop the criminality at LHRVRC other than reporting to the Sheriff's Department (hereinafter, "police"), what was going on there because they were dragged into other people's issues, and had to protect Plaintiffs/Appellants and wanted to help the innocent in the community from great physical and emotional harm, and property damage all of which was being attacked by these Defendants in some of the most bizarre ways.

81. **Plaintiffs/Appellants Worked at and Quit LHRVRC:** Both Plaintiffs/Appellants worked for LHRVRC, in July 2021 and a portion of August 2021, but neither got paid nor received lot rent credits. They quit working at LHRVRC by about August 4, 2021, due to seeing too much insider corruption with the campground merely a front for illegal activities for all the Defendants and others also involved who were not identified at the time of filing this suit in March 17, 2022, and too numerous to learn of all of them at the time.

82. It was Dr. Kennedy who was just returning to physical action of any kind, at the end of June 2021, and so had to take life and physical activity very slowly, and needed to keep her cortisol levels (stress) very low for her best chance to fully heal from this deadly Cancer without its return.

83. How Dr. Kennedy or Dr. Fink have thereafter, EVER experienced any healing at all, for the last 4 years, due to not being able to live even a slightly low-stress life as a part of Dr. Kennedy and then Dr. Fink's healing regimens, while going through what is detailed herein and then Dr. Kennedy even being forced to repeatedly take Prednisone (steroids), a terrible drug to take if dealing with Cancer and cortisol, to keep her ADA qualifying hand/thumbs/arms/elbows (hereinafter, "limbs") swelling down and try to manage the pain with Prednisone, due to the Judges in the 10th Circuit insisting she and Dr. Fink experience extreme work overloads, well beyond a normal workload while receiving purposeful short-deadlines to increase the workload even more, along with Dr. Fink also, is a miracle in itself that neither are not dealing with even newer cancer now.

84. Little did Plaintiffs/Appellants know that their decision to try to get Dr. Kennedy healed, within a peaceful environment at LHRVRC for she and her dogs, out in nature, was about to

drive them into 4 plus years of horrifyingly wicked and extremely dangerous circumstances by the most narcissistic¹³ gangs of thieves and drug pushers/ manufacturers, sex traffickers, child abusers, and other very narcissistic types, which similar narcissistic behaviors Plaintiffs/Appellants had to fight against the 10th Circuit Courts, the lawyers/firms, Allianz, other State Actors from SC and VA, and others, who involved themselves in the underlying case for financial gain and personal vindictiveness, which problems started at LHRVRC with its criminally liable owner and employees running illegal, “rough” businesses through the campground that was to pass as a front, for even worse horrors, better described in summary in Plaintiffs approved Amended Complaints that related back.

85. Plaintiffs was very limited on discussing the full criminality of the Courts themselves, that were a part of the case and the outcome, with predetermined findings constantly being dodged by Plaintiffs, which experiences with Judges and others in a murder for hire plot against Plaintiffs/Appellants, was just as bad and dangerous as the underlying case of the 11 Defendants, as there was an entirely other narrative going on at the same time as Defendants/Appellees were ruthlessly attacking Plaintiffs/Appellants in the underlying case.

86. Much later in litigation, the 10th Circuit Court refused a Motion to consolidate or supplement an additional case against all of these additional obstructors of justice to include the Judges and other State Actors, Allianz and so forth, as described briefly herein, who

¹³ Plaintiffs use the word “narcissists” not as a medical diagnosis, which is called, “Narcissistic Personality Disorder” (referred to as NPD in the DSM-5-TR), which is the end of a long continuum of various, selfish characteristics of a person who is in love with himself, puts his needs first over anyone and everyone, likes to cause others to suffer pain to make himself feel or look superior, wears a personality mask to mimic or mirror others who he is trying to deceive, feels entitled to other peoples’ property and ideas, likes to cause arguments and triangulate arguments between others using deceptive stories to each making them upset at the others over false information, and so forth, which is a summary of characteristics of general narcissism without discussing an actual mental illness called NPD, which is not the issue in this matter and can only be determined by professionals who do diagnostic testing.

Plaintiffs learned by Defendants own Group Texts admissions, were involved with Defendants in the underlying case and *after*, as RACKETEERS in the underlying case and in the bizarre rulings and attempts to predetermine the outcome, while the Judges insisted on presiding over the case they were criminally involved in, doing a Murdaugh scam (IRF/IF), and making sure Plaintiffs/Appellants received no chance at justice nor even discovery or depositions that would cause the truth of the State Actors and other involvement in Plaintiffs underlying case for the State Actors and other Financial Gain and Vengeance to come out.

87. Even the Virginia State Bar (VSB, VAJudges) were involved, per the Group Texts and Defendant Appellee Goldman's own admissions in a text to Plaintiffs on March 30, 2022, at 4:21 a.m., after Plaintiffs/Appellants filed suit against Defendants/Appellees on March 17, 2022, to further try to intimidate Plaintiffs/Appellants to withdraw the suit.

88. This entire shame on the SC legal system was all so absurd and deadly for Plaintiffs/Appellants, and mirrored the Alex Murdaugh case and the immunity to punishment of the knowingly criminal Murdaugh Dynasty that made up its own law and received a blind eye from government for about 100 years or more until too many dead bodies could no longer be hidden by the LMCE they were/are a part of.

89. Plaintiffs have had to deal with the most concentrated and highly dangerous narcissistic beings, which can be found in these SC campgrounds, which criminals seem to be protected and connected to the SC Court System at times, when necessary or convenient, (and others jurisdictions also as needed), for the last 4 years, with repeated waves of continuous attacks from these Defendants and their colleagues recently, as these attacks are not over, even now.

90. The more recent attacks Plaintiffs/Appellants wrote about in their writings to the Court, appeared to be timed and coordinated when Plaintiffs were under the most pressure from the courts to produce massive amounts of work in very short periods of time and is not a coincidence, as one of the main perpetrators is a drunken, drug addict friend of McIntosh's where he did drugs and alcohol with this person according to the perpetrator.

91. Other criminal types, who were either at LHRVRC, but Plaintiffs could not identify them at the time of the filing of their suit, or were friends and colleagues of Defendants were also involved, and still are up to this day. Plaintiffs have been in great physical danger and needed to leave this other location recently, while trying to deal with the corrupt courts and their massive workload, and shortened time frame again, which has now brought this appeal.

92. What is being described herein is that these campground gangs, consisting of felons, ex-felons, drug addicts, drug lords, child targeting perverts, and many other types of criminal elements, seem to be protected and under the control of the LMCE when needed to do dirty work against a disfavored litigant, or a litigant who has something the Legal Machine Criminal Enterprise wants from the litigant, like in the Murdaugh case, where great amounts of money were stolen, and victims abused and separated from their claims with the help of Judge Mullen, Judge Odom and many others, which truths have never been told to the public to protect the Legal Machine Criminal Enterprise (LMCE) in SC. **Plaintiffs are experiencing the same situation, with Murdaugh trained legal personnel implementing Murdaugh Country schemes in the 10th Circuit and even now with colleagues of the 11 Defendants who could not be identified at the time due to sheer volume of the gang, but are presently attacking Plaintiffs again, with out the Anderson police taking serious action to stop them, AGAIN.**

93. It was going to be proven in Plaintiffs/Appellants underlying case, through Defendants own written words as admissions, that the Legal Machine Criminal Enterprise, to include the 10th Circuit Judges, recently retired Solicitor General David Wagner, and others, gave legal cover to these very dangerous and destructive “narcissistic type” Defendants in the underlying case, and thereafter, who many have dangerous Criminal records and propensities, who could all mutually then make illegal, and tax-free money, and destroy any enemies of the LMCE that can be exploited unless the exploited attempts are met with two hated Whistle blowers like Plaintiffs/Appellants, who could eventually see and understand and discover such state actor scams, and schemes taken against Plaintiffs/Appellants, with the help of small time criminals without conscience, by SC’s Legal Machine Criminal Enterprise, who was/is working in collusion with fellow RACKETEERS, to include the Virginia State Bar and VA Judges (“hereinafter, VSB” and “VAJudges” or just VA for Virginia), per Defendants written admissions and Goldman’s message to Plaintiffs/Appellants, and also through interviews with witnesses outside of the Court process since Plaintiffs were denied for three years, their Discovery/Deposition Requests.

94. Needless to say, Plaintiffs/Appellants concern over cortisol levels, and other intended Plaintiffs/Appellants focus on healing with proper regimens of nutrition and exercise became quickly obsolete and Plaintiffs/Appellants had to change their approach from healing to a fight or flight strategy, to save themselves and their property, increasing hormonal stress/cortisol to very high levels that has had to continue for 4 straight years and counting, plus Dr. Kennedy actually having to take Prednisone (steroids raising cortisol), repeatedly due to injuries sustained at the hands of the Judges, and being thoroughly punished by the LMCE that has brutalized Plaintiffs/Appellants trying to force them to give up and go away, and not expose the

LMCE or receive their full Award from Allianz, where the money is gone according to attorney Dodd. This is through bribes, admitted by some Defendants to keep them and hostile witnesses from siding any further with Plaintiffs/Appellants to get back at their fellow Defendants who were all involved in blackmailing of each other in a turf war for control of LHRVRC.

95. Between Vellanti and Goldman tracking Plaintiffs down after they left LHRVRC, causing more problems for Plaintiffs, as shown in their Defendant writings, which are admissions, to statements by witnesses, Plaintiffs focus on fight or flight survival started in 2021, by moving to this criminally saturated LHRVRC location that was permitted to exist by Judges and police, that was operating above the law, and continues to this day, no matter which campground Plaintiffs flee to in order to try to focus on healing, as these criminal types and their associations with each other operate as if from a gypsy scene in an old western, moving from old discovered locations to new locations to carry on the same criminal activity and scams with some of the same fellow criminals who follow them over, wherever they go, while picking up a few new recruits along the way who are equally devoid of any morals and want a piece of the action.

96. These SC campgrounds are in their own little world, usually with criminal type owners willing to collude with these criminal residents, and they have their own hierarchy of trouble-making, self-appointed leadership and control, blackmailing, bullying, and so forth, and holding some sort of financial or other reward/benefits for those who join them, much like a prison has its own unwritten prison-rules, no matter what the overall official state or federal prison rules and laws are, or what usually exists in a civilized society.

97. These SC campground types are often people who are not equipped nor want to be in a civilized society and prefer to rule their “subjects” by the rules of the jungle, with the assistance of the LMCE who uses them as needed for its own benefit, like in Plaintiffs/Appellants case, and like Murdaugh allegedly did with his criminal associations with other criminals, to be used as needed.
98. Plaintiffs/Appellants, who are used to living in civilized society and are law-abiding citizens with a conscience, have had to deal with these hordes from hell almost since arriving at SC, and eventually their Campgrounds and entering into the SC Courts as well, after first experiencing severe and continuous emotional and physical attacks from Defendants that almost ended their lives, **confirmed by Defendants own writings as admissions and witness testimony in Plaintiffs own investigations**, to include Defendant recorded statements, Defendants Group Texts to each other, and witness statements, regarding this case, as Plaintiffs were not able to get their own lawyer or the Court to make Defense turn over Discovery for three full years after Plaintiffs submitted them for timely and good faith answers. Plaintiffs case was dismissed on an alleged evidentiary hearing on 162 documents to be defended in writing with 20 pages to include exhibits, without any Discovery, Depositions, Subpoenas, Subpoena Duce Tecums, or witnesses. This was after Plaintiffs could not be dismissed on a 12b6, and Plaintiffs won their case several times on obvious and clear defaults, and on Plaintiffs Motion for Judgement on the Pleadings since Defense stonewalled for three years, without even doing Discovery or having a hearing until after Plaintiff fired their attorney and found out about the Defaults and other bad acts by the colluding attorneys.

99. Defendants were trying to poison Plaintiffs by using anti-freeze in their water lines, and then planning to use a 50 gallon tub of hydrochloric acid to dissolve the bodies documented in the Group Texts and elsewhere.

100. Defendants were using “skunk spray” a pet name for Defendant Jennifer Burdette, McCuley’s daughter, making her own hydrogen sulfide (hereinafter, H₂S) slurry, and putting it into Plaintiffs air ducts to poison them, with more formula ready to use again if needed. H₂S is deadly, especially in closed quarters and high heat, all documented in the Group Texts and elsewhere.

101. Plaintiffs/Appellants electric lines were purposely cut by “accident” in the record breaking heat of the summer of 2021, and Plaintiffs and their pets got very ill and Kennedy’s one dog especially experienced many seizures. Plaintiffs and pets got well only after leaving LHRVRC and thoroughly cleaning cracks and crevasses in the camper closets and other areas inside the air vents.

102. Defendants were looking for a criminal like Stamm’s son in-law, who wasn’t in prison yet, to kill Plaintiffs. They tried to hire M13, an international violent gang that was in SC at the time to kill Plaintiffs. They dreamed of watching the life squeezed out of Plaintiffs/Appellants, by strangulation and talked about dump sites, and so forth, all documented in the Group Texts and elsewhere.

103. Defendant Ray Grenier, (hereinafter, “Grenier”) was appointed to burn Plaintiffs/Appellants camper down with them in it, and all the Defendants and friends who continued to harass Plaintiffs/Appellants with one being the friend of McIntosh, attempted to burn down the camper with Plaintiffs/Appellants inside on September 15,

2021, which was caught on film and admitted to in recorded interviews of some Defendants through Plaintiffs own investigation. The friend of McIntosh threatened to burn down Plaintiffs property as late as January 2025, in helping continue to harass Plaintiffs as they were trying to respond to the most ridiculous Sua Sponte Motion for an Evidentiary Hearing without any extra evidence, all blocked by McIntosh, and with sanction threats for all the motions the Judges would never have heard, that were meritorious and meant to force the Courts and Defense to allow Plaintiffs to bring forth their claims in spite of the Stonewalling and Defense getting 6 months at a time to have continuances and time off by the Judges to draw the time out until Plaintiffs outspent their budget or got too tired or became hopeless in continuing a lost cause due to Obstruction of Justice by the RACKETEERS.

104. And then in the SC courts, Plaintiffs/Appellants experienced even more emotional and other attacks encouraged or brought about by these Judges Sua Sponte, and others' actions, where Plaintiffs were abused through admissions and dangerous acts of some of the friends and fellow perpetrators of Defendants, repeatedly caught on film in all of 2024 and 2025 and continuing.

105. Even after Plaintiffs/Appellants realized the RACKETEERING was going on in their case with the Judges and others, the Judges would not recuse and presided over their own wrong doing to protect themselves and fellow RACKETEERS, which meant they also had to protect Defendants at all costs, including giving bribes to them to gain cooperation.

106. This underlying case RACKETEERING was documented in the writings and statements of some of the Defendants, and thereafter, once Plaintiffs/Appellants started insisting on recusals and seeing that their case was eerily similarly to the Murdaugh case(s).

107. Plaintiffs finally able to put 2 plus 2 together, and see the RACKETTEERING for what it was, caused:

- a. Solicitor General at the time, David Wagner to suddenly announce his intention to retire (even from the bar, in one news article in 2023);
- b. Judge Maddox to announce his early retirement at the end of 2024, and that he would attempt to come back as a retired Judge with a pension thereafter. This was also just before Plaintiffs discovered his familial relationship to crooked Murdaugh Judge Carmen Mullen who assisted Murdaugh in separating litigants from their claims in the IRF schemes they were perpetrating against innocent the SC Public to steal awards, and was involved in numerous obstructions in saving pay to play Lawyer-Legislators and their contacts and so forth without punishment by the LMCE who covered for them. Plaintiffs noted the great similarity to Plaintiffs/Appellants case with the 10th Circuit Judges/lawyers/firms/Allianz and others acting similarly in the theft of Plaintiffs Award, and trying to separate Plaintiffs from their case, where most likely some money laundering occurred until they illegally settled the Lanier case, against their agreements not to settle but together, with Dodd convincing Lanier that

Plaintiffs were in cahoots with Defendant Goldman to double cross the Lanier, which is totally false;

- c. Judge Taylor to enter Plaintiffs case through illegal steering by Lawyer-Legislator Bamberg into Plaintiffs case, once Murdaugh similarities were being made by Plaintiffs, and then quickly fled the case to escape Plaintiffs questions about whether he was steered to Plaintiffs case and was he purposely trying to ruin Plaintiffs case in spite of the evidence. Bamberg was not involved in any way in Plaintiffs case, nor was he in oversight over these Judges in the 10th Circuit, but was involved in the fraudulent show trial in the Murdaugh case and was concerned about Plaintiffs seeing and understanding too much about what happened in Murdaugh as any lawyer in the know would see such obvious IRF;
- d. Cocky and deceitful Defense Attorney for MGC, Alan Jones to quit/get fired by MGC, as Defendants alleged lawyer in conflict, and last Plaintiffs looked he was no longer practicing law, but was working as a claims adjuster for an insurance carrier, after caught in collusion with Plaintiffs Attorney Michael Dodd on tape recording. Dodd allowed Jones and other attorneys later to ghost write Plaintiffs amended complaint to make sure it was watered down and easily dismissed when they wanted it to be. Dodd even told Plaintiffs that the Defense promised that even if the complaint was wrong, they would allow an amendment later, just to get a complaint filed. Plaintiffs said NO.
- e. Attorney Dodd to claim he was giving Plaintiffs good legal advice by insisting they drop Stamm/Riha who were two of the most liable Defendants, and who gave

Plaintiffs the Group Texts. By dropping them, it created empty chairs, a huge hole in the case, and would make it much harder to get them to authenticate their recorded statements and the Group Texts, which were the death blows against Defendants, and created a Motion for Judgment on the Pleadings if Defense continued to Stonewall when Plaintiffs were insisting that the exact quotes of the Defendants be used in the Causes of Action, rather than generalization, that could be dismissed with a hostile court or lazy, and sloppy...and colluding attorneys involved. Plaintiffs continued to tell Dodd he needed to learn the facts of the case, not realizing then that he was colluding with Defense, and they already defaulted on the case of Stamm/Riha, and needed Dodd to save them, which he did for two years, until Plaintiffs took back their case and fired Dodd.

- f. Dodd to make up other stories to create a fake crisis allegedly involving Plaintiffs, with the assistance of Defense, to help Dodd get out of the case at a critical time when Plaintiffs were forcing Dodd to actually file his first motions after two years of delay and bring forth the case, like it or not and do what was in Plaintiffs best interest.
 - i. Dodd agreed to write the pleadings to include the quotes, names, dates, places and times, that were being brought up as reasons to dismiss the case by Defense, but Dodd would not include them anyway.
 - ii. He instead turned over the writing of the amended complaint to Defense to secretly write a Defense friendly complaint that they could dismiss when they were ready to. Further, Dodd gave them all of Plaintiffs

evidence, attorney-client privilege, and work-product, while never pursuing Plaintiffs Answers to their Discovery they filed two years earlier just before hiring Dodd.

- iii. After Plaintiffs retold the facts in detail in a document, Dodd again allowed Defense to hack it and state untruths, and cut out the very information they were challenging in a Motion to Dismiss, in order to win the Motion with Dodd's cooperation.
- iv. When Dodd turned that document over for Plaintiffs approval, Plaintiffs got very upset because Dodd promised he would not hack the facts and just clean them up and combine sentences that need to be better presented but not to change facts because he did not know the facts.
- v. Dodd turned over this document claiming that was what Plaintiffs agreed to which was not true, in order to force Plaintiffs to have that dismissible document filed or he would withdraw.
- vi. Dodd did not know Plaintiffs were recording him and had all his commitments to write the complaint as described where he would not just hack the document that could be easily dismissed, even taking out quotes, names, dates, places and times of Defendants admissions, which were very powerful proofs in that they admitted to the Causes of Action in their own words.
- vii. When Dodd/Defense realized they were caught on recording, and Plaintiffs were not agreeing to a fraudulent withdrawal and wanted Dodd

to file a proper Amended Complaint, Motions to Compel Discovery, Motions to receive first available dates for depositions from key Defendants, and other important filings, (and then Plaintiffs were intending to finally fire him for collusion), Dodd stated he would schedule a hearing on the contest against his withdrawal.

- viii. Instead, Dodd/Defense secretly wrote a very harsh and damaging set of reasons Dodd had to withdraw due to Plaintiffs being unreasonable, as if Dodd colluding and being caught on tape was not reasonable.
- ix. Dodd/Defense went to see McIntosh instead of going in to schedule a hearing on the withdrawal contest, but McIntosh was on a vacation and his clerk Tammy Jennings was going to have McIntosh review the motion for withdrawal when he got back from vacation.
- x. Instead, Plaintiffs knew how slick Dodd was becoming, and how much he lied to them, so Plaintiffs called Tammy the Clerk and she learned for the first time that Plaintiffs were contesting the action and there was supposed to be a scheduled hearing on the matter. Tammy and Scheduling Clerk Elizabeth Beasley filed Dodd's private writing that Plaintiffs never saw before, making false claims against Plaintiffs as the reason for withdrawal with the help of Defense, and publicly filed this and Plaintiffs initial response to the frivolous and fraudulent Dodd/Defense filing to further try to shelve and destroy Plaintiffs meritorious case, as Plaintiffs would have to learn the procedure on such matters and write

more than they could in the time allotted to get all the documents written and filed they needed to finally get filed through stopping the Dodd/Defense Collusion.

- xi. Dodd, not realizing that Plaintiffs talked to Tammy and his fake reasons for withdrawal were now public record and Plaintiffs knew of the false claims he made, then wrote Plaintiffs a nice email claiming it was nobody's fault and that Plaintiffs had a very meritorious case, and so forth, but they just needed to part because Plaintiffs have a different strategy than Dodd. This was not only incorrect, but Dodd/Plaintiffs agreed to the strategy in detail before Plaintiffs hired him and it is a part of the contract for hire. So now Dodd had many inconsistent statements made about the reasons for withdrawal, that were lies on their face, since they could not all be true.
- xii. This contest went on for months, and meanwhile Dodd/Defense were getting Judicial permission to settle the Lanier case quickly, which was a very weak case dependent on Plaintiffs evidence. This case had been open and stonewalled since 11/17/21, with no discovery put out by Dodd for over two years also and him turning over Plaintiffs evidence without discovery requests to help the Laniers, when Plaintiffs could not get answers to their won Discovery for over two years at the time, all without permission and expressed refusal to agree by Plaintiffs.

- xiii. Plaintiffs Motioned the Court and demanded that all cases are stayed including Lanier's case, until Plaintiffs are heard on their attorney issue which had both cases in flux since ethically Dodd could not go against Plaintiffs to help the Laniers, as an ethical issue, and this was also the agreement reached by all before Plaintiffs would hire Dodd. Plaintiffs also fired for an evidentiary hearing on Allianz, what money they still had in their Insurance Accounts for these claims, what money was spent, and on whom, since bribes were already made according to recipients of the bribes, and a complete accounting of Allianz actions in these two cases. Further Plaintiffs demanded an account of who Defense attorneys were representing, as they already lied about their clients they were representing in the past and were caught. Plaintiffs were told by some Defendants that they were not being represented by the lawyers/firms, nor answering pro se, and didn't know anything about the lawyers although they were served the complaint properly by Plaintiffs, yet the lawyers were filing documents on their behalf allegedly which is improper and would cause another default with ethical violations also. See Stamm/Riha letter, (April 19, 2022, by Stamm/Riha, Pg 128).
- xiv. Dodd also refused to provide Plaintiffs with their file after many requests so Plaintiffs could get documents ready to file once Dodd was fired, since he was not looking out for Plaintiffs in any way during the wait, but just

trying to isolate Plaintiffs by getting rid of Plaintiffs witnesses one by one, including the Laniers.

- g. Dodd to break his agreement with Plaintiffs by intentional creation of chaos, at the end of May 2023, where the Motion to Amend filed May 5, 2023, which was already agreed to by Defense to relate back, (and just needed the Court to rubber stamp the agreement, from an April 5, 2023's Scheduling Order AND Order with all attorneys agreeing it was a good idea by all lawyers to allow a 2nd Amended Complaint by Plaintiffs, and the Order was signed by Sprouse). This was merely another stall tactic to make it look like their was a real case proceeding, until Plaintiffs were taking their case back through the actions described above, and were going to file their own Amended Complaint, not ghost written by Defense, and Plaintiffs would have the final say on what was in their own complaint, by their own hand, and so forth. Then the Defense, realizing the party was over, tried to undo their agreement to allow the amended complaint, that they were so agreeable the day before, when Dodd had the case, which amended complaint was approved back on April 5, 2023, and signed by all attorneys, now with the attorneys knowing Plaintiffs were not going to give them a watered down version of their complaint to have it easily dismiss in collusion with Defense. One would think defense lawyers would be glad that the opposing Plaintiffs' lawyer was off the case, because it would be easier to win without Plaintiffs attorney involved. In this case, Defense attorneys actions tell on themselves, because only after it was clear that Plaintiffs would have control of

their case, did Defense not want Plaintiffs to have any chance to amend, which are freely given by SCRC 15A anyway. this is a very telling reaction to Dodd being discovered to have colluded and there is more in the case where Defense is demanding Dodd stay on the case because they cannot win without him, in December 2023.

h. Defense to actually try to undo the April 5, 2023 agreement to amend and Order signed by Sprouse, that Defense made with Dodd.

1. This Attempt for Defense to undo the April 5, 2023 Order signed by Sprouse became a very desperate series of actions taken by Dodd/Defense to not allow an amending once Plaintiffs had taken over their case, through the frivolous motion for Dodd to try to secretly get McIntosh to grant his withdrawal by fraud.
2. On or about June 2, 2023, Defense filed a Motion to Dismiss a prior filing of the 1st Amended Complaint by Dodd, and to dismiss Dodd's Motion to Amend that they all agreed to by April 5, 2023's Order, with Defense claiming that the Motion to Amend that was due and filed timely, with Plaintiffs insistence on or about May 4-5, 2023, where Dodd was directed to write into the Motion to Amend, the agreement reached by he and Defense that they would not oppose the amended complaint being filed, and agreed that they would not oppose it relating back. Plaintiffs insisted that this language be included in this Motion to Amend, which Dodd

eventually wrote into the Motion in spite of trying to default beforehand.

3. Once Plaintiffs unofficially got their case back (although the official firing of Dodd took all of 2023 and into 2024), Defense, in June 2023, was then trying to undo their agreement of April 5, 2023, that Sprouse signed, which language was incorporated into the Motion to Amend also, filed in May 2023, had to be stopped by Defense to stop Plaintiffs from actually amending the complaint according to Plaintiffs best interest without the ghost writing by Defense.
4. The Argument Defense used to try to get the Dismissal of the Motion to Amend the Complaint and that it would relate back, which was already agreed up, was to now claim that Dodd did not comply with VIRGIN ISLAND CUSTOM when filing the Motion to Amend, which cannot be a more frivolous filing if Defense tried.
5. Yet the courts would not dismiss such a frivolous filing, as they were looking for any reason to dismiss Plaintiffs case. When Defense won on the Virgin Island claim, they were then going to dismiss Dodd's first Amended Complaint, in these bizarre attempts to dismiss the Motion to Amend to a 2nd Amended Complaint that Plaintiffs would have control over, since they knew Plaintiffs had stopped the collusion between the attorneys for good and that

their case was meritorious and that the Group Texts alone proved their case, in spite of all other evidence that also did so. To block Discovery, and get rid of any quotes and admissions by Defense was the way Defense was trying to win with the help of the Judges who were helping block discovery/depositions, and were going to grant frivolous and even bizarre motions like the Virgin Island defense, to assure a loss for Plaintiffs and saving the RACKETEERS.

- i. Dodd continuous lies about work he allegedly did and efforts he allegedly made which were all lies. Plaintiffs were also insisting on a Motion to Compel, two year old Discovery answers at the time, while Dodd continually claimed he was trying to get the Discovery. Finally, in mid-April 2023, Dodd was forced to write Defense and copy Plaintiffs where he admitted he had an agreement with Jones not to go after the Discovery, in spite of his stories of trying to get discovery and alleged agreements for Defense to turn over discovery, all that were not true and never happened. Dodd continually said that he can't make Defense turn over discovery if they didn't want to, which is obviously a bold face lie. Plaintiffs insisted on Deposition dates for key witnesses and Defendants that were bribed, and Plaintiffs knew they could cross up the Deponents and get the truth whether bribed or not, (but Dodd could or would not, and didn't even know the facts after two years, which was going to lead to his firing once he filed these documents), and Dodd was to file other motions stopping the stonewalling of the case that Dodd kept promising to file, but never did, while he was caught helping Defense

win the case, proven by his actions and Plaintiffs recordings of their discussions with Dodd way back at the beginning of his representation and ongoing, where he was showing signs of being lazy, ignorant or both, but actually was colluding.

- j. Once these Documents were written and filed, along with a comprehensive Amended Complaint not written by the Defense, Plaintiffs were going to fire Dodd and argue and depose others themselves as Dodd was not working for Plaintiffs best interest and didn't even understand the case.
- k. Defense to change course and attempt to openly try to keep Dodd on the case to help them win, which Plaintiffs have never seen or heard any such desperation before from Defense Attorneys;
- l. Defense Attorney Robert Deloach to abruptly leave the CCG firm, and this case abruptly, without notice after Plaintiffs found out his connections to the 10th Circuit Judges, and his aristocratic family connections to Murdaugh and his insiders, and so forth whose family Dynasty ruled SC, no matter the law;
- m. Other Defense Attorneys to quit abruptly after learning they were colluding and being discovered; caused Scheduling Clerk Elizabeth Beasley to quit/get fired after Plaintiffs/Appellants discovered and proved that she and Clerk of Courts, Loureena Thomason, were purposely hiding Orders from Plaintiffs and lying about sending Orders to Plaintiffs when they were proven wrong, to try to end Plaintiffs case by default, which actions and obstructions actually helped to get Plaintiffs case dismissed by unjust means and actions of the judges of the 10th Circuit using all these schemes against Plaintiffs, and there are many more.

108. Further, Plaintiffs learned that a number of these Judges/State Actors are related by aristocratic families, and many are Masons, and Lewis Masons which is not proper for SC Judges to be in male only groups, and have allegiances to group members first, by oath, with threats of terrible deaths if they disclose any of their secrets and associations, rather than follow their oath of office to the Constitution. More than one witnesses was willing to testify before a jury, but any less would compromise their safety for no good reason, but the Judges have been seen in meetings within their Temples doing strange and bizarre rituals and mantras, and so forth and having “unholy alliances” with other members bent on favoritism and insider favors for each other over what they would rule for the public.

109. Judge McIntosh is a childhood friend and family member with the Murdaughs through the aristocratic Varn family and cut his legal teeth learning how the practice is done through the Murdaugh Country ways, which are obviously not based in law or ethics, and is a part of the LMCE.

110. Sprouse and Stoudermire are also aristocratic forces through marriage and otherwise, which accounts for some of Sprouse’s favor within SC circles, as he is another part of the LMCE, who is another Lewis Mason.

111. Maddox is a Lewis Mason also, connected to the Murdaughs and David Wagners, who started doing favors for Defendants through McCurley and Defendant Burdette, and has more aristocratic family ties, that are a part of the LMCE.

112. These Judges, lawyers/firms, and other State Actors are connected to old world families who ruled the state long ago and still do, and almost all of them

trained/practiced at least for a time in Murdaugh Country, learning the ropes, where some clerked in Murdaugh Country and some practiced personal injury law or insurance defense, which is part of the Murdaugh scam and the scam being run in Plaintiffs/Appellants case, through Insurance Fraud and Insurance Reserve Fraud (IF/IRF).

113. Further, McIntosh wont allow suits or discovery/subpoenas etc., but tells Plaintiffs/Appellants to “prove it” in an Unconstitutional alleged evidentiary hearing for all the marbles, when not even Discovery or Depositions were allowed to occur first, and Summary Judgment attempted thereafter, and prove 162 issues or documents, in 20 pages to include exhibits, which is a covering for Defense winning Summary Judgment without Discovery being permitted, which is not according to any Rules of Civil Procedure and displays an incredible amount of procedural manipulation for a predetermined outcome illustrating the meaning of usurpation and arbitrary power used to sabotage a meritorious case that the Judges and others were criminally involved in long before the case was filed in circuit court. Several of the Judges/lawyers on the case are lodge members, and Deloach even clerked in the county, but all these issues have been kept secret from Plaintiffs and not denied when they are questioned, but they just say, “prove it” and then quash any evidence, subpoenas, witnesses, or discovery/depositions.

114. As this Court knows, McIntosh has already been fingered by other litigants as a fraudulent Judge hiding theft in probate/conservatorship/guardian cases also, with magistrate judges, and has even been involved with imprisoning a witness/journalist for

about 50 days without so much as a case number, and demanding a gag order on the journalist thereafter, who is reporting on such wrong doing.

115. The imprisonment was done without even paperwork, nor release papers that prove that this man was in jail at all.

116. The lady being the personal representative in the case above, was set up to be a criminal, through lies about her threatening the service of processor, which McIntosh tried to do in Plaintiffs case also, with three armed servers in a Defensive posture in three separate cars came unexpectedly to serve Plaintiffs documents from McIntosh's January surprise regarding this Unconstitutional Evidentiary hearing. Fortunately, Plaintiffs were not available but their security cameras caught the three officers in staggard positions to make it appear that Plaintiffs were two dangerous old ladies with Cancer and other physical health issues, looking for a fight, which is ludicrous.

117. It appears the 10th Circuit Judges try to create a conflict, usually of a violent nature, with their officers willing to lie for them and make fake claims against innocent people, to hi-jack the actual case, they are colluding in, that involves a large spoil for the victors...the Judges. Probate fraud is another huge area of fraud in the States including in SC. There is a name for some of these Judicial groups, they are called "Tomb Raiders, and have complete organizations ready to be hired to do such hi-jacking and stealing of the inheritance meant for members of the public, under color of law.

118. There is much more, but obviously there is a lot of smoke here. Personal Injury, and Probate/Conservatorships/Guardianships/Personal Representatives and more are some of the biggest cases with fraud built in to the case, for government run theft of

other people's money. Plaintiffs/Appellants case is classified in personal injury, and this journalist witnessing a case was a probate case, that Plaintiff Dr. Kennedy actually attended and witnessed rewritten transcripts due to all the illegal things Judge McIntosh was saying, that never made it into the record, conveniently.

119. This transcript changing is nothing new in the LMCE as Plaintiffs exposed this with the FBI assistance in the early 2,000. Sprouse and Maddox were also involved in the probate fraud case. The Transcripts were changed in Plaintiffs hearing on January 11, 2024, with Sprouse, and so was the Order, which does not comply with the Transcripts that were not changed, and the Order issued was clearly not written by a legal mind, but like a child, that of course favored Defense.

120. In regard to an enormous amount of reaction to Plaintiffs bringing forth this case and these accusations, according to Defendants own Group Texts and other admissions, long-standing VSB RACKETEERS from the VSB/VAJudges are also involved in this matter with these SC State Actors RACKETEERS and Allianz and others. Obviously the Virginian LMCE has a really long-standing grudge against Plaintiffs/Appellants after 20 plus years of Plaintiffs never having any contact with them at all. How is hat legal?

121. In addition to all the persons/parties suddenly leaving, quitting or being fired regarding this case, summarized above, the two RACKETEERS against Plaintiffs in the VSB many years ago, have been fired from their VSB jobs, and no longer have the same sway with the VSB, including the bar prosecutor who is now interestingly abusing litigants through personal injury representation without a conscience, and the VSB long-time Head of Ethics at the VSB, who was 69 years old, in September 2023, and still working as

the head of ethics, when Plaintiffs notified the VSB of their involvement in this matter and put the VSB on notice of all of their continued harassment of Plaintiffs and the barratry and champerty in this matter by the State through their representatives they can't or won't control. Within the month, the Head of Ethics for 30 years, suddenly at 69 years old, decided to quit his cush bar job, giving ethical advice to others, and go out on his own and start, a ...personal injury firm.

122. Leaving a cush job in a head position where everyone wants to hear his advice, doesn't happen to institutionalized lawyers like this. McCauley was fired and his replacement was already announced. These are a lot of firings and emergency vacating off the premises of their long-standing positions with the state of SC and their agents, and VA, while Plaintiffs/Appellants are exposing them as RACKETEERS in this case, with evidence, as they are steering Judges and being steered, and presiding over Plaintiffs very meritorious case, where they should be Defendants in a civil and criminal case, to make sure Defense wins without ever letting Plaintiffs even do Discovery after it was filed three years ago and stonewalled by the Court and all lawyers, including Plaintiffs subsequently hired and fired attorney, Dodd who as busy colluding his way to favor within the LMCE where he was outside looking in.

123. Up until mid-November of 2023, Plaintiffs had been trying to bring forth their very meritorious case against these underlying 11 Defendants for justice, while fighting off Dodd/Defense inappropriate alliances that were still happening as Plaintiffs could not get their claims against Dodd heard, in violation of an Order by Sprouse, June 9, 2023, (pgs 129-131 with McIntosh cancelling the October 12, 2023 hearing after Plaintiffs filed

a blockbuster, of a motion to expose the collusion of Dodd/Defense, with evidence ready to present at the hearing, not realizing yet that the Judges of the 10th Circuit, VA, David Wagner, Allianz and many others had been RACKETEERING in the underlying case against Plaintiffs with Defendants, 7 months or more *BEFORE* Plaintiffs ever filed suit in Common Pleas Court on the matter, documented by Defendants in writing as admissions, and in interviews, especially a taped interview with Jennifer Burdette who first set up these meetings through her connected father McCurley, for State Actors, VA State Actors, Allianz, and others financial and personal/vengeful gain.

124. Plaintiffs also learned that Defendants, through State Actors encouragement, was increasing the violence against Plaintiffs and hiring others to help them hurt or kill Plaintiffs/Appellants by these dangerous Defendants and their associates.

125. Some of these same people, are still attacking Plaintiffs emotionally and physically, as recently as this year, 2025, as illuded to in a brief or two by Plaintiffs/Appellants in 2024-25, to the Judges, reminding the Judges of their past behavior to get Defendant, criminal-types to do their dirty work for them against Plaintiffs, and Plaintiffs are seeing a rise in the same attacks by some of the same people that were involved at LHRVRC, and also by friends of the Defendants and McIntosh, who helped the State Actors steal Plaintiffs award from Allianz and more (Insurance Fraud), and is involved in the money launder portion of the scam through the Insurance Reserve Accounts of Allianz with Allianz's permission and participation (Insurance Fraud and Insurance Reserve Fraud IF/IRF).

126. Just like Murdaugh, Mullen, Odom, and others, not accused, but involved in the Murdaugh scams carried out for the LMCE, this is an important point in that the Judges in Plaintiffs/Appellants case are doing all they can to stop Plaintiffs/Appellants from even Discovering in their own case after three years of them stonewalling to keep Plaintiffs from learning anything, with lawyer collusion that was caught on legal recording by Plaintiffs/Appellants, and other bad acts by all of these state actors, Allianz and others, etc.

127. Plaintiffs/Appellants have recognized the similarities between these three entities, i.e., the Defendants, Murdaugh Country and the LMCE in that they all operate comfortably in the laws of the jungle and that the three are strikingly similar in how they twist truths, ignore the letter and/or the spirit of the law, are extremely manipulative that comes by nature and not just recently learned, are very oppressive and controlling no matter the law, are entitled, and lie more than tell the truth. They ignored the rights of others, to life, liberty and the pursuit of happiness/property, and don't acknowledge any legal rights the person being attacked would have in the Courts, all of which are trampled upon by these entities, and their symbiotic existence with one another, no matter what the law/rules state in a civilized society that law abiding citizens follow, but Defendants, Murdaugh and the RACKETEERS in Plaintiffs/Appellants case, do not, and use the color of law, or their associates with same to carry out these LMCE operations against innocent people.

128. Although the underlying facts of the case with Defendants have become less relevant now by opposition design to hi-jack Plaintiffs meritorious case into this

procedural manipulation and corruption and chaos that doesn't not keep focus on the meritorious case but on the muddy waters of those who could not win the case and can't allow Plaintiffs one bit of discovery, or question anyone under oath to save their scam, while presiding over the case. These extremely bizarre acts of the LMCE who will not do the right thing even when caught, Plaintiffs case is still meritorious and should have never been dismissed for any reason, and the judges should have never had many ex parte schemes to play out to make it look like Plaintiffs just lost their case, when they actually won it several times, but for the Judges won't enter the judgments and are presiding over their own guilt and liability without Micha Black stepping up to the plate as he MUST Do, or he is admitting he is another part of the LMCE, no matter what his back story claims to be.

129. Plaintiffs have many more horror stories of intentional acts by Sua sponte and ex parte judges creating the much needed predetermined outcome for themselves and their fellow RACKETEERS/LMCE, like ex parte hearings and rulings that Plaintiffs were never present nor noticed for on or off the record, 6 months of ex parte continuances granted to Defense until Maddox was able to retire on January 1, 2025, before they claimed an unheard of Unconstitutional evidentiary hearing on 162 issues/documents, with Plaintiffs having to explain the complaints that were already amended and already related back, and all the motions that the Court refused to acknowledge and told Beasley not to schedule a hearing for no matter what, all in 20 pages including exhibits, with no Discovery, refusing to acknowledge Motions to Enter Judgments for Plaintiffs on Default, Notices Sua Sponte to ignore the January 9, 2023 Order by a different Judge and

argue their entire 2 year old case at the time, while there was still an attorney on the case for Plaintiffs who openly was throwing the case and refusing to argue all but his withdrawal, and the Motion to Amend (which he would have argued wrong in order to get rid of the 2nd and 3rd Amended Complaints and Motions for more time to finish granted. McIntosh ignored all this to dismiss Plaintiffs and give a predetermined outcome to Defense. Due to the physical abuse Plaintiffs were taking causing them to get no sleep for about 18 of the 30 days given to prepare, and walking into the Court with 4 days of no sleep, Dr. Fink collapsed, with seizures right in the Courtroom and Dr. Kennedy wears protective sleeves and has to be on constant prednisone. Dr. Fink is now on seizure medicine for the first time ever due to the harsh behavior of a sadistic group of judges hiding their crimes and giving vengeance to those who do not lay down or bow their knee to corruption.

130. Plaintiffs were just getting out of the 12(b)(6) stage after three years of stonewalling by Defense/Judges, and where Defense couldn't stop defaulting long enough to have their Dismissal heard, which was fatally flawed on its face anyway.

131. Plaintiffs want their meritorious victories from the Appeals Court as any attempt to return this case to the same criminals that were already presiding over the case would be fruitless as they already showed their cards and should be removed from the bench and investigated and sent to hard time in prison for their dirty deeds. Plaintiffs are not the first. They are well-seasoned in what they are doing. It is second nature.

132. Plaintiffs need this extension of time and pages so Plaintiffs/Appellants can get justice finally, even with the chaos created by the incredible amount of obstruction of

justice from beginning to the end of this case, and then be on their way to other matters having nothing to do with these corrupt courts involved but in actually helping people live a better quality of life through the programs Plaintiffs have set up having nothing to do with legal battles, which seem useless to the otherwise rightful winner when the LMCE is ruling the law.

133. But this underlying facts of the case had to be the relevant factor in the case and of great importance, and by increasing time and pages to argue all these hi-jacking issues that led to a wrongful dismissal on fake and fraudulent grounds by the Judges RACKETEERING with the others, because the torts, crimes, and general story of the underlying case and 11 criminally dangerous Defendants/Appellees, which case Plaintiffs believed was the entire case, is proven in the pleadings, and meritorious and Plaintiffs already won. Further, Defendants and Defense/LMCE cannot be rewarded by acting so criminally to win a case for their own personal gain.

134. In an extreme outrageous act by the Court/Government, it has decided that it can keep Plaintiffs from filing anything against the Courts/Government in this matter even though they have hi-jacked the case. It is not only improper but despotic for a Government to refuse to “allow” a citizen of the U.S. to speak against Federal , State or Local Government in a Court document, where government is harming Plaintiffs by the actions they claim. So there are several motions and letters that are not filed in the record, and others taken out of the Court record illegally, because they are damaging truths against Government infringement on Plaintiffs Constitutional rights and the facts of this case they do not want anyone to know about. This is absolutely absurd and

Unconstitutional with the Government acting like the Devine Right of Kings, usurping their boundaries, and trampling on Plaintiffs rights. They are exercising Arbitrary Power which is also Unconstitutional, saying if they want to steal from litigants, under color of law, then Plaintiffs cannot speak against that or show that a Legal Machine Criminal Enterprise of these Government is in existence, showing RICO activity in SC Government. Any barring of same needs to have the Judges and others involved, removed from Government positions and imprisoned as criminals breaching the trust of the people and violating The People's Rights under same.

135. Lastly, in the unrecorded filing by Plaintiffs in regard to this ridiculous and Unconstitutional Evidentiary Hearing and Sanctions, Judge McIntosh was let loose from his controllers and put on paper the most unconscionable behavior and statements any person entrusted with guarding the law and making sure the people are being treated within the law could ever make. Plaintiffs leave his mockery, misogyny, name calling, defaming inuendo, childish behavior of a four year old, and making fun of Plaintiffs disabilities with some of his jokes being directed right at the disabilities he caused, and why he has to material to make fun of Plaintiffs in the first Place. He also shows that the RACKETEERING issues were his focus not anything to do with Plaintiffs meritorious case, and he dismissed Plaintiffs for on and off the field (court) activity. In the court, Plaintiffs reacted with medical issues, they could not control due to the Judges intentional and malicious causing of their injuries. Out of Court is none of his business, and if Plaintiffs agree to be interviewed by the person McIntosh imprisoned for 50 days without a case number, and then slapped a gag order on him so he could not report, and then Plaintiffs

went to the probate hearings that were at the bottom of all of this retaliation against the reporter, and saw exactly why McIntosh was having people arrested in unrelated matters, and creating a crime against the representative of the estate he and his colleagues were trying to isolate for themselves, that is not a reason he can use to find against Plaintiffs case, as Plaintiffs have the right to free speech, and association, and don't need his approval before reviewing public cases where there is much LMCE abuses that have not been exposed yet. Plaintiffs are not under any of the 10th Circuits' self-imposed Kingdom, and they need removal for acting as such, as they also believe they have a right to or can get away with stealing Plaintiffs/Appellants and others' awards and inheritances using the LMCE under color of law.

136. There is much more that was not even covered, that needs to be covered on appeal to describe how fully this case was never meant to be processed and State Actors and their agents, including Defendants did all they could to make sure it would never get past SCRCF 12(b)(6), and only the greed of the participating RACKETEERS to keep it going for a while, allowed Plaintiffs enough time to figure out what was really going on and expose it, thus far to a small audience, to give this Court ample time to correct its underlying and tell the LMCE to leave Plaintiffs/Appellants alone from here forward.

ARGUMENT FOR AN EXTENSION OF PAGES AND TIME

ADA REASONABLE ACCOMMODATION REQUESTS FOR A PAGE AND TIME EXTENSION

The ADA is a federal civil rights law that prohibits discrimination against people with disabilities in everyday activities. The ADA prohibits discrimination on the basis of disability just as other civil rights laws prohibit discrimination on the basis of race, color, sex, national origin,

age and religion. The ADA guarantees that people with disabilities have the same opportunities as everyone else to enjoy ...services, and participate in state and local government programs.”¹⁴

The ADA, Title II, also requires government agencies to comply with the ADA, to include the Courts, which the 10th Circuit has refused to even entertain the thought that they must not physically abuse Plaintiffs, ignore their qualifying disabilities, and then exploit Plaintiffs qualifying disabilities against them to frustrate Plaintiffs/Appellants purpose in bringing forth their meritorious case and violating their ADA Rights, due process and redress of grievances, and rights to free speech and rights to freedom of association, and to a receive a fair and impartial hearing, by neutral judges, along with other 1st, and 14th Amendments and other rights, including unalienable rights.

The ADA covers major life activities, including, but not limited to, performing manual tasks, seeing, hearing, sleeping walking, standing, lifting, bending, speaking, breathing, reading, concentrating, thinking, communicating and working as just a partial, illustrative list of major life activities that are covered under the ADA.

Plaintiffs/Appellants have qualifying age, and physical illnesses/injuries/handicaps/disabilities, that medically require more time and pages than would otherwise be necessary for them to need, had they not been dealing with ADA qualifying age/injuries/illnesses/physical medical conditions, including those inflicted upon them maliciously by the Judges to punish and weaken Plaintiffs ability to produce timely.

The most important of these qualifying disabilities because it kept Plaintiffs/Appellants

¹⁴ Introduction to the Americans with Disability Act, U.S. Department of Justice, Civil Rights Division, ada.gov, page one, paragraph one.

from as effectively seeing and writing documents in their case, which seeing and writing are essential life functions, and are major tools to use in bringing and winning a case. Mainly Judge McIntosh and Sprouse, but Maddox and Taylor also, were intentionally inflicting punishments involving Plaintiffs abilities to see and write their documents, which were proximately caused by the Common Pleas Circuit Court Judges involved in this underlying case, where these and other disabilities directly affected Plaintiffs/Appellants performance in reading a computer and/or phone screen for more than a short-period of time, and affected their writing, researching organizing and proof reading abilities, as described and are common sense skills litigants need to be affective in their own case.

Further, a physical impairment that substantially limits one or more major life activities, which is an actual or perceived disability, and a record of a disability are factors that support a disability, with both Plaintiffs having Cancer, including remissions, Genetic Kidney Stones, with Dr. Kennedy, Dr. Fink's past head injury that healed fully by the end of 2015, but was exacerbated by the heartless actions of these Judges who loaded down the Plaintiffs with Unconstitutional work and workloads and shorted the due dates, to sleep deprive Plaintiffs several times since their first time appearing before McIntosh on November 28, 2023, and continuing to the very end of that underlying debacle, that did not even resemble real court proceedings, and perpetrated against Plaintiffs as punishment for not giving up and calling out the RACKETEERS, and to weaken the target of their wrath so Plaintiffs would have a hard time producing maximum amounts of information in limited time, with the judges exploiting and continuing to punish Plaintiffs for not giving up on their meritorious case just because some bullies in the Courthouse say so and want to keep their award for themselves and fellow

RACKETEERS and not get caught acting criminally , along with other Murdaugh style crimes they are involved in, with cover from the LMCE.

Reasonable accommodations are required when requested to the court, as long as, they do not overly burden or create undue hardship in the matter. In the underlying situation these accommodation requests for reasonable time and workload, were more than reasonable but denied and most often just plain ignored.

In this court, Plaintiff good faith requests for more time and pages, are also very reasonable under the circumstances, and are not exposing anyone to under hardship like what happened to Plaintiffs/Appellants when their case was stonewalled for three years to begin with at no fault of their own, and with approval of the Judges helping lawyers do so.

Continuances, Expansions of time/pages and other such accommodations are the least intrusive of all ADA requests for accommodations in that they require no structural changes or special equipment to attain the reasonable accommodations requested, and the accommodations are very easy to grant and make great sense so Plaintiffs have a better chance to participate in the hearings through reasonable measures allowing plaintiffs time to respond and not overloading them with work to make it impossible to respond without incredible sleep deprivation resulting.

Even this brief is not organized and proof read as would normally be the case with Plaintiffs but for their disabilities which those acquired through judicial misconduct will take surgery to have a chance to heal.

Further, Dr. Kennedy had an three kidney stone at once emergency and could not get a continuance in spite of extreme pain and Hydronephrosis that caused the doctor to clear his

calendar for Dr. Kennedy to avoid permanent damage. Much later Maddox ruled on the matter while McIntosh refused to give a continuance to Dr. Kennedy but meanwhile, McIntosh signed Defenses continued requests for vacation time and other frivolous activities at the same time, that cannot reasonably and in good faith be measured against a medical emergency, and as a result where the aftermath of these destructive stones, is still affecting Plaintiffs kidney due to intentional court delays.

This is one of many examples of the open hostility McIntosh and the other Judges wanted Plaintiffs to know existed and that Plaintiffs/Appellants had no chance to a fair trial so they needed to give up or he would further physically harm them through denials or causation of physical pain, and he would continue to turn the Defendants and their associates on Plaintiffs for very dangerous attacks against them outside the court, just like in the underlying case, they would continue to make incredibly ridiculous rulings, and call surprise Sua sponte hearings designed to block Plaintiffs hearing of their issues, while dismissing Plaintiffs on the ex parte schemed plans of the Defense/Judges, would continue to sleep deprive Plaintiffs to an extraordinary degree causing injuries requiring surgery for Dr. Kennedy, and Dr. Fink to take seizure medicine for the first time in her life, at 75 year old, and even more, McIntosh denied Dr. Fink a day to get her hearing aids that had been ordered and were due to be delivered the next day which was a day after the first surprise Evidentiary hearing date that he Sua sponte to take Plaintiffs/Appellants by surprise with no time or pages to respond, and an unmanageably large workload intended not to be possible to complete.

McIntosh, who recently received his own hearing aid updates still couldn't hear in Court, didn't believe it was necessary for a litigant to hear the proceedings that would involve the wrongful dismissal of Dr. Fink's case. This is very sadistic of these Judges.

It is also incredibly obvious and extremely bias and misogynistic behavior enjoyed by judges practicing arbitrary power with no limit nor accountability, to an absurd degree, but these behaviors further, clearly explain the bullying and sadistic nature of the LMCE and what they are willing to do to steal from litigants in mass, and why the Murder-for-Hire of Defendants by these Judges and others is clearly related to their lust for money, vengeance, and complete oppressive control just like the slavery days. What they are involved in is totally believable once the case is fully described and the amount of incredibly devious and Unconstitutional acts they perpetrated upon Plaintiffs/Appellants, as these are ruthless Judges enjoying their belief that they are under the Devine Right of Kings doctrine because Judicial Immunity protects them, which is not true generally, nor in this case either where their actions in the underlying case where they had no jurisdiction but were acting for personal gain and financial benefit, are merely crimes, using the hitman (men) like any other aristocratic criminal might commit through others he hires or gives benefit to in underhanded and secret plots and plans that become exposed.

The ADA protects litigants from these very abuses by Judges and other personnel of the Court process.¹⁵ Further, Sleep Deprivation is inhumane according to the United Nations

¹⁵ ADA, Title II, prohibits discrimination against individuals with disabilities in public services and programs. It requires state and local governments to provide equal opportunities for individuals with disabilities to participate in all programs, services, and activities. This title ensures that public entities cannot deny access or provide different services to individuals with disabilities. Plaintiffs/Appellants have qualifying disabilities, supported by medical records and treatment, that the lower court purposely ignored no matter how much Plaintiffs/Appellants objected, and called Plaintiffs/Appellants liars and that their medical disabilities were shenanigans, and other such very

Human Rights Counsel which caused Plaintiffs/Appellants physical eye/limb injuries that were foreseeable and inflicted upon them intentionally and with malice by these ruthless judges with a purpose.¹⁶ (page 130-134, with Eye treatment by a specialist and all recommending surgery for limbs and eyes, and Dr. Fink also began taking seizure medication (per doctor's orders and is under a neurologist care, with report submitted to McIntosh, who for the first time asked for the medicals they were offering all along). McIntosh still calls Plaintiffs liars regarding their medical conditions.

Please see more specifics for Dr. Fink¹⁷, who is 75 years old, which in itself is a qualifying condition under the ADA and Age Discrimination. (Report filed with McIntosh)

derogatory names and ruthless actions, including making fun of Plaintiffs/Appellants in his writings and verbally. Title II mandates that state and local governments and their instrumentalities must provide equal access to their programs, services, and activities to people with disabilities. This not only includes physical accessibility but also extends to the policies, procedures, and practices that these public entities employ. Central to Title II are the modifications and exceptions, which delineate how public services should be adjusted to accommodate individuals with disabilities and under what conditions exceptions might be made. The 10th Circuit has no idea what Title II and the DOJ, have explained to assist Courts in complying with real life medical issues of some of the Public who will be seeking justice, and that "access to the Courts" does not merely mean having a ramp on the building, but the disabled person being able to participate under Due Process and Equal Protection, to Redress their Grievances in spite of their disabilities. Please see, **DEPARTMENT OF JUSTICE, 28 CFR Part 35, [CRT Docket No. 105; AG Order No. 3180– 2010], RIN 1190–AA46, Nondiscrimination on the Basis of Disability in State and Local Government Services, AGENCY:** Department of Justice, Civil Rights Division. **ACTION:** Final rule.

¹⁶ Human Rights Violations/weaponized Courts into Torture: It is important to note the extreme and punitive actions of the Judges who have weaponized this legal industry against Plaintiffs/Appellants and the severity and obvious intentions of such actions cannot be dismissed. Sleep Deprivation is used on the alleged terrorists by the U.S. Sleep Deprivation is recognized by the International Community/United Nations/Human Rights Commission, and in the Medical Industry as Cruel and Unusual Punishment, that even the Geneva Convention band.

The use of sleep deprivation has been recognized by the International Human Rights framework as a method of torture or cruel, inhumane, and degrading treatment or punishment, tidsskrift.dk. The U.S. has been condemned by the International Community for using such torture as cruel and inhuman punishment. Interestingly, the U.S. Courts, on several occasions characterize sleep deprivation as torture when inflicted by other countries, which is part of the reason so many want to avail themselves of the International Courts rather than the hypocritical and WEAPONIZED courts in the U.S., SC and other states Courts. Needless to say their involvement are unconscionable revelations that will shock the conscience of the public and the International United Nations Human Rights Commission who has already been very critical of the U.S. lack of redress of grievances for U.S. citizens.

¹⁷ Dr. Fink and sometimes both: without provided the entire Hippa list of Dr. Fink, 75 years old (age), has thyroid issues that affect her energy levels beyond one who just feels a little tired now and then, and both Plaintiffs/Appellants were greatly affected by Judge McIntosh and Sprouse, Clerk of Courts Loureena Thomason,

Please see Dr. Kennedy, who is 66, which in itself is a qualifying condition under the ADA and Age Discrimination. The ADA qualifying conditions and how the Court also intentionally and maliciously injured and punished the Plaintiffs/Appellants, for the Courts and its fellow RACKETEERS financial gain and vengeance, and because especially Dr. Kennedy is a long time whistleblower against the status quo legal machine and has tried to change the criminal enterprise into a more Public-friendly court system where all receive blind justice and free access to the Courts, as Constitutional rights should not only be for the affluent who can hire expensive lawyers and consider these expenses as a cost of doing business to win rather than equal justice for all, and where all litigants can stay in control and understand their case and status of same to protect their interests from agents and Courts with too much authority, due to the litigants ignorance, who then remains in the dark as to the litigants' rights and

and scheduling Clerk Elizabeth Beasley's consistent and intentional attempts to short date due dates, and for the Judges and their agents to create large volumes of ex parte discussed material to be heard that caused Fink and Kennedy to pull enormous numbers of all-nighters within that short period of time, to the point that Plaintiffs lost their ability to see computer and phone screens for any length of time, or to type more than a very few hours spread out each day. Toward the end of the period of scheduling the hearing, Plaintiffs/Appellants each had to pull three-all nighters in a row, and go into Court working on their 4th day in a row with no sleep, in order to try to defeat Predetermined outcomes for Defense, by the court using procedural manipulation that made it impossible for Plaintiffs to keep their extremely meritorious case, properly pled from being dismissed anyway, on fatally flawed Defense motions, with the help of Plaintiffs own lawyer, who was assisting Defense also. Fink developed seizures from lack of sleep that the doctors stated was probably due to lack of sleep during these all-nighter extravaganzas to beat deadlines so they would not lose their meritorious case based on deceptions and Court procedural manipulation and playing with timelines and keeping away Orders, and has been on medication and in testing for other possibilities since November 28, 2023 and medication since January 2025 because the Courts continue to cause Plaintiffs/Appellants to be extremely sleep deprived to try to stop the predetermined outcome for Defense through sua sponte actions, where Judges are the Judges, prosecutors, moving party, defendants, investigators, and jury. This is explained herein. Not until the last medical event caused by the Judges short dating and work load, did McIntosh agree to receive medical documentation. McIntosh stated he believed Plaintiffs were making up medical conditions, that could clearly be seen objectively and from medical history from Dr. Fink and Dr. Kennedy's medical reports. These "shenanigans" McIntosh referred them as, were part of the reason McIntosh dismissed Plaintiffs case on an Unconstitutional Evidentiary hearing and sanctioned them also. The other reason was because they were reporting and observing another troubling case McIntosh was handling in a Probate fraud case involving other Unconstitutional actions by McIntosh. Both reasons McIntosh gave are Unconstitutional reasons to cause Plaintiffs to lose their case, and are clear violations of the law/Constitution, for which none of these Judges have any respect.

responsibilities and can easily lose due to that ignorance and not holding the government system accountable.

Further, her work on Federal Matters of concern to the public who are often kept in the dark and lied to, were areas of law that Dr. Kennedy refused to ignore and represented unfavored whistleblowers who had rights, and were heroes in the U.S. deserving of Dr. Kennedy's best efforts. This caused Dr. Kennedy to also be an unfavored whistleblower herself, but it was right to do and Dr. Kennedy answers to God, not a system that promote a go along to get along mentality in its LMCE, that Dr. Kennedy and Dr. Fink want nothing to do with.

Dr. Kennedy, who is 66, which is another qualifying condition under the ADA, also was discriminated and abused by the Courts to make sure the Plaintiffs had no chance of winning.¹⁸

¹⁸ Dr. Kennedy and sometimes both: Again, without disclosing too much Hippa information, Dr. Kennedy likewise is elderly, 66, (age is protected by the ADA, and Aged Discrimination Laws), is still trying to recovery from what became end-stage cancer by time surgery occurred here in SC, which is why Plaintiffs are even in SC at all...for the unique surgery and treatment plan. They have been stuck here ever since due to these bad faith Defendants, Judges, Lawyers, and so many others who have RACKETEERED against Plaintiffs and their meritorious case that exposes much more than 11 Defendants listed on the underlying suit, with evidence, as will be seen herein and in their briefs. Dr. Kennedy, who does not take blood transfusions, lost a lot of blood during the surgery, which affected her instant recall ability, where she needed to retrained herself, as she healed, and also had two serious head injuries in 2020, and in 2023, that she was recovering from and trying to get her thoughts reorganized for instant recall again also. Dr. Kennedy did not lose her memory or reasoning skills as she is very logical still, but could not quickly bring forward memories, thoughts and associations of thoughts together without taking more time to organize them, and this instant recall, had to be retrained, and therefore Dr. Kennedy will take longer to organize and write and then reorganize that is most likely enhanced by aging, which is also ADA protected. Further, Dr. Kennedy has genetic kidney stone disease and each time it became an issue, Kennedy could provide the scans to show the stone was present and usually blocking the kidney causing Hydronephrosis, which can end in the kidney being useless in the future and if so, they must be removed quickly to save the kidney. Not until the last medical event caused by the Judges short dating and work load, did McIntosh agree to receive medical documentation. McIntosh stated he believed Plaintiffs were making up medical conditions, that could clearly be seen objectively and from medical history from Dr. Fink and Dr. Kennedy's medical reports. These "shenanigans" as McIntosh referred to them, were part of the reason McIntosh dismissed Plaintiffs case on an Unconstitutional Evidentiary hearing and sanctioned them also. The other reason was because they were reporting and observing another troubling case McIntosh was handling in a Probate fraud case involving other Unconstitutional actions by McIntosh. Both reasons McIntosh gave are Unconstitutional reasons to cause Plaintiffs to lose their case, and are clear violations of the law/Constitution, for which none of these Judges have any respect.

Please see Plaintiffs/Appellants best efforts as to how to file the suit, how to try to get justice and how they expect to get complete justice on Appeal now.¹⁹

¹⁹ Plaintiffs handicap approach to filings suit and receiving justice finally on Appeal: Dr. Kennedy and Dr. Fink are writing jointly as in the underlying case, by both putting their thoughts down on paper as they come to mind, and then have to take much more time organizing and reorganizing these writings into what they need to submit with the elements and other laws in mind and then attach evidence. When not given time like with what happened with the lower court, who does this to other pro se litigants also, along with Plaintiffs/Appellants not being able to see computer screens for long periods of time, or write for long, due to the Courts intentional and malicious bad acts causing eye, limb physical damage, as described herein and on appeal with Plaintiffs/Appellants having to be on the computers nonstop for days at a time with no or limited breaks, Plaintiffs are at an extreme disadvantage. Plaintiffs breaks during these times were measured in minutes and not by sleeping, causing Dr. Kennedy and Dr. Fink to be at an extreme disadvantage, as they eventually just have to turn in what they have written, organized or not, attachments or not, by the Unconstitutional short deadlines intentionally given by the Court, knowing that most likely these intentional and malicious acts will cause Plaintiffs to experience a medical emergency, rather than providing a work that they believe would be their true and complete argument to put their best efforts forward and be able to argue unhindered. In spite of these sadistic acts by the Court and its agents, Plaintiffs still beat Defendants by law several times, but for the Court ignoring same, and their Complaints could not be dismissed by Defense even with great assistance from the Judges and their procedural manipulations to gift the predetermined outcome to Defense at each hearing as described on Appeal. McIntosh, Sprouse, Maddox and Taylor intentionally caused Plaintiffs injuries to their eyes, and arms/hands/thumbs, etc., and Dr. Fink's seizures due to overwork and sleep deprivation that rises to torture by the American medical profession and the United Nations Human Rights Counsel, and even the Geneva Convention, and then when Plaintiffs would not give up, called an unprecedented Evidentiary Hearing with Sanctions attached against Plaintiffs sua sponte, with impossible times and limits once again to be ready, that were not Constitutional on many grounds. This sua sponte act was another ex parte planned gift to Defense who took 6 ex parte months off before McIntosh called for the surprise Evidentiary hearing, which was merely a cloaked summary judgment for Defendants, who never provided Plaintiffs any discovery answers, refused to give depositions, and so forth, and did no discovery themselves for the entire three years. Plaintiffs had to "prove" their case, even though they just got past the motion to dismiss attempts and filed for entries of Judgment on several defaults and a Motion for Judgment on the Pleadings, all with no discovery given, nor depositions permitted nor witnesses called for Plaintiffs, and the courts finally found an illegal way to gift Plaintiffs meritorious case to Defense, who already repeatedly lost and who could not have an evidentiary hearing based on the SCRCF.

Further, the injuries Plaintiffs sustained at the hands of the colluding RACKETEERS presiding over and participating in Plaintiffs/Appellants case, which system Plaintiffs refer to as the Legal Machine Criminal Enterprise, (hereinafter, "LMCE"), made it further impossible for Plaintiffs to write and see/proof their documents, which McIntosh then made fun of their disabilities to attempt to add salt to the wounds the Court intentionally created and then exploited for their side to win by Unconstitutional exploitation for profit...and the Court did have a side. Further, beyond the 10th Circuit Court not in any way being honest, they are also not compliant with ADA Title II laws, other than they have a physical ramp in the front of the building and handicapped parking/elevator. They are extremely deficient in compliance, understanding, and sensitivity to the needs of the Disabled and make fun of and exploit the Disabled like children in elementary school might before they are taught better. The LMCE Court exploited Plaintiffs case and had financial and personal interests in the outcome as will be discussed that make this entire process a farce and incredibly corrupt and Plaintiffs/Appellants are demanding that this case be overturned, and Entry of Judgement be granted IN FULL to Plaintiffs so they do not have to sue the state/courts in Federal Court also. Not until the last medical event caused by the Judges short dating and workload, did McIntosh agree to receive medical documentation. McIntosh stated he believed Plaintiffs were making up medical conditions, that could clearly be seen objectively and from medical history from Dr. Fink and Dr. Kennedy's medical reports. These "shenanigans" McIntosh referred them as, were part of the reason McIntosh dismissed Plaintiffs case on an

Giving ruthless and immoral Judges this kind of usurpation and arbitrary power without real oversight is totally Unconstitutional and ruthless, and null and void, and Repugnant to the Constitution. Their intentional hi-jacking of Plaintiffs case has created many more issues that must be addressed that should have nothing to do with a case brought to the court for hearing on those facts and a jury trial, but for such criminality involved her. Therefore Plaintiffs request an increase of 200 pages and 2x's the time required to produce or answer writings or performances of any type to include the Determination of Matters, building and filing the record, and documents that must refer to the record, which are all reliant on eyes, hands, and are very time consuming. Plaintiffs/Appellants also request the court stay open in case they get close to a deadline and cannot finish in time.

**OTHER REASONS PLAINTIFFS/APPELLANTS SHOULD BE GRANTED
MORE PAGES AND MORE TIME TO PREPARE IN ALL ACTIONS REQUIRED**

Four Years of Plaintiffs/Appellants lives from 2021 to the present and continuing, have been stolen from them by bad acts and sheer greed from Defendants that are documented in their own writings, and then the shenanigans of the Legal System and its LMCE, which for reasons stated herein and on appeal, can't allow Plaintiffs/Appellants to win, that are a part of the financial interests and other personal vengeance reasons that the 10th Circuit Common

Unconstitutional Evidentiary hearing and sanctioned them also. The other reason was because they were reporting and observing another troubling case McIntosh was handling in a Probate fraud case involving other Unconstitutional actions by McIntosh. Both reasons McIntosh gave are Unconstitutional reasons to cause Plaintiffs to lose their case, and are clear violations of the law/Constitution, for which none of these Judges have any respect.

Pleas Judges and other State Actors, and Allianz, and all lawyers²⁰ involved had a part, which was discovered by Plaintiffs long after Plaintiffs/Appellants filed suit on March 17, 2022, Pro Se against 11 soon to be identifiable Defendants, but there were many more not identifiable at the time.

In addition to the ADA reasons for granting Plaintiffs request for Justice, by expansion of pages and time, Plaintiffs/Appellants also make demand in accordance with Rule 208(5), of the Appellate Rules of Procedure, SCACR stating, “[o]n motion, the appellate court may grant a party permission to exceed those [page] limitations” and Plaintiffs/Appellants, and provide same below. Further, Rule 240, grants this Court authority to expand time for Plaintiffs for the above reasons, involving the ADA matters, especially the Court created injuries that caused great detriment to Plaintiffs in bringing forth their case, and for other good cause shown, which include, but are not limited to, the following reasons given below, that should be somewhat clear from the summary of illustrative facts stated above.

It is said that if a lawyer has favorable facts but not law in his case, then the lawyer is to argue the facts, and if a lawyer has favorable law and not facts, then the lawyer is to argue the law. However, Plaintiffs/Appellants have made up a third prospect, that should never happen if the rules, Canons/Ethics, laws, to include the Constitution, are followed and honored per the oath of government servants.²¹ That is that if a lawyer does not have either favorable facts nor

²⁰ Plaintiffs/Appellants hired their lawyer, Michael Dodd (hereinafter, “Dodd” or “Plaintiffs/Appellants lawyer”), the Dodd Law Firm, shortly after filing suit hastily and right after they filed their Discovery Requests to Defendants to nail down one story even if not true on April 12, 2022 so Plaintiffs/Appellants could heal from Cancer and extremely violent abuse by Defendants.

²¹ If a judicial opinion is law, like McIntosh is trying to claim through usurpation and arbitrary power, we don’t actually have a Constitution. That’s the warning the People received from Lysander Spooner. He made five key points to this warning: 1) the idea that a judicial opinion is law because it is a judicial opinion is the definition of

the law then if his goal is to win at any costs anyway, he must engage in Unconstitutional and unethical trickery, deceit and be assisted in blurring any checks and balances by other State Actors presiding, to create chaos in the underlying meritorious case at hand, to hi-jack it so the litigant with the law and facts on his side can't win, and instead, the lawyer (and in this case many state actors and lawyers and others) creates an entirely irrelevant and new set of issues and narratives that will keep the honorable litigant with favorable facts and law from arguing his meritorious narrative regarding what really happened in the underlying case and what the evidence and facts/law proves, that would give the honest litigant a well-deserved win by fair and just processes and well established procedures on the part of all parties, lawyers, and Judges and their agents who would be playing by the rules.

To receive this fair and impartial hearing/trial, the participants are Constitutionally bound by their Oaths, to respect the Constitutional process that the law mandates we ALL follow, as the Rule of Law in the land and the process would allow NOBODY to act above the Law and no court to rationalize ways that it can act beyond what the Constitution grants him.

The repeated claim by our National, State and Local leaders that we operate under the Rule of Law repeated almost daily on the news regarding American Jurisprudence was entirely ignored in this underlying case by the Judges, all lawyers, State Actors involved, agents of the

tyranny; 2) instead, the Constitution is Supreme Law not the opinions by anyone; 3) Judicial Opinions are binding when they are in accordance with the Constitution itself; 4) Every level of government, Federal, State and Local all take an Oath to uphold the Constitution not to the opinions of the Constitution; 5) Refusal to enforce Unconstitutional Acts, no matter by whom, including judicial actions, isn't just a good idea, its required by those who took the oath, to include the 10th Circuit Judges who by Constitutional Law, must refuse to act as they did, and must inform the authorities of those who were acting criminally. The same obligation is on the lawers and their firms. Not taking their Constitutional Oath seriously is treasonous. Taking other oaths like that to the Masons, is equally tyranny. "An unconstitutional judicial decision is no more binding than an unconstitutional legislative act." An essay for "Fugitive Slaves", 1850.

court, Allianz and others, making Plaintiffs/Appellants have to deal with all these other bad faith and criminal liable issues and trickery by the opposition representatives and agents, including extremely criminal and incredibly biased judges with interests, and those inappropriately helping them and vis versa, against the rules, ethics, Canons, laws, Constitution and so forth, that have hi-jacked and dismissed Plaintiffs meritorious case that Defendants could not win due to them not having the law or facts on their side, and proven by much evidence including their own written admissions in other documents (Group Texts) Plaintiffs were able to attain without benefit of Discovery all blocked by the Court for three plus years. Many of these admissions are written into the complaint and raise reasonable questions for a jury to determine, and give more than a scintilla of evidence. Further, because Defense ignored this, and defaulted repeatedly, and Plaintiffs also filed a Motion for Judgment on the Pleadings after Defense and Court three years of stonewalling, Plaintiffs won this case repeatedly, but for Judges to refuse to acknowledge same.

The Courts finally had to completely step in for the lawyers who repeatedly defaulted on the case, including Plaintiffs colluding lawyer who was eventually fired, to Sua sponte create a new and Unconstitutional reason to dismiss Plaintiffs after another court permitted 6 month stonewalling of Plaintiffs case, due to ex parte plans by the Judges and lawyers on how to dismiss Plaintiffs without using the Rules of Civil Procedure except through Unconstitutional manipulation and not letting Plaintiffs finally receive Discovery answers and Depose very loud Defendants, who lack discretion and could never hide the crimes Plaintiffs have claimed occurred with admissions from Group Texts and recorded and other interviews they did with

Defendants and hostile witnesses while they were all at odds with each other, and before they were bribed by Allianz/Defense attorneys (claimed by some Defendants)

Because of this hi-jacking and unlawful RACKETEERING dismissal, Plaintiffs must appeal all these extra issues of procedural and substantive due process manipulation, due to this third prong of what to do when the lawyers have no law or fact on their side, and there has been secret and unilateral meetings between the 10th Circuit Common Pleas Judges, the Virginia State Bar personnel, criminal-type Defendants, with some serious criminal records, and Allianz, and others listed in the written and spoken word of Defendants, meeting through nepotism with a Defendant, at least 7 months **BEFORE** Plaintiffs ever even filed the suit in question in Common Pleas Court on the matters being appealed.

Plaintiffs had no knowledge of such meetings and goals of this RACKETEERING operation as they were being viciously attacked by Defendants in the underlying case, and attempts to murder them were being made and attempted against Plaintiffs.

When Plaintiffs filed their initial suit, they did not understand these meetings were taking place nor why they would take place, nor did they realize there were financial and vengeful reasons for all of these shenanigans by the Court, lawyers, the Virginia State Bar/Judges, and others in a RACKETEERING scheme against whistle blowing Plaintiffs who practiced law in Virginia until about 22 plus years ago for Dr. Kennedy and 15 years ago for Dr. Fink and are long-time legal reformers and past leaders of the move to simplify the Court process and improve access to the courts for the People. Plaintiffs thought it was Plaintiffs v. 11 LHRVRC Defendants and that is how they initially filed their case.

So, Plaintiffs obviously need more pages and more time to address all of these crazy and criminal activities of all of these RACKETEERS, over the past three years, that directly affected every part of their attempt to get justice in the 10th Circuit Common Pleas Courts, where these same judges were insisting on presiding over Plaintiffs case they were involved in already, and would not recuse and the lawyers would not disqualify in spite of many other bizarre activities by them beyond even this portion of the RACKETEERING that affected Plaintiffs case, only touched upon in the fact summary.

Plaintiffs reported this to the Judicial Committee on Discipline, the Bar, the Legislature, the Judicial Merit Committee and so forth, the Legislators, the Senators, the Governor, the Attorney General, demanded meetings with David Wagner who refused saying they could not meet with the public, but yet, met with Burdette and Defendants repeatedly and got them to the Judges in the 10th Circuit for no legal reason as this was long before Plaintiffs filed suit, and the only issue was that Plaintiffs paid rent and Defendants didn't want those not involved in the crimes to know what they were up to. Since then Micha Black has been called out as has Sheriff McBride and others to move against these criminals and start an investigation, but have remained silent. SLED also will not discuss matters with the public, but only the law enforcement arm can prompt them to act, whether honestly or like they did with Murdaugh.

Not one of them were going to go against the LMCE and many are a part Plaintiffs would conclude as their educated guess, as what Plaintiffs described can't happen if anybody was really hold others accountable. Plaintiffs even had to fight off Lawyer-Legislator Justin Bamberg (hereinafter, "Bamberg"), for steering Judge Taylor onto Plaintiffs case to try to get rid of it, that didn't work.

Why Bamberg? He wasn't a part of Plaintiffs case, as seen from the human eye.

Because Plaintiffs case was being compared to the Murdaugh Family crime cases with colluding Aristocrats who are all a part of the LMCE, regarding the well-known crime of Insurance Reserve Fraud/Insurance Fraud (hereinafter, "IRF/IF"), where Bamberg was in a position in the Murdaugh case to be a part of that crime, and his office knows this crime exists as does the FBI.

Only the public is not well versed on what insurance reserve fraud is. Dr. Kennedy has taught on this criminal scheme where government theft exploits injured persons like what happened to the Murdaugh crime victims, with collusion with the carrier, firms and so forth, and the LMCE covers up the crimes, much like what is happening in the Murdaugh case now. Then the LMCE gives a show trial when the public demands answers, and they have a Clerk of Court or another insider purposely providing appealable issues, like Clerk Beck Hill who is actually Beck "Heir" Hill, a relative of Murdaugh, whose grand parents bribed and threatened witnesses, and the jury to get Buster Murdaugh out of his criminal corruption prosecution in 1956, while Becky Hill has claimed she never knew Murdaugh until 2008. Generational Aristocratic family/friends helping each other keep control of the peasants with the lie of freedom the peasants chase like a horse to a carrot. These "aristocratic" families from the "old world" go way back and run the present system still, just like the Murdaugh Country laws ran Murdaugh Country, where not one Judge/Prosecutor put the Murdaugh crime family in jail for 100 years or more knowing what they were doing was extremely corrupt and illegal in the LMCE.

Plaintiffs have done genealogies and group membership studies on all these judges and other players involved and see that McIntosh is actually family with Murdaugh through the Varn

connection, and all Judges trained in and practiced in Murdaugh Country, and some even clerked there. They teathed on Murdaugh laws and privileges and how to work as the LMCE to exploit and steal from catastrophically injured or the wrongfully killed and their family members as the Murdaugh case shows. If there was not enough business, it was created, like Plaintiffs targeted for death or catastrophic injuries through the Murders for Hire by these corrupted and ruthless Judges just like Mullen. Plaintiffs were a part of a creation of a catastrophic injury or wrongful death claim that failed, not just once and not just in 2021, as McIntosh Defendants and friends are still attacking Plaintiffs with about 4 cases where someone was charged but of course let off with a slap on the wrist at best. Plaintiffs have film footage of some of the attackers attacking them violently and sometimes drawing blood. And they ramped up their efforts while Plaintiffs/Appellants were trying to work on the evidentiary hearing and this appeal initiation. One is a good friend of McIntosh, who was his drinking and drug buddy and caroused for women with McIntosh according to the friend of McIntosh. They claim they were paid to do this to Plaintiffs and to ruin their case for the Judges, just like their friends and associate 11 Defendants in the underlying case. They all used the same tactics.

So Plaintiffs now seek real justice and demand that public servants in government they go before now will refuse to cover for the LMCE, and first grant Plaintiffs the pages and time needed to attempt to describe such lunacy created by those who have no facts nor law on their side, and then will enter Judgment for Plaintiffs, and order Allianz and all others to pay Plaintiffs IN FULL, what makes them whole, and not what is left over after bribes and “loans”, i.e. payoffs were stolen from Plaintiffs amount due by Allianz to pay off others to ruin Plaintiffs case.

So in addition to a) receiving reasonable accommodations for qualified medical issues, as a reason for this Court to grant Plaintiffs/Appellants more pages (and time) to prepare for and write the appeal/reply, Plaintiffs/Appellants also need this granting: (b) because the number of Causes of Action in Plaintiffs/Appellants case are numerous and the elements for several causes of action are also lengthy and detailed and needed to be pled under Rule 9, under the SCRC, making the pleading of these elements more lengthy; (c) because Plaintiffs/Appellants were respectfully demanding a jury to award Plaintiffs/Appellants, Punitive Damages, included, but not limited to, uncapped and partially capped Punitive Damages, due to Defendants' criminality, drug related bad acts, and financial gain as goals of the Defendants that greatly motivated Defendants attacks against Plaintiffs/Appellants, along with other fraudulent actions of Defendants;²² (d) because the facts that have to be described were greatly increased through this bomb-shell, 2,000 pages of after-acquired evidence, plus Plaintiffs personal, recorded interviews without the use of blocked Discovery, that greatly increased the facts, connections, deceptions and overall nefarious acts of Defendants and others not known at the time of the initial filing that have greatly interfered and affected Plaintiffs/Appellants ability and right to a fair trial/hearing on the underlying case, that are a part of this appeal;²³ (e) because the

²² That Defendants needed to be punished and that a message needed to be sent to deter others similarly situated to stop subsequent, potential dangerous actions based on this punishment, that Defendants have a history of reckless conduct; that Defendants were aware of or attempted to conceal the danger; that the degree of punishment was needed for an act of their nature; that Defendant's wealth was sufficient, and an increased amount of award would truly impact the Defendant's decisions in the future; and, the likelihood the award would deter other people or companies like the Defendant from engaging in the same conduct.

²³ Very complex and bad faith, deceptions were implemented and utilized by those who should never have been involved in the underlying case, to pull off such nefarious bad acts and crimes against Plaintiffs/Appellants to obstruct and ruin their meritorious case now being appealed. The subsequent bad actors were those who should have been Defendants in the underlying case, or a part of a separate RACKETEERING CASE, but for bad faith processing of this case, which are incredibly diabolical Miscarriages of Justice that are being appealed as

complexity of the legal issues themselves are straight forward but were ignored by the lower Court, due to the chaos and bad acts of the Respondents, Courts and those assisting them that even to this day, (f) because there were initially 11 Defendants listed and should have been many more, but for Plaintiffs/Appellants not being able to immediately identify all of them or all of the additional issues as the case unfolded, however, many are still active in attacking Plaintiffs/Appellants even now, and are identified as those who were/are active in continuing to obstruct justice and protect those who should be sued as Defendants and Racketeers in this matter that played a huge and Unconstitutional role in the outcome and the procedural and substantive Unconstitutional manipulative and deceitful processing of this case, (g) because the growing list of should be Defendants and RACKETEERS have unlawfully interfered with the prosecution of this case, with lawyers and state actors, and an insurance carrier also involved in the obstruction of justice in this matter due to other complex and criminal and deceptive matters and crimes, that should never be a part of any case, involving state actors from SC and even from Virginia, working under color of law against Plaintiffs/Appellants, (h) because there are two Plaintiffs with two or more opinions on various matters, (i) because there is clear collusion and RACKETEERING involved in this case, with the lawyers and then lawyers, Judges, other State Actors, Allianz, Defendants and so forth, through extremely nefarious actions that are not covered in any Rules of Civil Procedure, during the underlying case, and the process of Plaintiffs/Appellants trying to have the case fairly prosecuted, which took an incredible amount of work and extra investigation by Plaintiffs/Appellants, showed Plaintiffs/Appellants were not

Plaintiffs/Appellants had no chance of bringing forth their case based on these latter deceptions and criminal acts by those interjecting themselves into the case.

going to ever have any chance of bringing forth their meritorious claims, concluding with an extremely deceitful and corrupt procedural process and alleged findings in manipulative procedural engineering, and prosecution from the bench when the attorneys were not able to defeat Plaintiffs/Appellants, and ridiculous and Unconscionable Orders and in the final Order(s),²⁴; (j) that an Evidentiary was Unconstitutionally called Sua Sponte by the Judge after 6 months more of ex parte delays (j) and because Plaintiffs/Appellants also have many good faith law challenges to existing law, or law that needs to be overturned as Unconstitutional, that because of these Unconstitutional laws on the books that were able to be so abused in this case, those obstructing justice could openly and freely and without fear of reprisal commit such criminal activity due to the laws in place and collusion/Racketeering in ignoring the law easily, that must be addressed, overruled and changed now, and Plaintiffs/Appellants must be granted their victories no matter what money Allianz wrongfully spent, and no matter where the other wrong doers have to go to get the funds to make Plaintiffs/Appellants completely whole.

Plaintiffs estimate they need 200 additional pages and twice as many additional days for each writing or submission of any type and any production or action they need to take such as Delegation of Matters, making the record, referring to the record, and so forth, throughout these proceeding in the interest of justice that Plaintiffs must finally receive in such a shameful display of a type of anarchy against any law, where the Devine Right of Kings exercised

²⁴ Plaintiffs/Appellants actually won their case on procedure several times, but for the Judges refusing to find or enter Judgements on obvious victories by Plaintiffs/Appellants. Pro se Plaintiffs/Appellants are often lectured on how they have to bring their performance up to attorney standards to complete in Court, and will lose if they do not do so, but do not the attorneys also have to bring up their standard to match that of attorneys also or they will lose? They lost several times but for Unconstitutional help and even Judges ignoring law and facts, and so forth.

usurpation and arbitrary law as if they had the right to do so. Defiance is not a good trait for a judge.

Plaintiffs believe they have made a strong case for same, with good causes shown, and these requests are not unduly burdensome and will not prejudice the other side, who has received the benefit of all possible favors of the Court, to include the Court prosecuting the case for them, that are not even Constitutional thus far, and it is time that Plaintiffs receive a fair and just result, after four years of abuse, as they procured admissions from Defendants admitting what they did, and already won the case several times, but for the Judges refusing to enter Judgments. The time for abusing Plaintiffs must be over now, and justice prevail.

Plaintiffs/Appellants complaints/amended that was granted by Judge Taylor to be filed and relate back from his 2/16/24 hearing, contained Defendants' own admissions of liability in their own writing/quotes, that Plaintiffs/Appellants included in the pleadings, and all elements were also included and explained appropriately even beyond the minimum requirements. The Judges used procedural manipulation to try to limit anything the Plaintiffs/Appellants could file that would dismiss Defendants fatally flawed 12(b)(6) Motion to Dismiss, for failure to state a claim, even though Defendants already defaulted many times already. Further only a scintilla of evidence is required in most cases to pass such a low standard of legal sufficiency, on a motion to dismiss. There is much more to this argument not made here, but suffice it to say, a Motion to Dismiss is easily combated by a Motion to Amend the Complaint when and if necessary, and

these are freely granted via Rule 15A, SCRC²⁵, but instead the Judges themselves took the lead when the lawyers could not get dismissed two older, physically handicapped and disabled ladies with ADA qualifying physical health issues, to procedurally manipulate Plaintiffs/Appellants case to even help Plaintiffs/Appellants own lawyer and his collusion with Defense before fired, who was trying to get Plaintiffs/Appellants case dismissed in the most obvious, and manipulative Court proceedings, that started on 11/28/23, with Dodd noticing he was not going to argue the dismissals of Defense, and McIntosh allowing that proceeding to go forward, knowing Dodd was purposely going to default for Defense to win.

These obviously illegal moves by the Court in RACKETEERING with lawyers and others, made it impossible for Plaintiffs/Appellants to defeat the Judicial manipulation and trickery of the Judges through their lawyers posing as Defendant attorneys, in spite of Plaintiffs case passing muster on the merits and procedure, had Dodd been an honest lawyer arguing in good faith. Because this is when Dr. Fink collapsed and had her first seizure in years, and was taken by ambulance to the Emergency Room, the case was continued to 1/11/24, with an entirely different, totally made up set of facts, that involved the Judges, lawyers, and Allianz setting up a false fact pattern to try to dismiss Plaintiffs on grounds other than by 12b6 which Defense could not get done, even with the gifts of the Court and Dodd. That failed with an unexpected move by Plaintiffs that caused them to be off balance and miss their predetermined plan to dismiss on fake grounds.

Then Judge Taylor was steered to the case by Lawyer Legislator Bamberg, and another bag of tricks was attempted, but Plaintiffs made enough noise against these criminal acts and

²⁵ SCRC 15: Amendments are freely given.

RACKETEERING that stalled out Defense and the Judges to let Maddox have time to retire with benefits before they dropped the hatchet on Plaintiffs/Appellants with the alleged Evidentiary Hearing that wasn't. The rules provided, the time provided, and the outcome, with government denying Plaintiffs filing against government wrong doing, and a gem of an opinion from McIntosh where he showed his true colors in the most Unconscionable Order Plaintiffs have ever heard of in their years of practicing including story telling time when lawyers let their hair down and tell war stories. This one is priceless as McIntosh proves everything Plaintiffs have been claiming as to extreme bias, hatred, and his concern for the RACKETEERS way more than the case that was dismissed without reason, and Plaintiffs were punished for their behavior in and out of court, which both are totally Unconstitutional reasons, left for the appeal, but basically, it involves all Plaintiffs Medical issues that have confirming doctors opinions that the Judge doesn't want to believe, even though he has no medical degree or license to practice medicine, and his thin skin where Plaintiffs went to a hearing of abused litigants to observe, and then was interviewed by a local journalist about their case. These are not Constitutional reasons for a dismissal and even a sanction.

But the name calling and presentation of the Judge cannot be missed, even if just skimming the Order. These are RACKETEERS with financial and vengeful interests. McIntosh is a bully and Plaintiffs/Appellants in good faith, truly believe he is mentally ill and extremely corrupt and needs immediate removal from the bench and law. Sprouse is a bully and criminal. Maddox, acted criminally, and from Plaintiffs investigations this is not the first time, but he should not have joined the others since there seems to be as small part of him that has a conscience even though he does his best to ignore it, and sold out the people of SC even with

his deceitful departure speech. Taylor is going to do whatever lawyer-legislators tell him to do so he can get ahead. But he left as soon as he knew Plaintiffs know how he got to Plaintiffs case, tried to hatchet Plaintiffs case while smiling in their face, and cowardly ran with lies as to why he was no longer on the case.

In this case, there was a collusion with the Clerk of Courts, the Scheduling Clerk and others also. Plaintiffs were totally surrounded with no way to hold anyone accountable but for hanging in there, and waiting for the chance to get this on appeal as there was no change at the RACKETEERING level. Any reports to the authorities were met with more stone walls, as SC has created a closed loop where the LMCE is very hard to hold accountable without public pressure, which Plaintiffs understand may have to be an option, but would like to give this appeals court a clean state and clear opportunity to show the public that it is not part of a LMCE and will hold the judges and others accountable for their wrongs and crimes, where these positions are present to allegedly protect the public, not exploit it for its own gain without recourse or great punishment to the perpetrators.

WHEREFORE for the foregoing reasons, Plaintiffs request 200 EXTRA pages per assignment, written or otherwise, and double the time usually provided for ADA, Complexity and Constitutional reasons given above, with the Court being open to additional time and pages should the Plaintiffs get closer to the deadline or page limit and realize they need more to accommodate them for various Constitutional reasons given herein.

Written but not proofed due to vision and limb issues along with other disabilities affecting Plaintiffs at this time.

5-1-25

Dr. Linda Kennedy, J.D., B.A., B.S.

5-1-25

Dr. Marsha Fink, J.D., B.A.

Filed Jointly

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PLEASE NOTE NO MAIL SHOULD GO TO PLAINTIFFS PRIOR ADDRESS IN TOWNVILLE, BUT ONLY THIS ADDRESS GIVEN. THANK YOU.

Certificate of Service

Plaintiffs affirm that they sent this mailing, the MOTION FOR EXTENTION OF TIME AND PAGES ON APPEAL IN A CIVIL CASE, by Certified Mail to the following Attorneys for Defendants Plaintiffs believe are on the case on 5-1-25, postage prepaid:

From McAnus, Goudelock, and Courie, LLC:

Robert Mebane: 201 West McBee Ave., 2nd Floor, Greenville, SC 29601

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