

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

R Lawton McIntosh, Circuit Court Judge

Court of Appeals No. 2025-000859

Linda Kennedy and

Marsha Fink

Appellants

v.

Lake Hartwell Resort and Cabins, LLC, a/k/a Lake Hartwell Resort and Cabins, a/k/a Lake Hartwell Campers and Cabins, a/k/a Lake Hartwell Management, a/k/a Chris Vellanti, a/k/a Christopher Vellanti; Christopher Vellanti, as a Member and Personally; Yvonne Goldman, as a General Manager and Personally; Frank Pellegrini; Fritzie Maroto; Jennifer Burdette; Marsha Stamm; Allen Riha; John Doe #1, a/k/a Ray Grenier a/k/a Ray Dukes; John Doe #2, a/k/a Tow Truck Owner and Operator; and John Doe #3, a/k/a LHR VRC Maintenance Employee,

Respondents.

MOTION IN OPPOSITION TO TWO LETTERS OF DEFICIENCY

RECEIVED

MAY 20 2025

SC Court of Appeals

MOTION IN OPPOSITION TO TWO DELIQUENCY LETTERS

WHERE THE COURTS ARE INTENDING TO REVIEW COURT ORDERS TO DETERMINE IF THEY ARE APPEALABLE IN ADVANCE OF THE APPEAL BRIEF AND RECORD BEING SUBMITTED AND REVIEWED, WITH FRAUD ON THE COURT BEING CLAIMED AND PRESERVED, and FOR APPELLANTS TO BE FORCED TO USE THE INCORRECT STYLE OF THE CASE, RATHER THAN THE AMENDED COMPLAINT STYLE THAT WAS APPROVED BY THE COURT AND THE ATTORNEYS, AND RELATED BACK, WHICH IS THE CORRECT STYLE OF THE CASE, BY ORDER OF THE COURT.

PLAINTIFFS/APPELLANTS Motion is not proofed, due to Disabilities they have raised with the underlying court and this court, requesting Reasonable Accommodations

COMES NOW PLAINTIFFS AND APPELLANTS, (DR.) LINDA KENNEDY AND (DR.) MARSHA FINK, (HEREINAFTER, “(DR.) Kennedy,” and “(Dr.) Fink,” or “PLAINTIFFS/APPELLANTS”), and respectfully demand that the Appeal’s Court Deficiency Letters on two issues be quashed for good cause.

First, Plaintiffs/Appellants challenge the demand for Plaintiffs/Appellants to file all Orders in the case for the Appeals Court to determine first, if the Orders are even appealable up front. Respectfully, this is not a proper review and the Court should review the Orders within the Appellant Brief/Record submission, coming later, as Plaintiffs/Appellants have alleged and have been alleging for a long time, that Fraud, RACKETEERING, Coercion, bribery of Defendants and witnesses, ex parte communications and scheming, Predetermined outcomes through Procedural Manipulation, ignorance of the law and facts and so forth were occurring, along with the Legal Machine Criminal Enterprise in Plaintiffs/Appellants, allegations with proof of many other crimes and wrongs committed against Plaintiffs/Appellants, between RACKETEERING Judges and lawyers/firms, Allianz Corporate and Specialty, Defendants and many other State

Actors and agents, (even to include Virginia State Actors [hereinafter, "VSB"]¹, who have no business in this case), all Racketeering together in Plaintiffs/Appellants case, with Financial and other interests in the outcome of this case, to procure a total OBSTRUCTION OF JUSTICE against Plaintiffs/Appellants in this matter.

Further, the Common Pleas Court Judges and other State Actors lost any immunity claim to hide behind, by secretly and unilaterally being involved in Plaintiffs underlying case, at least 7 months **before** Plaintiffs even filed suit in the Common Pleas Court as these meetings with future Defendants were documented in Defendants own writings, Plaintiffs/Appellants recorded interviews with some of the participants at these meetings, and so forth, that Plaintiffs procured, long before Plaintiffs/Appellants filed suit and then later, long before attorneys were ever involved in the filed suit. The Common Pleas Judges know they are caught in these unethical and criminal planning sessions with Defendants, which is why Plaintiffs could not get any Discovery, Depositions, Subpoenas and so forth for three years due to Court stonewalling, and why ever hearing was a loaded, Judicial procedural manipulation, where the lawyers (including Plaintiffs lawyer) were set up to enter default against Plaintiffs case, to rid themselves of Plaintiffs, their case, and the RACKETEERING Plaintiffs had stumbled upon, and then pursued

¹ Plaintiffs/Appellants were long-time whistleblowing attorneys in Virginia, calling for Legal Reform in the Courts for the benefit of We the People. Plaintiffs/Appellants have made many powerful friends in Washington DC, but also many powerful enemies in Virginia and elsewhere in the legal system, due to their Constitutionally protected work. The Courts/Judges, for the most part, are not fans of Plaintiffs and Plaintiffs have been discriminated against before by Courts. Meeting between these Judges, with the collusion of Virginia State Actors meetings, documented in Defendants' writings and oral statements, were intended to try to further retaliate against Plaintiffs/Appellants for Plaintiffs/Appellants work in Virginia long ago, which greatly exposed the Virginia LMCE. The VSB retaliation against Plaintiffs/Appellants is a recurring theme Plaintiffs/Appellants have to regularly work around, but finally got the VSB head of ethics fired in September 2023, due to such, inappropriate interference in Plaintiffs lives as described.

once it became clear that Plaintiffs were in the middle of criminality and danger through these RACKETEERS using Plaintiffs case for financial gain, and other inappropriate interests and the problem is Plaintiffs escaped the Defendants physical site and the physical attacks against Plaintiffs, before they escaped, didn't harm or kill Plaintiffs as per their own writings, that they were attempting to do so, as instructed in these unilateral and secret meetings with SC State Actors.

Obviously, the Court Judges and others should not have been meeting secretly and unilaterally with future Defendants to help them plot against Plaintiffs/Appellants, and especially also, so long before Plaintiffs unsuspectingly filed their suit in good faith, before these very same judges who never even recused or reported themselves or each other, but instead worked very obviously to sabotage and rid themselves of Plaintiffs and their case by any means. Plaintiffs/Appellants did not know of such meetings at the time of filing their suit against Defendants/Appellees, but very obvious actions caused Plaintiffs/Appellants to look deeper and accept what was written in the notes of Defendants to each other for what they were saying and what that meant.

Since that time, Plaintiffs learned that the meetings between Judges/State Actors and future Defendants were set up through nepotism with State Actors who were trying to help one of the Defendants escape possible liability/criminality perpetrated against Plaintiffs/Appellants, and became an opportunity for the RACKETEERS to gain financial/other inappropriate interests the State Actors could receive, in Plaintiffs future case, if Plaintiffs were catastrophically injured or killed by these criminal-type Defendants, who were being encouraged to take violent action against Plaintiffs by the State Actors for reasons described in the Appeal Brief, and a short

summary in the May 1, 2025 filing of a Motion for expansion of time and pages by Plaintiffs, due to the complexity of this case, because of State Actor and other agents RACKETEERING, likened to a Murdaugh-style scam with State Actors using the Courts and RACKETEERING, for financial gain and other interests.

The Court of Appeals is not supposed to merely be a procedural gatekeeper; it is supposed to be a Constitutional safeguard against injustice. The Court must review the Orders with the Appeal/Record also at the Courts ready, to have a contextual look at why these Orders are appealable and how they played into the fraud and so forth.

Second, PLAINTIFFS/APPELLANTS respectfully demand that the Style of the Case continue to be the style Plaintiffs/Appellants properly used, by law, when filing their Notice of Appeal, See pages 1-2, and 3-4 showing Plaintiffs were granted the Amended Complaint Motion and filed/served the Amended Complaint that related back and this is the proper style of the case. This style of the case, which is PLAINTIFFS/APPELLANTS proper style as an amended and relating back filing of the amended complaint was granted through SCRCP, Rule 15, by Court Order, Pages 1-2, and has become an issue for RACKETEERING Defense and Judges in this case/appeal, where the colluding State Actors and agents, do not want to acknowledge the amendment because it does not help them get rid of Plaintiffs and their case by any means, to hide their RACKETEERING and fraud and so forth. PLAINTIFFS/APPELLANTS won that argument to amend back in March 2024, Record pgs 1-5, and the Common Pleas Judges and lawyers illegally and unethically just ignoring the Order of March 12, 2024, and Plaintiffs/Appellant proper execution of that Order, Pgs 4-5, that they did not object to or appeal when ripe to do so. No objection was noted in the record or at any time by them either.

RACKETEERING Judges and Lawyers and others, who should have recused and disqualified before ever deciding to preside and participate over their own liability/crimes, cannot just ignore the Court Order granting an Amended Complaint without the Defense attorneys ever objecting to it or appealing it, and where these same RACKETEERING Judges and Defense and others have financial and other inappropriate interests in the outcome of Plaintiffs/Appellants case, and also need to hide what they did to Plaintiffs/Appellants before Plaintiffs ever filed their suit, and they know they would do better if Plaintiffs didn't Amend their complaint. In actuality, the RACKETEERS would actually still lose, if the Judges would have entered the Default Judgments against Defendants, which also had to be ignored for Plaintiffs/Appellants to even be dealing with this matter at all now. It is a farce and for the Courts to review Orders for appealability or force Plaintiffs to ignore the Order that granted them an amendment, is for the Court to not acknowledge or understand the severity of this situation, which if this news got to the general public would possibly destroy the SC government system and perhaps others also.

The law must be followed, even by underlying RACKETEERING JUDGES, as the Amended Complaint was freely granted by Order of Judge Heath P. Taylor, on or about March 12, 2024, and Plaintiffs execution of that Order, (Record pages 1-5) after argument on February 16, 2024, in another improper hearing due to Lawyer-Legislator steering Judge Taylor to Plaintiffs case, which caused many other problems before the Judge unexpectedly left the case without following any procedure, due to the Murdaugh connections being discovered between Plaintiffs case and Judges/lawyers/Allianz/Bamberg, and now Taylor. However, the proper style of the case is the style PLAINTIFFS/APPELLANTS provided in their Notice of Appeal, per Order of the

Court to do so, not what the opposition (to included Judges with financial interests and who insisted on presiding over their own liability/criminality) wants to claim against the Order allowing the amended complaint, that is still in place, but for RACKETEERS continuing deception and fraud on the Court and against Plaintiffs/Appellants, to win this matter no matter how corrupt they need to be to do it, due to their criminal interests in the outcome of Plaintiffs/Appellants case and all of what went on briefly stated herein. The RACKETEERING Judges cannot get any special deference in this matter as they are a part of the RACKETEERING in the case and must be viewed in that light for purposes of this Deficiency Letter.

PLAINTIFFS/APPELLANTS are including the Orders from the Common Pleas Court, for compliance sake, and have used the former style of the case, but vehemently Object to any review of these Orders at this time, which is not the proper review standard in a case where fraud and other documented claims are being alleged by PLAINTIFFS/APPELLANTS and where their Unalienable Rights have been trampled upon by the lower Court, and their fellow RACKETEERS, for financial and vengeance interests (see May 1, 2025 Motion filed and the subsequent Appeals brief/record that will be submitted, which is where the Orders should be reviewed with the Record and Brief). Further, as a part of Plaintiffs Unalienable Rights and for this Court to also oppose fraud on its Court, the correct style of the case must be used which is what Plaintiffs/Appellants have used for Notice of Appeal and respectfully demand that the law be followed and the Order of March 12, 2024, Record Pgs 1-3, be followed, Record Pgs 4-5.

It is obviously premature for PLAINTIFFS/APPELLANTS to try to write an entire Appeal on these matters and supply the entire record at this time, and they have requested expansion of

time and pages, due to all the other issues that came out and then dominated Plaintiffs case, having nothing to do with the merits of the case or proper procedure as dictated by the SCRCP.

Further note, that PLAINTIFFS/APPELLANTS noted in Common Pleas Court, in writing, many of their Objections repeatedly in the Record, that will further be explained and argued by PLAINTIFFS/APPELLANTS, with Record entries, in their Appeal Brief. Also note, when fraud and other actions of the Court are claimed, it is not necessary for objections and preservation of the lower court record for appeal.

Plaintiffs also reported Judges/Lawyers and others to the Judicial Disciplinary Committee several times, the Judicial Merit Selection Committee several times, The SCBar several times, to all Legislators by certified mail informing them of a Murdaugh 2.0 situation developing in the 10th Circuit of the Common Pleas Court/Anderson County several times, to SLED, to David Wagner several times, and then to Micah Black several times, to Sheriff Chad McBride and many others to no avail. Plaintiffs even subpoenaed Black and McBride, the Disciplinary lay person judges, and others to Court to hear the case and be witnesses, but the 10th Circuit Judges quashed sua sponte as the lawyers were no longer taking an active part in the case, but watching the Judges get rid of the case Sua sponte.

Where Common Pleas Judges just did what they wanted and needed to do to protect their own financial and vengeance Interests and that of their fellow RACKETEERS/LMCE, against PLAINTIFFS/APPELLANTS and their case, the Judges treated themselves to be above the law, and ignored or circumvented the legal process and fair and impartial proceedings through procedural manipulation or total ignorance, and so often, didn't provide Orders at all, or

provided fraudulent Orders where they could not be explained or justified by the Judge, but were clearly so fraudulent that they openly ignored the law and facts to come to these conclusions, especially in light of the criminally acting triers of facts with fellow RACKETEERS participating in the case, with financial and vengeful reasons to predetermine outcomes against PLAINTIFFS/APPELLANTS. They also overrode Orders on the books from different judges, using Sua Sponte Motions that went against the Order and were not lawful because a Judge cannot override another Judges Order without stated reasons of fraud and so forth. Further, the demanded of the Sua Sponte Notice of hearing and what would be heard were also extreme Constitutional violations on their own accord to try to get rid of PLAINTIFFS/APPELLANTS and their case, with no Discovery/Depositions where Defendants might out the Judges and others schemes against PLAINTIFFS/APPELLANTS and refusal to recuse/report themselves and others.

These Judges, and other State Actors and agents were actively involved in PLAINTIFFS/APPELLANTS underlying matters, long before PLAINTIFFS/APPELLANTS even filed a suit in Common Plea Court, without PLAINTIFFS/APPELLANTS knowledge, divesting these State Actors of any immunity as they were not involved in any judicial capacity, nor had any jurisdiction.

After PLAINTIFFS/APPELLANTS filed their original complaint that had since been amended by Judicial Order with a change in the Style of the Case, and related back to the original filing date, per Order dated March 12, 2024, Record Pgs 1-3, and Plaintiffs filing, Record Pgs 4-5, the Judges were having meetings with Defendants as a favor/nepotism for David Wagner, Solicitor General at the time, whose good friend and former Anderson County Sheriff Detective/colleague was the father of one of the Defendants-to-be (Jennifer Burdette), if

PLAINTIFFS/APPELLANTS were to file suit, and the Judges and other State Actors, were going to help Defendants get out of their liability/criminality very early and while doing so the Judges, and other state actors from SC and Virginia and agents would also bring forth great harm to PLAINTIFFS/APPELLANTS through Defendants now Judicially protected continued criminal violence encouraged to be perpetrated against PLAINTIFFS/APPELLANTS for Judges and other RACKETEERS future financial and other present vengeful reasons² described in PLAINTIFFS/APPELLANTS Motion, filed May 1, 2025, that then involved the Virginia State Actors RACKETEERS also. (See Insurance Reserve Fraud FN 4, and in the Motion filed 5/1/25).

Further, the Judges involved in this RACKETEERING refused to recuse, and the accompanying lawyers also RACKETEERING refused to Disqualify themselves (please see Motion filed May 1, 2025), all in violation of the Rules/law regarding Judge and Lawyer recusal/disqualification (See argument).

All additionally, refused to report criminal and ethical wrong doing against themselves or each other, per the Canons and Rules of Ethics, law and so forth, sometimes resulting in Unconstitutional Orders being written, or other actions not reviewed by the Court until the Appeal Brief/Record are submitted, that keep all the other acts of the Court in contexts, that will not be understood by this Court without this context. In **South Carolina**, judicial recusal/disqualification is governed by both **state statutes** and **judicial ethics rules**. A judge is

² These secret meetings with Defendants for nepotism reasons, were documented in Defendant Group Texts to each other, received by Plaintiffs from some Defendants outside of Discovery before lawyers were involved, and also stated in taped interviews with some Defendants. (Explained more in initial Motion filed 5/1/25).

required to step aside from a case if their **impartiality might reasonably be questioned**. This case exceeds any of these standards as to why a recusal MUST have occurred, even in the Judges own words, which PLAINTIFFS/APPELLANTS quoted judicial speeches and Judicial Merit Applications and other sources where they were not practicing what they preached, and their past quotes were merely words with no meaning.

Further, because the Defense lawyers were caught in collusion with PLAINTIFFS/APPELLANTS soon to be fired lawyer, and then all with the Judges also, Defense would not disqualify after they were ghost-writing PLAINTIFFS/APPELLANTS amended complaint complete with receiving PLAINTIFFS/APPELLANTS attorney-client privilege and work-product materials they did not authorize their attorney to grant such authority over their case to the other side, nor violate their privileges. Meanwhile PLAINTIFFS/APPELLANTS attorney was giving PLAINTIFFS/APPELLANTS alleged legal advice that would only help Defense, like when Defendants defaulted, but PLAINTIFFS/APPELLANTS attorney was trying to convince PLAINTIFFS/APPELLANTS to drop the Defendants that defaulted on other fake and ridiculous grounds, without informing PLAINTIFFS/APPELLANTS that the Defendants defaulted, and PLAINTIFFS/APPELLANTS won on that matter. PLAINTIFFS/APPELLANTS did not buy into such ridiculous advice, and refused to follow that advice and soon fired their attorney where a lot of collusion between the sides was exposed. There were also unauthorized settlements involving more collusion an RACKETEERING, and even after PLAINTIFFS/APPELLANTS attorney was fired and inappropriate behavior over PLAINTIFFS/APPELLANTS case was exposed against Defense, they would still not disqualify themselves. Having represented PLAINTIFFS/APPELLANTS without their knowledge or consent, and against the ethical rules that do not permit such conflicts of

interest where Defense is representing Defendants and PLAINTIFFS/APPELLANTS, such disqualification was mandatory. Further, they were also representing different Defendants, some without their permission or consent, Record attachment, Pg 6, with different interests and still did not disqualify.³

Finally, Defense counsel/judges were going to be material and necessary witnesses in Plaintiffs underlying case, and perhaps Defendants in the Amended/Supplemental/

³ **Conflict of Interest**

An attorney may be disqualified if representing a client would violate **Rules 1.7–1.10, RPC**, especially:

- **Rule 1.7 – Conflict of interest with current clients** (e.g., representing clients with directly adverse interests).
- **Rule 1.9 – Duties to former clients** (e.g., using confidential information against a former client).
- **Rule 1.10 – Imputed disqualification** (conflict applies to entire law firm).

2. Appearance as a Witness

- **Rule 3.7** – A lawyer shall not act as an advocate in a trial in which they are likely to be a **necessary witness**, unless: The testimony relates to an uncontested issue; The testimony relates to the nature and value of legal services; Disqualification would cause substantial hardship.

3. Misconduct or Unethical Behavior

- **Rule 8.4** – Misconduct includes:

Dishonesty, fraud, deceit, or misrepresentation; Conduct prejudicial to the administration of justice; Assisting a judge or judicial officer in conduct that violates judicial ethics. Allegations of **case-fixing, collusion, or fraud upon the court** can form a basis for disqualification and referral to the **Office of Disciplinary Counsel (ODC)**, which was **done but ignored**.

5. Violations of Court Orders or Improper Influence

If a lawyer is shown to have: Improperly contacted the judge or opposing party; Violated court orders; Participated in **collusion or fraud**—They must be disqualified and reported for disciplinary action.

A. Motion to Disqualify were made and ignored;

- **Stokes-Craven Holding Corp. v. Robinson**, 416 S.C. 517, 787 S.E.2d 485 (2016):
A lawyer's dual roles and confidential knowledge justified disqualification.
- **In re Anonymous Member of the Bar**, 346 S.C. 177 (2001):
Attorney sanctioned for violating duties of candor and fairness to the tribunal.

Consolidation Motion, and still would not disqualify themselves and ruled against any such actions to protect their own interests. (The laws on disqualification are not to be argued here, but for to say, that the Orders issued were coming out of a completely tainted and RACKETEERING Court, and the Orders cannot be evaluated without knowing what and why PLAINTIFFS/APPELLANTS are appealing, based on their Appeal Brief and Record submission together). PLAINTIFFS/APPELLANTS and Defense lawyers were colluding with each other some of which is caught on legal recording, and then it was clear, RACKETEERING with the Judges as will be described in the Appeal/Record submission. The Lawyers were representing the judges and the judges the lawyers as they all shared the same criminal interests.

Although not an issue for argument over the details of conflicts today, A South Carolina attorney, including Plaintiffs since fired attorney can be disqualified for: Representing conflicting interests (Rules 1.7–1.9); Being a necessary witness (Rule 3.7); Engaging in misconduct, dishonesty, or fraud (Rule 8.4); Switching sides or misusing confidential information; Colluding with opposing counsel or court officials. All of these were present in PLAINTIFFS/APPELLANTS case, by all attorneys, including their own, and many recordings were made by Plaintiffs/Appellants, of their attorney colluding and also was clearly seen in the record when the Defense was trying to save PLAINTIFFS/APPELLANTS attorney from being fired, which would then save them also. They didn't want to face Plaintiffs Pro se, not because Plaintiffs have any special gift/talent, but Plaintiffs would not be colluding and RACKETEERING against their own interest and would not help throw their own case.

Further, many of the unconscionable Court Actions did not result in Orders at all, including, but not limited to, Sua Sponte Notices of hearings, defying Orders from other Judges

already in place through contrary Notices rather than new orders created, or other Sua Sponte actions with no Orders, or in some cases, the Court making ex parte Orders where only the Defense was heard secretly and unilaterally, and an immediate Order issued, obvious through ex parte action, without PLAINTIFFS/APPELLANTS even knowing that a discussion had occurred until after the fact, and PLAINTIFFS/APPELLANTS were prevented from arguing the matter because the Order was already entered, and so forth. PLAINTIFFS/APPELLANTS issued written objections knowing that the Court was going to do what it wanted and needed and would ignore PLAINTIFFS/APPELLANTS for their own financial and personal gain. Further, other Orders were so favorable to Defense and so discriminatory and biased against PLAINTIFFS/APPELLANTS, but the overall situation must be described to know that Equal Protection/Due Process and other Violations were at work.

Court personnel actively took part in hiding Orders, keeping Orders from Plaintiffs who did not have access to the court computer, which is Unconstitutional. The Clerk of Court, Reena Thomason, who Plaintiffs compare to Beck Heir Hill and their aristocratic genealogy that is often a prerequisite in appointment as their families are long-time Aristocratic members in the LMCE, and also Scheduler Elizabeth Beasley, would lie and say they sent Orders they did not send, and then were caught in lies, taking more of Plaintiffs/Appellants time and energy to fight more Obstruction of Justice.

It is telling, that in a brief review of the underlying case, right after Defense first defaulted, on April 15, 2022 and many times thereafter, that was hidden by RACKETEERING Plaintiffs attorney from Plaintiffs, who was then trying to convince Plaintiffs to drop certain RACKETEERING Defendants who defaulted without telling Plaintiffs there were defaults, two

RACKETERING attorneys on the case from RACKETEERING Defendant firm McAngus, Goudelock, and Courie (hereinafter, "MGC"), immediately left the firm, then shortly thereafter, another RACKETEERING lawyer, was put on probation and then was fired by MGC and became a claims adjuster for a company in Georgia, RACKETEERING Plaintiffs attorney was trying to get Plaintiffs to fire him because of what had happened with he and MGC/Allianz, that he would not explain, but was very nervous and distracted and stressed, and RACKETER Grier, Cox and Cranshaw, (hereinafter, "GCC"), two RACKETEERING attorneys stopped showing up for Court, another RACKETEERING attorney, entrenched into Murdaugh Country Aristocratic Elite, suddenly left or was fired from GCC, unexpectantly and in a rush, and has hidden under "OF Counsel" in another state, RACKETEERING Plaintiffs attorney was fired for being caught in collusion, and RACKETEERING with the Judges, RACKETEER Scheduling Clerk Beasley left or was fired for getting caught by Plaintiffs with the RACKETEERING Clerk of Courts hiding Orders and further obstructing justice against Plaintiffs, RACKETEER Solicitor General Wagner, announced he would not run for office again and was surrendering his law license also in the news, RACKETEER Judge Taylor disappeared as quickly as he appeared after being outted as being steered by Lawyer-Legislator to Plaintiffs case once the Murdaugh connections were made by Plaintiffs, RACKETEER Maddox suddenly announced his early retirement with Plaintiffs case being stalled until he was retired with full pension at the beginning of 2025, VSB Head of Ethics for 30 years, was fired/resigned to start his own PI firm at age 69, and there are many more suspicious moves from people who were entrenched in their places of business for many years but then prematurely left very suddenly. And then the Sua Sponte Unconstitutional acts by the

remaining judges to hold extremely biased and Unconstitutional hearings, that were fraudulent on their face, as soon as Maddox left, which is why Plaintiffs are Appellants now.

Further PLAINTIFFS/APPELLANTS were intentionally also injured by the Judges through cruel and unusual punishment (defined by the American Medical Association and the International United Nations Human Rights Counsel), and PLAINTIFFS/APPELLANTS were not given Reasonable Accommodations to have additional time/pages or be permitted to try to regain health, mitigate the injuries by going a normal speed, or even slowing down the process to accommodate for PLAINTIFFS/APPELLANTS physical inability mostly caused by the Judges. There may be some instances where PLAINTIFFS/APPELLANTS could not always try to keep up with the objections due to the siege they were put under by the gang of RACKETEERING legal actors, who were involved and were protected by a Legal Machine Criminal Enterprise (hereinafter, "LMCE").

PLAINTIFFS/APPELLANTS were forced to face this LMCE way more than being able to focus on their matters, in trying to bring forth their meritorious claims in the underlying case, until their meritorious case was totally hi-jacked into PLAINTIFFS/APPELLANTS having to try to keep the manipulated procedure and ex parte scheming at bay to fight another day that would never come, because fighting off the RACKETEERS was a full time job and no hearings were going to go forward without these schemes in full force and effect.

PLAINTIFFS/APPELLANTS know that when outrages and illegal acts occur openly in government, then either the government has done something much more heinous and are willing to take the slap on the wrist in a lessor act they are taking to try to escape exposure of

their more heinous acts, and/or, the government is protected by fellow criminals in government, the LMCE, and therefore can criminally act openly with no fear of reprisal. PLAINTIFFS/APPELLANTS know and have established in this case that both are true here with these RACKETEERS.

The Court of Appeals is not supposed to merely be a procedural gatekeeper; it is supposed to be a Constitutional safeguard against these injustices as briefly described herein and elsewhere. It must vehemently oppose all fraud on the Court, which even more so is a fraud against Plaintiffs Unalienable Rights to a fair and just redress of grievances, which has already been trampled upon by RACKETEERS in the LMCE, under color of law,⁴ and should make each honest Judge absolutely disgusted with such a miscarriage of Justice for selfish gain by the LMCE, and this Murdaugh-Style criminal activity within the judiciary must stop immediately, with the retraction of the two letters of Deficiencies, and granting of Plaintiffs respectful demands, by law.

ARGUMENT

THE SOUTH CAROLINA COURT OF APPEALS HAS A CONSTITUTIONAL AND LEGAL DUTY TO REVIEW PLAINTIFFS/APPELLANTS' CLAIMS OF FRAUD, COLLUSION, RACKETEERING, CASE FIXING, EX PARTE COMMUNICATIONS TO PRESERVE THE FUNDAMENTAL RIGHTS OF LITIGANTS THAT CANNOT BE REVIEWED UNLESS THE ORDERS ARE REVIEWED WITHIN THE APPELLANTS BRIEF AND RECORD AT THE TIME OF FINAL SUBMISSION.

⁴ One of many types of Insurance Reserve Fraud, that involves catastrophic injury or wrongful death to the litigant or his family, and then the Courts, lawyers, carrier and others working together to separate the party with standing to gain an award by law, so that the LMCE members can then split the award, and money laundering this and many other illegal profiting enterprises through the Insurance Reserve Account to wash and then spend the money without it able to be easily traced. See Alex Murdaugh Satterfield, and other cases. The money can be laundered through the Trust Accounts of the lawyers also, since the Bar oversees the Trusts and is part of this collusion to protect the LMCE.

PLAINTIFFS/APPELLANTS are objecting to having to submit Orders to see if they are appealable, when that is not the law in cases where such fraud and crimes and RACKETEERING is alleged and even noted in the underlying record repeatedly, even though such objections are not necessary. Plaintiffs are also objecting to being forced to use an inappropriate style of their case that helps RACKETEERING Defense/Judges arguments and hides some of their extremely fraudulent activity, when an Order was made on 3/12/24, that Plaintiffs could amend their case and they did so in pages Record Pages 1-2, and 3-4.

First, the issues here are not matters for reviewing Orders to see if they can be appealed that is applicable or relevant, when Constitutional Violation claims are combined with Fraud on the Court and Plaintiffs, Collusion, RACKETEERING, ex parte communications, and Case Fixing by the Court, Judges, other State Actors of SC and VA, and Allianz, lawyers/firms, Lawyer-Legislator Justin Bamberg, the SC BAR and Judicial Disciplinary Committee, and other State Actors and Defendants, and others are involved.

At the point of this Appeal's Court understanding that these allegations against the lower Courts and their agents is made, and Plaintiffs have made these allegations with supporting proof repeatedly in the underlying court, until government chose to limit Plaintiffs exposure of it and Plaintiffs had to have approved by government whether their filing against government could be filed, which is ludicrous on its face. There is RACKETEERING here at the magnitude of the Murdaugh cases they were involved in over the generations, and no individual look at an order in a test-tube can be reviewed, as the entire record/appeal must be all reviewed together, but either way, the Court must address the Constitutionality or appropriateness of those issuing Orders in this most troubling case.

Documentation and objections and reports to the various alleged oversight committees are noted in the record, and PLAINTIFFS/APPELLANTS have also filed formal complaints to no avail, and PLAINTIFFS/APPELLANTS case was totally sabotaged and made irrelevant by such criminal activity on the part of the RACKETEERS, who had not the law or the facts on their side, so they just hi-jacked the case through Unconstitutional processes, and violation of PLAINTIFFS/APPELLANTS Unalienable Rights that are not gifts from the Government and cannot be infringed or abridged.

The South Carolina Court of Appeals, though limited to reviewing matters preserved in the record normally, is bound by its Constitutional and Judicial responsibility and Oaths to **protect the integrity of the judicial process and ensure that litigants' Unalienable and Constitutional Rights, are not violated through judicial fraud, collusion, racketeering, Obstruction or other forms of misconduct.** All the Appeal/Record must be reviewed together, and this Court must issue SLED and other investigative organizations to investigate these matters with the assistance of Plaintiffs/Appellants. Further, even if PLAINTIFFS/APPELLANTS did not note objections in the underlying case, which they did repeatedly, the Appeals Court MUST still protect the process integrity by protecting PLAINTIFFS/APPELLANTS unalienable and Constitutional Rights.

The law is clear from founder writings and intent and case law that PLAINTIFFS/APPELLANTS have Unalienable Rights that are not gifted by the Government and that cannot be taken away under any circumstances. Further, under both the **U.S. Constitution/Bill of Rights and other Amendments** and the **South Carolina Constitution and its Declaration of Rights and other Articles**, litigants are guaranteed the right to **due process of**

law, equal protection, and access to an impartial tribunal. See: U.S. Const. amend. V & XIV; S.C. Const. art. I, §§ 3, 22 for just some sections that apply.

Any allegation that PLAINTIFFS/APPELLANTS Natural, Unalienable Rights, or these illustrative Constitutional guarantees were violated through **collusion among judges, attorneys, insurers, or parties, and others**, or through **intentional fraud or racketeering**, compels appellate review—even if such claims challenge the actions of the judiciary itself. The appellate court is the last line of defense in safeguarding the **appearance and reality of judicial impartiality**. It is not the perception of Public Trust that is protected. "A fair trial in a fair tribunal is a basic requirement of due process. "*In re Murchison*, 349 U.S. 133, 136 (1955). It clearly did not happen, and PLAINTIFFS/APPELLANTS allegations require the Appeals Court to change its normal course of business, to one where the system is being challenged for very good and serious reason as PLAINTIFFS/APPELLANTS have made this matter very well known, by certified letters to all Lawyer-Legislators, Judicial Merit Committee Members, Sled, Sheriff McBride, David Wagner, Micah Black, and other organizations and associations, that PLAINTIFFS/APPELLANTS are being scammed by the Court/Lawyers/Allianz/others in a Murdaugh-style scheme called Insurance Reserve Fraud, in the Legal Machine Criminal Enterprise that is part of the protector of such scams and all who ignored such a serious claim in government office is equally a part. Silence is consent.

Although PLAINTIFFS/APPELLANTS preserved their objections in the lower Court, against all odds. Even more than just a fraud on the Court, but fraud against PLAINTIFFS/APPELLANTS with Unalienable Rights, these allegations of Fraud upon the Court warrant special consideration even if not , which they were. There are oaths to be upheld

here, that are more than words, or ceremony, and in this case, those Oaths were not only ignored, they were trampled upon by State Actors and their agents for money and other interests.

While appellate review is generally limited to issues raised and preserved at trial, the **doctrine of "fraud upon the court"** is a recognized exception. Further, Fraud upon ones Natural Rights MUST be Paramount! These allegations are of such vital importance that, a claim that the judicial process was corrupted by **intentional misconduct**, particularly by judges or officers of the court, and without immunity, even more so, **is not subject to ordinary preservation rules**, as such conduct undermines the entire legal process. See: **Hazel-Atlas Glass Co. v. Hartford-Empire Co.**, 322 U.S. 238 (1944). **Stone v. McGowan**, 308 S.C. 235, 417 S.E.2d 544 (1992) (recognizing extrinsic fraud alone, may justify reopening a judgment). **Rule 60(b), SCRPC**, which allows relief from judgment for "fraud (whether heretofore denominated intrinsic or extrinsic), misrepresentation, or other misconduct of an adverse party," which there is plenty of Defense misrepresentation, frivolous arguments and filings permitted, and other RACKETEERING/Ex parte and other collusion evident in this case. This requires far more than looking at an Order in a test tube to determine its appealability, which isolates it from all the fraud and unclean interests around it that brought it forth.

As for preservation for appeal, this matter is so of the system being fraudulent is so vital, that if the court declines to review allegations of fraud or corruption simply because they were not preserved, it would create a **safe harbor for conspiracies** to fix cases beyond accountability, in violation of the Natural Rights of We the People, the Law, and public policy. Right now, these

Judges and other RACKETEERS are acting as though they have a safe harbor to RACKETEER through the LMCE that will not protect the people but only the RACKETEERS.

It is clear, that Systemic or Coordinated LMCE Case Fixing Implicates Federal RICO and Civil Rights Statutes, and with the Judges having no immunity, allegations of coordinated conduct among attorneys, insurers, and judicial officers and others to deny litigants fair trials and even worse, steal the awards and money launder through the carrier's and attorney trust accounts, real estate mortgages, and other nefarious means, perhaps calling payoffs, "loans" like in the Murdaugh case, may also implicate other federal statutes, including: **18 U.S.C. § 1961 et seq. (RICO)** – Prohibiting enterprises engaged in patterns of racketeering activity; **42 U.S.C. § 1983** – Allowing civil suits for deprivation of constitutional rights under color of state law, which includes other RACKETEERS like Judge Heath Preston Taylor, Clerk of Courts, Loureena Thomason, and fired/dismissed Scheduling Clerk Elizabeth Beasley, among others who participated in the RACKETEERING.

Using the Murdaugh situation, that looks eerily similar to PLAINTIFFS/APPELLANTS case, in many ways, and both look like IRF cases, it is clear that Murdaugh Country was an open secret and all LMCE let them operate with impunity for about 100 years or more. They were an Old Aristocratic family working and conspiring with other Old Aristocratic families to RACKETEER and exploit the public for financial gain. The carriers, who normally deny everything and are not held to bad faith in SC, another part of the IRF scheme, paid up with barely any resistance which does not happen for real, unless the Carrier is a part of the scheme. The PMPED firm would have been caught long ago, by the SC Bar who oversees trust accounts, but openly were violating trust rules that had to be reviewed regularly but were not. The payoffs were called

"loans." The bank was run by a family member of PMPED firm who was CFO of the firm. The Clerk of Courts, Beck Heir Hill was a long time family friend of the Murdaughs going at least as far back as Buster Murdaugh, where the Heirs helped him escape criminal conviction over his public corruption case in 1956, where few if any spoken words had anything to say other than how Buster bribed, threatened, fixed and otherwise made a mockery of the justice system to get out of being convicted and become the Solicitor of the 5 counties, with not a word from the Bar or Courts.

Becky Heir Hill being an Aristocratic family relation of the Murdaugh's for generations then gives Murdaugh appealable issues, never telling anyone her true relation to Murdaugh and that it goes back generations, as she is helping him escape liability and criminality just like her grandparents did for Buster Murdaugh by providing these appealable issues. Its all stays in the Aristocratic family. The same type of stories can be told in PLAINTIFFS/APPELLANTS case, with family and friend/business relationships with Murdaugh and training in Murdaugh Country by the Judges and some of the lawyers who actually own or have their name on many buildings, involved in PLAINTIFFS/APPELLANTS case.

The Anderson County Clerk of Courts has incredibly criminal genes which Aristocracy has led her to the appointment as the Clerk by none other than Aristocrat McMasters who has a seedy relationship with the Murdaugh and Boulware Aristocratic families and generational crimes, that led to another murder and other incredibly devious acts, never or barely reported, with witnesses and victims silenced or killed, that continue the line of criminality in SC by its aristocrats protected by the LMCE, such as the Judge Mullens findings repeatedly violating the appearance of impropriety with no discipline and so many others.

The quotes from Federal Judge Hoffman, and the newspapers then and now are incredibly telling statements about the known corruption permitted for the privileged in SC, and by the privileged in these Old Aristocratic systems, where now people refer to these Aristocrats more as the “good ol’ boys” but the meaning is the same and so are the players. They are the LMCE and they are untouchable, because the system doesn’t want to touch them and they don’t touch the system. This is how the justice system works here in SC and in Virginia also.

Comments such as Buster Murdaugh, in 1956, and again the Murdaugh cases recently **“...put on parade South Carolina’s tradition of laws designed for corruption.”** [Emphasis added].⁵

Further, the author stated, **“[a] public office isn’t a guilt-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. Because some South Carolinians have tolerated law breaking, winked at it or worse, the federal government [tried] to clean up the mess [in 1956 and in the present Murdaugh debacle show trial]. 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, in the most recent Murdaugh series of show trials, 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 nor willing to

⁵ “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>

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 higher 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, instead of being part of the RACKETEERS, 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 led by the Aristocratic genealogies, under color of law, in performing or protecting government theft, murders, trafficking of all types and other heinous crimes, against the People.

These government positions 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/APPELLANTS great detriment and a complete waste of Plaintiffs/Appellants time and money.

PLAINTIFFS/APPELLANTS are not naïve but expect this Appellate Court to honestly do its job anyway, and cut off those involved from special protections that may otherwise be the case.

PLAINTIFFS/APPELLANTS see they are working within these extremely Unconstitutional and dangerous circumstances, and implore the Court to take a stand in this case to award PLAINTIFFS/APPELLANTS their full due so they can move on without further dealing with corrupt courts as they are not new to this or the legal and nonviolent subsequent battles that will occur if justice is not done here in spite of inappropriate and illegal associations by the government to keep the status quo even if unlawful.

The Murdaugh case is not one case, and not even several cases, but a position statement of how the SC government was and still is run, where the aristocratic population exploits the people, to steal their awards, their probate inheritances, their trusts, and so much more through the LMCE, and Judges like McIntosh, Sprouse, Maddox and Taylor, and Lawyer Legislators like Bamberg, not even involved in PLAINTIFFS/APPELLANTS case, other than he was on the Murdaugh case and knows the truth and that PLAINTIFFS/APPELLANTS also know the truth about what Murdaugh was doing with other members of the LMCE, and how the system has schemed appealable issues for he and the others using, none other than, Beck Heir Hill to be sacrificed with great benefits for her for doing so, PLAINTIFFS/APPELLANTS are sure.

Although state appellate courts are not criminal investigative bodies, they, including the Appeals Court, **are not permitted to ignore credible allegations** that show systemic bias or unlawful coordination, which **renders the judicial process illegitimate**. Plaintiffs have writings, recordings, other statements and witnesses, and the behavior of the Courts, lawyers, lawyer-legislator, and so much more showing what was happening in this case, all illegally performed by those with financial and other inappropriate interests in Plaintiffs case.

PLAINTIFFS/APPELLANTS have been thwarted for three years by Judges and Lawyers from receiving any submitted discovery, depositions, Subpoenas, Subpoena Dues Tecum, Witnesses, and the opposition has bribed any cooperating witnesses. These are facts not speculation. PLAINTIFFS/APPELLANTS still interviewed many Defendants and witnesses on recording and received other information and evidence that helped them expose the Judges and Lawyers in what was obvious colluding and RACKETEERING, because they know they are being protected by the LMCE. PLAINTIFFS/APPELLANTS received over 2,000 pages of Defendant muti-text Group Texts to each other admitting secret and unilateral meetings with Judges, and other State Actors, to scheme against PLAINTIFFS/APPELLANTS and even harm or kill PLAINTIFFS/APPELLANTS with impunity. PLAINTIFFS/APPELLANTS recorded their lawyer and all the lies he told PLAINTIFFS/APPELLANTS on recording to include that the Defense defaulted and lost the case, but for their lawyer protecting them and trying to get PLAINTIFFS/APPELLANTS to drop several Defendants instead of notifying them of the Default. And much more. (See Motion May 1, 2025, and more detail in the Appeal Brief/Record).

These frauds that brought about any Order, Notice, or Sua Sponte move, can be shown not through a review of Orders independently to see if they are appealable, when the frauds

bringing them about are not known to the Court, but through an expanded pages and time PLAINTIFFS/APPELLANTS brief, where the Court thoroughly reviews PLAINTIFFS/APPELLANTS Appeal Brief and Record to see enough proof that normal proceedings are not occurring in PLAINTIFFS/APPELLANTS case, and only those that favor and even can only provide a predetermined outcome for Defense, but suppressing PLAINTIFFS/APPELLANTS ability, filings, and even ignoring PLAINTIFFS/APPELLANTS Entries for Judgment and Motion for Judgment on the Pleadings, and so forth, once PLAINTIFFS/APPELLANTS finally were able to fire their colluding attorney.

PLAINTIFFS/APPELLANTS are putting the SC Court System on Notice that they MUST act against the RACKETEERS, they MUST make sure PLAINTIFFS/APPELLANTS are fully made whole, they must severely discipline Judges, Lawyers, employees, and others who they have control over publicly, they MUST open investigations with SC and the Federal Government, to include those overseeing Allianz for the scams they are using to deny claims and keep claims open anyway while the IRF is taking place, they MUST be willing to change the law on good faith expansions to restructure the Solicitor General's Office, the Sheriff's Office the Constitutional protections of Judges who act as these Judges have, and so forth to make sure that government is servant to We the People, and not merely another level of protection for the LMCE status quo.

If an entry for Judgment for PLAINTIFFS/APPELLANTS in full, and settlement from the State received, so they can go on their way, then SC must be prepared to change in the Interest of Justice NOW, and some major laws must be changed, that PLAINTIFFS/APPELLANTS are

appealing as Unconstitutional, to stop the LMCE and ineffectiveness of the alleged public protection mechanisms that are allegedly in place but presently working only for the LMCE.

Further, the Court ignoring the Order dated 3/12/24, allowing for Plaintiffs to Amend, with Plaintiffs actually filing and serving the amended complaint, shows that the style they are using is the appropriate style, and just because the RACKETEERS, including Judges issuing the Order dismissing Plaintiff case that he has financial and other interest in, want the case to go back to its original complaint that was rightfully amended and relates back, to help the RACKETEERS win the appeal on other frauds, is not proper and this Court should not give any deference to what a RACKETEER wrote, but to the law in place, with the Order dictating how the case is styled.

The Appellate Court Must Address Constitutional Violations, Even Sua Sponte if Necessary. The Underlying Judges were more than willing to prosecute their own case against PLAINTIFFS/APPELLANTS by ex parte scams and full on Sua Sponte directives and prosecution of PLAINTIFFS/APPELLANTS case when their high-priced lawyers allegedly defending Defendants, could not get the job done for the Judges.

To make justice work in this case, if an entry for Judgment for PLAINTIFFS/APPELLANTS is not made and settlement by the State completed so PLAINTIFFS/APPELLANTS can be on their way and be left alone, when the appellate record indicates a potential violation of a party's constitutional rights, which it does, and will in the Appellant's Brief and Record submission, the Court of Appeals has the authority—and duty—to address those violations, regardless of preservation. See: State v. Pace, 316 S.C. 71, 447 S.E.2d 186 (1994) (courts may

consider unpreserved issues affecting substantial rights); **Rule 220(c), SCACR** – Allowing appellate courts to affirm on any ground appearing in the record. Therefore, the RECORD, accompanied by the Appeal Brief is necessary to review together and the Court wanting to review the Orders now for appealability is NOT the proper review, and Orders sterilized by the test tube will not bring forth a good faith revue of the frauds that PLAINTIFFS/APPELLANTS have been pleading from the beginning of their own representation once they fired their attorney for helping bring forth their potential but not warranted Default, which PLAINTIFFS/APPELLANTS were able to stop.

In cases where the appeal/record reasonably suggests that a litigant was denied impartial adjudication due to RACKETEERING, collusion, fraud, or coercion, and other bad faith and criminal actions, were involved, the appellate court should reverse or remand the case to protect the legitimacy of the court and preserve or in this case, try to reinstate, public confidence in the justice system. Coercion is more recently understood in the punishments PLAINTIFFS/APPELLANTS received through the Judges Cruel and Unusual Punishments that physically injured PLAINTIFFS/APPELLANTS, and their encouraging the Defendants and now McIntosh's friend who is an associate with the Defendants to put PLAINTIFFS/APPELLANTS in great physical danger again, during their time to try to write a final brief in the underlying case, and this appeal, that is caught on digital film.

To remand, would be to turn the victims over to the sharks infested 10th Circuit and their partners in the LMCE for another meal. This matter must be reversed and allow PLAINTIFFS/APPELLANTS to get full damages and full payment by Allianz, no matter how much Allianz misappropriated funds, through the determination of damages not claimed specifically,

by an unbiased jury and then for the State to make PLAINTIFFS/APPELLANTS whole also for their extremely devious role in making PLAINTIFFS/APPELLANTS last 4 years and counting, miserable and dangerous for them to exist, where PLAINTIFFS/APPELLANTS have had to be in fight/flight mode, in spite of being the victims, in a Judge and other State Actors and others concerted effort to greatly harm or have them killed, through the relationship the Judges and other State Actors fostered with these criminal-type Defendants, without morals, not only long before PLAINTIFFS/APPELLANTS filed their suit, but up to this day, where PLAINTIFFS/APPELLANTS have had to continue to protect themselves from physical attacks, some that have drawn blood, from these Defendants and their associates doing just as they did 4 years ago, one of whom is a friend of Judge McIntosh himself.⁶ This is all absurd!

The Court of Appeals is not supposed to merely be a procedural gatekeeper; it is supposed to be a Constitutional safeguard against injustice. The Court must review the Orders with the Appeal/Record also at the Courts ready, to have a contextual look at why these Orders

⁶ To remand, would be to turn the victims over to the sharks infested 10th Circuit and their partners in the LMCE for another meal. This matter must be reversed and allow Plaintiffs to get full damages and full payment by Allianz, no matter how much Allianz misappropriated funds, through the determination of damages not claimed specifically, by an unbiased jury and then for the State to make Plaintiffs whole also for their extremely devious role in making Plaintiffs last 4 years and counting, miserable and dangerous for them to exist, where Plaintiffs have had to be in fight/flight mode, in spite of being the victims, in a Judge and other State Actors and others concerted effort to greatly harm or have them killed, through the relationship the Judges and other State Actors fostered with these criminal-type Defendants, without morals, not only long before Plaintiffs filed their suit, but up to this day, where Plaintiffs have had to continue to protect themselves from physical attacks, some that have drawn blood, from these Defendants and their associates doing just as they did 4 years ago, one of whom is a friend of Judge McIntosh himself. This is all absurd!

are appealable and how they played into the fraud and so forth. The Court must allow Plaintiffs to use the approved style of their case, by law, and not use what RACKETEERS want who never objected or appealed to the style of the case used by Plaintiffs on the approved amended complaint that relates back.

Later, the Appellants will respectfully urge this Court to give a good faith, and common sense review of the allegations of fraud, collusion, coercion, RACKETEERING and other misconduct, and find that so many of the actions the Court took were so far afield from the normal course of a case proceeding legally, that such conduct undermined and intended to sabotage the integrity of the proceedings, and grant relief accordingly per FN 6, so PLAINTIFFS/APPELLANTS can put Court reform behind them and be left alone, as they have worked for many years to protect the public from such crimes and injustices and have clean hands and clear consciences to be able to leave the reform movement now after many years of service.

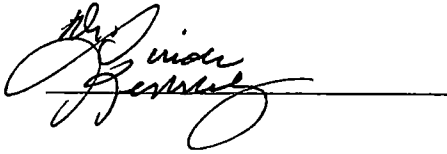
If Generational Aristocratic Family member Becky Heir Hill can purposely give fellow generational Aristocratic Family Dynasty member Alex Murdaugh appealable issues and maybe a new trail, like the assistance her grandparents gave to Buster Murdaugh, and then she is charged with crimes by SLED, who is ignoring Plaintiffs mirror image case, then Plaintiffs/Appellants certainly deserve an entry of Judgment on all matters as described herein. Plaintiffs and their claims actually are legitimate, which SLED would know the difference, but they do not have generational Aristocratic friends to throw victories to them with friendly courts to help them be protected from corruption in the LMCE, that has denied Plaintiffs/Appellants any sense of justice whatsoever. Add to that Plaintiffs/Appellants are not

Defendants in murder cases and criminals using IRF schemes to defraud the people, but only the victims, like the Murdaugh victims, with crimes perpetrated by the LMCE. The double standard cannot be tolerated by this Court, nor Plaintiffs/Appellants.

RELIEF

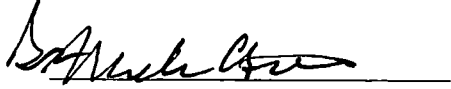
For now, for the foregoing reasons, this Court should (1) find that it has both the authority and obligation to review the ENTIRE case, at the time of filing the Appeal Brief and Record, for Constitutional and structural integrity of the proceedings below and until then it should not make rulings over what is appealable, due to Fraud, Coercion, Racketeering, Ex parte and other noted objections in the lower court; (2) Not Review the Orders in a test tube by themselves, but learn about them in the Appellants Brief and Record in context with PLAINTIFFS/APPELLANTS arguments and only make rulings on the complete position of PLAINTIFFS/APPELLANTS and why they are appealing Orders and all else; (3) address the alleged misconduct of its judges, lawyers, legal machine, in the most severe way available ; (4) open investigations state and federal to clean and get rid of these LMCE members by all legal means, to include Allianz and its fraudulent practices; and (5) As soon as possible, grant relief to PLAINTIFFS/APPELLANTS in full, to preserve the Appellant's right to a fair and impartial trial that has been stolen from them and their case ruined due to the frauds, RACKETEERING and other bad and criminal acts of all the RACKETEERS involved; (6) Keep the Style of the Case that was Ordered by the Court on March 12, 2024, that Plaintiffs rightfully used in the Notice of Appeal, through an Amending and Relation Back Order.

Respectfully submitted, but not proofed due to REASONABLE ACCOMMODATIONS PENDING,



5/15/25

Dr. Linda Kennedy



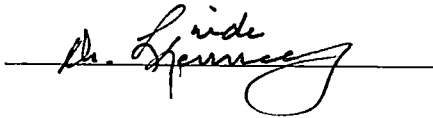
5/15/25

Dr. Marsha Fink

Certificate of Service

PLAINTIFFS/APPELLANTS certify that they sent this Motion by 1st Class mail, Postage

Prepaid, to the Attorneys of Record in this matter on 5/15/25.



STATE OF SOUTH CAROLINA
COUNTY OF Anderson
IN THE COURT OF COMMON PLEAS

FORM 4

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell Rv Resort And Cabins Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

The Plaintiff's motion for leave to amend is hereby granted. The Plaintiffs shall file and serve their amended complaint within 15 days of the filing of this order.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 03/12/2024.

Grant Ferrendelli
Marsha Fink for Marsha Fink
Fritzie Maroto
Linda Kennedy for Linda Kennedy
Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

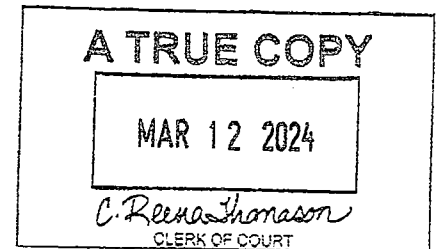
A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.





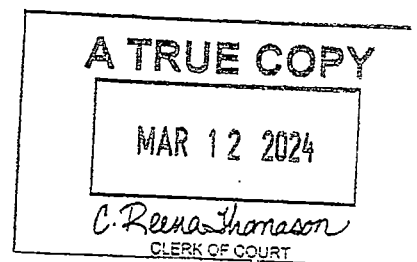
Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins.Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Electronic Form 4

IT IS SO ORDERED.

Heath P. Taylor

Electronically signed on 2024-03-12 14:44:09 page 3 of 3



STATE OF SOUNT CAROLINA
COUNTY OF ANDERSON

Dr. LINDA KENNEDY,

&

Dr. MARSHA FINK,

Plaintiffs,

vs.

LAKE HARTWELL RV RESORT AND CABINS, LLC, aka
LAKE HARTWELL RESORT AND CABINS, LLC, LAKE
HARTWELL RV RESORT AND
CABINS, LAKE HARTWELL RESORT AND CABINS,
LAKE HARTWELL CAMPERS AND CABINS, LAKE
HARTWELL MANAGEMENT, Christopher Vellanti, Other,

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, Ohter, Pellegrini), as Employ-
ee, and Individually,

RAY GRENIER, as Independent Contractor, and
Individually,

GRANT FERRENDELLI as Independent Contractor, and
Individually,

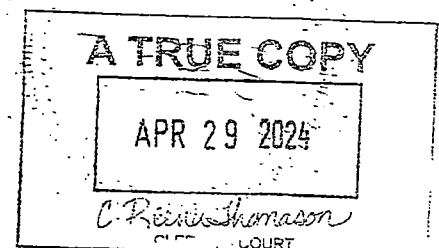
CHARLES CARPENTER, as Employee and Individually.

Defendants.

IN THE COURT OF
COMMON PLEAS

Civil Action No.
2022-CP-04-00592
JURY TRIAL

Summons



STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON

Dr. LINDA KENNEDY,

&

Dr. MARSHA FINK,

Plaintiffs,

vs.

LAKE HARTWELL RV RESORT AND CABINS, LLC, aka
LAKE HARTWELL RESORT AND CABINS, LLC, LAKE
HARTWELL RV RESORT AND
CABINS, LAKE HARTWELL RESORT AND CABINS,
LAKE HARTWELL CAMPERS AND CABINS, LAKE
HARTWELL MANAGEMENT, Christopher Vellanti, Other,

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, Ohter, Pellegrini), as Employ-
ee, and Individually,

RAY GRENIER, as Independent Contractor, and
Individually,

GRANT FERRENDELLI as Independent Contractor, and
Individually,

CHARLES CARPENTER, as Employee and Individually.

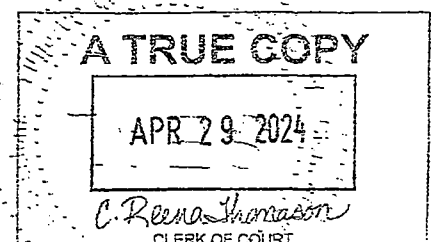
Defendants.

IN THE COURT OF
COMMON PLEAS

Civil Action No.
2022-CP-04-00592
JURY TRIAL

*3rd Amended Complaint
filed while under a
Doctor's care not to
work due to Keding
Stone emergency this
it was warned about
long ago.*

*Please need evidence
for good cause & leave
of Court from Judges
who are NOT dependent
or witnesses in this case*



To whom it may concern:

22 APR 19 PM 12:08:38
INLET 5000 CP/SS

We, Allen Riha and Marsha Stamm
have not spoke with Attorney Alan Jones
from Goudelock-Couch (mgc law).

Mr. Jones is not Allen Riha nor
Marsha Stamm's Attorney in case
2022cp0400592. Kennedy and Fink vs.
Lake Hartwell RV Resort and Cabins
LLC and others.

Allen Riha and Marsha Stamm
have never heard of Alan Jones nor
the law firm.

We, Allen Riha and Marsha Stamm
were given an extra 30 days from time
our answers was due to answer
with our own representation.

This is misrepresentation and we,
Allen Riha and Marsha Stamm do not
appreciate it. We, hope Kennedy/Fink
expose Mr. Vellanti and Ms. Goldman
for who they are.

Please file this letter in case number
above.

Allen Riha Marsha Stamm
Allen Riha Marsha Stamm

REQUEST OR MOTION AND ORDER**ATTORNEY SECTION:****ANDERSON COUNTY COMMON PLEAS**

Case Name: 2020CP0400705: Willie Lewis Martin v. Mid-Atlantic Co. Inc.; CIA Recovery, Inc.; Ryan Collins; Hunter Wyatt; Motion Dealer Group Inc., d/b/a Automotion; and Loss Prevention Services, LLC

Case Name: 2022CP0400392: Debra Root v. Freedom Fences, Inc., Patrice Shearin and Barbara Armstrong

Case Name: 2022CP0400592: Linda Kennedy and Marsha Fink v. Lake Hartwell Resort and Cabins, LLC, a/k/a lake Hartwell Resort and Cabins, a/k/a Lake Hartwell Campers and Cabins, a/k/a Lake Hartwell Management, a/k/a Chris Vellanti, a/k/a Christopher Vellanti; Christopher Vellanti, as a member and personally; Yvonne Goldman, as a General Manager and personally; Frank Pellegrini; Fritzie Maroto; Jennifer Burdette; Marsha Stamm; Allen Riha; John Doe #1, a/k/a Ray Grenier, a/k/a Ray Dukes; John Doe #2, a/k/a Tow Truck Owner and Operator; and John Doe #3, a/k/a LHRVRC Maintenance Employee

I am requesting PROTECTION for the above-named case for the date(s) of June 13, 2022, through June 17, 2022, for vacation; July 21, 2022, through July 22, 2022, for a CLE conference; and August 17, 2022, through August 19, 2022, for vacation and my signature certifies, pursuant to Rule 11(a), SCRCP, that:

(1) I have communicated with all other attorneys involved in the case and that there are no objections to this request; or

If there is an objection to this request, please explain fully, using additional pages as necessary.

(2) I have notified the appropriate docket clerk (in civil cases) or the appropriate representative from the Office of the Solicitor (in criminal cases) of this request; and

(3) There are no special Orders or dockets setting the case for trial in this particular time period.

Upon receiving the completed Request/Motion and Order, I will confirm that the original is filed with the Clerk of Court and that copies have been provided to all attorneys involved in the case.

April 25, 2022

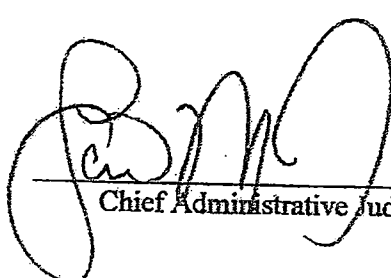
s/ Alan G. Jones

Attorney Making Request

Alan G. Jones

Please Print Attorney's Name

54, 2022


Chief Administrative Judge

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON

IN THE COURT OF COMMON PLEAS

LINDA KENNEDY AND MARSHA
FINK,

Plaintiffs,

Civil Action No. 2022-CP-04-00592

v.

LAKE HARTWELL RESORT AND
CABINS, LLC, A/K/A LAKE
HARTWELL RESORT AND CABINS,
A/K/A LAKE HARTWELL CAMPERS
AND CABINS, A/K/A LAKE
HARTWELL MANAGEMENT, A/K/A
CHRIS VELLANTI, A/K/A
CHRISTOPHER VELLANTI;
CHRISTOPHER VELLANTI, AS A
MEMBER AND PERSONALLY;
YVONNE GOLDMAN, AS A GENERAL
MANAGER AND PERSONALLY;
FRANK PELLEGRINI; FRITZIE
MAROTO; JENNIFER BURDETTE;
MARSHA STAMM; ALLEN RIHA;
JOHN DOE #1, A/K/A RAY GRENIER
A/K/A RAY DUKES; JOHN DOE #2,
A/K/A TOW TRUCK OWNER AND
OPERATOR; AND JOHN DOE #3, A/K/A
LHRVRC MAINTENANCE EMPLOYEE,

Defendants.

CONSENT SCHEDULING ORDER

The parties hereby request the entry of the following Consent Scheduling Order in order to continue to manage discovery and the trial date in this case. Consent of all parties having been given, the Court finds that the Consent Scheduling Order as proposed is reasonable and in the interests of all parties. **ACCORDINGLY, IT IS ORDERED AS FOLLOWS:**

1. All Motions to Amend Pleadings shall be filed within thirty (30) days of this Scheduling Order¹.

¹ Defendants reserve the right to move to dismiss Plaintiffs amended complaint or in the alternative to move for summary judgment pursuant to SCRCF Rule 56.

2. Mediation shall be conducted no later than January 31, 2024.
3. This case shall be eligible for trial on or after March 31, 2024. The parties agree that they may conduct discovery up until the trial of this case.

The deadlines in this Consent Scheduling Order may be extended at the Court's discretion upon consent of all parties or upon motion of any party for good cause.

IT IS SO ORDERED.

The Honorable R. Scott Sprouse
Chief Administrative Judge
10th Judicial Circuit

I CONSENT:

s/ Michael J. Neubauer

ROBERT L. MEBANE, JR. (SC Bar No. 78043)

robert.mebane@mgclaw.com

Michael J. Neubauer (SC Bar No. 104450)

michael.neubauer@mgclaw.com

McAngus Goudelock & Courie, L.L.C.

Post Office Box 2980

55 East Camperdown Way, Suite 300 (29601)

Greenville, South Carolina 29602

(864) 239-6729

ATTORNEYS FOR DEFENDANTS LAKE
HARTWELL RESORT AND CABINS, LLC,
CHRISTOPHER VELLANTI, YVONNE
GOLDMAN, FRANK PELLEGRINI, FRITZIE
MAROTO, JENNIFER BURDETTE, JOHN DOE
#1, A/K/A RAY GRENIER, A/K/A RAY DUKES,
JOHN DOE #2, A/K/A TOW TRUCK OWNER
AND OPERATOR AND JOHN DOE #3, A/K/A
LHRVRC MAINTENANCE EMPLOYEE

Consent Scheduling Order
Civil Action No. 2022-CP-04-00592

I CONSENT:

s/ Michael B. Dodd

Michael B. Dodd, Esquire (SC Bar No. 100599)

Michael@thedoddlawfirm.com

The Dodd Law Firm, LLC

13 Sevier Street

Greenville, SC 29605

(864) 214-5012

ATTORNEY FOR PLAINTIFFS

Consent Scheduling Order
Civil Action No. 2022-CP-04-00592

I CONSENT:

s/ James C. (Trey) Cox III

James C. (Trey) Cox III, Esquire

Tcox@griercoxandcranshaw.com

George R. DeLoach III, Esquire

Bdeloach@griercoxandcranshaw.com

Grier, Cox, & Cranshaw, LLC

P.O. Box 2823

Columbia, SC 29202

(803) 731-0030

ATTORNEY FOR DEFENDANTS

MARSHA STAMM AND ALLEN RIHA



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Scheduling Order

s/R. Scott Sprouse, Judge #2752

Tenth Judicial Circuit

STATE OF SOUTH CAROLINA

COUNTY OF ANDERSON

IN THE COURT OF COMMON PLEAS

LINDA KENNEDY AND MARSHA
FINK,

Civil Action No. 2022-CP-04-00592

Plaintiffs,

vs.

**CONSENT ORDER FOR
CONTINUANCE**

LAKE HARTWELL RESORT AND
CABINS, LLC, A/K/A LAKE
HARTWELL RESORT AND CABINS,
A/K/A LAKE HARTWELL CAMPERS
AND CABINS, A/K/A LAKE
HARTWELL MANAGEMENT, A/K/A
CHRIS VELLANTI, A/K/A
CHRISTOPHER VELLANTI;
CHRISTOPHER VELLANTI, AS A
MEMBER AND PERSONALLY;
YVONNE GOLDMAN, AS A GENERAL
MANAGER AND PERSONALLY;
FRANK PELLEGRINI; FRITZIE
MAROTO; JENNIFER BURDETTE;
MARSHA STAMM; ALLEN RIHA;
JOHN DOE #1, A/K/A RAY GRENIER
A/K/A RAY DUKES; JOHN DOE #2,
A/K/A TOW TRUCK OWNER AND
OPERATOR; AND JOHN DOE #3, A/K/A
LHRVRC MAINTENANCE EMPLOYEE,

Defendants.

This matter appears before me on the Anderson County Motions Roster for Wednesday, June 22, 2022, to hear Defendants' Motion to Dismiss and Motion to Enlarge Time to Answer Discovery. Defendants request and Plaintiffs consent to a continuance of the hearing due to defense counsel having tested positive for COVID.

Now, therefore, **IT IS ORDERED** that this case be continued and heard at another session of the Common Pleas Court for Anderson County, South Carolina.

AND IT IS SO ORDERED

The Honorable R. Scott Sprouse
Tenth Judicial Circuit

Anderson, South Carolina

June 22, 2022

I CONSENT:

s/ Michael B. Dodd

Michael B. Dodd, Esquire
The Dodd Law Firm, LLC
Attorney for Plaintiffs

I SO MOVE AND CONSENT:

s/ Alan G. Jones

Alan G. Jones, Esquire
Bar No: 100141
McAngus Goudelock & Courie, LLC
Attorney for Defendants

I CONSENT:

s/ James C. Cox, III

James C. Cox, III
Grier, Cox & Cranshaw, LLC
Attorney for Defendants, Marsha Stamm,
and Allen Riha



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Continuance

s/R. Scott Sprouse, Judge #2752

Tenth Judicial Circuit

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022 CP-04-00592

LINDA KENNEDY AND MARSHA FINK

LAKE HARTWELL RV RESORT AND
CABINS LLC. ET, AL.

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:

Attorney for : ☐ Plaintiff ☐ Defendant
or
☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. ☐ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

ORDER INFORMATION

PLAINTIFF MOTION TO RECONSIDER IS DENIED WITHOUT THE NECESSITY OF A FORMAL HEARING. NO FORMAL ORDER IS REQUESTED.

This order ☒ ends ☐ does not end the case.

INFORMATION FOR THE JUDGMENT INDEX

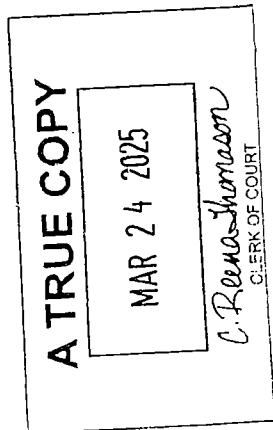
Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
		\$
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.



Circuit Court Judge

Judge Code

Date

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20____ and a copy mailed first class or placed in the appropriate attorney's box on this _____ day of _____, 20____ to attorneys of record or to parties (when appearing pro se) as follows:

 ATTORNEY(S) FOR THE PLAINTIFF(S)

 ATTORNEY(S) FOR THE DEFENDANT(S)

 CLERK OF COURT

Court Reporter:

E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.



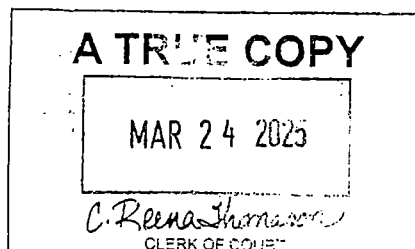
Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

Electronically signed on 2025-03-24 15:21:40 page 3 of 3



FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022 CP-0400592

LINDA KENNEDY AND MARSHA FINK

LAKE HARTWELL RESORT AND CABINS,
LLC ET, AL.

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:

Attorney for : ☐ Plaintiff ☐ Defendant
or
☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. ☐ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

ORDER INFORMATION

PLAINTIFF MOTION TO USE COURT COMPUTER SYSTEM IS DENIED WITHOUT THE NECESSITY OF A FORMAL HEARING. NO FORMAL ORDER IS REQUESTED.

This order ☐ ends ☒ does not end the case.

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
		\$
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order:

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E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

Circuit Court Judge

2155

Judge Code

Date

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20____ and a copy mailed first class or placed in the appropriate attorney's box on this _____ day of _____, 20____ to attorneys of record or to parties (when appearing pro se) as follows:

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

CLERK OF COURT

Court Reporter:

E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Fileers or who are appearing pro se. See Rule 77(d), SCRCP.

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022 CP-0400592

LINDA KENNEDY AND MARSHA FINK

LAKE HARTWELL RESORT AND CABINS,
LLC ET, AL.

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:

Attorney for : ☐ Plaintiff ☐ Defendant
or
☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

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- ☐ STAYED DUE TO BANKRUPTCY
- ☐ DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

ORDER INFORMATION

PLAINTIFF MOTION FOR EX-PARTE TEMPORARY RESTRAINING ORDER PURSUANT TO RULE 65, SCRPC IS DENIED. NO FORMAL ORDER IS REQUESTED.

This order ☐ ends ☒ does not end the case.

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
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		\$
		\$

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Circuit Court Judge

2155

Judge Code

Date

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ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

CLERK OF COURT

Court Reporter:

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Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al
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Type: Order/Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022 CP-0400592

LINDA KENNEDY AND MARSHA FINK

LAKE HARTWELL RESORT AND CABINS,
LLC ET, AL.

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:

Attorney for : ☐ Plaintiff ☐ Defendant
or
☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

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☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

ORDER INFORMATION

PLAINTIFF MOTION TO JOIN IS DENIED WITHOUT THE NECESSITY OF A FORMAL HEARING.
NO FORMAL ORDER IS REQUESTED.

This order ☐ ends ☒ does not end the case.

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

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Circuit Court Judge

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Judge Code

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ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

CLERK OF COURT

Court Reporter:

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This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

Electronically signed on 2022-03-24 08:54:47 page 3 of 3

STATE OF SOUTH CAROLINA)

COUNTY OF ANDERSON)

Linda Kennedy and Marsha Fink,)

Plaintiff,)

vs.)

IN THE COURT OF COMMON PLEAS
TENTH JUDICIAL CIRCUIT

CIVIL CASE NO. 2022-CP-04-00592

**MOTION/ORDER FOR
CONTINUANCE**

Lake Hartwell RV Resort and Cabins LLC,)
 Christopher Vellanti and Yvonne Goldman,)
 And Frank Pellegrini, Fritzie Maroto,)
 Jennifer, Burdette, Marsha Stamm,)
 Allen Riha, and)
 Ray Grenier,)
 Grant Ferrendelli,)
 and)
 Charles Carpenter,)
 Defendants.)

YOU WILL PLEASE TAKE NOTICE THAT the Plaintiffs, by and through their undersigned counsel, and do make this motion and request for a continuance of the hearing scheduled for the June 14, 2023 term of court on Plaintiff's motion to amend and Defendant Marsha Stamm and Alan Riha's motion to strike and motion to dismiss, and any other pending motions in this case pursuant to Rule 40 of the South Carolina Rules of Civil Procedure ("SCRCP") for good cause shown. The motion is made without objection upon conference of counsel for all parties. The Parties are not aware of any prejudice any party may suffer as a result of a continuance. There is now pending a motion to be relieved as counsel and a continuance is warranted until that motion may be heard. Accordingly, the Plaintiffs ask for a continuance, and request that a continuance be granted until the motion to be relieved as counsel has been decided and ruled on by the court, and the court sets such time frames as may be appropriate under the

circumstances for the hearing of any other motions or matters in this case. The defendants, through their respective counsel, do not object to the request, as set forth in their signatures below.

IN CONSIDERATION OF THE FOREGOING, it is ORDERED that all motions in this matter are continued beyond the currently scheduled date of June 14, 2023 and shall be rescheduled at a date and time as the court deems appropriate and within its sound discretion.

IT IS SO ORDERED.

WE SO MOVE:

The Dodd Law Firm, LLC

s/Michael B. Dodd
Attorney for the Plaintiffs
The Dodd Law Firm, LLC
13 Sevier Street
Greenville, SC 29605
864-747-5607
michael@thedoddlawfirm.com

WE DO NOT OPPOSE:

s/G. Robert DeLoach. III

GRIER, COX & CRANSHAW, LLC
2001 Assembly Street, Suite 204
Columbia, SC 29201
(803) 731-0030
Attorney for Marsha Stamm and Alan Riha

s/Michael Neubauer
McAngus Goudelock and Courie
michael.neubauer@mgclaw.com
55 E. Camperdown Way Suite 300
Greenville, SC 29601
864-239-4000
Attorney for all other Defendants

Judge's Signature Page to Follow



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Continuance

s/R. Scott Sprouse, Judge #2752

Tenth Judicial Circuit

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON

IN THE COURT OF COMMON PLEAS

LINDA KENNEDY AND MARSHA
FINK,

Civil Action No. 2022-CP-04-00592

Plaintiffs,

vs.

ORDER FOR PROTECTION

LAKE HARTWELL RESORT AND
CABINS, LLC, A/K/A LAKE
HARTWELL RESORT AND CABINS,
A/K/A LAKE HARTWELL CAMPERS
AND CABINS, A/K/A LAKE
HARTWELL MANAGEMENT, A/K/A
CHRIS VELLANTI, A/K/A
CHRISTOPHER VELLANTI;
CHRISTOPHER VELLANTI, AS A
MEMBER AND PERSONALLY;
YVONNE GOLDMAN, AS A GENERAL
MANAGER AND PERSONALLY;
FRANK PELLEGRINI; FRITZIE
MAROTO; JENNIFER BURDETTE;
MARSHA STAMM; ALLEN RIHA;
JOHN DOE #1, A/K/A RAY GRENIER
A/K/A RAY DUKES; JOHN DOE #2,
A/K/A TOW TRUCK OWNER AND
OPERATOR; AND JOHN DOE #3, A/K/A
LHRVRC MAINTENANCE EMPLOYEE,

Defendants.

It appearing to the Court that Michael J. Neubauer, Esquire, attorney at law, practicing with the law firm of McAngus, Goudelock & Courie, L.L.C. in Greenville, South Carolina, requests protection for July 20, 2023, through August 11, 2023, for the birth of his child.

It is, therefore, **ORDERED** that Michael J. Neubauer, Esquire, be, and hereby is, granted protection from any and all Court proceedings concerning the above-captioned case from July 20, 2023, through August 11, 2023.

AND IT IS SO ORDERED.

Administrative Judge

June ____, 2023



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Protection from Court Appearance

s/R. Scott Sprouse, Judge #2752

Tenth Judicial Circuit

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022 CP-0400592

Linda Kennedy et. al.
PLAINTIFF(S)

Lake Hartwell Rv Resort And Cabins Llc
DEFENDANT(S)

Submitted by:	Attorney for : ☐ Plaintiff ☐ Defendant
	or ☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. ☐ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

ORDER INFORMATION

Plaintiff's Motion to Relieve as Counsel was scheduled to come before the Court on 7/13/2023. This motion was continued for good cause.

This order ☐ ends ☒ does not end the case.

INFORMATION FOR THE JUDGMENT INDEX		
Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.		
Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
		\$
		\$
		\$
If applicable, describe the property, including tax map information and address, referenced in the order:		

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk.
Note: Title abstractors and researchers should refer to the official court order for judgment details.
E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

 Circuit Court Judge

2131

 Judge Code

 Date

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20____ and a copy mailed first class or placed in the appropriate attorney's box on this _____ day of _____, 20____ to attorneys of record or to parties (when appearing pro se) as follows:

 ATTORNEY(S) FOR THE PLAINTIFF(S)

 ATTORNEY(S) FOR THE DEFENDANT(S)

 CLERK OF COURT

Court Reporter:

E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Fileers or who are appearing pro se. See Rule 77(d), SCRCP.

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Continuance

So Ordered

s/ J. Cordell Maddox Jr.

STATE OF SOUTH CAROLINA
COUNTY OF Anderson
IN THE COURT OF COMMON PLEAS

FORM 4

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell Rv Resort And Cabins Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled);
☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

All motions that were before the court on November 28th, 2023 are continued due to a medical emergency.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 12/01/2023 .

Grant Ferrendelli
Fritzie Maroto
Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy
Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCF.



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Electronic Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

STATE OF SOUNT CAROLINA
COUNTY OF ANDERSON

IN THE COURT OF
COMMON PLEAS

LINDA KENNEDY,

Civil Action No. 2022-CP-04-00592

&

MARSHA FINK,

Plaintiffs,

vs.

LAKE HARTWELL RV RESORT AND CABINS, LLC,
aka LAKE HARTWELL RESORT AND CABINS, LLC,
LAKE HARTWELL RV RESORT AND
CABINS, LAKE HARTWELL RESORT AND CAB-
INS, LAKE HARTWELL CAMPERS AND CABINS,
LAKE HARTWELL MANAGEMENT,

CHRISTOPHER VELLANTI, Corporately, as the Sole
Member, Manager Employee, and Personally,

YVONNE GOLDMAN, as General Manager Employee
and Personally,

MARSHA STAMM, as Co-Assistant Manager, and
Personally,

ALLEN RIHA, as Co-Assistant Manager, and
Personally,

JENNIFER BURDETTE, as Employee, and Personally,

FRANK PELLEGRINI, as Employee, and Personally,

FRITZIE MAROTO (Pellegrini), as Employee, and
Personally,

RAY GRENIER, as Independent Contractor, and
Personally,

GRANT FERENDELLI as Independent Contractor,
and Personally,

CHARLES CARPENTER, as Employee and Personally.

Defendants.

ORDER

Denied
for MD
12-11-23

IN CONSIDERATION OF THE FOREGOING, it is ORDERED that

- a) All Motions to Dismiss and Motions to Strike and Renewed Motion to Dismiss and Renewed Motion to Strike filed on behalf of Lake Hartwell RV Resort and Cabins, LLC, *et al* are stricken and dismissed as Defendants have agreed to filing of Second Amended complaint making all previous motions moot.
- b) All Motions to Dismiss and Motions to Strike and all Renewed Motion to Dismiss and Motion to Strike filed on behalf of Marsha Stamm and Allen Riha are stricken and dismissed as Defendants have agreed to filing of Second Amended complaint making all previous motions moot.
- c) It is further ORDERED that the affirmative defense of Insufficient Service of Process raised by Lake Hartwell RV Resort and Cabins, LLC, *et al*, pursuant to Rule 12(b)(5) South Carolina Rules in its first Motion to Dismiss and Motion to Strike dated April 15, 2022 is waived and stricken because it was not properly raised because it lacked specificity.
- d) Further, IT IS ORDERED that because of bad acts and collusion of all defense attorney and others, JUDGMENT is entered for Plaintiffs

IT IS SO ORDERED.

Denied
Judge

12-11-23

JS

STATE OF SOUTH CAROLINA)

COUNTY OF ANDERSON)

Linda Kennedy and Marsha Fink)

vs.)

IN THE COURT OF COMMON PLEAS

CASE NO: 2022-CP-04-00592

Order Denying Motion for Reconsideration

Lake Hartwell RV Resort and
Cabins, LLC, A/K/A Lake Hartwell
Resort and Cabins, LLC, Lake
Hartwell RV Resort et. al.

The attached order was filed pro se by plaintiffs on December 11, 2023. Currently the plaintiffs are represented by counsel although there is an outstanding motion by plaintiff's counsel to be relieved.

Previously a hearing was scheduled on November 28, 2023 on multiple motions. The hearing was continued due to a medical emergency of one of the parties.

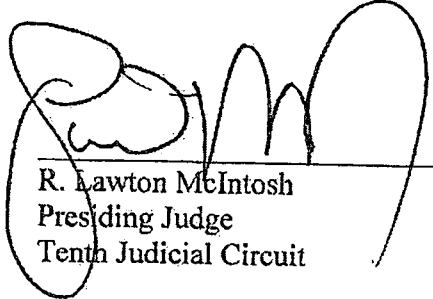
Subsequently, the attached order was submitted pro se by plaintiff. The order was neither solicited nor the result of a hearing. Accordingly, the order was denied.

To the extent that plaintiffs current pro se motion seeks a reconsideration of this court's denial of the attached order, the motion is denied.

This order is limited to the motion for reconsideration to the extent one is asserted and is not directed to any other motions plead. Nothing in this order is directed to the validity of any of the alleged motions pled.

IT IS SO ORDERED.

December 18, 2023
Anderson, South Carolina


R. Lawton McIntosh
Presiding Judge
Tenth Judicial Circuit

STATE OF SOUNT CAROLINA
COUNTY OF ANDERSON

IN THE COURT OF
COMMON PLEAS

LINDA KENNEDY,

Civil Action No. 2022-CP-04-00592

&

MARSHA FINK,

Plaintiffs,

vs.

LAKE HARTWELL RV RESORT AND CABINS, LLC,
aka LAKE HARTWELL RESORT AND CABINS, LLC,
LAKE HARTWELL RV RESORT AND
CABINS, LAKE HARTWELL RESORT AND CAB-
INS, LAKE HARTWELL CAMPERS AND CABINS,
LAKE HARTWELL MANAGEMENT,

CHRISTOPHER VELLANTI, Corporately, as the Sole
Member, Manager Employee, and Personally,

YVONNE GOLDMAN, as General Manager Employee
and Personally,

MARSHA STAMM, as Co-Assistant Manager, and
Personally,

ALLEN RIHA, as Co-Assistant Manager, and
Personally,

JENNIFER BURDETTE, as Employee, and Personally,

FRANK PELLEGRINI, as Employee, and Personally,

FRITZIE MAROTO (Pellegrini), as Employee, and
Personally,

RAY GRENIER, as Independent Contractor, and
Personally,

GRANT FERENDELLI as Independent Contractor,
and Personally,

CHARLES CARPENTER, as Employee and Personally.

Defendants.

ORDER

Denied
Jan M
12-11-23

IN CONSIDERATION OF THE FOREGOING, it is ORDERED that

- a) All Motions to Dismiss and Motions to Strike and Renewed Motion to Dismiss and Renewed Motion to Strike filed on behalf of Lake Hartwell RV Resort and Cabins, LLC, *et al* are stricken and dismissed as Defendants have agreed to filing of Second Amended complaint making all previous motions moot.
- b) All Motions to Dismiss and Motions to Strike and all Renewed Motion to Dismiss and Motion to Strike filed on behalf of Marsha Stamm and Allen Riha are stricken and dismissed as Defendants have agreed to filing of Second Amended complaint making all previous motions moot.
- c) It is further ORDERED that the affirmative defense of Insufficient Service of Process raised by Lake Hartwell RV Resort and Cabins, LLC, *et al*, pursuant to Rule 12(b)(5) South Carolina Rules in its first Motion to Dismiss and Motion to Strike dated April 15, 2022 is waived and stricken because it was not properly raised because it lacked specificity.
- d) Further, IT IS ORDERED that because of bad acts and collusion of all defense attorney and others, JUDGMENT is entered for Plaintiffs

Judge

Denied
12-11-23
JSM

IT IS SO ORDERED.

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON

IN THE COURT OF COMMON PLEAS
FOR THE TENTH JUDICIAL CIRCUIT

Linda Kennedy and Marsha Fink,

Case No.: 2022-CP-04-00592

Plaintiff,

vs.

Lake Hartwell Resort and Cabins, LLC,
A/K/A Lake Hartwell Resort and Cabins,
A/K/A Lake Hartwell Campers and Cabins,
A/K/A Lake Hartwell Management, A/K/A,
A/K/A Christopher Vellanti; Christopher
Vellanti, as a Member and Personally;
Yvonne Goldman, As A General Manager
and Personally; Frank Pellegrini; Fritzie
Maroto; Jennifer Burdette; Marsha Stamm;
Allen Riha; John Doe #1, A/K/A Ray
Grenier, A/K/A Ray Dukes; John Doe #2,
A/K/A Tow Truck Owner and Operator;
John Doe #3, A/K/A LHRVRC Maintenance
Employee,

Defendants.

ORDER

This matter was before the Court pursuant to Plaintiff's counsel moving to be relieved as counsel. A number of other motions were on the docket as well. Multiple hearings have been continued. The Court heard from Plaintiff's counsel, the Plaintiffs and defense counsel. The Plaintiffs do not wish Mr. Dodd to remain their counsel, but wanted it noted on the record that they had "fired" him. The Plaintiffs make various allegations against Dodd and have a pending ODC complaint against him. Dodd vehemently denies the allegations made by the Plaintiffs against him.

The Court concludes that, given the nature of the relationship between Dodd and the Plaintiff, the motion to be relieved should be granted. Dodd was instructed by the Court to provide the Plaintiff's file to them, which he did in the courtroom. The Plaintiffs informed the Court that

the file should be thicker than what was provided. Dodd noted for the record that he had provided all that he had in the file.

Dodd requested that the Plaintiffs be given a period of time in which to retain counsel. The Plaintiffs indicate that they wish to retain another attorney. The Plaintiffs ask that the Court continue the other motions to give them time to obtain counsel. Defense counsel is concerned about the volume of documents that have been filed by the Plaintiffs themselves-----there have been several filings since the November 28, 2023 hearing that was continued by Judge McIntosh.

Accordingly, it is ordered as follows:

1. That Michael Dodd, Esquire, is relieved as counsel for the Plaintiffs.
2. That the other motions scheduled for today are continued.
3. That the Plaintiffs shall have thirty (30) days in which to retain counsel, after which a hearing shall be held on the remaining motions.
4. That the new Plaintiff's counsel shall have the ability to consolidate and amend the various motions prior to the new hearing, provided that defense counsel is given notice of at least ten (10) days prior to the hearing.
5. No new matters shall be considered at the hearing. The matters to be considered are the filings prior to January 11, 2024.
6. No further continuances shall be granted.

AND, IT IS SO ORDERED.

R. SCOTT SPROUSE
Judge, Tenth Judicial Circuit

Anderson, South Carolina
January ____, 20__



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Form 4

s/R. Scott Sprouse, Judge #2752

Tenth Judicial Circuit

Electronically signed on 2024-01-12 10:02:46 page 3 of 3

STATE OF SOUTH CAROLINA
COUNTY OF Anderson
IN THE COURT OF COMMON PLEAS

FORM 4

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell Rv Resort And Cabins Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED** (CHECK REASON): ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled);
☐ Other
- ☐ **ACTION STRICKEN** (CHECK REASON): ☐ Rule 40(j), SCRPC; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT** (CHECK APPLICABLE BOX):
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

The Plaintiff's motion for leave to amend is hereby granted. The Plaintiffs shall file and serve their amended complaint within 15 days of the filing of this order.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 03/12/2024 .

Grant Ferrendelli
Marsha Fink for Marsha Fink
Fritzie Maroto
Linda Kennedy for Linda Kennedy
Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

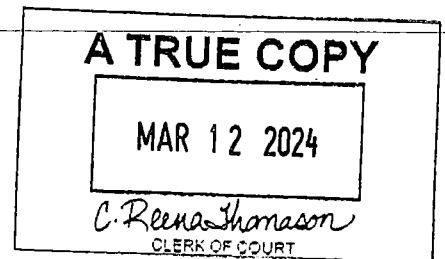
A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.





Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Electronic Form 4

IT IS SO ORDERED.

Heath P. Taylor

Electronically signed on 2024-03-12 14:44:09 page 3 of 3

A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Anderson
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell Rv Resort And Cabins Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

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- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled);
☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

The Plaintiffs' motion to change venue is hereby denied.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 03/12/2024 .

Grant Ferrendelli
Marsha Fink for Marsha Fink
Fritzie Maroto
Linda Kennedy for Linda Kennedy
Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Electronic Form 4

IT IS SO ORDERED.

Heath P. Taylor

Electronically signed on 2024-03-12 14:45:09 page 3 of 3

A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Anderson
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell Rv Resort And Cabins Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled);
☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

The Plaintiffs motions to strike and enter default judgment are hereby denied.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 03/12/2024 .

Grant Ferrendelli
Marsha Fink for Marsha Fink
Fritzie Maroto
Linda Kennedy for Linda Kennedy
Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

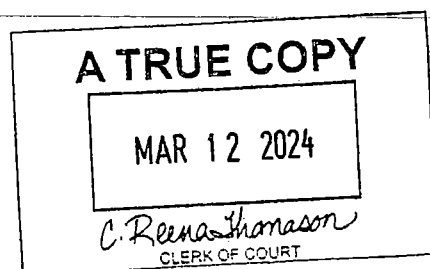
A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



C



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Electronic Form 4

IT IS SO ORDERED.

Heath P. Taylor

Electronically signed on 2024-03-12 14:44:49 page 3 of 3

A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Anderson
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell Rv Resort And Cabins Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRCP; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

Defendant Riha's motion to strike is withdrawn as moot.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 03/12/2024 .

Grant Ferrendelli
Marsha Fink for Marsha Fink
Fritzie Maroto
Linda Kennedy for Linda Kennedy
Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

A TRUE COPY

MAR 12 2024

C. Reena Thompson
CLERK OF COURT

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Electronic Form 4

IT IS SO ORDERED.

Heath P. Taylor

Electronically signed on 2024-03-12 14:44:59 page 3 of 3

A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT

STATE OF SOUTH CAROLINA
COUNTY OF Anderson
IN THE COURT OF COMMON PLEAS

FORM 4

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell Rv Resort And Cabins Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED** (CHECK REASON): ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled);
☐ Other
- ☐ **ACTION STRICKEN** (CHECK REASON): ☐ Rule 40(j), SCRPC; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT** (CHECK APPLICABLE BOX):
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

Defendant Vellanti's motion for protection from discovery is hereby granted. Discovery is held in abeyance pending a hearing on the Defendants motions to dismiss.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 03/12/2024 .

Grant Ferrendelli
Marsha Fink for Marsha Fink
Fritzie Maroto
Linda Kennedy for Linda Kennedy
Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

A TRUE COPY

MAR 12 2024

C. R. Rouse

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

A TRUE COPY

MAR 12 2024

C. Reenan
CLERK



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Electronic Form 4

IT IS SO ORDERED.

Heath P. Taylor

Electronically signed on 2024-03-12 14:45:19 page 3 of 3

A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Anderson
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell Rv Resort And Cabins Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED** (CHECK REASON): ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other
- ☐ **ACTION STRICKEN** (CHECK REASON): ☐ Rule 40(j), SCRPC; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT** (CHECK APPLICABLE BOX): ☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

Defendant Riha and Defendant Goldman's motion to dismiss are held in abeyance until the filing of the Plaintiff's amended complaint.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 03/12/2024 .

Grant Ferrendelli
Marsha Fink for Marsha Fink
Fritzie Maroto
Linda Kennedy for Linda Kennedy
Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy

A TRUE COPY

MAR 12 2024

C. Reena Thomas
CLERK OF COURT

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

A TRUE COPY

MAR 12 2024

C. Beena Thomason
CLERK OF COURT



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Electronic Form 4

IT IS SO ORDERED.

Heath P. Taylor

Electronically signed on 2024-03-12 14:44:39 page 3 of 3

A TRUE COPY

MAR 12 2024

C. Reena Thomason
CLERK OF COURT

STATE OF SOUTH CAROLINA
COUNTY OF Anderson
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell Rv Resort And Cabins Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED** (*CHECK REASON*): ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled);
☐ Other
- ☐ **ACTION STRICKEN** (*CHECK REASON*): ☐ Rule 40(j), SCRPC; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT** (*CHECK APPLICABLE BOX*):
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

Plaintiffs motion for enlargement of time is hereby granted. Plaintiff has 30 days from the date of this order to file amended complaint.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 03/27/2024 .

Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy
Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc . defendant, et al
Case Number: 2022CP0400592
Type: Order/Electronic Form 4

IT IS SO ORDERED.

Heath P. Taylor

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON

IN THE COURT OF COMMON PLEAS

LINDA KENNEDY AND MARSHA
FINK,

Civil Action No. 2022-CP-04-00592

Plaintiffs,

ORDER FOR PROTECTION

vs.

LAKE HARTWELL RESORT AND
CABINS, LLC, A/K/A LAKE
HARTWELL RESORT AND CABINS,
A/K/A LAKE HARTWELL CAMPERS
AND CABINS, A/K/A LAKE
HARTWELL MANAGEMENT, A/K/A
CHRIS VELLANTI, A/K/A
CHRISTOPHER VELLANTI;
CHRISTOPHER VELLANTI, AS A
MEMBER AND PERSONALLY;
YVONNE GOLDMAN, AS A GENERAL
MANAGER AND PERSONALLY;
FRANK PELLEGRINI; FRITZIE
MAROTO; JENNIFER BURDETTE;
MARSHA STAMM; ALLEN RIHA;
JOHN DOE #1, A/K/A RAY GRENIER
A/K/A RAY DUKES; JOHN DOE #2,
A/K/A TOW TRUCK OWNER AND
OPERATOR; AND JOHN DOE #3, A/K/A
LHRVRC MAINTENANCE EMPLOYEE,

Defendants.

It appearing to the Court that Michael J. Neubauer, Esquire, attorney at law, practicing with the law firm of McAngus, Goudelock & Courie, L.L.C. in Greenville, South Carolina, will be on vacation beginning Monday, July 1, 2024, through Friday, July 5, 2024, and beginning Thursday, July 11, 2024, through Friday, July 12, 2024.

It is, therefore, **ORDERED** that Michael J. Neubauer, Esquire, be, and hereby is, granted protection from any and all Court proceedings concerning the above-captioned case from

Monday, July 1, 2024, through Friday, July 5, 2024, and from Thursday, July 11, 2024, through Friday, July 12, 2024.

AND IT IS SO ORDERED.

Administrative Judge, Tenth Judicial Circuit

Greenville, South Carolina

June _____, 2024



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Protection from Court Appearance

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON

Dr. LINDA KENNEDY,

&

Dr. MARSHA FINK,

Plaintiffs,

vs.

LAKE HARTWELL RV RESORT AND CABINS, LLC, aka
LAKE HARTWELL RESORT AND CABINS, LLC, LAKE
HARTWELL RV RESORT AND
CABINS, LAKE HARTWELL RESORT AND CABINS,
LAKE HARTWELL CAMPERS AND CABINS, LAKE
HARTWELL MANAGEMENT, Christopher Vellanti, Other,

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, Ohter, Pellegrini), as Employ-
ee, and Individually,

RAY GRENIER, as Independent Contractor, and
Individually,

GRANT FERRENDELLI as Independent Contractor, and
Individually,

CHARLES CARPENTER, as Employee and Individually.

Defendants.

IN THE COURT OF
COMMON PLEAS

Civil Action No.
2022-CP-04-00592
JURY TRIAL

24 JUN 4 PM 4:43:25
Anderson, SC CLK, CP/SS

*Order of Continuance
of 3rd Amended Compl
to Continue Unconstituted
filing of a June 4, 2024
Hearing*

ORDER

1. Plaintiffs' request to Continue the June 4, 2024 hearing is granted;
2. Plaintiffs' motion for an extension of time for 30 days to finish the Amended Complaint they have tried to write through Kidney stones and damages to arms/hands/thumbs/ eyes is granted.

IT IS SO ORDERED



Judge

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON

Dr. LINDA KENNEDY,

&

Dr. MARSHA FINK,

Plaintiffs,

vs.

LAKE HARTWELL RV RESORT AND CABINS, LLC, aka
LAKE HARTWELL RESORT AND CABINS, LLC, LAKE
HARTWELL RV RESORT AND
CABINS, LAKE HARTWELL RESORT AND CABINS,
LAKE HARTWELL CAMPERS AND CABINS, LAKE
HARTWELL MANAGEMENT, Christopher Vellanti, Other,

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, Ohter, Pellegrini), as Employ-
ee, and Individually,

RAY GRENIER, as Independent Contractor, and
Individually,

GRANT FERRENDELLI as Independent Contractor, and
Individually,

CHARLES CARPENTER, as Employee and Individually.

Defendants.

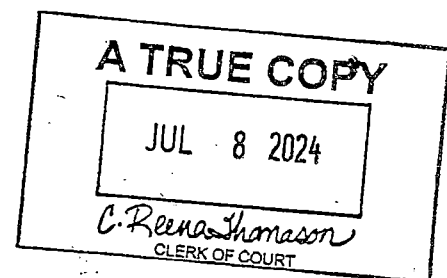
IN THE COURT OF
COMMON PLEAS

24 JUN 4 PM 4:43:25
Anderson, SC CO, CP/CS

Civil Action No.
2022-CP-04-00592
JURY TRIAL

*Order of Continuance
of 3rd Amended Compl
& to Continue Uncontested
filing of a June 4, 2024
Hearing*

*Received
7/12/24*



ORDER

1. Plaintiffs' request to Continue the June 4, 2024 hearing is granted;
2. Plaintiffs' motion for an extension of time for 30 days to finish the Amended Complaint they have tried to write through Kidney stones and damages to arms/hands/thumbs/ eyes is granted.

IT IS SO ORDERED


Judge

A TRUE COPY

JUL 8 2024

C. Reena Thomason
CLERK OF COURT

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell RV Resort & Cabins LLC et al
DEFENDANT(S)

Submitted by: R. Lawton McIntosh	Attorney for : ☐ Plaintiff ☐ Defendant
	or
	☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. ☐ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

ORDER INFORMATION

COURT WAS ADVISED THAT ONE OF THE PLAINTIFFS ALLEGEDLY SUFFERED A MEDICAL EVENT. MATTER IS CONTINUED TO NEXT TERM OF COURT.

This order ☐ ends ☒ does not end the case.

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
		\$
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

A TRUE COPY

AUG 26 2024

C. Rena Thomason
Clerk of Court

2155

Circuit Court Judge

Judge Code

Date

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20____ and a copy mailed first class or placed in the appropriate attorney's box on this _____ day of _____, 20____ to attorneys of record or to parties (when appearing pro se) as follows:

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

CLERK OF COURT

Court Reporter:

E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

ELECTRONICALLY FILED - 2024 Aug 26 3:46 PM - ANDERSON - COMMON PLEAS - CASE#2022CP0400592



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

Electronically signed on 2024-08-26 15:39:09 page 3 of 3

A TRUE COPY

AUG 26 2024

C. Beena Thomason
CLERK OF COURT

REQUEST OR MOTION AND ORDER

ATTORNEY SECTION:

ANDERSON COUNTY COMMON PLEAS

Case Name: Linda Kennedy and Marsha Fink v. Lake Hartwell RV resort and Cabins LLC., et, al.

Case Number: 2022CP0400592

I am requesting PROTECTION for the above-named case for the date(s) of September 16, 2024, to September 20, 2024, due to Medical Appointments and my signature certifies, pursuant to Rule 11(a), SCRCP, that:

(1) I have communicated with all other attorneys involved in the case and that there are no objections to this request; or

If there is an objection to this request, please explain fully, using additional pages as necessary. _____; and

(2) I have notified the appropriate docket clerk (in civil cases) or the appropriate representative from the Office of the Solicitor (in criminal cases) of this request; and

(3) There are no special Orders or dockets setting the case for trial in this particular time period.

Upon receiving the completed Request/Motion and Order, I will confirm that the original is filed with the Clerk of Court and that copies have been provided to all attorneys involved in the case.

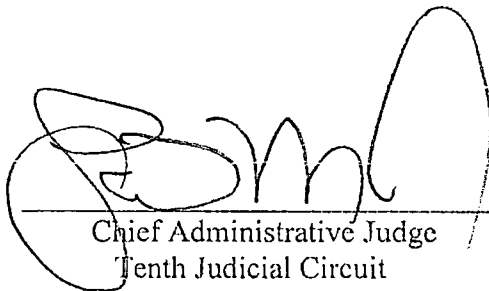
August 29, 204

Pro Se Plaintiffs Kennedy and Fink

Attorney Making Request

Please Print Attorney's Name

9-6, 2024



Chief Administrative Judge
Tenth Judicial Circuit

A TRUE COPY

SEP - 6 2024

C. Reardon

REQUEST OR MOTION AND ORDERATTORNEY SECTION:ANDERSON COUNTY COMMON PLEAS

Case Name: Linda Kennedy and Marsha Fink v. Lake Hartwell RV resort and Cabins LLC., et, al.
Case Number: 2022CP0400592

I am requesting PROTECTION for the above-named case for the date(s) of September 16, 2024, to September 20, 2024, due to Medical Appointments and my signature certifies, pursuant to Rule 11(a), SCRCP, that:

(1) I have communicated with all other attorneys involved in the case and that there are no objections to this request; or

If there is an objection to this request, please explain fully, using additional pages as necessary. _____; and

(2) I have notified the appropriate docket clerk (in civil cases) or the appropriate representative from the Office of the Solicitor (in criminal cases) of this request; and

(3) There are no special Orders or dockets setting the case for trial in this particular time period.

Upon receiving the completed Request/Motion and Order, I will confirm that the original is filed with the Clerk of Court and that copies have been provided to all attorneys involved in the case.

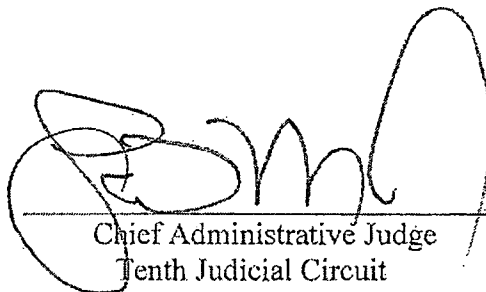
August 29, 2024

Pro Se Plaintiffs Kennedy and Fink

Attorney Making Request

Please Print Attorney's Name

9-6, 2024



Chief Administrative Judge
Tenth Judicial Circuit

No! the ~~defaulted~~ Attorneys NEVER

Kennedy
Marsha Fink

Have had to do this &
don't even ask us or
show us. you are
not part of this case!

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON

Dr. LINDA KENNEDY,
&
Dr. MARSHA FINK,

Plaintiffs,

vs.

LAKE HARTWELL RV RESORT AND CABINS, LLC, aka
LAKE HARTWELL RESORT AND CABINS, LLC, LAKE
HARTWELL RV RESORT AND
CABINS, LAKE HARTWELL RESORT AND CABINS,
LAKE HARTWELL CAMPERS AND CABINS, LAKE
HARTWELL MANAGEMENT, Christopher Vellanti, Other,

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, Ohter, Pellegrini), as Employ-
ee, and Individually,

RAY GRENIER, as Independent Contractor, and
Individually,

GRANT FERRENDELLI as Independent Contractor, and
Individually,

CHARLES CARPENTER, as Employee and Individually.

Defendants.

IN THE COURT OF
COMMON PLEAS

Civil Action No.
2022-CP-04-00592
JURY TRIAL

NOTICE of
HEARING

A TRUE COPY

OCT - 1 2024

CLERK OF COURT

TO ALL DEFENDANTS

YOU WILL PLEASE TAKE NOTICE that a hearing has been scheduled before R. Scott Sprouse on Wednesday, October 9, 2024 at 9:30 AM in the Anderson County Courthouse, 100 S. Main Street, Anderson, SC 29624 to hear the following motions of Plaintiffs:

1. Motion to Quash - 9/26/23
2. Motion to Stay, Motion to Determine Conflicts of Interest, Motion to Interplead, Motion for Sanctions - 10/9/23
3. Motion to Strike and Enter Default Judgment, Stamm and Riha - 11/14/23
4. Motion to Strike and Enter Default Judgment - 11/27/23
5. Motion to Recuse R. Lawton McIntosh - 11/27/23
6. Motion to Conduct Hearing via Telephone - 11/27/23
7. Motion to Alter, Amend and/or Reconsider McIntosh Order - 12/14/23
8. Motion for Recusals - 12/18/23
9. Motions for Recusals, McIntosh and Sprouse - 12/29/23
10. Motion for an Evidentiary Hearing - 1/9/24
11. Motion for Entry of Default for All Defendants - 1/9/24
12. Motion to Honor Plaintiffs' Constitutional Rights - 2/2/24
13. Motion to Compel Discovery, Insufficient Responses and Request Deposition Dates - 2/26/24
14. Motion to Amend, Alter, Reconsider filed jointly - 3/25/24
15. Motion Opposing Extension of Time - 3/25/24
16. Motion for Entry of Default Judgment against All Defendants - 4/29/24
17. Motion for Enlargement of Time - 4/29/24
18. Motion for Leave to Amend - 4/29/24
19. Motion to Compel and Memorandum in Support of Motion to Compel - 4/29/23
20. Motion to Strike, Set Aside, Vacate - 5/24/23
21. Plaintiffs' Motion to Disqualify Attorneys, Firms and Judges and to Strike All Defensive Pleadings, Filings and Memoranda - 5/24/24
22. Motion to Recuse J Maddox - 5/24/24
23. Plaintiffs' Motion to Supplement Pleadings - 5/28/24

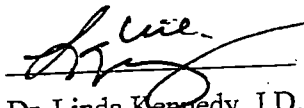
24. Motion to Consolidate - 5/28/24
25. Plaintiffs' Motion and Memorandum Opposing Defendants' Motion to Dismiss - 5/31/24
26. Motion objecting and Striking - 6/6/24
27. Motion for Continuance - 6/11/24
28. Motion to Strike and Dismiss Defendants - 6/20/24
29. Motion for Entry of Default Judgment - 6/24/24
30. Plaintiffs' Motion for Enlargement of Time -- 7/8/24
31. Motion to Quash -- 8/5/24
32. Motion for Sanctions -- 8/7/24
33. Motion to Quash -- 8/12/24
34. Motion to Objecting to and Quashing Any Ruling without Oral Argument -- 8/29/24
35. Motion for Leave to Amend Complaint -- 9/27/24
36. PLAINTIFFS' MOTION OBJECTING TO AND QUASHING AND STRIKING ANY HEARINGS, OR OTHER COURT ACTIVITY ON THIS MATTER, AGAINST PLAINTIFFS, UNTIL AFTER A NEW, NEUTRAL JUDGE, IF ANY, BE PROPERLY BE APPOINTED PER CONSTITUTIONAL DUE PROCESS AND EQUAL PROTECTION, CANON 2, (3)(B)(1), (3)(B)(5), AND (3)(E)(1)
37. PLAINTIFFS MOTION FOR AN EVIDENTIARY HEARING AGAINST ALL RACKETEER PERSONS TAKING PART AS JUDGES (AT LEAST SPROUSE, MADDOX, MACINTOSH, TAYLOR), AND ALL LAWYERS AND CLERKS (THOMASON/BEASLEY), AND COURT REPORTER LISA SCOTT, WHO PLAINTIFFS CLAIM HAVE HELPED TO FIX THIS CASE PER CONSTITUTIONAL DUE PROCESS AND EQUAL PROTECTION, CANON 2, (3)(B)(1), (3)(B)(5), AND (3)(E)(1),
38. PLAINTIFFS *RENEWED MOTION* TO RECUSE/DISQUALIFY PER CONSTITUTIONAL DUE PROCESS AND EQUAL PROTECTION, CANON 2, (3)(B)(1), (3)(B)(5), AND (3)(E)(1), MURDAUGH STYLE RACKETEERING JUDGES, LAWYERS/FIRMS, CLERK THOMASON, CLERK BEASLEY, FOR OBVIOUS RACKETEERING AND CONFLICTS OF INTEREST
39. PLAINTIFFS *RENEWED MOTION* TO COMPEL FOR A CONTINUANCE OR EXPANSION OF TIME FOR GOOD CAUSE SHOWN, PER CANON 2, PER CONSTITUTIONAL DUE PROCESS AND EQUAL PROTECTION, CANON 2, (3)(B)(1), (3)(B)(5), AND (3)(E)(1), TO HAVE OPPORTUNITY TO FINISH

PLAINTIFFS AMENDED COMPLAIN, PER REASONABLE ACCOMODATIONS UNDER THE AMERICANS WITH DISABILITIES ACT PER Title 42 & 47 U.S. CODE, AND CANONS FOR GOOD CAUSE SHOWN

40. PLAINTIFFS *RENEWED MOTION* TO QUASH AND STRIKE RACKETEERING JUDGES CHOOSING WHAT PLAINTIFFS AND RACKETEERING DEFENSE/DEFENANTS CAN HAVE HEARD AT A BIASED AND UNCONSTITUTIONAL HEARING, WHICH IS CLEARLY USED TO FURTHER FIX THIS CASE FOR A PREDETERMINED OUTCOME, PER CONSTITUTIONAL DUE PROCESS AND EQUAL PROTECTION, CANON 2, (3)(B)(1), (3)(B)(5), AND (3)(E)(1)
41. PLAINTIFFS *RENEWED MOTION* FOR AN EVIDENTIARY HEARING AND ALLIANZ INTERPLEADING OF ALL FUNDS, WITH ALL LAWYERS/FIRMS, ALLIANZ AND BARBARA ROBEDEE, AND PATRICE DEAMOR, AND THEIR TRUST FUND MANAGER PRESENT, AND OTHERS INVOLVED IN THIS MATTER AS DETERMINED BY PLAINTIFFS , AND TO INCLUDE, BUT NOT LIMITED TO, ALL LIABILITY AND ALL OTHER FUNDS THAT IN ANY WAY RELATE TO THIS OR THE LANIER CASE, PER CONSTITUTIONAL DUE PROCESS AND EQUAL PROTECTION, CANON 2, (3)(B)(1), (3)(B)(5), AND (3)(E)(1),
42. PLAINTIFFS *RENEWED MOTION* FOR AN EVIDENTIARY HEARING AGAINST ALL LAWYERS INVOLVED IN THIS MATTER TO DISCLOSE WHO THE DEFENSE ATTORNEYS REPRESENTED, WHEN THEY STARTED THAT REPRESENTATION, AND WHEN IT ENDED OR RESTARTED, AND TO PROVIDE ANY RECORDS IN THEIR TRUST ACCOUNT,
43. PLAINTIFFS *RENEWED MOTION* TO STAY ANY PROCEEDINGS IN THE LANIER CASE AS REQUESTED AND IGNORED LONG AGO, AND TO OPEN THE CRIMINALLY CREATED SETTLEMENT AND JUDGES AND LAWYERS AND MEDIATOR PROVIDE ALL SETTLEMENT AND FINANCIAL INFORMATION, PER CONSTITUTIONAL DUE PROCESS AND EQUAL PROTECTION, CANON 2, (3)(B)(1), (3)(B)(5), AND (3)(E)(1),
44. PLAINTIFFS *RENEWED MOTION* TO CONSOLIDATE CASES LHRVRC 2, AND 3, AND/OR TO SUPPLEMENT THE AMENDED COMPLAINT WITH AFTER ACQUIRED EVIDENCE AND RECENTLY ACQUIRED EVIDENCE, AND SUBSEQUENT LIABILITY OF ADDITIONAL PARTIES AND CAUSE OF ACTION THAT ARE KEY TO SUE IN THE SAME TRANSACTION AND OCCURANCE, PER CONSTITUTIONAL DUE PROCESS AND EQUAL PROTECTION, CANON 2, (3)(B)(1), (3)(B)(5), AND (3)(E)(1),
45. ALL PLAINTIFFS *RENEWED* AND STANDING OTHER MOTIONS ON FILE TO BE HEARD BEFORE ANY DESMISSAL HEARINGS, THAT MUST BE HEARD FIRST PER CONSTITUTIONAL DUE PROCESS AND EQUAL PROTECTION, CANON 2, (3)(B)(1), (3)(B)(5), AND (3)(E)(1),

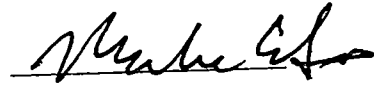
And all motions as relates to Plaintiffs' 3/17/22 complaint

Govern yourself accordingly.



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

Date ~~9/27/24~~ 10/1/24

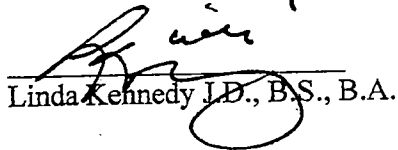


Dr. Marsha Fink, J.D., B.A.

Date ~~9/27/24~~ 10/1/24

CERTIFICATE OF SERVICE

I/WE hereby certify that a true and correct copy of the foregoing has been served upon attorneys for Defendants this ~~27~~ day of ~~Sept~~ ^{October}, 20 ~~24~~


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

Date ~~9/27/24~~


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

Date ~~9/27/24~~

STATE OF SOUTH CAROLINA)

COUNTY OF ANDERSON)

IN THE COURT OF COMMON PLEAS

LINDA KENNEDY AND MARSHA
FINK,)

Civil Action No. 2022-CP-04-00592

Plaintiffs,)

- vs.)

LAKE HARTWELL RESORT AND
CABINS, LLC, A/K/A LAKE
HARTWELL RESORT AND CABINS,
A/K/A LAKE HARTWELL CAMPERS
AND CABINS, A/K/A LAKE
HARTWELL MANAGEMENT, A/K/A
CHRIS VELLANTI, A/K/A
CHRISTOPHER VELLANTI;
CHRISTOPHER VELLANTI, AS A
MEMBER AND PERSONALLY;
YVONNE GOLDMAN, AS A GENERAL
MANAGER AND PERSONALLY;
FRANK PELLEGRINI; FRITZIE
MAROTO; JENNIFER BURDETTE;
MARSHA STAMM; ALLEN RIHA;
JOHN DOE #1, A/K/A RAY GRENIER
A/K/A RAY DUKES; JOHN DOE #2,
A/K/A TOW TRUCK OWNER AND
OPERATOR; AND JOHN DOE #3, A/K/A
LHRVRC MAINTENANCE EMPLOYEE.)

**MOTION FOR CONTINUANCE OF
SCHEDULED MOTION HEARINGS**

Defendants.)

COMES NOW counsel for Defendants Marsha Stamm and Allen Riha who moves this Court for a continuance of the multiple motion hearings scheduled in this case for October 9, 2024 on the grounds he has a conflict with a long standing mediation that has been scheduled in a different case on October 9, 2024.

Therefore, the undersigned counsel respectfully requests that the multiple motion hearings scheduled in this case for October 9, 2024 be continued to a subsequent motions term of court, and prays the Court find this request is made in the interests of judicial economy and not for purposes of delay

s/ James C. (Trey) Cox III
James C. (Trey) Cox III, Esquire
GRIER, COX & CRANSHAW, LLC
Post Office Box 2823
Columbia, South Carolina 29202
bdeloach@griercoxandcranshaw.com
tcx@griercoxandcranshaw.com
*Attorney for Defendants Allen Riha and
Marsha Stamm*

October 2, 2024

STATE OF SOUTH CAROLINA

COUNTY OF ANDERSON

LINDA KENNEDY AND MARSHA
FINK,

Plaintiffs,

vs.

LAKE HARTWELL RESORT AND
CABINS, LLC, A/K/A LAKE
HARTWELL RESORT AND CABINS,
A/K/A LAKE HARTWELL CAMPERS
AND CABINS, A/K/A LAKE
HARTWELL MANAGEMENT, A/K/A
CHRIS VELLANTI, A/K/A
CHRISTOPHER VELLANTI;
CHRISTOPHER VELLANTI, AS A
MEMBER AND PERSONALLY;
YVONNE GOLDMAN, AS A GENERAL
MANAGER AND PERSONALLY;
FRANK PELLEGRINI; FRITZIE
MAROTO; JENNIFER BURDETTE;
MARSHA STAMM; ALLEN RIHA;
JOHN DOE #1, A/K/A RAY GRENIER
A/K/A RAY DUKES; JOHN DOE #2,
A/K/A TOW TRUCK OWNER AND
OPERATOR; AND JOHN DOE #3, A/K/A
LHRVRC MAINTENANCE EMPLOYEE,

Defendants.

IN THE COURT OF COMMON PLEAS

Civil Action No. 2022-CP-04-00592

ORDER

THIS MATTER IS BEFORE THE COURT on motion of counsel for Defendants Marsha Stamm and Allen Riha who moves this Court for a continuance of the multiple motion hearings scheduled in this case for October 9, 2024 on the grounds he has a conflict with a long standing mediation that has been scheduled in a different case on October 9, 2024.

A TRUE COPY

OCT - 3 2024

C. Reena Thomason
CLERK OF COURT

The Court finds the relief requested is reasonable and made in the interest of judicial economy and, therefore

IT IS ORDERED that the multiple motion hearings scheduled in this case for October 9, 2024 be continued to a subsequent term of court to be set by the Clerk.

AND IT IS SO ORDERED.

Presiding Judge, Tenth Judicial Circuit

_____, 2024



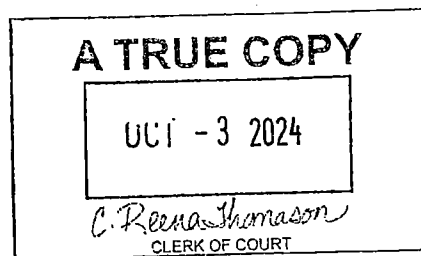
Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Continuance

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

Electronically signed on 2024-10-03 09:39:26 page 3 of 3



STATE OF SOUTH CAROLINA
COUNTY OF Anderson
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell Rv Resort And Cabins Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled);
☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

The Defendants' Motions to Reconsider were filed on June 12th and 13th of 2024. The 30-day time period subject in the Defendant's Motions to Reconsider has already expired. This point is now moot and therefore, DENIED.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 10/09/2024 .

Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy
Marsha Fink for Marsha Fink
Linda Kennedy for Linda Kennedy

A TRUE COPY

OCT - 9 2024

C. Reena Thomason
CLERK OF COURT

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



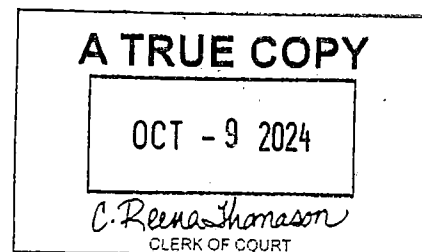
Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Electronic Form 4

So Ordered

s/ J. Cordell Maddox Jr.

Electronically signed on 2024-10-09 13:22:42 page 3 of 3



STATE OF SOUTH CAROLINA

COUNTY OF ANDERSON

LINDA KENNEDY AND MARSHA
FINK,

Plaintiffs,

vs.

LAKE HARTWELL RESORT AND
CABINS, LLC, A/K/A LAKE
HARTWELL RESORT AND CABINS,
A/K/A LAKE HARTWELL CAMPERS
AND CABINS, A/K/A LAKE
HARTWELL MANAGEMENT, A/K/A
CHRIS VELLANTI, A/K/A
CHRISTOPHER VELLANTI;
CHRISTOPHER VELLANTI, AS A
MEMBER AND PERSONALLY;
YVONNE GOLDMAN, AS A GENERAL
MANAGER AND PERSONALLY;
FRANK PELLEGRINI; FRITZIE
MAROTO; JENNIFER BURDETTE;
MARSHA STAMM; ALLEN RIHA;
JOHN DOE #1, A/K/A RAY GRENIER
A/K/A RAY DUKES; JOHN DOE #2,
A/K/A TOW TRUCK OWNER AND
OPERATOR; AND JOHN DOE #3, A/K/A
LHRVRC MAINTENANCE EMPLOYEE,

Defendants.

IN THE COURT OF COMMON PLEAS

Civil Action No. 2022-CP-04-00592

ORDER

THIS MATTER IS BEFORE THE COURT on motion of counsel for Defendants Marsha Stamm and Allen Riha who moves this Court for a continuance of the multiple motion hearings scheduled in this case for October 9, 2024 on the grounds he has a conflict with a long standing mediation that has been scheduled in a different case on October 9, 2024.

The Court finds the relief requested is reasonable and made in the interest of judicial economy and, therefore

IT IS ORDERED that the multiple motion hearings scheduled in this case for October 9, 2024 be continued to a subsequent term of court to be set by the Clerk.

AND IT IS SO ORDERED.

Presiding Judge, Tenth Judicial Circuit

_____, 2024



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Continuance

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

STATE OF SOUTH CAROLINA)

COUNTY OF ANDERSON)

IN THE COURT OF COMMON PLEAS

LINDA KENNEDY AND MARSHA
FINK,)

Civil Action No. 2022-CP-04-00592

Plaintiffs,)

ORDER FOR PROTECTION

vs.)

LAKE HARTWELL RESORT AND
CABINS, LLC, A/K/A LAKE
HARTWELL RESORT AND CABINS,
A/K/A LAKE HARTWELL CAMPERS
AND CABINS, A/K/A LAKE
HARTWELL MANAGEMENT, A/K/A
CHRIS VELLANTI, A/K/A
CHRISTOPHER VELLANTI;
CHRISTOPHER VELLANTI, AS A
MEMBER AND PERSONALLY;
YVONNE GOLDMAN, AS A GENERAL
MANAGER AND PERSONALLY;
FRANK PELLEGRINI; FRITZIE
MAROTO; JENNIFER BURDETTE;
MARSHA STAMM; ALLEN RIHA;
JOHN DOE #1, A/K/A RAY GRENIER
A/K/A RAY DUKES; JOHN DOE #2,
A/K/A TOW TRUCK OWNER AND
OPERATOR; AND JOHN DOE #3, A/K/A
LHRVRC MAINTENANCE EMPLOYEE,)

Defendants.)

It appearing to the Court that Michael J. Neubauer, Esquire, attorney at law, practicing with the law firm of McAngus, Goudelock & Courie, L.L.C. in Greenville, South Carolina, requests protection from Wednesday November 1, 2024, through Friday, November 29, 2024, for the birth of his child.

It is, therefore, **ORDERED** that Michael J. Neubauer, Esquire, be, and hereby is, granted protection from any and all Court proceedings concerning the above-captioned case from Monday, November 1, 2024, through Friday, November 29, 2024.

AND IT IS SO ORDERED.

Administrative Judge, Tenth Judicial Circuit

Greenville, South Carolina

October ____, 2024



Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Protection from Court Appearance

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP0400592

Linda Kennedy et al
PLAINTIFF(S)

Lake Hartwell RV Resort and Cabins LLC et al
DEFENDANT(S)

Submitted by: R. Lawton McIntosh

Attorney for : ☐ Plaintiff ☐ Defendant
or
☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. ☐ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

ORDER INFORMATION

PLAINTIFF'S REQUEST TO CONTINUE THE RULE TO SHOW CAUSE HEARING IS DENIED.

This order ☐ ends ☒ does not end the case.

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
		\$
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.
E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

TRUE COPY

JAN 27 2025

C. Reena Thompson
CLERK OF COURT

2155

Circuit Court Judge

Judge Code

Date

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20____ and a copy mailed first class or placed in the appropriate attorney's box on this _____ day of _____, 20____ to attorneys of record or to parties (when appearing pro se) as follows:

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

CLERK OF COURT

Court Reporter:

E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

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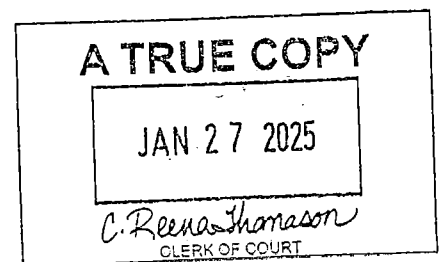
Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

Electronically signed on 2025-01-27 15:14:42 page 3 of 3



STATE OF SOUTH CAROLINA)

COUNTY OF ANDERSON)

Linda Kennedy and)
Marsha Fink,)
Plaintiff,)

vs.)

Lake Hartwell Resort)
and Cabins LLC, et al)
Defendant.)

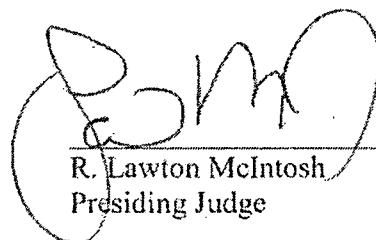
IN THE COURT OF COMMON PLEAS
TENTH JUDICIAL CIRCUIT

Civil Action No: 2022-CP-04-00592

ORDER DENYING PLAINTIFFS'
MOTION TO DISMISS

Plaintiffs' Motion to Dismiss this Court's Order and Rule to Show Cause as well as the hearing scheduled on February 6, 2025 shall be and/is hereby denied.

IT IS SO ORDERED.


R. Lawton McIntosh
Presiding Judge

January 30, 2025
Anderson, South Carolina

STATE OF SOUTH CAROLINA)

COUNTY OF ANDERSON)

Linda Kennedy and)
Marsha Fink,)
Plaintiff,)

vs.)

Lake Hartwell Resort)
and Cabins LLC, et al)
Defendant.)

**IN THE COURT OF COMMON PLEAS
TENTH JUDICIAL CIRCUIT**

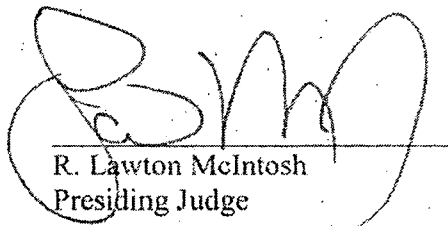
Civil Action No: 2022-CP-04-00592

**ORDER DENYING MOTION TO
RECONSIDER DENIAL OF
CONTINUANCE AND ORDER
DENYING MOTION FOR RECUSAL**

Plaintiffs' Motion for Reconsideration of the Court's prior order denying Plaintiffs'
Motion to Continue the Rule to Show Cause hearing scheduled for February 6, 2025 is denied.

Plaintiffs' Motion that I recuse myself from further involvement in this case is denied.

IT IS SO ORDERED.


R. Lawton McIntosh
Presiding Judge

January 30, 2025
Anderson, South Carolina

STATE OF SOUTH CAROLINA)

COUNTY OF ANDERSON)

Linda Kennedy and)

Marsha Fink,)

Plaintiff,)

vs.)

Lake Hartwell Resort)

and Cabins LLC, et al)

Defendant.)

**IN THE COURT OF COMMON PLEAS
TENTH JUDICIAL CIRCUIT**

Civil Action No: 2022-CP-04-00592

**ORDER NULLIFYING ALL
SUBPOENAS ISSUED BY
PLAINTIFFS TO ATTEND THE
HEARING SET FOR
FEBRUARY 5, 2025**

TO: All Persons Subpoenaed by Plaintiffs to Attend the Hearing Scheduled for February 6, 2025.

It has come to the Court's attention that Plaintiffs have subpoenaed numerous people to attend the Rule to Show Cause hearing scheduled for February 6, 2025 in Anderson, SC at 9:00 AM.

Each and every subpoena issued by Plaintiffs for anyone's attendance at the scheduled hearing and to produce any documents are hereby declared to be null and void and are recalled.

Anyone served with a subpoena to attend the hearing on February 6, 2025 is notified that their attendance is not required and are further advised that they are released from the subpoenas.

The Clerk of Court for Anderson County and her staff are hereby directed to advise anyone that has been subpoenaed that contacts the Clerk's Office, that the subpoenas have been nullified and that they are released from the subpoenas (the Clerk and her staff may direct all inquiries to my office at 864-260-4059).

The Clerk of Court and her staff are hereby directed that they are not to issue any further subpoenas at the request of Plaintiffs and that all requests by Plaintiffs to have subpoenas issued shall be approved by the Administrative Judge in advance of their issuance.

The Clerk of Court is directed, if possible, to post a notice on her website that anyone subpoenaed by Plaintiffs to the February 6, 2025 hearing may disregard the subpoenas and not appear.

IT IS SO ORDERED.


R. Lawton McIntosh
Presiding Judge

January 30, 2025
Anderson, South Carolina

STATE OF SOUTH CAROLINA)
COUNTY OF ANDERSON)

Linda Kennedy and
Marsha Fink,
Plaintiff,

vs.

Lake Hartwell Resort
and Cabins LLC, et al
Defendant.

IN THE COURT OF COMMON PLEAS
TENTH JUDICIAL CIRCUIT

Civil Action No: 2022-CP-04-00592

**SUA SPONTE
ORDER STRIKING PLAINTIFFS'
PLEADINGS
AND
DIRECTING THE CLERK OF COURT
NOT TO ACCEPT FURTHER FILINGS
BY PLAINTIFF WITHOUT
COURT PERMISSION**

This case was filed by Plaintiff on March 3rd, 2022 seeking compensation related to circumstances surrounding their eviction from a property located in Townville, SC. Over the course of time, the filings by Plaintiffs have morphed into indescribable and nonsensical themes.

After numerous such filings by Plaintiffs, the undersigned issued and scheduled a Rule to Show Cause hearing set for February 6, 2025 at 9:00 AM for Plaintiffs to show cause as to why sanctions under Rule 11, SCRCP for their prior continuous filings should not be issued.

Subsequent to issuing and scheduling the Rule to Show Cause hearing, Plaintiffs on 01/24/2025 filed a "pleading/motion" that is approximately twenty-one (21) pages. Plaintiffs also requested and obtained subpoenas directing multiple people to attend the scheduled hearing inter alia. [Note: The Court nullified all such subpoenas in a separate order and directed that any person subpoenaed has been released and need not attend the hearing].

Upon a review of Plaintiffs' filing dated 01/24/2025, pursuant to S.C. Code Ann. Section 15-36-10, et al, the Court sua sponte, finds that no reasonable attorney in the same circumstances

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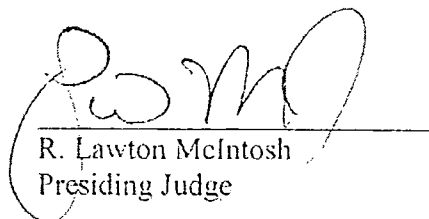
JAN 30 2025

C. Reena Thomason
CLERK OF COURT

would believe that under the facts, Plaintiffs' "claims" are warranted under existing law. The Court further finds that Plaintiffs' "claims" are not warranted under the existing law and that no good faith argument exists for the extension, modification, or reversal of existing law. Further, that no reasonable attorney in the same circumstances would believe that the "procurement, initiation, continuation" of Plaintiffs' "claims" was not for the purpose of harassing and/or injuring the persons to whom the "claims are directed. The Court finds that a reasonable attorney in the same circumstances would believe that Plaintiffs' "claims" are frivolous and interposed for delay and are further brought for purposes other than to secure proper discovery, joinder of parties, or adjudication of the claims and defenses. The Court finds that Plaintiffs' filing on 01/24/2025 is frivolous and pursuant to S.C. Code Ann. Section 15-36-10(B)(1), the pleading shall be and is hereby stricken.

THE CLERK OF COURT AND HER STAFF ARE HEREBY DIRECTED THAT THEY SHALL NOT EXCEPT ANY FURTHER FILINGS BY PLAINTIFFS WITHOUT THE PRIOR PERMISSION OF THE ADMINISTRATIVE JUDGE, HOWEVER, THE CLERK OF COURT AND HER STAFF ARE DIRECTED TO ACCEPT MOTIONS FOR RECONSIDERATION FILED BY PLAINTIFFS AND/OR ANY APPEALS FROM THIS COURT.

IT IS SO ORDERED.



R. Lawton McIntosh
Presiding Judge

January 30, 2025
Anderson, South Carolina

STATE OF SOUTH CAROLINA)

COUNTY OF ANDERSON)

Linda Kennedy and)
Marsha Fink,)
Plaintiff,)

vs.)

Lake Hartwell Resort)
and Cabins LLC, et al)
Defendant.)

IN THE COURT OF COMMON PLEAS
TENTH JUDICIAL CIRCUIT

Civil Action No: 2022-CP-04-00592

**ORDER NULLIFYING ALL
SUBPOENAS ISSUED BY
PLAINTIFFS TO ATTEND THE
HEARING SET FOR
FEBRUARY 5, 2025**

TO: All Persons Subpoenaed by Plaintiffs to Attend the Hearing Scheduled for February 6, 2025.

It has come to the Court's attention that Plaintiffs have subpoenaed numerous people to attend the Rule to Show Cause hearing scheduled for February 6, 2025 in Anderson, SC at 9:00 AM.

Each and every subpoena issued by Plaintiffs for anyone's attendance at the scheduled hearing and to produce any documents are hereby declared to be null and void and are recalled.

Anyone served with a subpoena to attend the hearing on February 6, 2025 is notified that their attendance is not required and are further advised that they are released from the subpoenas.

The Clerk of Court for Anderson County and her staff are hereby directed to advise anyone that has been subpoenaed that contacts the Clerk's Office, that the subpoenas have been nullified and that they are released from the subpoenas (the Clerk and her staff may direct all inquiries to my office at 864-260-4059).

A TRUE COPY

JAN 30 2025

C. R. [Signature]

The Clerk of Court and her staff are hereby directed that they are not to issue any further subpoenas at the request of Plaintiffs and that all requests by Plaintiffs to have subpoenas issued shall be approved by the Administrative Judge in advance of their issuance.

The Clerk of Court is directed, if possible, to post a notice on her website that anyone subpoenaed by Plaintiffs to the February 6, 2025 hearing may disregard the subpoenas and not appear.

IT IS SO ORDERED.



R. Lawton McIntosh
Presiding Judge

January 30, 2025
Anderson, South Carolina

STATE OF SOUTH CAROLINA)

COUNTY OF ANDERSON)

Linda Kennedy and)
Marsha Fink,)
Plaintiff.)

vs.)

Lake Hartwell Resort)
and Cabins LLC, et al)
Defendant.)

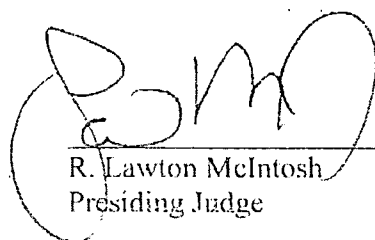
IN THE COURT OF COMMON PLEAS
TENTH JUDICIAL CIRCUIT

Civil Action No: 2022-CP-04-00592

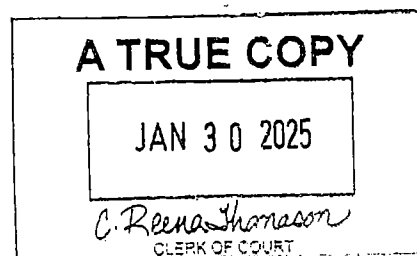
ORDER DENYING PLAINTIFFS'
MOTION TO DISMISS

Plaintiffs' Motion to Dismiss this Court's Order and Rule to Show Cause as well as the
hearing scheduled on February 6, 2025 shall be and/is hereby denied.

IT IS SO ORDERED.


R. Lawton McIntosh
Presiding Judge

January 30, 2025
Anderson, South Carolina



STATE OF SOUTH CAROLINA)

COUNTY OF ANDERSON)

Linda Kennedy and)
Marsha Fink,)
Plaintiff,)

vs.)

Lake Hartwell Resort)
and Cabins LLC, et al)
Defendant.)

IN THE COURT OF COMMON PLEAS
TENTH JUDICIAL CIRCUIT

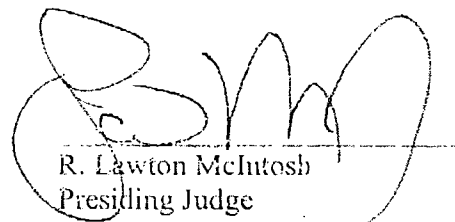
Civil Action No: 2022-CP-04-00592

ORDER DENYING MOTION TO
RECONSIDER DENIAL OF
CONTINUANCE AND ORDER
DENYING MOTION FOR RECUSAL

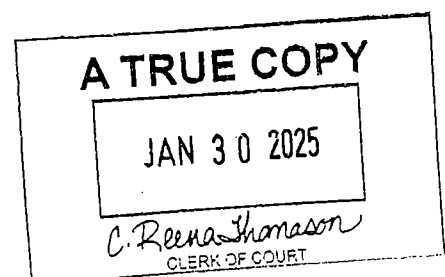
Plaintiffs' Motion for Reconsideration of the Court's prior order denying Plaintiffs'
Motion to Continue the Rule to Show Cause hearing scheduled for February 6, 2025 is denied.

Plaintiffs' Motion that I recuse myself from further involvement in this case is denied.

IT IS SO ORDERED.


R. Lawton McIntosh
Presiding Judge

January 30, 2025
Anderson, South Carolina



STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

COUNTY OF ANDERSON)

Linda Kennedy and Marsha Fink)

CASE NO: 2022-CP-04-00592

vs.)

Lake Hartwell RV Resort and
Cabins, LLC, A/K/A Lake Hartwell
Resort and Cabins, LLC, Lake
Hartwell RV Resort et, al.)

Rule to Show Cause

A TRUE COPY

JAN - 6 2025

C. Reena Thomason
CLERK OF COURT

To: Plaintiff's: Linda Kennedy and Marsha Fink; Counsel for Defendants: James C. Cox III, Esq., Trevor Hughey Esq., Robert Mebane, Esq., and Michael Neubauer, Esq.

You will please take notice that the Administrative Circuit Judge, R. Lawton McIntosh will conduct a hearing on February 6, 2025 at 9:00 a.m. at the Anderson County Courthouse on case number 2022-CP-04-00592, for plaintiff's, Linda Kennedy and Marsha Fink to show cause, if they can, why sanctions pursuant to Rule 11 SCRPC, shall not be issued against either or both of you as a result of some and/or all of the filing of the following pleadings, motions, orders or other material;

Dates	Action
12/18/24	• (Pro Se) Plaintiff's Letter
12/10/24	• (Pro Se) Plaintiff's Letter
10/1/24	• (Pro Se) Motion to Alter and/or Amend • (Pro Se) Plaintiff's Motion Objecting, Quashing, and Striking Hearing and Racketeering
9/6/24	• (Pro Se) Plaintiff's Order of Protection – Signed by Judge McIntosh
8/29/24	• (Pro Se) Plaintiff's Motion for Protective Order • (Pro Se) Plaintiff's Motion Objecting and Quashing Ruling
8/13/24	• (Pro Se) Plaintiff's Letter – “Judge Maddox: Yesterday we filed a Motion to Quash and request for a continuance in the above-

	referenced matter that needs an immediate ruling..." • (Pro Se) Plaintiff's Letter – "To: Court/Judges, and Clerk of Courts for immediate attention and decisions so we do not injure ourselves further due to court/judge/clerk malfeasance..." • (Pro Se) Plaintiff's Amended Summons and Complaint
8/12/24	• (Pro Se) Plaintiff's Motion to Quash • (Pro Se) Plaintiff's Defendant List
8/7/24	• (Pro Se) Plaintiff's Motion for Sanctions • (Pro Se) Plaintiff's Filing of Exhibits
8/5/24	• (Pro Se) Plaintiff's Motion to Quash
7/16/24	• (Pro Se) Plaintiff's Letter – "Dear Mrs. Thomason: This is a follow up to two certified mailings..."
7/8/24	• (Pro Se) Plaintiff's Motion for Enlargement of Time
07/03/24	• (Pro Se) Plaintiff's Letter – "Dear Ms. Reena Thomason: We received on or about June 27, 2024..."
6/27/24	• (Pro Se) Plaintiff's Letter (email from Plaintiffs to the Clerk of Court regarding Plaintiff's continuance)
6/24/24	• (Pro Se) Plaintiff's Motion for Entry of Default
6/21/24	• (Pro Se) Plaintiff's Letter (emails between Plaintiff and Former Docket Clerk regarding Plaintiff's request for continuance)
6/20/24	• (Pro Se) Plaintiff's Motion to Strike & Dismiss Defendants
6/11/24	• (Pro Se) Plaintiff's Motion for Continuance
6/6/24	• (Pro Se) Plaintiff's Motion in Opposition to Defense's Order of Protection
6/4/24	• (Pro Se) Plaintiff's Order of Continuance
5/31/24	• (Pro Se) Plaintiff's Motion Opposing Defendant's Motion to Dismiss and Memorandum in Support
5/28/24	• (Pro Se) Plaintiff's Motion to Consolidate • (Pro Se) Plaintiff's Motion to Supplement Pleadings
5/24/24	• (Pro Se) Plaintiff's Motion to Disqualify All Defense Counsel (and their firms) and Judges with Memorandum in Support • (Pro Se) Plaintiff's Motion to Recuse Judge Maddox • (Pro Se) Plaintiff's Motion to Strike, Set Aside, or Vacate Judge Taylor's Orders • (Pro Se) Plaintiff's Motion for Continuance • (Pro Se) Plaintiff's Filing of Exhibits
4/29/24	• (Pro Se) Plaintiff's Motion for leave to Amend • (Pro Se) Plaintiff's Motion to Enlarge Time • (Pro Se) Plaintiff's Motion to Compel and Memorandum • (Pro Se) Plaintiff's Motion for Entry of Default • (Pro Se) Plaintiff's Letter to Judge Taylor • (Pro Se) Plaintiff's Letter to Representative Attorney Bamburg • (Pro Se) Plaintiff's Filing of Exhibits
03/25/24	• (Pro Se) Plaintiff's Motion Opposing Extension of Time

	• (Pro Se) Plaintiff's Motion for Enlargement of Time • (Pro Se) Plaintiff's Motion to Amend, Alter, or Reconsider
3/11/24	• (Pro Se) Plaintiff's Letter – "Dear Defense Attorneys: Plaintiffs have gathered much, but not all, documents that should have been filed by attorney Michael Dodd from April 12, 2022..." • (Pro Se) Plaintiff's Discovery Request
3/8/24	• (Pro Se) Plaintiff's Letter to Defense Attorneys and their Firms
2/27/24	• (Pro Se) Plaintiff's Discovery Request • (Pro Se) Plaintiff's Discovery Request
2/26/24	• (Pro Se) Plaintiff's Motion to Compel Discovery • (Pro Se) Plaintiff's Filing of Exhibits
2/22/24	• (Pro Se) Plaintiff's Discovery Request
2/21/24	• (Pro Se) Plaintiff's Discovery Request • (Pro Se) Plaintiff's Discovery Request
2/20/24	• (Pro Se) Plaintiff's Letter – "Dear Ms. Thomason: Attached hereto are amended copies of SCRCF Form C against Allen Riha and Marsha Stamm..." • (Pro Se) Plaintiff's Letter – "Dear Judge Taylor: This is a letter, from Plaintiffs Kennedy and Fink, in follow-up to our hearing on February 16, 2024, in Anderson County in the above referenced matter..."
2/12/24	• (Pro Se) Plaintiff's Notice of Motions 1. Motion to Honor Constitutional Rights
2/6/24	• (Pro Se) Plaintiff's Request for Clarity from Judges
2/2/24	• (Pro Se) Plaintiff's Motion to Honor Constitutional Rights • (Pro Se) Plaintiff's filing of Exhibits
1/22/24	• (Pro Se) Objections to Order
1/12/24	• Form 4- Order Relieving Counsel- Signed (Sprouse)
1/9/24	• (Pro Se) Plaintiff's Motion for Evidentiary hearing • (Pro Se) Plaintiff's Motion to Fire Dodd's firing Order • (Pro Se) Plaintiff's Notice of Hearing 1. For Evidentiary hearing 2. Default Judgment 3. For Dodd fire Order to be singed but to oppose Motion to be Relieved • (Pro Se) Plaintiff's Notice of Hearing
1/9/24	• (Pro Se) Plaintiff's Motion for Default- All Defendant's (not uploaded)
1/5/24	• (Pro Se) Plaintiff's Motion to Change Venue ▪ Affidavit of Linda Kennedy ▪ Affidavit of Marsha Fink
12/29/23	• (Pro Se) Plaintiffs Writ of Mandamus- Recusals • (Pro Se) Plaintiff's Mandamus to Enter Default
12/19/23	• (Pro Se) Plaintiff's Objections

12/18/23	• (Pro Se) Plaintiff's Motion in Opposition to Plaintiff's Motion to Strike
12/18/23	• (Pro Se) Plaintiff's Motion to Recuse (Sprouse)
12/18/23	• Order- denying Motion for Reconsideration (McIntosh)
12/15/23	• (Pro Se) Plaintiff's Discovery Request
12/14/23	• (Pro Se) Plaintiff's Motion for Continuance • (Pro Se) Plaintiff's Motion to Reconsider Dec 11, 2023 Order
12/11/23	• Order- Denied (Plaintiff's Pro Se and unsolicited Order) (McIntosh)
12/1/23	• Form 4- All motions before Court on 11/28/23 are continued due to medical emergency (McIntosh)
11/28/23	• (Pro Se) Plaintiff's memo in Support of 2nd Amended Complaint (2nd Amended Complaint not uploaded)
11/28/23	• (Pro Se) ▪ Ex.1 ▪ Ex. 2 ▪ Ex. 3 ▪ Ex. 4 ▪ Ex. 5
11/28/23	• (Pro Se) Plaintiff's Motion to Amend Complaint 2 • (Pro Se) Plaintiff's Motion to Amend Complaint 1
11/28/23	• (Pro Se) Plaintiff's Motion to Amend Complaint 3 • (Pro Se) Plaintiff's Motion to Amend Complaint 4
11/27/23	• (Pro Se) Plaintiff's Notice of Hearing ▪ Plaintiff's Motion to Record Hearing ▪ Plaintiff's Motion for hearing by Phone ▪ Plaintiff's Motion for Recusal of RLM ▪ Others
11/27/23	• (Pro Se) Motion to Record Hearing • (Pro Se) Motion for Recusal of RLM
11/22/23	• Motion to Strike (not uploaded)
11/20/23	• (Pro Se) Plaintiff's Notice of Hearing- "a hearing has been set over Plaintiff's objections and in violation of Due Process Rights re: Order of hearing presentation Plaintiff's will have following heard: A. Motion to Continue B. Motion for Hearing by Phone C. Motion to Dismiss Defendant's Motion to Dismiss D. Motion for more definite statement re: Defendant's Motion to Dismiss
11/17/23	• (Pro Se) Plaintiff's Motion for Continuance
11/14/23	• (Pro Se) Plaintiff's Motion to Strike and Motion for Default Judgment
11/14/23	• (Pro Se) Plaintiff's affidavit of default
11/14/23	• (Pro Se) Plaintiff's affidavit of default
11/14/23	• (Pro Se) Plaintiff's affidavit of non-military service

11/14/23	• (Pro Se) Notice of Hearing (Motion to Strike Default Judgment (11/28/23 McIntosh)
11/8/23	• (Pro Se) Plaintiff's letter- "To whom it may concerns Judge McIntosh and other Court personnel" ▪ Motion to Dismiss allegedly being herd first with opposition to Amend Pleadings ▪ "why is Court suddenly changing an order that outline that it could only her the superseding matters regarding Dodd's withdrawn motion first which is the only way the matters can be heard legally..."
10/26/23	• (Pro Se) Plaintiff's letter to Judge's on Lanier Heating and Air - "Kennedy and Fink motions that were scheduled to be heard on Oct 12, 2023 before Judge McIntosh were continued due to ...unrelated trial going forward..."
10/9/23	• (Pro Se) Plaintiff's Notice of Hearing: 1. To oppose Dodd's Motion to be Relieved 2. Plaintiff's Motion to Stay All Actions 3. Plaintiff's Motion to Require Allianz to Interplead Full Reserve 4. Plaintiff's Motion for Court to Require Defendant's to Disclose Actual Clients etc. 5. Plaintiff's Motion for Sanctions
10/9/23	• (Pro Se) Plaintiff's filing of Exhibits ▪ Ex 4- Did not upload ▪ Ex 3- Did not upload ▪ Ex 2- Did not upload ▪ Ex 1- Did not upload
9/26/23	• (Pro Se) Plaintiff's Motion to Quash and Stay until Court Rules on: ▪ Defendant's Conflicts of Interest ▪ Plaintiff's Motion to Dodd's withdrawal motion ▪ Plaintiff's Motion to Intervene ▪ Plaintiff's Motion to Interplead ▪ Dodd's Motion to Withdraw (Plaintiff's assert Dodd and the defense are working closely against their interest, etc.)
8/24/23	• Defendant's Renewed Motion to Dismiss (Neubauer)
7/18/23	• Order of Continuance of Motion to Relieved as Counsel (Maddox)
6/15/23	• Notice of Hearing- Motion to be Relieved (7/13/23) (Maddox)
6/15/23	• Dodd's Notice of Hearing- Virtual (to be relieved) • Dodd's Notice of Hearing- Virtual (to be relieved)
6/12/23	• (Pro Se) Plaintiff's oppositions to Dodd's Motion to be Relieved (written to Tammy- after Dodd and Opposing counsel contacted Tammy ..to speak to Judge re: Attorney withdraw without their knowledge and request to be heard) Plaintiff's really appreciated both Tammy and Elizabeth's kind

	demeanor Plaintiff's attorney lying to plaintiffs for a full year with long description of attorney omissions
6/8/23	• Motion to Relieved as Counsel (Dodd)
6/2/23	• Notice of Hearing (Dodd)
5/16/23	• Notice of Hearing- Motion to Amend (6/1/23) (McIntosh)
5/4/23	• Plaintiff Motion to Amend Complaint (Dodd)
4/5/23	• Consent Scheduling Order (Sprouse) ▪ All motions to Amend within 30 days of Order ▪ Mediation by January 31, 2024 ▪ Trial- After March 31, 2024
6/28/22	• Plaintiff's affidavit of Service (by Process Server) • Plaintiff's affidavit of Service (by Process Server)
6/22/22	• Consent Order for Continuance (re: Motion to Enlarge and Motion to Dismiss) (Sprouse)
6/6/22	• Amended Summons and Complaint filed (Dodd) ▪ Ex 1- Inventory of Stolen Damaged Property Verification
5/24/22	• (Pro Se) Plaintiff's Notes (we hired Dodd and Jones needs to act accordingly)
4/18/22	• (Pro Se) Plaintiff's affidavit of Service • (Pro Se) Plaintiff's affidavit of Service
4/15/22	• Affidavit of non-service (Chris Vellanti)
4/15/22	• Plaintiff's handwritten notes filed (Michael Dodd will be hired)
4/15/22	• (Pro Se) Plaintiff's Discovery- Lake Hartwell RV • (Pro Se) Plaintiff's Discovery- Jennifer Burdette • (Pro Se) Plaintiff's Discovery- Ray Grenier • (Pro Se) Plaintiff's Discovery- Fritzie Maroto • (Pro Se) Plaintiff's Discovery- Lake Hartwell RV
3/31/22	• Filing of Summons and Complaint
3/24/22	• (Pro Se) Letter to Judge requesting under seal- McIntosh note to put in file not under seal (3/25/22) • (Pro Se) Letter to Judge without note attached
3/17/22	• (Pro Se) Summons and Complaint • (Pro Se) Motion for TRO (Block Sale of Lake Hartwell RV) • (Pro Se) Motion to Join (Lanier Heating and Air v. Lake Hartwell RV) • (Pro Se) Motion to use Court Computer System

Notice of this hearing is hereby given to all counsel and/or parties of record to attend and participate as allowed by the court.

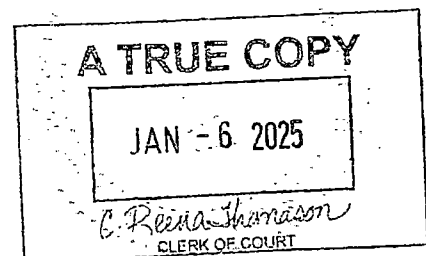
Your unexcused failure to attend the hearing shall not be the basis for a continuance of the hearing.

If you assert that you cannot attend because of medical condition(s), you must submit a continuance request no later than five (5) days prior to the scheduled hearing. The request shall be accompanied with a written explanation from a licensed medical doctor from South Carolina explaining your condition and stating unequivocally that your condition prevents your attendance and participation. Upon receipt of the required document(s) from a bona fide qualified medical provider that actually treats either or both of you, that party shall be allowed to participate virtually. Based upon prior occurrences, the hearing shall not be continued except for the most exceptional and extraordinary reason(s).

IT IS SO ORDERED.

January 3, 2025
Anderson, South Carolina


R. Lawton McIntosh
Administrative Circuit Court Judge
Tenth (10th) Judicial Circuit



STATE OF SOUTH CAROLINA)
)
 COUNTY OF ANDERSON)
)
 Linda Kennedy and Marsha Fink)
)
 vs.)
)
)
 Lake Hartwell RV Resort and)
 Cabins, LLC, A/K/A Lake Hartwell)
 Resort and Cabins, LLC, Lake)
 Hartwell RV Resort et, al.)

IN THE COURT OF COMMON PLEAS

CASE NO: 2022-CP-04-00592

Order Dismissing Plaintiff's Complaint(s)
 with Prejudice

A TRUE COPY

FEB 28 2025

CLERK OF COURT

Plaintiffs commenced this action by filing a pro se Summons and Complaint, asserting multiple causes of action and seeking other relief. Since that time, the Plaintiffs through their antics, have caused this case to take no less than a "left turn into the twilight zone". Plaintiffs' multiple filings, mostly unsolicited and unrecognizable, go so far as to, inter alia, accuse the undersigned of conspiring with their former attorney and defense counsel to "murder them and to boil them down in hydrochloric acid". Unfortunately, Plaintiffs' conduct has unnecessarily delayed and confused this matter and has caused the Defendants to have spent a great deal of time and money unnecessarily in defense. Plaintiffs' antics have also caused an inordinate amount of unnecessary time to be spent by the Court and staff on this matter.

While the Court has no earthly idea of what Plaintiffs' strategy may be, it is abundantly obvious that Plaintiffs are not interested in litigating any real controversy. Instead, Plaintiffs seem intent on filing voluminous "pleadings and memoranda" (if they can be considered such) maligning almost everyone that crosses their fruitful imaginations and making unbridled and unsupported assertions concerning a host of people who have absolutely no connection to this case. The Plaintiffs' assertions

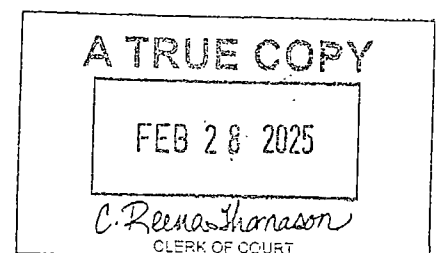
regarding persons involved in this case, and otherwise, causes the undersigned to be concerned about their overall judgment.

Plaintiffs' antics arose to the level that the Court took the unusual step of not allowing further filings by the Plaintiffs without the Court's permission. Most recently, because Plaintiffs allege that they were unable (unwilling) to attend scheduled hearings as a result of alleged incidents inside and outside of the courthouse, the Court determined to have the issue of Rule 11 sanctions decided on briefs. The Court set strict page and time limitations on the parties' filings. Notwithstanding, like the daffodils of spring, the Plaintiffs tried to file a memorandum in excess of 150 pages not counting exhibits.

The Court finds that it is time to end Plaintiffs' shenanigans by dismissing their case in its entirety with prejudice. In dismissing Plaintiffs' case with prejudice, the Court finds that Plaintiffs should be and are required to pay the Defendants' attorney fees and cost unnecessarily incurred because of Plaintiffs' unreasonable conduct. Based on the submissions, I find that Defendants' Lake Hartwell RV Resort and Cabins LLC, et al are awarded fees and cost in the amount of two thousand seven hundred forty-seven dollars (\$2,747.00). Although defendants' Stamm and Riha are entitled to an award of attorney's fees, their counsel intentionally did not submit a claim.

Accordingly, it is Ordered that:

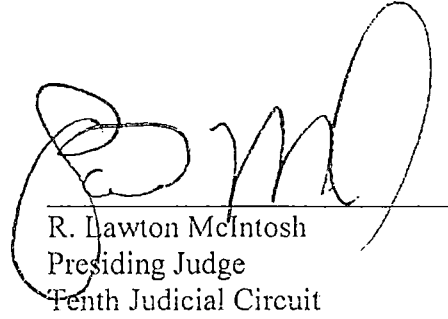
- 1) Plaintiff's complaint and each and every iteration of Plaintiff's complaint shall be and is hereby dismissed with prejudice.
- 2) Defendant's Lake Hartwell RV Resort and Cabins, LLC, Christopher Vellanti, Yvonne Goldman, Frank Pellegrini, Fritzie Maroto, Ray Grenier,



Charles Carpenter, Jennifer Burdette and Grant Ferrendelli are awarded attorney fees and cost in the amount of \$2,747.00.

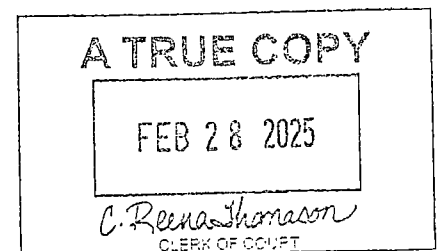
IT IS SO ORDERED.

February 27, 2025
Anderson, South Carolina



R. Lawton McIntosh
Presiding Judge
Tenth Judicial Circuit

ELECTRONICALLY FILED - 2025 Feb 28 8:57 AM - ANDERSON - COMMON PLEAS - CASE#2022CP0400592



STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022 CP-04-00592

LINDA KENNEDY AND MARSHA FINK

LAKE HARTWELL RV RESORT AND
CABINS LLC., ET, AL.

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:

Attorney for : ☐ Plaintiff ☐ Defendant
or
☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. ☐ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

ORDER INFORMATION

PLAINTIFFS' ATTEMPTED FILING ON FEBRUARY 26, 2025 AT APPROXIMATELY 3:43 P.M. IN EXCESS OF 150 PAGES NOT COUNTING EXHIBITS IS NOT ALLOWED AND SHALL NOT BE CONSIDERED BY THE COURT. NO FORMAL ORDER TO FOLLOW.

This order ☐ ends ☒ does not end the case.

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
		\$
		\$
		\$

A TRUE COPY

FEB 27 2025

C. Reena Thomason

If applicable, describe the property, including tax map information and address, referenced in the order.

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

Circuit Court Judge

Judge Code

Date

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20____ and a copy mailed first class or placed in the appropriate attorney's box on this _____ day of _____, 20____ to attorneys of record or to parties (when appearing pro se) as follows:

 ATTORNEY(S) FOR THE PLAINTIFF(S)

 ATTORNEY(S) FOR THE DEFENDANT(S)

 CLERK OF COURT

Court Reporter:

E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

A TRUE COPY

FEB 27 2025

C. Reena Thomason
 CLERK OF COURT



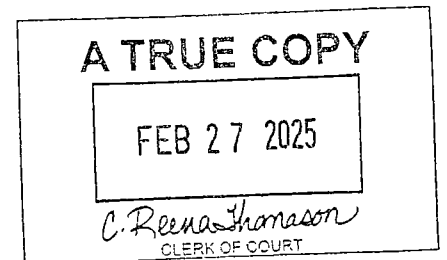
Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And
Cabins Llc , defendant, et al
Case Number: 2022CP0400592
Type: Order/Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

Electronically signed on 2025-02-27 15:34:44 page 3 of 3



THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

R Lawton McIntosh, Circuit Court Judge

RECEIVED

Court of Appeals No. 2025-000859

MAY 20 2025

SC Court of Appeals

Linda Kennedy and

Marsha Fink

Appellants

v.

Lake Hartwell Resort and Cabins, LLC, a/k/a Lake Hartwell Resort and Cabins, a/k/a Lake Hartwell Campers and Cabins, a/k/a Lake Hartwell Management, a/k/a Chris Vellanti, a/k/a Christopher Vellanti; Christopher Vellanti, as a Member and Personally; Yvonne Goldman, as a General Manager and Personally; Frank Pellegrini; Fritzie Maroto; Jennifer Burdette; Marsha Stamm; Allen Riha; John Doe #1, a/k/a Ray Grenier a/k/a Ray Dukes; John Doe #2, a/k/a Tow Truck Owner and Operator; and John Doe #3, a/k/a LHR VRC Maintenance Employee,

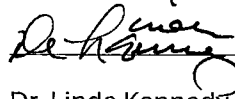
Respondents.

PROOF OF SERVICE

Dr. Linda Kennedy, J.D., B.S., B.A. and Dr. Marsha Fink, J.D., B.A., *pro se*, certify that we have served copies of the Motion in Opposition to two Letters of Deficiency on Lake Hartwell RV Resort and Cabins, LLC, aka Lake Hartwell Resort and Cabins, LLC, Lake Hartwell Resort and Cabins, Lake Hartwell Campers and Cabins, Lake Hartwell Management, Christopher Vellanti, Other, Christopher Vellanti, Corporately, as the Sole Member, Manager Employee and Individually, Yvonne Goldman, as General Manager, Employee and Individually, Jennifer Burdette, as Employee and Individually, Frank Pellegrini, as Employee and Individually, Fritzie Maroto (Moroto, other, Pellegrini) as Employee and Individually, Ray Grenier, as Independent Contractor and Individually, Grant Ferrendelli, as Independent Contractor and Individually and Charles Carpenter, as Employee and Individually, who are represented by Michael Neubauer, Esquire and Robert Mebane, Esquire of McAngus, Goudelock and Courie, LLC, 201 West McBee

Avenue, 2nd Floor, Greenville, SC 29601 and Marsha Stamm, as Co-Assistant Manager and Individually, Allen Riha, as Co-Assistant Manager and Individually, who are represented by James Cox, III, and Trevor Hughey, Grier, Cox and Cranshaw, LLC, 2001 Assembly Street, Suite 204, Columbia, SC 29201 by depositing copies of it in the United States Mail, first class postage prepaid to their respective attorneys on May 15, 2025.

DATE May 15, 2025

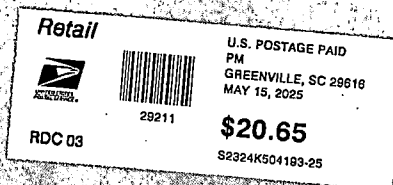


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954-279-3785
Pro se Appellant



Dr. Marsha Fink, J.D., B.A.
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Dr. Marsha Fink, J.D., B.A.
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Townville, SC 29689



Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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MAY 20 2025
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