

RECEIVED

Jun 25 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM HORRY COUNTY

Court of Common Pleas

The Honorable B. Alex Hyman, Circuit Court Judge

Trial Court Case 2020-CP-2605267

Appellate Court Case 2024-001687

25th Avenue LLC., Respondent, v . Carol Ann Honeycutt, Appellant

MOTION TO AMEND THE MOTION TO REINSTATE

Pursuant to SCACR 240, and in response to Clerk Harrison's letter of June 16, 2025, this Appellant submits this motion to this honorable court requesting permission of this Court to approve Appellant's Motion to Amend the Motion to Reinstate for the above numbered and captioned case.

Appellant prays that this Honorable Court accepts this amendment to the Motion to Reinstate this case, filed May 30, 2025, and that this amendment is approved by this Court. This amendment is added to the Motion to Reinstate as paragraph 9. In addition to the eight paragraph statements in the motion, Appellant prays that this Court will accept the following statement as an important and key factor in granting this motion.

9. This appeal has taken additional time for this novice appellant to complete because there is an added layer to the underlying appeal on the orders. In the Initial Brief, this is referred to as "The Invisible Hand." This additional level is summarized in the following paragraphs.

This entire appeal argues to reverse the three orders which block the Appellant/Defendant from receiving the Complete Transcript of the Motions Hearing of April 24, 2023. The former attorney for the Plaintiff who has no standing in the Horry County Case nor in this appeal has engaged in behind-the-scenes actions to block the Appellant from receiving the benefits of the law to pursue her defense at the county level and her appeal at the Appellate Court level. These extra legal actions involve the power and influence derived by this former attorney's personal relationships with numerous officers of the South Carolina Judicial Branch. These extra legal actions have covered up the illegal actions engaged in to prevent the Appellant from receiving the Complete Transcript for use in these actions at both levels. These extra legal actions fall within violations of criminal statutes and bring severe penalties. It appears that the former attorney's actions are directed at protecting herself and others from criminal prosecution. An incidental by product of these illegal actions is that they aid the Plaintiff by obstructing justice from Appellant.

Appellant believes that the evidence presented in the Initial Brief shows that the former attorney intercepted the transcript ordered by the Defendant, edited out portions of the transcript, and provided the altered transcript to the court reporter to present to the Defendant. On August 30, 2023, the Defendant filed a motion to compel the court reporter to provide the Complete Transcript. That motion was heard on February 21, 2024, was blocked by lies from the attorney before the attorney was fired by the Plaintiff, and was then denied by the court. On March 15, 2024, Defendant filed a motion to complete the hearing of February 21, 2024. On July 10, 2024,

Defendant obtained and served a subpoena for the court reporter to attend the hearing of July 24, 2024, as a witness and to bring the Complete Transcript with her. The attorney, dismissed by the Plaintiff sometime prior to April 24, 2024, went to Chief Justice Beatty of the South Carolina Supreme Court and had the subpoena quashed without a motion to quash and without a hearing to quash. The second motion to compel was heard on July 24, 2024, and again, denied. The attorney, present at that hearing did not participate except to be heard on the Plaintiff's motion to dismiss her. The motion to dismiss the attorney was granted. On August 12, 2024, Defendant filed a motion to reconsider. The Motion to Reconsider stated four points:

I. THE ORDER OF JULY 30, 2024, CREATED A STRANGE INVERSION
IN JUDICIAL RANK AND PROCEDURE.

II. THE ORDER OF JULY 30, 2024, RULED AGAINST THE FACTS OF THE CASE

III. THE ORDER OF JULY 30, 2024, RULED AGAINST THE
LAWS OF THE STATE OF SOUTH CAROLINA.

IV. THE ORDER OF JULY 30, 2024, RULED AGAINST THE ORDER OF CHIEF JUSTICE BEATTY
OF THE SUPREME COURT OF SOUTH CAROLINA

That Motion to Reconsider is attached to this motion as **Exhibit 1**.

The Motion to Reconsider was filed with the Clerk of the Fifteenth Judicial District on August 12, 2024. That motion was denied on September 3, 2024. On October 2, 2024, Defendant filed the present appeal, Appellate case Number 2024-001687.

When Appellant began to write the Initial Brief, Appellant searched for this Motion to Reconsider on the Horry County Public Index for this case, 2020-CP-2605276, and found that this Motion had disappeared from the Public Index Case Record. See **Exhibit 2**. This appears to be

an example of the behind-the-scenes action taken by the former attorney. It is one example of numerous behind-the-scenes actions that have intended to Obstruct Justice by denying the Appellant/ Defendant the benefits, processes, and protections of the law, by altering and omitting court records, changing dates on actions, and making up dates of actions that did not happen. These behind-the-scenes actions occurred in both the Circuit Court and the Appellate Court. This chain of Obstructions of Justice are enumerated in the Initial Brief and play a *sine qua non role* in this case. More importantly, this list reflects the perversion of the process of justice in the State of South Carolina. This is not a situation that is palatable to the officers of the Judicial System of South Carolina, but it is one which must be addressed, sooner than later. This case is a good place to start.

The Appellant/ Defendant prays that this Court grants this Motion to Amend the Motion to Reinstate, grants the Motion to Reinstate, and accepts the Initial Brief and Designation of Matter in this case.

June 25, 2025

Respectfully Submitted

s/Carol Ann Honeycutt

Carol Ann Honeycutt
P.O. Box 8574
Myrtle Beach, S.C. 29578
Appellant Pro Se
843-907-7061

cc: USPS
Mr. Richard F. Williams
Agent of Record, Manager
25th Avenue LLC
309 North Highland Way
Myrtle Beach, S. C. 29572

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FIFTEENTH JUDICIAL CIRCUIT
COUNTY OF HORRY)	CIVIL ACTION NO. 2020-CP-26-05267
)	
25 th Avenue LLC,)	
)	
Plaintiff,)	MOTION TO RECONSIDER AND VACATE
)	THE ORDER OF JULY 30, 2024,
vs.)	WHICH DENIED DEFENDANT THE RIGHT
)	TO A COMPLETE TRANSCRIPT OF THE
Carol Ann Honeycutt)	THE HEARING OF APRIL 24, 2023,
)	
Defendant)	
)	
<hr/>		
TO: THE PLAINTIFF ABOVE NAMED		

This motion seeks to vacate the order of July 30, 2024, for the reasons supported the following detailed explanations. Pursuant to South Carolina Rules of Civil Procedure, Rule 59, Amendment of Judgments, defendant, Carol Ann Honeycutt, hereby submits this motion to the Court requesting the Court reconsider and vacate the Order of July 30, 2024, by the Honorable Judge B. Alex Hyman, which denied the defendant the right to have a Complete Transcript from the Hearing of April 24, 2023, which was held before the Honorable Judge Debra R. McCaslin.

Additionally, during the hearing of July 24, 2024, Defendant requested that Judge Hyman order that court reporter Ms. Julie Kevish be ordered to appear as a witness to give testimony about the Incomplete Transcript she prepared and proffered to the defendant. This is in keeping with SCRCF Rule 59 which states:

On a motion for a new trial in an action tried without a jury, the court may open the judgment if one has been entered, take additional testimony, amend findings of fact and conclusions of law or make new findings and conclusions, and direct the entry of a new judgment.

The hearing of July 24, 2024, was not a hearing based on a motion for a rehearing, but a motion to complete the hearing which was partially heard on February 21, 2024, before the Honorable B. Alex Hyman. The reasons to complete the hearing are given in detail in the Motion to Complete the hearing filed on March 15, 2024, and included that defendant was blocked from presenting her motion to compel discovery by the interruption of plaintiff's attorney.

Furthermore, the order of February 29, 2024, was based on speculation and blatant misstatements of facts by the plaintiff's attorney. More importantly, the hearing of July 24, 2024, included information which was no longer speculation during the hearing of February 21, 2024. That information was the results of the Appellate Court decision of April 9, 2024, which reinstated appellate/defendant's appellate case. Though the new information was presented during the hearing, and the misinformation put forth by the plaintiff's attorney in the hearing of February 21, 2024, was clearly impeached, the Court, by denying the defendant's right to a Complete Transcript, disregarded both the factual truths and the ruling of the Appellate Court.

The order of July 30, 2024, ruled against the facts of the case, ruled against the laws of the state of South Carolina related to defendant's rights to have a complete transcript of the above noted hearing, and ruled against the order of Chief Justice of the South Carolina Supreme Court, Justice Beatty.

I. THE ORDER OF JULY 30, 2024, CREATED A STRANGE INVERSION IN JUDICIAL RANK AND PROCEDURE.

The order of July 30, 2024, denied the appellant/defendant the right to her appeal. Thus, a circuit court judge, in defiance of the law and the facts of the case, blocked the appellant/defendant from her rights to appeal by denying her access to the Complete Transcript. There are no laws in South Carolina which allow a circuit court judge to deny an appellant a right to appeal.

II. THE ORDER OF JULY 30, 2024, RULED AGAINST THE FACTS OF THE CASE

1. Appellant/defendant's appeal was reinstated by the Appellate Court on April 9, 2024. The orders appealed from Judge Curtis and Judge McCaslin were still under appeal. Therefore, appellant's causes of action remained active.

2. All of the information provided to the court by the appellant/defendant was true.

3. Misstatements made by plaintiff's attorney were impeached by documents in the case file. This impeachment of misinformation given by the plaintiff's attorney was ignored by the court.

4. The Court was fully knowledgeable that the Appellant/defendant needed the Complete Transcript to complete the appeal to the Appellate Court.

5. The statements made by Judge Hyman, which are present in the transcript of the hearing of July 24, 2024, document that Judge Hyman listened to the audio/digital recording of the Hearing of April 24, 2023. Judge Hyman made statements in the July 24, 2024, hearing about the hearing of April 24, 2023, that are not in the Incomplete Transcript given to the appellant/defendant and filed as the Incomplete Transcript with the Appellate Court.

6. Therefore, the order of July 30, 2024, denies the appellant/defendant the right to the evidence of her case which is the Complete Transcript of the April 24, 2023, hearing, and in the audio/digital recording of the hearing. These statements prove that appellant/defendant was not given the complete transcript. These statements prove that the order of July 30, 2024, by Judge Hymen actively seeks to deny the Complete Transcript to the defendant.

7. Conversely, if the Incomplete Transcript matched the audio/digital recording of the hearing of April 24, 2023, Judge Hyman would have ruled that the appellant/defendant had a right to hear the audio/digital recordings which is the evidence part of the appellant/defendant's case.

III. THE ORDER OF JULY 30, 2024, RULED AGAINST THE LAWS OF THE STATE OF SOUTH CAROLINA.

1. There is nothing in the laws of the State of South Carolina which block or prevent any appellant/defendant from having a Complete Transcript of any proceeding or any evidence which is part of the appellant/defendant's case.

2. Pursuant to the South Carolina Court of Appeals Rule 201, the appellant/defendant had the right and followed all of the procedures required for this appeal 2023-001023.

3. Pursuant to SCCA Rule 207, appellant/defendant met all of these requirements.

4. Pursuant to SCCA Rule 208, appellant/defendant is being blocked from completing the Intial Brief and Designation of Matter because, in spite of numerous court actions to obtain the Complete Transcript, appellant/defendant was blocked by circuit court Judge Hyman from obtaining a Complete transcript.

5. Pursuant to SCCA Procedures for obtaining a Complete Transcript, which appellant/defendant

vigorously and repeatedly followed, appellant/defendant was blocked by the Clerks of the Appellate Court from obtaining a Complete Transcript.

6. Pursuant to SCCA Rule 607, appellant/defendant followed all of the rules to obtain a Complete Transcript from the court reporter. Included in rule 607(c), appellant/defendant made requests of the court reporter to provide the communications required in the South Carolina Court Reporter Manual, which is made a part of the rules by its inclusion in this Rule 607(c). Appellant/defendant was denied all of these procedures required of the court reporter.

IV. THE ORDER OF JULY 30, 2024, RULED AGAINST THE ORDER OF CHIEF JUSTICE BEATTY OF THE SUPREME COURT OF SOUTH CAROLINA

On July 16, 2024, Chief Justice Beatty signed an order quashing a subpoena of court reporter Ms. Julie Kevish to provide testimony at the hearing of July 24, 2024, and to provide the Complete Transcript of the April 24, 2023, hearing to appellant/defendant. Additionally, Chief Justice Beatty provided in the order the following:

“In light of her important duties as a Judicial Branch Court Reporter, Ms. Kevish will only appear as a witness in this matter if directed by a circuit court judge. Additionally, Ms. Kevish will only respond to a subpoena seeking documents if a circuit court judge determines the records sought are relevant to a claim or defense in this matter and do not constitute an undue burden. Any additional requests by the defendant for the issuance of a subpoena in this matter must be approved and signed by a circuit court judge.”

1. Appellant/defendant's need of a Complete Transcript of the Hearing of April 24, 2023, are not just “relevant to a claim or defense in this matter,” it is required by the SCCA Rule of 208, the law of South Carolina. Without a Complete Transcript, the appellant/defendant appeal cannot be completed.

2. Appellant/defendant's information requested of court reporter Ms. Julie Kevish were made to her on July 31, 2023, eleven and a half months before the subpoena was issued.

3. All requests in the subpoena of July 10, 2024, were duties legally required of all court reporters.

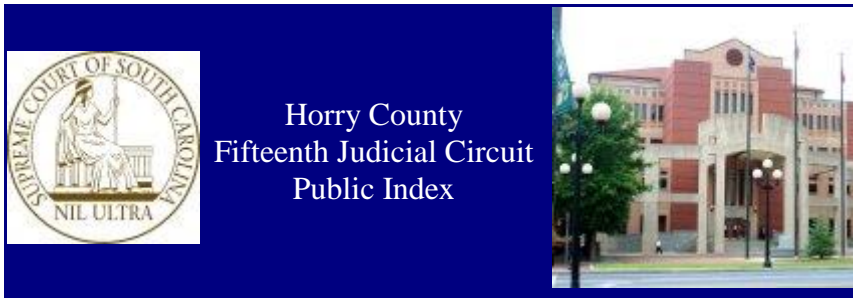
WHEREFORE,

appellant/defendant prays that this Honorable Court hear defendant's motion to reconsider and vacate the order of July 30, 2024, and will grant defendant's motion to to compel the court reporter, Ms. Julie Kevish, to provide

a Complete Transcript to the defendant, to provide the information required by law to the defendant, and to appear in a hearing to be a witness to answer questions about the transcript.

Myrtle Beach, South Carolina
August 12, 2024

Carol Ann Honeycutt, Pro Se
Post Office Box 8574
Myrtle Beach, South Carolina, 29578
Phone: 843-254-5951
Email: auso2@southcarolina.usa.com



Horry County Home Page South Carolina Judicial Department Home Page SC.GOV Home Page

25th Avenue LLC VS Carol Ann Honeycutt					
Case Number:	2020CP2605267	Court Agency:	Common Pleas	Filed Date:	09/10/2020
Case Type:	Common Pleas	Case Sub Type:	Special-Comp/Oth 699	File Type:	Non-Jury
Status:	Appeal	Assigned Judge:	Clerk Of Court C P, G S, And Family Court		
Disposition:		Disposition Date:		Disposition Judge:	
Original Source Doc:		Original Case #:		Restore Reason:	Reopened Case
Judgment Number:		Court Roster:			

Case Parties
Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
25th Avenue LLC	C/O Richard F. Williams 309 N. Highland Way Myrtle Beach SC 29572				Plaintiff		10/21/2024
25th	C/O Richard F. Williams 309 N. Highland Way				Plaintiff Pro Se		10/21/2024

Avenue LLC	Myrtle Beach SC 29572		
Clerk of Court	1301 2Nd Avenue Conway SC 29526	Other Party to Case	09/05/202 4
Floyd, Dalton B. Jr. (Inactive)	PO Drawer 14607 Surfside Beach SC 295874607	Alternate Mediator	04/01/202 1
 Golding, Henrietta U. (Inactive)	PO Box 336 Myrtle Beach SC 29578	Plaintiff Attorney	10/21/202 4
<input checked="" type="checkbox"/> Honeycutt, Carol Ann	PO Box 8574 Myrtle Beach SC 29578	Defendant	10/08/202 4
<input checked="" type="checkbox"/> Honeycutt, Carol Ann	PO Box 8574 Myrtle Beach SC 29578	Defendant Pro Se	05/18/202 3
<input checked="" type="checkbox"/> Schillizzi, Joseph Salvatore (Inactive)	2411 Oak St. Suite 206 Myrtle Beach SC 29577	Plaintiff Attorney	10/21/202 4
Thompson, Joseph DuRant III (Inactive)	111 Coleman Boulevard, Suite 301 Mount Pleasant SC 29446	Mediator	04/01/202 1
Voegel, Taylor Kay (Inactive)	PO Box 336 Myrtle Beach SC 29578	Plaintiff Attorney	01/10/202 4

Associated Cases

Agency	Case #	External	Relationship	Description	Case Filed Date	Disposition Date	Case Status	Disposition
Myrtle Beach Magistrate Court	2020CV261090667	Y	COCS	Common Pleas Case	02/11 /2020	09/01/2020	Transferred	Transferred Civil

Actions

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
25th Avenue LLC	DEFENDANT IS PRO SE - MAIL ALL ORDERS - NOTICE OF HEARINGS	Filing		09/15/20 32-09:41		

RECEIVED

Jun 25 2025

SC Court of Appeals

FORM 7

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY

Court of Common Pleas
Circuit Court Judge, Honorable B. Alex Hyman

Appellate Case No. 2024-001687

Case No. 2020-CP-26-05267

25th Avenue, LLC,

Respondent

v.

Carol Ann Honeycutt,

Appellant.

PROOF OF SERVICE

I certify that I have served the MOTION TO AMEND THE MOTION TO REINSTATE the above captioned and numbered case on Respondent, Agent of Record, Richard F. Williams, 25th Avenue Llc., by emailing this document to the Respondent, Agent of Record, Richard F. Williams, on June 25, 2025, 25th Avenue Llc., whose mailing address is 309 North Highland Way, Myrtle Beach, South Carolina 29572. This document is emailed to the Appellate Court and to the Respondent simultaneously. The Respondent has no attorney of record.

June 25, 2025

s/Carol Ann Honeycutt

Carol Ann Honeycutt

Appellant Pro Se

Post Office Box 8574

Myrtle Beach, South Carolina 29578

843-907-7061

email: auso2@southcarolina.usa.com

June 25, 2025

VIA EMAIL

The Honorable Jenny Abbot Kitchings
The Honorable Catherine Harrison
Clerks, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Motion to Amend Motion to Reinstate
25th Avenue Llc., Respondent, *Pro Se* v. Carol Ann Honeycutt Appellant, *Pro Se*
Appellate Case No. 2024-001687

Dear Clerk Harrison,

This Motion to Amend the Motion to Reinstate Case no. 2024-001687 is in response to your deficiency letter of June 16, 2025, requiring:

"You must provide a motion to amend the motion to reinstate."

Enclosed is the corrected motion to amend the motion to reinstate with proof of service on Respondent.

Please advise if there are any other corrections required.

Thank you,

s/Carol Ann Honeycutt

Carol Ann Honeycutt
Appellant Pro Se
Post Office Box 8574
Myrtle Beach, South Carolina 29578
843-907-7061

cc: email
Mr. Richard F. Williams
Agent of Record, Manager
25th Avenue LLC
309 North Highland Way
Myrtle Beach, S. C. 29572