

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY
District Court

Honorable Daniel Coble, Circuit Court Judge

105111

RECEIVED

JUN 30 2025

SC Court of Appeals

Court of Appeals Case No. 2024-001152

In Re: Estate of M.K. Jennings 2010ES2800169

Beverly Hennager.....Appellant

Mary E. Dearden, Personal Representative of the Estate of M.K.Jennings...Respondent

MOTION BY RULE 60(b)(4)

CASE IS VOID FOR LACK OF JURISDICTION
(evidence of fraud on the court)

"When appeal is taken from a void judgment, the appellate court must declare the judgment void, because the appellate court may not address the merits, it must set aside the trial court's judgment and dismiss the appeal. A void judgment may be attacked at any time by a person whose rights are affected."

El-Kareh v. Texas Alcoholic Beverage Comm'n, 874 S.W.2d 192, 194 (Tex. App.—Houston [14th Dist.] 1994, no writ):

A void judgment is "a complete nullity and without legal effect" because the court acted without jurisdiction. It is not merely voidable but fundamentally invalid (Thomas & Howard Co. v. T.W. Graham & Co., 318 S.C. 286, 291 (1995)).

A probate order entered without jurisdiction is void and can be challenged and set aside at any time (Coon v. Coon, S.C. Ct. App. 2003)

I. JURISDICTION

A. Jurisdictional Limits of South Carolina Probate Courts

1. Under S.C. Code § 62-3-201, probate jurisdiction requires either the decedent's domicile in South Carolina or the presence of estate property in the state at the time of death. The South Carolina Probate Code (§ 62-1-302) grants jurisdiction over "*estates of decedents*," but limits this authority to property physically located within the state.

2. The decedent, MK Jennings, was domiciled in Virginia, and contested assets were located in Virginia. Ancillary proceedings in South Carolina are only valid for assets situated in South Carolina. Orders attempting to control out-of-state property are legally void for lack of subject matter jurisdiction.

B. Void for Lack of Subject Matter Jurisdiction

3. If a probate court attempts to adjudicate property outside its jurisdiction, its orders are void ab initio (invalid from the outset). This principle is supported by case law:

In *Campbell v. Taylor*, the court held that probate courts cannot adjudicate property disputes beyond their statutory authority.

In re *Estate of Carr*, the court dismissed a probate action for lack of jurisdiction over the assets in question.

Under Rule 60(b)(4), a judgment is void if the court lacked subject matter jurisdiction, and the court must grant relief if this is established.

C. Evidence Supporting Lack of Jurisdiction

- a). MK Jennings's death certificate confirms Virginia residency (Exhibit 1).
- b). Virginia Promissory Note (R. 147-148)
- c). Va Shipping record (R. 158, 159).
- d). Bank accounts held in Virginia (Exhibit 2).

II. FRAUD AND FRAUD ON THE COURT

A. Fraudulent Conduct

4. Shortly after Mary Dearden's appointment as executor on April 28, 2010, I emailed her: *"According to Virginia law, probate is done in the county where the person was residing prior to death, which would be Fauquier County, VA, not Camden, SC. Please do not proceed with probate in SC if you are not in the proper jurisdiction."* (Exhibit 3). *She was unresponsive.*

5. On May 1, 2010, I emailed Judge Pierce to ask whether South Carolina was the correct state for probate. I wrote: *"I have gotten no response to my question from the executor of her estate, Mary Dearden, so I contacted the attorney in charge of probate, M. Burns, whose name I got through your office. He says my mother considered SC to be her home and intended to return."* (Exhibit 4). As Judge Pierce did not respond, I assumed Burns was correct.

6. I am not an attorney. For years, I believed that having any assets listed on the inventory in South Carolina allowed probate to take place there. I only recently discovered that only assets physically located in the state can be adjudicated in SC probate court. The emails are evidence of deliberate misrepresentation (e.g., concealing domicile/assets). As further proof that Burns knew where the decedent was

domiciled, during the 2016 hearing Dearden testified several times to the fact that the decedent was living in VA.

B. INTENT TO HARM

7. Dearden's and Burns' falsification enabled the statute of limitations to expire on the contested claims. It was also meant to financially weaken me in preparation for a lawsuit brought in VA to force a below value sale of my family partnership assets where Dearden, Dauphin and M Jennings would benefit from the sale.

C. CAUSAL DAMAGES

8. Probate filed in SC allowed the expiration of statutes of limitations. This also resulted in fifteen years of unnecessary litigation and depletion of financial resources until I was forced to represent myself Pro Se. As a result of the financial stress causing inability to represent myself with competent attorneys, I also lost millions in VA.

D. Legal Remedies for Fraud and Fraud on the Court

9. The clear misrepresentation by Dearden and her attorney regarding jurisdiction constitutes fraud and, under South Carolina law, supports a claim for punitive damages, especially where the conduct is egregious (*Cartee v. Lesley*, 290 S.C. 333, 350 S.E.2d 388 (1986)). This is a case of clear fraud on the court given the entire judicial system was tricked for fifteen years. It clearly meets the standards of egregious.

10. South Carolina Case Law: Fraud on the Court for Falsification of Jurisdiction

Ray v. Ray, 373 S.C. 426, 646 S.E.2d 880 (2007)

The South Carolina Supreme Court directly addressed "*fraud upon the court*" and defined it as conduct that "*does, or attempts to, subvert the integrity of the Court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery cannot perform in the usual manner its impartial task of adjudging cases.*"

South Carolina Statutory and Common Law Grounds

11. Fraudulent Intent in Fiduciary Relationships:

South Carolina Code § 15-3-240(2) explicitly allows recovery when a defendant "*acted with fraudulent intent or reckless disregard for the truth*" in contractual/fiduciary contexts.

Executors and attorneys owe fiduciary duties; deliberate jurisdictional fraud qualifies under this statute.

Punitive Damages for Fraudulent Conduct:

12. Cartee v. Lesley (1986) established that punitive damages apply when tortfeasors act with "*willful, wanton, or reckless disregard*" for others' rights.

Deliberately filing in the wrong jurisdiction to suppress claims constitutes such conduct.

Lister v. Nations Bank (1997) SC- Punitive damages for breach of duty with fraudulent act.

Perry v. Heirs of Gadsden (1993) SC - Punitive damages for fraud in estate administration.

Probate-Specific Penalties:

13. *Marshall v. Marshall*, 547 U.S. 293 (2006). The U.S. Supreme Court upheld a federal court's award of both compensatory and punitive damages for tortious interference with an expected inheritance, where the defendant engaged in willful, malicious, and fraudulent conduct to manipulate probate outcomes:

"The District Court awarded Vickie some \$44.3 million in compensatory damages and, based on 'overwhelming' evidence of Pierce's willfulness, maliciousness, and fraud, an equal amount in punitive damages".

14. This case is a leading authority for the proposition that punitive damages are available in probate-related fraud and tortious interference cases, even when the conduct involves manipulating probate proceedings or jurisdiction.

CONCLUSION

15. In summary, the South Carolina probate court's orders regarding assets outside its jurisdiction are void and subject to vacatur, and the fraudulent conduct of the executor and her attorney warrants severe punitive damages under established South Carolina precedent. South Carolina courts permit punitive damages under § 15-3-240 and *Cartee* principles, given the deliberate jurisdictional fraud. Federal precedent (*Marshall*) further supports such claims.

Requested Remedies

16. The Court is requested to order the following remedies:

1. **Attorney's Fees and Costs under S.C. Code Ann. § 62-1-111**
Award all reasonable attorney's fees and litigation costs incurred due to the Personal Representative's actions, to be paid by the PR personally and/or Moultrie Burns as justice and equity require.

2. **Sanctions under S.C. Code Ann. § 15-36-10**
Impose sanctions against the PR and/or Moultrie Burns for maintaining frivolous litigation in bad faith on a void case for fifteen years, including monetary penalties and reimbursement of costs.
3. **Breach of Fiduciary Duty under S.C. Code Ann. § 62-3-712**
Find the PR liable for breach of fiduciary duty and order: Return of all compensation received for administering the void case and Personal liability for losses caused by her conduct.
4. **Return of Assets Disbursed Under Void Order**
Order the return of all assets disbursed pursuant to the void probate orders, as void judgments confer no legal rights and cannot justify asset transfers.
5. **Remove Mary Dearden as Personal Representative.**
6. **Order severe punitive damages for defrauding the court and damaging the estate and beneficiaries by intentionally bringing probate without jurisdiction knowing that it would be declared void.**
7. **Any other remedy the Court deems just under the circumstances.**

17. The PR's prolonged administration of a void case warrants fee-shifting, sanctions, disgorgement of compensation, punitive damages and asset recovery under South Carolina law.

Respectfully Submitted,



date June 23, 2025

Beverly Hennager
315 Wood Lane, Corvallis, MT 59828
hennagerbev@gmail.com
406-361-0796
PRO SE

CERTIFICATE OF SERVICE

I, Beverly Hennager, do hereby certify that I have served a copy of the foregoing

MOTION BY RULE 60(b)(4) to the following addresses:

Moultrie Burns, Esquire
Savage Royal & Sheheen, LLP
PO Drawer 10
Camden, SC 29021
Attorney for Respondent, Mary Dearden

South Carolina Office of Administration 1220 Senate Street, Suite 200 Columbia, SC
29201

Enclosed is a fifty dollar motion filing fee.

Hard copies to follow.

Respectfully Submitted,

RECEIVED

JUN 30 2025

SC Court of Appeals



date June 23, 2025

Beverly Hennager
315 Wood Lane, Corvallis, MT 59828
hennagerbev@gmail.com
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PRO SE

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In Re: Estate of M.K. Jennings 2010ES2800169

Beverly Hennager.....Appellant

Mary E. Dearden, Personal Representative of the Estate of M.K.Jennings...Respondent

AFFIDAVIT OF BEVERLY HENNAGER

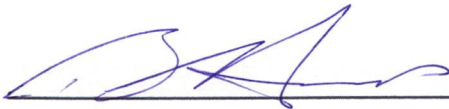
I, BEVERLY HENNAGER, being duly sworn, depose and state as follows:

1. I am the Petitioner in the above-captioned matter.
2. I submit this affidavit in support of my Motion Pursuant SCRPC Rule 60(b)(4) to void this case for lack of jurisdiction.
3. Attached are exhibits not included in the Record on Appeal.
 - a) death certificate of decedent
 - b) Virginia Promissory Note (R. 147-148)
 - c) Va Shipping record (R. 158, 159).
 - d) Bank accounts held in Virginia (Exhibit 2).

e) 4-2010 email to Mary Dearden

f) 5-2010 email to Judge Pierce

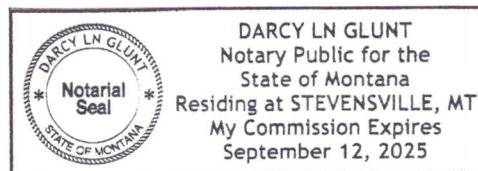
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

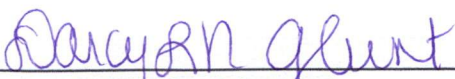
 date June 23, 2025

Beverly Hennager
315 Wood Lane, Corvallis, MT 59828
hennagerbev@gmail.com
406-361-0796
PRO S

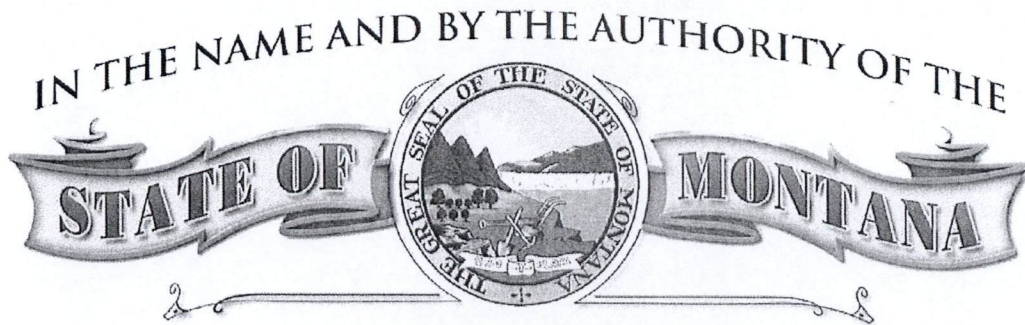
Sworn to and subscribed before me

this 23rd day of June, 2025




Notary Public for Montana

My Commission Expires: September 12, 2025



Secretary of State of the State of Montana

To all to whom these Presents shall come, Greeting:

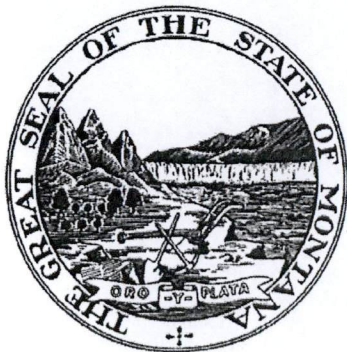
Know Ye That I,

Christi Jacobsen, Secretary of State of the State of Montana,

by virtue of the power vested in me by the Constitution and in pursuance of
the Laws, hereby appoint and commission

DARCY LN GLUNT
Notary Public for the State of Montana
Residing at Stevensville, Montana
Commission Expires September 12, 2025
Commission Number: 356189

I invest this person with the power and authority to execute and discharge the duties
appertaining to the office and to enjoy all privileges and immunities thereof for the
period of four years from September 12, 2021 through September 12, 2025, unless
sooner revoked by the Secretary of State.



In Testimony Whereof, I have hereunto
subscribed my name and caused the Great
Seal of the State of Montana to be affixed at
Helena, Montana, this 12th day of September,
2021.

A handwritten signature in cursive script that reads "Christi Jacobsen".

Christi Jacobsen
Montana Secretary of State

EXHIBIT 1

CERTIFIED COPY OF A DEATH RECORD

COMMONWEALTH OF VIRGINIA - CERTIFICATE OF DEATH
DEPARTMENT OF HEALTH - DIVISION OF VITAL RECORDS - RICHMOND

130		132		130	
Minnie Katherine Jennings		Minnie Katherine Jennings		Minnie Katherine Jennings	
March 31, 2010		89		Feb. 23, 1921	
Fauquier Hospital		Fauquier		Fauquier	
Warrenton		500 Hospital Drive		20138	
Virginia		Fauquier		Louis Allen Jennings	
Calverton		3534 Old Weaver's Road		Mary Bearden-daughter	
Beverly Randolph McCreight		Sarah Katherine Sullivan		+2	
white		South Carolina		Auto Dealer	
U.S.A.		240-30-4145		Owner	
CARDIOPULMONARY ARREST		DEMORALIZATION, PNEUMONIA, RESPIRATORY ARREST		DEMENTIA, CONGESTIVE HEART FAILURE, OBSTRUCTIVE PNEUMONIA	
1:08 am		3/31/10		3/31/10	
Moser Crematory		Warrenton, VA		Moser Funeral Home, Inc.	
233 Broadview Ave. Warrenton, VA		4-1-2010		4-1-2010	

This is to certify that this is true and correct reproduction of the original record
Filed with the Fauquier County Department of Health, Warrenton, Virginia.

Date Issued: 4-1-2010
(SEAL) Randy Caradocian
Registrar or Deputy

ANY REPRODUCTION OF THIS DOCUMENT IS PROHIBITED BY STATUTE.
DO NOT ACCEPT UNLESS THE IMPRESSED SEAL OF THE FAUQUIER COUNTY
DEPARTMENT OF HEALTH IS CLEARLY AFFIXED.

EXHIBIT 2

Minnie K Jennings
P O BOX 242
CALVERTON VA 20138-0242

=====

14 MONTH CD SPECIAL Certificate 11321

=====

Original Issue Date: 07/30/2009 Interest Rate: 2.2310 %
Original Issue Value: 100,000.00 Maturity Date: 09/30/2010
Term: 14 Months

* Approaching Renewal Advice *

Your certificate will mature on 09/30/2010. Interest will be credited to your certificate quarterly. The current balance of your 14 MONTH CD SPECIAL Certificate is 102,249.73. If the certificate renews, the new maturity date will be 09/30/2011.

THE INTEREST RATE AND ANNUAL PERCENTAGE YIELD (APY) HAVE NOT BEEN DETERMINED; THEY WILL BE AVAILABLE ON 09/30/10 BY CALLING 540-347-2700. THERE IS A GRACE PERIOD OF 10 CALENDAR DAYS AFTER MATURITY IN WHICH YOU MAY WITHDRAW FUNDS WITHOUT A PENALTY BEING ASSESSED. WE USE THE DAILY BALANCE METHOD TO CALCULATE INTEREST ON YOUR ACCOUNT. INTEREST BEGINS TO ACCRUE ON THE BUSINESS DAY YOU DEPOSITED FUNDS. THE MINIMUM BALANCE TO OPEN THIS ACCOUNT IS \$500.00. OUR CERTIFICATE OF DEPOSITS ARE TIERED ON DAILY BALANCES AS FOLLOWS: TIER 1: \$0.00 UP TO \$499.99; TIER 2: \$500.00 AND UP. THE STATED RATE AND ANNUAL PERCENTAGE YIELD WILL BE PAID ON THE ENTIRE BALANCE BASED ON THE TIER YOUR BALANCE FALLS UNDER. A PENALTY CALCULATED USING THE CURRENT RATE ON THE ACCOUNT WILL BE ASSESSED ON PRINCIPAL WITHDRAWALS PRIOR TO MATURITY, IF THE TERM IS 12 MONTHS OR LESS THE PENALTY IS 3 MONTHS INTEREST. IF THE TERM IS GREATER THAN 12 MONTHS THE PENALTY IS 6 MONTHS INTEREST. A WITHDRAWAL WILL REDUCE EARNINGS. DEPOSITS MAY NOT BE MADE ONCE THE ACCOUNT IS OPEN.



Bank of America

Bank of America, N.A.
P.O. Box 25118
Tampa, FL 33622-5118



Combined Statement H
7-1
Page 1 of 4 000757001294
Statement Period
07-29-09 through 08-28-09
B I T O A P P A 17
Number of checks enclosed: 0

⑆000123456789⑆
ME 09/03 0 0003 345 225 012304 9901 AT 0.357

M K JENNINGS
MARY E BRANDES
KATHERINE DAUPHINE
PO BOX 242
CALVERTON VA 20138-0242

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Our free Online Banking service allows you to check balances, track account activity, pay bills and more.
With Online Banking you can also view up to 18 months of this statement
online and even turn off delivery of your paper statement.
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For additional information on services, you may call:	Or you may write to:
1.800.432.1000 Priority Telephone Banking	Bank of America, N.A.
1.800.295.4408 TDD/TTY Users Only	P.O. Box 25118
1.800.898.6000 En Español	Tampa, FL 33622-5118

Your Statement Summary

Account Name	Account Number	Statement Date	Balance (\$)
Bank Deposit Accounts **			
MyAccess Checking	0007 8763 1284	08-26	74,374.54
7 Mo Featured CD	* 910 000 8898 7329	08-26	105,036.44
7 Mo Featured CD	* 910 000 8898 7332	08-26	105,036.44
7 Mo Featured CD	* 910 000 8898 7345	08-26	105,036.44
7 Mo Featured CD	* 910 000 8898 7387	08-26	105,036.44
7 Mo Featured CD	* 910 000 8898 7400	08-26	105,036.44

Total Deposit Account Balance \$699,556.74

* Detailed information about this account is not included on this statement.

** Banking products such as checking and savings accounts and credit accounts are offered by Bank of America, N.A., member FDIC. Credit card accounts are offered by Bank of America, N.A. (USA).

BEST RATE CHECKING 892876307
Printed by: BETH MALABY

THE FAUQUIER BANK

9/10/2009 2:52:01 PM
Reporting Institution: 54

Demand Deposit 892876307 - Minnie K Jennings

	Rel	Birthdate	Phone	Tax Identification
[01] Minnie K Jennings	P	*****	*****	*****
[02] Mary E Dearden	S	*****	*****	*****

Post Office Box 242
Calverton VA 20138-0242

Tax Name: [1] Minnie K Jennings

Previous Cycle

Description	Debits	Credits	Date	Balance
Balance Forward:			Jul 31, 2009	\$0.00
Deposit		\$30,000.00	Jul 31, 2009	\$30,000.00
Interest		\$7.36	Aug 11, 2009	\$30,007.36
Balance This Statement:			Aug 11, 2009	\$30,007.36

BH 000185

Primary Account: 7FN, 12324



TOTAL MERRILL*

M K JENNINGS
PO BOX 242
CALVERTON VA 20135-0242

YOUR MERRILL LYNCH REPORT

September 01, 2010 - September 30, 2010

PORTFOLIO SUMMARY

	September 30	August 31	Month Change
Net Portfolio Value	-	\$0.08	(\$0.08) ▼
Your assets	-	\$0.08	(\$0.08) ▼
Your liabilities	-	-	-
Your Net Cash Flow (Inflows/Outflows)	(\$0.08)	\$0.08	-
Securities You Transferred In/Out	-	-	-
Subtotal Net Contributions	(\$0.08)	\$0.08	-
Your Dividends/Interest Income	-	-	-
Your Market Change	-	-	-
Subtotal Investment Earnings	-	-	-

**Need Investment Guidance?
Call Your Financial Advisor**

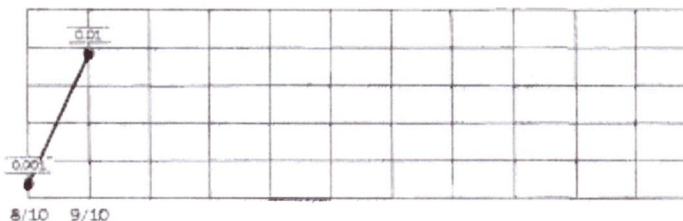
Your Financial Advisor:
ALBERT M WRIGHT III
1901 MAIN STREET 6TH FLOOR
COLUMBIA SC 29201
mel.wright@ml.com
(802) 733-2908

**If you have questions on your statement,
call 24-Hour Assistance:**
(800) MERRILL
(800) 637-7455
Access Code: 79-735-12324

Up-to-date account information can be viewed
at: www.ml.ml.com, where your statements
are archived for three or more years.

Questions about MLOL? Click the "help" tab at
the top of the screen once you log in.

Net Portfolio Value (in hundreds), 2010-2010



E-DELIVERY IS CONVENIENT AND SECURE

Receiving account records electronically can be safer and more secure because it helps reduce the threat of mailbox theft while protecting your private information. Reducing paper is also good for the environment. Visit www.mymerrill.com to enroll in e-delivery.

Merrill Lynch, Pierce, Fenner & Smith Incorporated (MLPF&S) is a registered broker-dealer, Member Securities Investor Protection Corporation (SIPC) and a wholly owned subsidiary of Bank of America Corporation. Investment products: **Are Not FDIC Insured | Are Not Bank Guaranteed | May Lose Value**

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M K JENNINGS
 PO BOX 242
 CALVERTON VA 20138-0242

Primary Account: 7FM12324



TOTAL MERRILL*

YOUR MERRILL LYNCH REPORT

September 01, 2010 - September 30, 2010

PORTFOLIO SUMMARY

	September 30	August 31	Month Change
Net Portfolio Value	-	\$0.08	(\$0.08) ▼
Your assets	-	\$0.08	(\$0.08) ▼
Your liabilities	-	-	-
Your Net Cash Flow (Inflows/Outflows)	(\$0.08)	\$0.08	-
Securities You Transferred In/Out	-	-	-
Subtotal Net Contributions	(\$0.08)	\$0.08	-
Your Dividends/Interest Income	-	-	-
Your Market Change	-	-	-
Subtotal Investment Earnings	-	-	-

Need Investment Guidance?
Call Your Financial Advisor

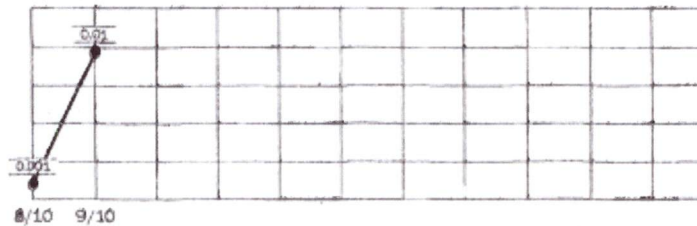
Your Financial Advisor:
 ALBERT M WRIGHT III
 1901 MAIN STREET 5TH FLOOR
 COLUMBIA SC 29201
 mel.wright@ml.com
 (803) 733-2906

If you have questions on your statement,
 call 24-Hour Assistance:
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 (800) 637-7455
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Net Portfolio Value (in hundreds), 2010-2010



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EXHIBIT 3

Probate

From: Beverly Hennager <b@nefferdun.myrf.net>

Date: 04/28/2010 10:16

To: Ziba & Mary Dearden <mg glory@erols.com>, Beverly Hennager <b@nefferdun.myrf.net>, Michael Jennings <MJennings@kjtoyota.com>, "Louis A. Jennings Jr." <LAJ@cfl.rr.com>, randy dauphin <rjdauphin@msn.com>

Mary

According to VA law, probate is done in the county where the person was residing prior to death, which would be Fauquier County, VA, not Camden SC.

Please do not proceed with probate in SC if you are not in the proper jurisdiction.

EXHIBIT 4

Probate for Minnie K Jennings

From: Beverly Hennager <b@nefferdun.myrf.net>

Date: 05/01/2010 21:44

To: <harriet.pierce@kershaw.sc.gov>

Dear Ms Pierce,

I am concerned that probate for my mother, Minnie Katherine Jennings, is being done in the wrong state. My mother was living in Va for over two years prior to her death. On her death certificate, 3534 Old Weaversville Rd Calverton, VA, is given as her residence. That is in Fauquier County, VA.

I have gotten no response to my question from the executor of her estate, Mary Dearden, so I contacted the attorney in charge of probate, M. Burns, whose name I got through your office. He says my mother considered SC to be her home and intended to return. My mother left Camden SC in 2007 when her sister could no longer care for her because of physical and mental disability. She lived with my sisters in VA visiting Camden only once or twice that I know of. The conditions contributing to her death (listed on the death certificate) are dementia, congestive heart failure and diabetes and she was 89 when she died so it was very unlikely that she would ever have returned to Camden. The memorial service for my mother was held in Va and she was buried in Va.

I am confused as to why the probate is being held in SC. I was just informed of this and have set up an appointment with an attorney to get more information. Please do not proceed with probate until we are all certain that this is being done in the correct state and county.

Sincerely,

Beverly Hennager