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Sep 26 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the 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; Ray Grenier; Grant Ferrendelli; and Charles Carpenter

Respondents.

Appellate Case No. 2025-000859

*(continuous objection to the erroneous style that favors lower level RACKETEERING Judges, lawyers and others involved in the Criminal Fraud on the Court and P-Appellants).*

MOTION FOR EXPANSION OF TIME AND PAGES  
IN NEW SITUATION AFTER MEDICAL EMERGENCY

Not proofed due to disability issues

This brief was entirely rewritten on September 25, 25, 2025 due to a hacker destroying the original and also again attempting to get into the computer today as well.<sup>1</sup>

Comes now Plaintiff-Appellants, Pro Se, Dr. Linda Kennedy and Dr. Marsha Fink, Pro Se

(hereinafter, "Dr. Kennedy" and "Dr. Fink" or "P-Appellants" collectively), needing a reasonable

accommodation of expansion of time and pages pursuant to SCACR Rule 240 and Rule 267(d);

under the rules and laws of meaningful Due Process and Constitutional Equal Protection; under

<sup>1</sup> See part of the response to the hacking on a 2<sup>nd</sup> computer used to try to fix the first computer, where it was also being hacked during trying to stop the hacking, while P-Appellants and their computer tech company were trying to save the first computer, with a pop up that states that the 2<sup>nd</sup> computer was checking for leaked pass words and so forth due to the hacking entry. Ex1

the laws of the Americans with Disabilities Act of 1990 (ADA), 42 U.S.C. §§ 12131–12134 (2018), the Rehabilitation Act of 1973, 29 U.S.C. § 794 (2018), and Physical Health Circumstances beyond P-Appellants control. These physical health issues caused by the Judges in the lower Court affect P-Appellants' ability to work quickly and within page limits and have severely weakened P-Appellants' physical health. Further, because of these deadlines Dr. Kennedy's continuing health issues involving urgent Kidney issues/damage has caused her to delay in seeking medical care. And where the Court/lawyers and other State Actors and agents, have made such a mockery of justice that it takes many pages and much work to put forth the appeals necessary to hold these recalcitrant state actors/agents liable for their bad faith and criminal acts that directly affect the outcome of this case, and involved Judges and other State Actors in the matter, along with the Defendants listed, long before P-Appellants ever filed their case, without knowledge of such involvement at the time of filing their original suit. This motion granting expansion of time/pages involves the upholding of Rules of Ethics/Canons.

Further, P-Appellants have a parasitic hacker now involved for the third time in this case. This was not the usual hacker taking P-Appellants hostage by asking for ransom money in order to get their computers restored, but these hackers were more interested in totally destroying their entire computers with all types of information, briefs, and other work accomplished on them. Fortunately, most was backed up and only the more recent work has been destroyed, but still it was a lot of work and effort destroyed.

P-Appellants first had this happen in this case, with their own colluding attorney Michael Dodd sending a virus in one of his last emails, begging P-Appellants not to disclose the evidence of his collusion with Defense, on or about early June 2023, with a virus attached that P-

Appellants software caught. Dodd never answered whether that email with his name on the sender line was his, but we had it later verified that it was his.

The Defense seems to have sent the second, much more damaging hack, that was getting into P-Appellants entire google accounts, and P-Appellants had enough attack detection on their computer to thwart much of the attack although some emails from the Defense were no longer visible in P-Appellants email. This was done at a critical time in 2024, when Defense was being terribly exposed with the Judges in a Racketeering operation over P-Appellants case, and P-Appellants had put enough together that Judge Maddox immediately announced his "retirement" and the RACKETEERS stopped all activity on the case for about six months, until Maddox could retire, before Judge McIntosh's last move to criminally interfere with this case by calling a Sua Sponte Evidentiary Hearing when the other side could not get P-Appellants dismissed even using the P-Appellants didn't comply with Virgin Island Customs, and therefore must be dismissed, which isn't in any law or rule book P-Appellants, nor anyone else, has seen before or P-Appellants would imagine, since. At the time of this second hacker attempt to ruin all P-Appellants files, they had to stop the court proceedings because of what P-Appellants were going to present at a public hearing with a news reporter, who thrives on such exposure of these criminal acts by SC State Actors, just a day or two before that hearing, that the RACKETEERS had no answers for. Not only did Maddox early "retire" but RACKETEER, defense attorney Robert Deloach ran away without announcement, in a sudden burst of chaos involving he and his firm and partners. He is practicing in another state now and under the radar as much as he can be because he knows at least a part of what P-Appellants know about what these RACKETEERS did in

P-Appellants case, and in other SC cases, that P-Appellants have investigated that involve similar acts or abuse of other innocent people in SC by the State and its justice system

Now this third hacking masterpiece, with P-Appellants even picking up the phone with the hacker calling them after they caught the hack and were having it stopped by P-Appellants' tech personnel, but could still not save an entire computer, that had most but not all the files backed up (but due to time constraints to meet these deadlines the more recent writings are lost, including what was going in the mail today as this first writing of this brief), and P-Appellants will have to produce many new replacements for previous writings that can no longer be incorporated, that they had completed already, which will obviously be more time-consuming jobs to do to meaningfully present. Fortunately, most were backed up.

Earlier in other submissions in appeal documents filed in this court, Dr. Kennedy and Dr. Fink had asked for a very necessary page and time expansion. This is because the incredible amount of work including 4 years of court and lawyer shenanigans with them keeping the case from progressing amounting to over 6000 pages of documents/evidence needing review and implementation into initial appeal brief and accounting for the massive amount of time need to do such appeal brief.

As a part of the incredible volume of evidence and time/pages provided to review the relevant documents and other evidence in this case, and write and cite in a reply brief, the case includes underlying Defendants, Judges and other state agents and even Virginia Agents, Allianz agents, Solicitor General, Anderson Sheriff's Department and more, RACKETEERING together at least 7 months *BEFORE* P-Appellants even decided to file their case in the 10th Circuit Common

Pleas Court. Without knowing of this information at the time of filing suit, P-Appellants filed in this 10<sup>th</sup> Circuit Common Pleas Court, which went before the same Judges involved in their underlying case as participants with other Defendants and agents partially listed above, with State's motive at least retaliation and financial interests (P-Appellants took part in a national call for legal reform years ago in Virginia, as lawyer-whistleblowers against the LMCE already working in the legal system from long ago as the Murdaugh case, this case and other cases prove). Even the Clerks filing the suit knew about the alleged facts from Defendants who would have no reason to be telling the clerks or anyone else in the Court about a case that was never known to them until after they were served from the filing date, March 17, 2022.

Using Defendants' 2000 plus pages of Defendants' own written admissions against their interests that they voluntarily made and turned over to P-Appellants, and P-Appellants recorded statements from Defendants and witnesses saying likewise, all after P-Appellants filed their initial suit, and before Discovery was filed by P-Appellants and before lawyers were involved, Defendants already admitted their own liability/guilt and the liability/guilt of the SC Judges and others involved in what amounts to RACKETEERING in the underlying case. The Judges refused to disclose and when P-Appellants finally learned why this case continued to be sabotaged by Judges and Lawyers, even their own and even discovery stonewalled to this date, the Judges refused to recuse, the SC Bar and the Judicial Committee on Discipline failed to Discipline, and the Judicial Merit Committee reappointed these recalcitrant and criminally liable Judges for another term each; just like Murdaugh had been preserved and bolstered for about 100 years creating Murdaugh Country and Murdaugh Justice.

The State Actors are not protected by immunity in this RACKETEERING because these RACKETEERS and those joining them are a part of the underlying suit itself and would have been named if P-Appellants understood their involvement before filing their initial suit. Any attempt to supplement the case with this after acquired evidence was, of course, ignored as were all demands for judicial recusal and lawyer disqualification, in that they could not be presiding or presenting in this case since they were/should be Defendants, Material Witnesses and had financial and retaliatory interests in this matter, while judging over their own guilt/liability that caused such incredibly convoluted but obvious Unconstitutional procedural manipulation and impossible acts perpetrated on P-Appellants by these RACKETEERS in P-Appellants trying to get an honest hearing/trial before a Jury, which was never going to happen.

The RACKETEERING is clear from how the case was so openly geared to getting P-Appellants dismissed by any means necessary no matter the bad faith involved, such as Defense submitting a dismissal motion because P-Appellants (through their attorney at the time), didn't comply with a Virgin Island *Custom* claim, which the Judges would not find Defenses frivolous claim sanctionable or even without merit, in spite of its ridiculous and Unconstitutional basis in law and common sense. These types of ridiculous claims and strategies by Defense and assisted by Dodd (Plaintiffs own attorney) in order to dismiss P-Appellants on any grounds possible whether legal or not or true or not, is unconscionable and obviously part of a "fixed", predetermined outcomes in the works, to dismiss P-Appellants while refusing them any Discovery or Depositions/etc., to get all the RACKETEERS participating in these show hearings, including P-Appellants' own attorney Michael Dodd (who P-Appellants eventually fired), out of their criminal

RACKETEERING participation while stealing P-Appellants award (they already won several times in the lower court).

This is so Orwellian and unconscionable and criminal that the case was almost totally irreparably harmed by these RACKETEERS, but for P-Appellants incredibly voluminous evidence collected by them even when their discovery requests were stonewalled the entire time filed in April 2022. To address these extremely unconstitutional and criminal fraud on the Court and P-Appellants, in a meaningful way, for the court to comply with Due Process requirements, regarding this motion, these issues and record citing requires much time and many pages of writing. This meaningful Due Process is in effect no matter whether P-Appellants are going against the Legal Machine Criminal Enterprise or anyone else.

But P-Appellants will not quit even when being severely bullied and there is much worse to be heard in the facts of this case and the actions of the underlying courts and all RACKETEERS that joined them.

As to the current emergency medical situation, P-Appellants warned at the beginning of this appeal that Dr. Kennedy was feeling a stone moving in her kidney. Kidney stone pain is a very unique pain, even before it fully appears as a big problem that may not pass and could stay lodged in a new place or begin its ripping descent through the kidney. Any time it gets lodged, there is a chance for hydronephrosis, which is comparable to a balloon being over filled with water, with the ballon representing a blocked kidney. If a "cure" isn't found soon enough, this can permanently destroy the kidney and make it nonfunctioning.

Unfortunately, Dr. Kennedy is affected in both kidneys by a genetic disorder that create these stones, and when under great stress they are known to be much larger and more painful and dangerous. Some time these eventually pass and sometimes they become big health risks, and in Dr. Kennedy's case, the blockage actually reverses with toxic waste collecting in arms, hands and especially legs, to where the legs can become twice as big around, and very numb and painful.

An example, illustrating the lack of concern for the ADA laws and other common sense rules and canons, where judges are not permitted to bully litigants they do not favor or for financial and retaliation gain, last year in early June 2024, Dr. Kennedy was trying to beat her share of the early deadline because the lower court Judges ignored P-Appellants many requests for reasonable accommodations after the judges withheld sleep from P-Appellants for 3 and 4 days at a time preparing for court hearings, and then expected them to be coherent enough to present. This was after an every other day all-nighter. By the end of this first strategy employed against P-Appellants, Dr. Kennedy lost much of her vision from staring at computer/phone screens for long periods of time which was overwhelming her eyesight (she had just gotten an eye check and new glasses two months before). Dr. Fink went into seizures several times, including a couple of times at the court, and was ushered off by ambulance. She was diagnosed with seizures and was told that they were most likely brought on by an extreme deprivation of sleep. Dr. Kennedy has to get surgery on her eyes and limbs for nerve damage.

It should be noted that Sleep Deprivation is considered a violation of Human Rights and torture by various national and international organizations, with just one day of sleep missed, likened to a blood alcohol level above the DWI/DUI limit. But the Judges kept doing it as did their

agents, weakening the target and trying to bully P-Appellants to quit. But P-Appellants are not going to quit.

P-Appellants had doctor's orders that hydronephrosis had set in and scheduled the surgery for the very next morning due to urgency, and Dr. Kennedy, understanding she had to save her kidney, agreed to comply. There were actually 3 stones that were blocking one kidney, and they had finally joined together to create one big blockage. Dr. Kennedy and Dr. Fink also hired an American's with Disabilities Advocate to attempt to politely educate Judge Taylor (letter from ADA Advocate to the Court, Ex 2), who didn't care about following the law as he is another of the many defiant Judges in SC where defiance is protected as a LMCE member, but is the exact opposite of how a Judge must conduct him/herself by the Canons and Constitution.

Judge McIntosh denied the continuance while giving the Defense days off for vacation and other requests that added up to about 800 or more days of delays by Defense by March 2024, counting these days missing as each person's requests for protection, counted all together, with Judge McIntosh making sure P-Appellants understood that he was going to dismiss them no matter what, if any evidence or alleged evidence was available, including fake Judges, Allianz and colluding attorneys making up an entire fact pattern they developed and even tried to pad the record with after the fact to substantiate something that never happened that would dismiss P-Appellants on other grounds (not procedure and not merits because they could not do so as hard as they tried), using P-Appellants own attorney as a fake witness, before Dodd was fired, with such a scheme as Dodd being a witness against P-Appellants in a separate claim with no Plaintiff, and would not even be Constitutional or ethical. By then P-Appellants were laughing, and were pointing out all the extremely obvious reasons their attempt could not even pass muster even if

they made up more facts, so this eventually didn't happen with easy proof, once P-Appellants outsmarted the greedy Sprouse who was too fixated on one plan that he could not see what P-Appellants did to undercut such lies, including P-Appellants having tape recordings of Dodd because P-Appellants had learned early not to trust their own attorney, who seemed to be representing the Defense very strenuously.

This warning earlier in this appeal about feeling a kidney stone, but not being sure of what course this kidney stone would take, and how that situation would end with the stone, and being denied meaningful due process, Dr. Kennedy fought through the stone pain and signs of trouble, as it continued to get worse in order for Dr. Kennedy and Dr. Fink to meet their short deadlines in too few allowable pages to even try to be able to meaningfully receive Due Process against the State and its agents all working together as should be defendants, while presiding over themselves and their Co RACKETEER Defendants.

A few days before the emergency was truly beyond the emergency point, the Court was notified that the stone was very painful and Dr. Kennedy had been in bed on pain medicine as much as possible, as anyone who has Kidney stones knows, that an attack is excruciating. The Court was notified that if Dr. Kennedy had to get to an ER, she would drive herself the long distance to get to one, and until then was trying to finish the work by the short due date/page limitations.

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The Court responded without a motion, which was appreciated, as Dr. Kennedy nor Fink could do a motion at that point.

On August 26, 2025, Dr. Kennedy got in the car and somehow made her way to the ER through the country roads, and the hospital performed a CT Scan, urinalysis, blood work etc. There were actually two stones, one on each side that were almost totally blocking the kidneys, and the kidneys were well into hydronephrosis, with Dr. Kennedy's legs about double the size/circumference because of backed up toxicity. She had a serious infection behind the stones that required the doctors to wait until the next day to do emergency surgery because they were afraid to cause sepsis by pushing the infection further into the blood stream if they operated at that moment. A very large amount of blood was in the urine. They admitted Dr. Kennedy and operated the next morning. They put in stents in both ureters, a very painful process and quality of life as sitting or any kind of actions were painful. The stones were 5 mm, which is enough to block the ureter, and the other was an unusual 13 mm, that was obviously also very painful.

Dr. Fink kept the court abreast and said that deadline set was before any of these events happened and would most likely not be enough time, and certainly not enough pages for meaningful due process and Dr. Fink stated she could not do this entire appeal by herself with Dr. Kennedy down.

This Motion is to update this court and respectfully demand a larger extension of pages and time due to all the circumstances referenced above and below as the law favors P-Appellants position for many reasons that are reasonable, common sense and favored by law. Meaningful Due Process must be permitted and protected.

The further update is now a Motion to be filed. P-Appellants state that by about September 10-11, 2025, Dr. Kennedy felt about 60% better. She had to go under a second course

of stronger/broader spectrum antibiotics, which helped, but there was still some swelling in her legs, and her kidneys were still not functioning as they should. An ultrasound is on schedule, but the doctors sent her back to the Emergency Room for another CT Scan and blood/urine and there was still the infection behind far up in her kidneys and in her blood, and her urine was still bloody, which should not happen this far after surgery unless more stones were moving around (there are about 10 in each kidney most of the time with only one or more active at a time).

While Dr. Kennedy has been doing some work, she is not at full strength, with full strength defined as dealing with nerve damage in her limbs and eyes due to the 10th Circuit Court's constant punishments of Dr. Kennedy and Dr. Fink who is on seizure medicine, unable to drive, and both still sleep deprived, although not healing as much as in the underlying case so far, except when deadlines are getting closer and there was not enough time/pages to be able to have meaningful due process. The Supreme Court amazingly said the solution is to just give up because P-Appellants can't be concerned for their health if they continue, which is frankly what the bullies from the underlying case and since have said because they want us to give up, and don't want to consider that some people can't be bullied and standing for rights when they are important to the matter is more important than cowardly running away anytime bullies are nearby, even from the Courtroom. P-Appellants will not give up and need their award paid in full that they already won, and the State to settle its debt to them to make them complete and whole for all those putting P-Appellants through.

P-Appellants went to their doctors on a normal follow up appointment in mid- September and got prescriptions filled for prednisone for Dr. Kennedy's limbs, which is terrible for someone trying to fight cancer as it raises cortisol even more than it already is from excess stress of having

the last almost 5 years of their lives stolen by State Actors and criminal small time crooked

Defendants and the SC Bar, VA Bar even (how is this possible)? The Defendants told P-Appellants

they got the Virginia State Bar involved and the VSB would be at the trial and was coaching them,

involved with these other RACKETEERS and so forth, and the SC Judicial Disciplinary Committee

and others involved in the heist and retaliation of P-Appellants for the money, and to get back at

P-Appellants for being long time whistle blowing attorneys against the Legal Machine Criminal

Enterprise, (hereinafter, "LMCE"). which exploits the public with ruthless and deadly acts for

selfish gain, mirroring the horrifyingly wicked acts of the Murdaugh Dynasty here in SC, and all

their agents including Judges who are never disciplined and truths never told to the public

through show trials and show appeals created by family, friends, masonic associates, and allies of

Alex Murdaugh and the LMCE. The LMCE can no longer be denied by the public nor any Judge

who is working toward the fair and unbiased legal system allegedly fought for by rebels against

the King long ago represented today by the First Families of each colonial state.

P-Appellants' plan is to keep working as best as P-Appellants can under this situation, but

if Dr. Kennedy's leg swelling does not go down by Monday, P-Appellant needs to be seen again by

the doctors. The feeling is that maybe the kidneys are stretched or otherwise affected by waiting

so long while trying to meet these deadlines that do not match the circumstances even before

this attack of stones. Hopefully she has not lost one or both of her kidneys as they are not

working at 100% capacity due to her trying to meet these deadlines. There is severe pain where

the two kidneys meet at her spine area also, which pain she has never experienced before.

This situation alone requires the ADA to be invoked with liberal times/pages and an open

mind to what might be an issue down the road as this is a "fluid" situation, and there are other

complications they are facing because of their abuse by the 10th Circuit Judges and their agents, and the Supreme Court ignoring these very issues to P-Appellants' detriment, physically and otherwise. All who play a part in this RACKETEERING are by law RACKETEERS or AGENTS Assisting the RACKETEERS and violators of the most basic of civil rights and so forth.

Hacker for the fun of it? In other facts that are relevant, P-Appellants finished this brief yesterday and were prepared to mail it out this morning, September 25, 2025, with the money order purchased today also. Instead, they each awoke to funny business going on with their computers. Dr. Kennedy's computer was hit the hardest with no ransom requested, but only the goal of completely destroying everything they could be on the computer and then destroying the complete computer. All three attacks discussed were with no hostage/ransom attached, which means that this was not the goal of the hacking. Who benefits if our electronics that have incredibly strong evidence are hacked? Is it just a kid doing it for fun three times since this case started? The hacking damage was to one of the newer computers P-Appellants bought that is still under warranty and purchased to try to ease the amount of strain on Dr. Kennedy's eyes more than the others in their possession could. The gutsy attack by the hackers even while the computer tech was trying to fix the computer was extremely arrogant and cocky, as was a phone call from a google number wanting to talk about the hacking who was not from the company contacted. These criminal tactics are not new, but very similar to another court situation Dr. Kennedy had, not even addressed herein, but one where P-Appellants can tell that Judge McIntosh and the other RACKETEERS are trying to subtly use those strategies, against P-

Appellants, through LMCE sharing of information with other LMCE states, even though P-Appellants could use these additional acts as more racketeering in the LMCE if they wanted to.<sup>2</sup>

So electronic compromising crimes used against the alleged nobody is not new and P-

Appellants were ready for it as best they could be. However, if someone is bent on hacking and spends all day after day being paid to do it, they will eventually succeed, and P-Appellants job is to keep as much as possible far from the computer being used, which P-Appellants did this time also, except when they were rushed and had to delay backups to try to beat short deadlines/page limits.

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<sup>2</sup> If P-Appellants wanted to spend time proving that these criminal hacking acts are common place in the LMCE when the case becomes troubling for the LMCE and/or large sums of money are at stake. In that situation a connected law firm, like those P-Appellants are fighting here, used tech to control Dr. Kennedy's entire computer and phone and the video and audio plus emails hacked to erase the proof of rewritten transcripts, while they were deleting the prior e-mailings of older changed transcripts that were not changed enough to fit the new situation, and these and other such documented crimes by the lawyers/judges were filed to that Court, showing real time alterations that benefited the lawyers/judges involved. In that matter, Dr. Kennedy, knowing of these crimes the LMCE uses to control the victories and defeats in Court, had already set up stealth backup email systems and other securities to show that the email of old transcripts the court reporter had already delivered to Dr. Kennedy as true, were altered afterwards, with the court reporter hired by the state, trying to rewrite the transcripts later. The old transcripts already sent, that needed more alterations, were being deleted by these hackers from Dr. Kennedy's email account she gave to the opposition and court. But Dr. Kennedy had several backups that were forwarding silently all emails received from the known email account to show that the old emails with the transcripts no longer helpful to the opposition, were deleted from the known email, with new and improved versions helpful to the Defense. Dr. Kennedy still has the proof of these cybercrimes of law firms hacking as a criminal act to create advantages that never happened, right out of Orwell's 1984 scenarios. These proofs have been included in Dr. Kennedy's seminars and writings regarding what to expect from today's LMCE, from which the public can learn and benefit:

It would take time and effort to recreate what was hacked by professional hackers, like this motion had to be completely rewritten to meet the October 1, 2025 deadline, as discussed with the Clerk of Courts. But peculiar to this situation is someone was interested enough to spend time hacking into P-Appellants account, but was not holding them hostage by blocking and controlling their content on that computer, but not interested in taking a ransom to release the files/computer. This hacker(s) was willing to spend the time and know how to destroy what was on the computers only. Why? Who benefits? Note, that ALL audio and video recordings are also safe, as they are not near where P-Appellants work or stay or exposed to online attack, for the protection of all evidence P-Appellants have that is not needed at this time for the protection of evidence obviously targeted for destruction. Who benefits?

P-Appellants note that the Murdaugh appeal gifted to Murdaugh by government who purposely were violating obvious rights, like Becky Heir Hill, whose Heir family had also helped the Murdaugh Dynasty even in the 1956 Federal Corruption case against Buster Murdaugh, where witnesses and juries were intimidated and/or bribed, and the circus was run by Solicitor General Buster Murdaugh himself. These incredibly criminal acts of intimidation, coercion, obstruction and bribery, led Judge Hoffman (see Norfolk, VA, Federal Building name), who presided over Murdaugh's trial, to conclude that he had never seen anything like this miscarriage of justice and would think that any man with any dignity at all would not be returning to his Solicitor General position after such a criminal display of injustice. However, Murdaugh did return to his prosecutor position just days later, having been found not guilty through these Murdaugh criminal acts against witnesses and the jury, no matter what the evidence. Becky Heir Hill had even stated that she didn't know Alex Murdaugh, later recanted after her Heir

connection was exposed. Further, Judge Taol (see Asbestos fraud cases) is known in the public as a very corrupt retired judge still used in these troubling cases because there is purposely no accountability for retired judges which of course is Unconstitutional. Also Judges like Mullen, Odom, and the 10th Circuit Court Judges are equally corrupt and is being learned by the public, as word is now getting out about them too.

In spite of this, the Murdaugh Defense only needed approximately 47 pages and a normal time deadline to file their initial appeal brief, because the appealable issues were directly gifted to them and were so clean and clear that there was nothing to describe other than the facts on their face, without dealing with all the deceptions P-Appellants have had to deal with by the RACKETEERS including the State. The Murdaugh Initial brief could just be stated plainly due to such gifts on a silver platter and and they should win as the system will protect itself/LMCE including giving such gifts to Murdaugh to appeal.

In Murdaugh, the Attorney General's office, on the other hand, alleged needed two 90 day extensions and about 148 pages of conclusory commentary rather than any legal arguments to provide a word-salad that the public would assume was a lot of evidence and work completed by the AG's office when it was not necessary nor was it covering substantive or procedural errors for the most part, as this Murdaugh gift keeps on giving and only a show of Justice needs to be presented to the public, not actual truths. This is all based on perceptions created by those in control. Further, the Murdaugh crimes were limited in their exposure of alleged defendants and issues, hiding the real and extensive crimes that actually occurred that show the LMCE is at work and saving its own by a complete staged performance by its own lawyer-legislators, hand picked judges, and Plaintiff lawyers being told what to do and not to do, like who would be questioned

under oath and who would and wouldn't be deposed and about what topics. Who would be sued was also an issue. Lawyer-Legislator Justin Bamberg was one of the examples of lawyer-legislators on the case, lying to the public, while knowing exactly what was happening in that case. He also interjected himself into P-Appellants case and steered Judge Heath P. Taylor to Plaintiffs case to try to save the other RACKETEERS, but was exposed and quickly left the case on a lie that he himself and the evidence contradicts. Just more RACKETEERS added to the RACKETEER pile.

On the other hand, P-Appellants have real Constitutional issues and procedural and meritorious issues, and a jury being stolen from them, that will be purposely limited if these page and time limitations are not corrected by an extreme change of stance by this Court, with this new evidence presented that must be considered strongly as this and the argument are extremely compelling.

Due Process and Equal Protection is for everyone, not for the Attorney General's office has unlimited staff and tax payer funds to finish as fast or as slow as he wishes with as many or as few pages as he needs or wants, even ignoring the rulings of the Court in the Murdaugh matter when he so desires with no accountability. It appears the Attorney General chose slow and long to fool the public into thinking that he had something to say, when there is very little substance to those many pages taking much unnecessary time to submit.

The difference in treatment between the Murdaugh case and P-Appellants more extensive, voluminous and complex matter, is an example of selective procedures being enforced by Judges who are favoring their choice of victor, and any law that allows the state to protect the

state, but not the people, has to be changed to comply with the law. This is another reason that time and pages must be expanded in this matter to at least 90 days, and at least 200 pages, as P-Appellants are needing to go through and specifically cite quotes from well over 6,000 pages of evidence they were able to acquire even with the Stonewalling and refusal of the Judge/attorneys to ever give P-Appellants their Discovery answers filed in April 2022, depositions, and the Supreme Court refusing to allow any subpoenas or duces tecums, also in the fake and illegally scheduled and untimely Sua Sponte evidentiary hearing after Defense could not get a Dismissal on any other grounds legal or not, and the Court could not allow P-Appellants to ever question anyone about their RACKETEERING, where P-Appellants already had enough evidence on that to go forward, if the Judges recused as they were required to do, but didn't.<sup>3</sup>

Argument

Is it right for this Appeals Court of South Carolina to violate the Americans with Disabilities Act of 1990 (ADA), 42 U.S.C. §§ 12131–12134 (2018), the Rehabilitation Act of 1973, 29 U.S.C. § 794 (2018), hacking by someone who would benefit from destroying this case at this time, and constitutional guarantees of *MEANINGFUL* due process by denying Plaintiff–Appellants reasonable accommodations for their disabilities, including the emergency and continuation of Kidney issues due to Dr. Kennedy delaying treatment to try to meet the unreasonable and punishing demands of the court to limit their due time and number of pages? And if it is an issue

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<sup>3</sup> There was a token submission of one client Discovery only after they were permitted to re-enter the case after several defaults and refusal of the Court to entertain a Motion to enter Judgment for P-Appellants. This was late in the in year 2 and 3 of the lawyers secretly agreeing together with P-Appellant's own attorney to secretly stonewall all discovery answers throughout the case existence to protect their RACKETEERING interests. It was worthless and so stale anyway after such prolonged delays that it said nothing by its own statements and by the staleness to be worth paying attention to.

of not having reasonableness, is it right for the Court to ignore the least restrictive accommodations that could be given—specifically, extended filing deadlines and expanded page limits—necessary to ensure meaningful access to the judicial process. Please include also the other qualifying disabilities, especially those caused by the lower court, which is a factual issue,

in that neither Dr. Kennedy, nor Dr. Fink had limb numb damage, nor eye surgery necessary, nor did Dr. Fink have seizures requiring no driving for Fink, since about 2015 when she fell off a ladder and then one even in the heat and high stress of Defendants ruthlessly bullying P-Appellants in 2021. Further, in the case of Fraud on the Court and other Crimes, especially involving the Judges, lawyers, other State Actors and so forth, with Defendant witnesses admitting same, the Court must do a de novo reviews over any lower court and no abuse of discretion standard is enough to protect the P-Appellants and the Court process to act in any way that does not protect the P-Appellants, as Constitutional and criminal fraud by the Court itself must be taken as a initial and very serious matter, that makes all other matters moot if true. And

Judgment must be granted to P-Appellants for such criminality involved in this matter.

Standard of Review any court reviewing the findings of this motion would be answering Questions of law, including the interpretation and application of federal statutes such as the ADA and constitutional due process claims, are reviewed de novo. See Tennessee v. Lane, 541 U.S. 509, 522–23 (2004). Procedural rulings regarding extensions of time and page limits are ordinarily reviewed for abuse of discretion, see Duvail v. Cnty. of Kitsap, 260 F.3d 1124, 1135 (9th Cir. 2001), but judicial discretion MUST be exercised within the confines of statutory and constitutional rights. P-Appellants would add that when the culprits are the state itself for causing or worsening the condition due to refusing such considerations, therefore, are ignoring P-

Appellants warnings of harm they will be subject to if ignored, the review must be interpreted much more rigorously in favor of P-Appellants and motives of why such obvious reasonableness and Constitutional protections are being ignored.

When the basis for such a request is a qualifying disability, the ADA transforms what might otherwise be a discretionary matter into a statutory obligation. A court's refusal to grant such accommodations absent a showing that they would fundamentally alter the proceedings, constitutes both an abuse of discretion and a violation of federal law.

#### A. Title II of the ADA Applies to State Courts and Judges

The Americans with Disabilities Act (ADA), 42 U.S.C. §§ 12101 et seq., defines disability broadly as a physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or being regarded as having such an impairment. See 42 U.S.C. § 12102(1). The ADA Amendments Act of 2008 (ADAAA) clarified that this definition should be construed broadly in favor of expansive coverage.

Title II of the ADA provides: "Subject to the provisions of this subchapter, no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity." 42 U.S.C. § 12132 (2018).

Congress defined "public entity" to include "any State or local government" and "any department, agency, special purpose district, or other instrumentality of a State." 42 U.S.C. §

12131(1) (2018). Courts, including state trial and appellate courts, are therefore instrumentalities of the state within the statute's scope.

The Supreme Court has held that Title II validly applies to state courts and judicial officers because access to the courts is a fundamental right protected by the Constitution. *Tennessee v. Lane*, 541 U.S. at 522–23. Denial of accommodations that prevent meaningful access to courts falls squarely within the ADA's coverage.

#### B. The ADA Requires Reasonable Modifications to Court Procedures

The Department of Justice regulations implementing Title II mandate that “[a] public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.” 28 C.F.R. § 35.130(b)(7)(i) (2024).

For courts, such modifications include extensions of filing deadlines, increased page limits, provision of interpreters, and allowance of assistive devices. See *Duvall v. Cnty. of Kitsap*, 260 F.3d at 1136 (holding that judges have an affirmative duty to provide accommodations under Title II and must engage in an interactive process with the individual requesting them). Judge McIntosh thinks they are in compliance if they have an old cement ramp out front and is extremely uneducated as to the law and thinks he can do whatever thou whilts. This will be an issue at another time involving Dr. Fink being almost deaf and other such ridiculous statements and lack of action by Judge McIntosh, and the Anderson Circuit Court, in extreme noncompliance with same.

Accommodations such as additional pages or deadline extensions impose no fundamental alteration of judicial proceedings. Taking care of a schedule is no excuse. Instead, these are among the least restrictive means of ensuring equal participation for disabled litigants, requiring no physical alterations to the building.

## B2. Denying Accommodations Violates the Rehabilitation Act

Section 504 of the Rehabilitation Act of 1973 provides that “[n]o otherwise qualified individual with a disability in the United States, as defined in section 705(20) of this title, shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 29 U.S.C. § 794(a) (2018).

State courts receiving federal funding, like the South Carolina Court system, and the LMCE,—including through judicial branch operations, technology grants, or programs such as victim assistance—are subject to this mandate. The standards for compliance under the Rehabilitation Act are generally the same as those under the ADA. See *Henrietta D. v. Bloomberg*, 331 F.3d 261, 272 (2d Cir. 2003).

## C. Qualifying Disabilities

There is no exhaustive list of qualifying Disabilities for these Acts, but only illustrative examples using focusing on permanent unless surgery, rather than an acute matter standing alone as a one time issue. 29 C.F.R. sec 1630.2 defines a non-exhaustive list of conditions recognized under the ADA and its regulations and P-Appellants highlight just some of the

conditions relevant, while keeping others on a need to know basis for HIPPA/privacy if any needs to be so.

1. Neurological Conditions: ....seizure disorders...;
2. Sensory Impairments: ...significant vision loss...deafness or significant hearing loss;
3. MusculoSkeletal: ... significant mobility impairments...severe arthritis;
4. Organ and Bodily Function Impairments: ...Kidney disease...including recurrent kidney stones if they substantially limit major life activities such as eliminating wastes, working, or daily living...cancer;
5. Mental Health: n/a;
6. Immunity and other Systemic Conditions: n/a

The ADA defines Major life Activities Recognized as: Seeing, Hearing, Eating, Sleeping, Walking, Standing, Lifting, Bending, Speaking, Breathing, Learning, Reading, Concentrating, Thinking, Communicating, Working.

Also operation of major bodily functions is included: Immune system, Normal Cell Growth, Digestive, Bowel, Bladder, Neurological, Brain, Respiratory, Circulatory, Endocrine, Reproductive.

As this Court can clearly see, P-Appellants unfortunately qualify under several prongs of disabilities and the Courts are not to consider mitigating measures the disabled take such as mediation, prosthetics, or surgery unless it is getting a new pair of eyeglasses or contact lenses or something common to most people in normal life events. The ADA made it clear in 2008 that the list should be interpreted as expansive and the courts should not impose a demanding standard for what counts as a disability. In *Toyota Motor Mfg., Ky., Inc. v. Williams*, 534 U.S. 184 (2002), the Supreme Court narrowly construed the definition of disability, but this was expressly rejected

by the ADA Amendments Act of 2008. Congress clarified that the term "substantially limits" should not impose a demanding standard and that disabilities are to be determined without regard to mitigating measures (except ordinary eyeglasses or contact lenses). See 42 U.S.C. §12102(4)(E).

Dr. Kennedy's kidney stones are a genetic calcium oxalate issue that diet cannot cure and pills are very limited in assisting, more with dealing with the pain and other steps to not cause further harm to the body than anything that will stop the condition.

Dr. Kennedy's limb and eye issues caused by the 10th Circuit Judges attempts to bully and weaken the target, with Supreme Court approval to protect the LMCE, are examples of long-term problems with nerve damage and damage to the eyes long-term without surgery. Dr. Kennedy cannot look at computer or phone screens for long periods of time and without many long breaks where she can prop her arms and close her eyes to rest in between. Dr. Kennedy cannot get the surgeries on limbs and eyes because the Court is not going to give Dr. Kennedy time to properly heal, making the condition as bad or worse. Kennedy has many other listed disabilities including Musculoskeletal and cancer. These are tough to deal with but also make those who choose to survive and thrive anyway, tougher for it.

Dr. Fink's Seizures is also a qualifying disability and she is not even allowed to drive now which is so unfair to her, just because she demands justice...this is part of the punishment supported by the Supreme Court. Dr. Fink also suffers from cancer and arm and eye strain, but the seizures were so shocking that P-Appellants had to focus on the most dangerous attacks against them first as this could cause death and the Judges were not going to stop it knowing

what it was doing. The Court refused to take their reports of injury and Dr. Fink also lost a hearing aid and her contacts in these events at the courthouse and not one person would look for them for her. Later her hearing issues with the lost hearing aid became another major trampling of her rights by Judge McIntosh and the others, making her sit through a hearing where she could not hear due to their malicious acts against us.

It is clear that our reasonable accommodation that matches Murdaugh and the AG's office is in line as reasonable that will not affect anyone since the attorneys have not represented their case since about August 2024, when McIntosh became the prosecutor using Sua Sponte motions for the next 8 months and the attorneys kept quiet because anything they said was not only a contradictory lie, but it could and will be used against them. Respectful demand of 90 days with the understanding this may not be enough, and 200 pages with that same understanding since we have more issues than the Murdaugh/AG had to make conclusory comments about.

**D. Due Process Requires More Than Mere Notice and a Hearing; It Requires a Meaningful Opportunity Consistent with the Spirit of the Law**

Due Process Clause of the Fourteenth Amendment guarantees that no state shall "deprive any person of life, liberty, or property, without due process of law." U.S. Const. amend. XIV, § 1.

The Declaration of Independence also states that the pursuit of happiness is of equal importance as clear intent.

The Supreme Court has explained that "[t]he fundamental requirement of due process is the opportunity to be heard 'at a meaningful time and in a meaningful manner.'" Mathews v.

Eldridge, 424 U.S. 319, 333 (1976) (quoting Armstrong v. Manzo, 380 U.S. 545, 552 (1965)).

Emphasis added.

South Carolina courts echo this principle: “Due process requires notice, an opportunity to be heard in a meaningful way, and judicial findings issued in a fair and impartial manner.” Ex parte Morris, 367 S.C. 56, 61, 624 S.E.2d 649, 652 (2006). Thus, due process is not satisfied by a hollow technicality—it requires both the letter and the spirit of meaningful participation. Emphasis added.

In relation to the ADA, where a court refuses accommodations that allow disabled P. Appellants to meet deadlines or present arguments adequately, the litigant may nominally have “notice” and a “hearing,” but in substance is denied the meaningful opportunity to be heard. This violates both the ADA/R Act and the Due Process Clause. See United States v. Georgia, 546 U.S. 151, 157 (2006) (holding Title II validly abrogates sovereign immunity where state conduct independently violates the Constitution). Emphasis added.

P. Appellants respectfully demand their rights be protected and that they initially get a 90 day extension from time of the Order being filed, and a 200 page limit, both of which may need to be expanded and the Court should be open to same due to the extreme criminality and the number of real defendants P. Appellants really had to face including the State. This is consistent with the Murdaugh opportunities and does not favor the State which is Unconstitutional.

**E. South Carolina Rules of Procedure Require Flexibility,  
Which Must Be Applied Consistently with the ADA**

South Carolina Rule of Civil Procedure 6(b) provides that “when an act is required or allowed to be done at or within a specified time by these rules, by notice given thereunder, or by

order of court, the court for cause shown may at any time in its discretion (1) with or without motion or notice order the period enlarged." S.C. R. Civ. P. 6(b).

Likewise, South Carolina Appellate Court Rule 240 permits deviations in formatting, length, and deadlines "for good cause shown." S.C. App. Ct. R. 240. P-Appellants have shown very good cause and violations of the Constitution and Fraud on the Court in the underlying case, which are extremely obvious without the initial brief ever being filed.

When the basis for such a request is a qualifying disability, the ADA transforms what might otherwise be a discretionary matter into a statutory obligation. A court's refusal to grant such accommodations, absent a showing that they would fundamentally alter the proceedings, constitutes both an abuse of discretion and a violation of federal law.

Even without the ADA issues, which are clearly dictating the law here, Plaintiffs also have had to deal with Hackers only interested in destroying this case itself. Who benefits is a very important issue here, and P-Appellants can cite even more cases, where hacking and rewritten transcripts and other criminal acts that are involved in this case also are grounds for Judgment for P-Appellants right now, let alone the issues of time/page generous extensions based on the facts.

Further, the state CANNOT give preferential treatment to the State whether in another case like Murdaugh or in a case where P-Appellants should be able to sue SC agents, but were controlled by the very RACKETEERS that should have been sued as they would not recuse from their own liability and guilt.

The similarities are uncanny between this case and the Murdaugh Country cases including the Murdaugh case, and some of the same players who trained in Murdaugh Country, are relatives of Murdaugh, or friends and associates of Murdaugh, or clerked for Murdaugh Judges or lived by Murdaughs and have been involved in criminality and RACKETEERING in this case, also just like that in the Murdaugh case, that has not been disclosed/exposed to the public yet through LMCE strategies to keep the truth hidden to protect itself and its members.

Add to this that P-Appellants discovered the Murdaugh similarities long before they made the generational and other connections between the 10<sup>th</sup> Circuit actors and those in the Murdaugh debacles, with the Murdaugh saga still being paraded with show trials and appeals to protect the LMCE who is also stealing from P-Appellants and actually tried to greatly physically harm P-Appellants in the underlying case itself (see facts on appeal, and even the criminal actions of these RACKETEERS during the lower court procedural manipulations and their rewriting of the Rules of Civil Procedure to dismiss P-Appellants meritorious case on criminally fraudulent grounds, while keeping P-Appellants from Discovery/Depositions/Subpoenas/etc from this case from 2022 through 2025 to hide their crimes, through this overwhelming proof).

Rule 208(b)(1), SCACR, provides:

“Unless otherwise ordered by the appellate court, the brief of the appellant shall not exceed fifty (50) pages in length, and the brief of the respondent shall not exceed fifty (50) pages. The reply brief shall not exceed twenty-five (25) pages.”

Rule 263(a), SCACR, provides:

“The appellate court for good cause shown upon motion may enlarge or shorten the time prescribed by these Rules or by its order for doing any act, or may permit an act to be done after the expiration of such time; but the court may not enlarge the time for serving a notice of appeal under Rules 203 and 243.”

Together, the rules grant the Court discretion to enlarge both the briefing schedule and page limits upon a showing of good cause.

### G. Good Cause Exists for Enlargement

#### 1. Equal Treatment Concerns

State agencies and government parties are routinely granted additional time and pages despite possessing superior staff and taxpayer-funded resources. To deny similar relief to private litigants would create structural imbalance, contravening *Evitts v. Lucey*, 469 U.S. 387, 393 (1985) (holding that once a State establishes appellate review, procedures must comport with due process and equal protection).

If this Court is deferring to the state or to Murdaugh/Attorney General arguments as reasons the AG could receive preferential treatment because they are the state and P-Appellants are not a part of the Murdaugh case and are not the state, this is wrong in that procedural precedents must still be used equally in deciding from case to case what amount of time and pages should be given and all else. P-Appellants have far more issues and evidence to sift through than Murdaugh, astounding, but for what the RACKETEERS and the underlying Defendants and all other nefarious steps and actions they have taken and perpetrated against P-Appellants, to steal this award and retaliate, including a murder for hire plot and operation with

the direction of these RACKETEER Judges in the LMCE that Defendants already discussed with us on recording. The LMCE is no different than any mafia-type operation and the lives of innocent people are not of concern to it, but only profit.

This describes the aristocratic union with other elites who still run this state, seen through genealogy studies, social networks, masonic involvement, being family and/or neighbors for many years, and so forth, often referred to as the Good Ole' Boy Network, established as fact by so many different news sources and interviews with so many victims of the LMCE and examining the laws that provide the escape parachutes for these LMCE members to never be held accountable by their own that the system is self-perpetrating. This is why SC history is filled with

Aristocrats separating families, raping slaves and using them up until they die or are no longer useful, buying and selling them as chattel, beating them, killing them, manipulating laws to further their enslavement no matter what the law, including McIntosh's own father, a SC lawyer allegedly accountable to the SC Bar, manipulating laws for a long time, and being forced by the Federal Government to comply with Federal Law many years after complete defiance by

McIntosh, and so forth. It is this states history to be defiant of anyone who tries to hold them accountable for their crimes and wrongs, and why they also agreed to fire the first shot in two deadly wars as rebels who were so defiant that they would rather have people killed then give up their profits in rice and cotton and hold human beings as slaves to make it happen.

This defiance is a terrible trait among judges, and those like McIntosh, Sprouse, and Maddox used it to steal and try to greatly harm P-Appellants who are demanding nothing short of full justice for them even if they are being punished for doing so.

Dr. Kennedy and Dr. Fink need time and pages necessary to provide meaningful due process compliant facts and arguments needed to expose such criminality against them, and even more so, to receive proper justice against these Defendants, RACKETEERS and the State to make them whole and then receive assurances that they will be left alone in the future.

## 2. Complexity of Issues:

This appeal raises multiple constitutional, Factually meritorious and statutory claims, with extreme Criminal Fraud on and by the Court against the court and P-Appellants, each requiring detailed analysis, explaining the deceptions like peeling an onion, (layer after layer), preservation of arguments, and citation to authority and over 6,000 pages of the evidence and in addition, to the record also. Restricting briefing to the standard page limits will necessarily omit due process, equal protection and substantive arguments, undermining the fairness of the appellate review.

## 3. Procedural Fairness and Neutrality

Due process requires a “meaningful opportunity to be heard at a meaningful time and in a meaningful manner.” *Armstrong v. Manzo*, 380 U.S. 545, 552 (1965). This Court has held that “due process requires fundamental fairness, which includes the right of a party to be heard in a meaningful way.” *Ex parte Gregory*, 378 S.C. 430, 434, 663 S.E.2d 46, 49 (2008). Granting enlargement with openness under the full circumstances of what P-Appellants have had to deal with and are continuing to deal with, ensures Appellant’s right to present arguments in a meaningful manner by arbitrary and capricious or worse, bias findings due to the State and LMCE involvement.

## H. Relief Respectfully Demanded:

Wherefore, for the above foregoing reasons: P-Appellants Respectfully Demand:

1. Enlarge the time for filing Appellant's brief by an additional [90 plus] days beyond the current deadline and counting from the Order entered with the understanding that they may need more due to the circumstances but are making every effort in compromised physical conditions to get this finished for their own sake as well as the general concerns with moving the matter forward; and

2. Increase the page limit for Appellant's principal brief from 50 pages to [200 plus] pages where openness to additional pages need to be made in case more time is needed due to the extreme conditions of P-Appellants circumstances, not created buy their own wrong doing and most created by their own lower Court shenanigans to hide their own unconscionable RACKETEERING in this matter for financial interest and retaliation purposes, and/or

3. At any time an unbiased and fair Court can see the absolute criminal fraud the P-Appellants have had to deal with, even choosing to get to the Appeals Court rather than hear anything further from the lower court filled with obvious disdain and bent on dismissing P-Appellants for any reason, legal or illegal, to hide their RACKETEERING. This Court can force the Judgment for P-Appellants to be entered from the lower Court who refused to address the matter, and then Lawyer-Legislator Bamberg steered Judge Taylor to the case to get rid of it no matter what the law and facts, with Bamberg not being in any way authorized or a part of the case, but only a part of the cover up of the Murdaugh case. This Court can also Order the State to meet and resolve these State issues, make P-Appellants completely whole and they can go on their way in their own lives and not have to deal with any of this mess created by the Courts and

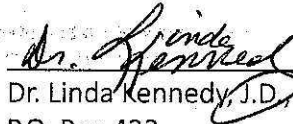
lawyers and their agents, trapping P-Appellants in their own crimes for their own profit, that backfired, as they are now putting the target on the appeals court to clean up their mess, which then involves the appeals court as potential RACKETEERS, just as Judge Taylor became a RACKETEER for trying to save these bad actors and their agents.

P-Appellants must receive the first two numbered respectful demands above in order for the law to be in full force and effect and applied in a fair and unbiased manner and will also hurt nobody to grant such a fair, logical and reasonable motion. P-Appellants would gladly, instead, receive number 3, as long as the finding fully makes Dr. Kennedy and Dr. Fink completely whole so they can go on with their lives and never deal with such corruption again, as they have already done their part for humanity and exposed the LMCE in Virginia and many of these same tricks played out by these RACKETEERS who decided to pick on seasoned veterans of these tactics for many years, thinking that their RACKETEERING would be able to hide what they did and who they are.

Not proofed due to disability issues

This brief was entirely rewritten on September 25, 25, 2025 due to a hacker destroying the original and also again attempting to get into the computer today as well.

Submitted by

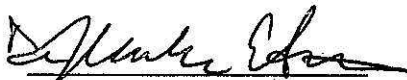


Dr. Linda Kennedy, J.D., B.S., B.A., pro se Appellant

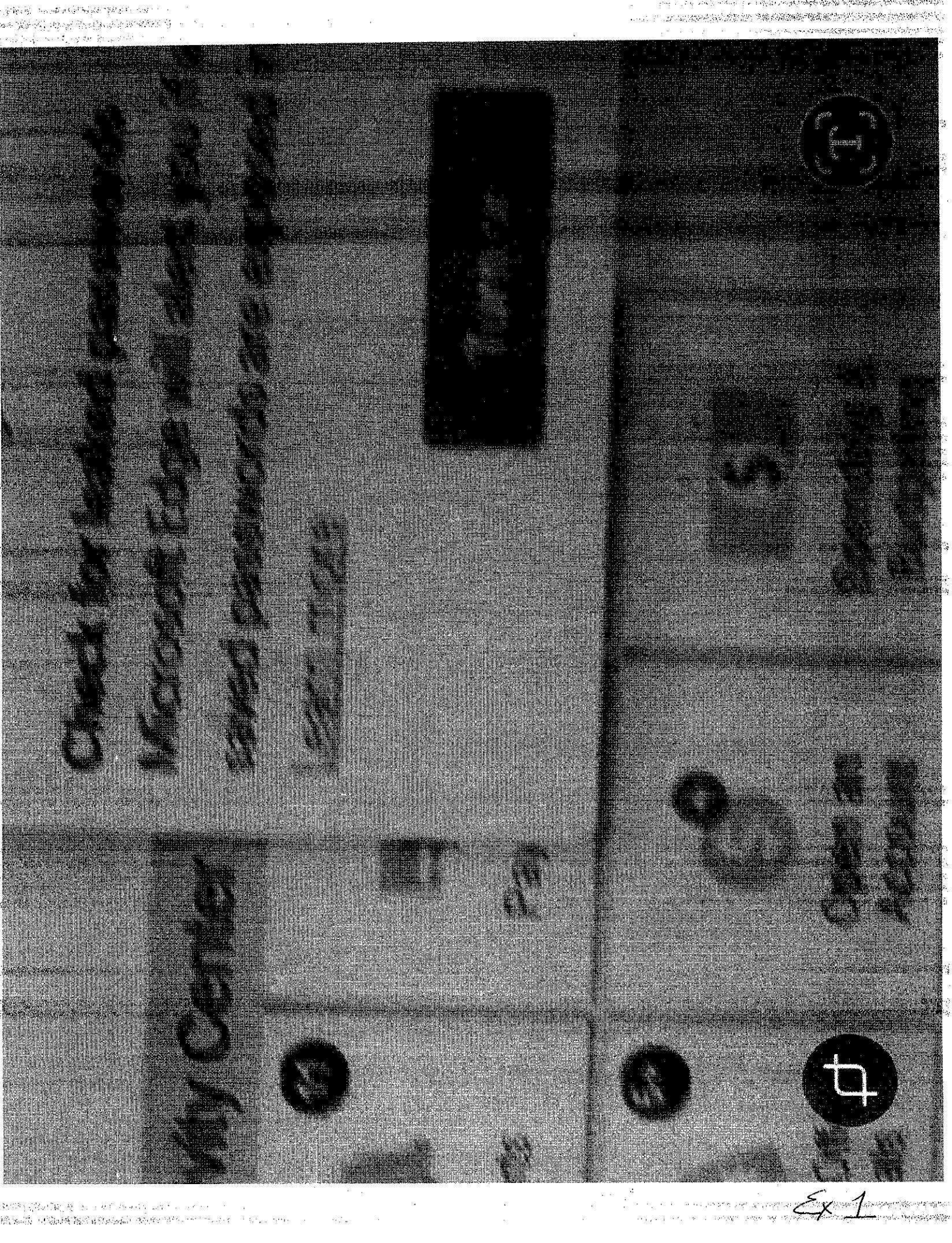
P.O. Box 433

Townville, SC 29689

954-2793785



Dr. Marsha Fink, J.D., B.A., pro se Appellant  
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Townville, SC 29689  
954-279-3785



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Ex 1

**A TRUE COPY**

APR 29 2024

*C. Beena Thomason*  
CLERK OF COURT

Janice Wolk Grenadier  
Certified ADA Advocate & Mediator  
15 W. Spring St.,  
Alexandria, VA 22301  
202-368-7178  
[ADAAdvocate4@gmail.com](mailto:ADAAdvocate4@gmail.com)

April 26, 2024

Judge Heath P. Taylor  
100 South Main Street,  
Anderson, SC 29624  
(803) 535-2187  
864-260-4053  
[htaylor@sccourts.org](mailto:htaylor@sccourts.org)

RE: Case No. 2022 CP 0400592 Linda Kennedy et al vs. Lake Hartwell RV Resort & Cabins LLC et al

Dear Judge Taylor,

My name is Janice Wolk Grenadier. I am a Certified ADA Advocate who specializes in the courts ensuring that litigants are treated fairly.

**The ADA Advocate is not a lawyer and this should not be construed as Legal Advice or Legal Representation - but, a Natural Attempt at ensuring both sides are presented to the court and considered for the BEST INTEREST OF JUSTICE**

**An ADA Advocate can not ensure the outcome of a case and or her services, they can only do their best to create a fairer outcome.**

**An Advocate can notify a Court that she will be working as an ADA Advocate due to the Legal Abuse by all appearances from the documents reviewed in the Clerk's office of the Court with the finding of the questionable behavior of the Judge, the Court, and or others.**

**No one is immune from violations of the ADA this includes judges.**

**This information that is entered into the Record can suggest an advocate is appropriate. That "The Appearance of Justice is Just as Important as Justice itself".**

**The documents the ADA Advocate can find in review can show an injustice to the living, to the deceased, and or the heirs. The SCHEMES of this and other courts disenfranchise litigants, and families from Justice while protecting a powerful lawyer with many "Ole Boy" Network connections.**

**The State and the United States Constitution are our strongest advocates.**

1  
EX 2

The cases can be and are extremely disheartening when the family, litigants, and the docket, the documents speaking for themselves are being denied, Justice.

Abuse matters, as all across America we have seen the "Me too" movement. The fact a Judge is asked to recuse for Bias and then another Judge would then empower the recused Judge's ruling is always questionable. The appearance and the documents usually show the denial of any and or all meaningful discovery, with subpoenas usually being quashed after being filed. Again we look at the "Appearance of Justice is just as important as Justice itself.

I was asked to review this case as it appears the Plaintiff has some physical health issues that required her to request an extension of time.

The time was denied to Plaintiff who is already *Pro Se*, even with her making the doctor's notes available to the court.

The Court is usually tolerant of health issues, especially after COVID. Health issues are not something we can control and an extra 30 days will rarely make a difference to a case.

I would like more information as to why the extension of time was denied before a report is done.

Thank you for your help in this matter.

/s/ *Janice Wolk Grenadier*

Janice Wolk Grenadier

RECEIVED

Sep 26 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the 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; Ray Grenier; Grant Ferrendelli; and Charles Carpenter

Respondents.

Appellate Case No. 2025-000859

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PROOF OF SERVICE

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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 Motion for Expansion of Time and Pages in New Situation After Medical Emergency on Lake Hartwell RV Resort and Cabins, LLC, aka Lake Hartwell Resort and Cabins, LLC, Lake Hartwell 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, 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, 2<sup>nd</sup> Floor, Greenville, SC 29601 and on 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 *Friday*, September 26, 2025.

DATE: *September 26, 2025*



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RECEIVED

Sep 26 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the 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; Ray Grenier; Grant Ferrendelli; and Charles Carpenter

Respondents.

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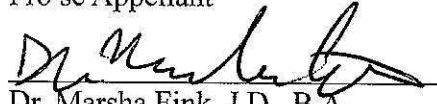
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Dr. Linda Kennedy, J.D., B.S., B.A. and Dr. Marsha Fink, J.D., B.A., *pro se*, certify that we have served copies of Motion for Expansion of Time and Pages in New Situation After Medical Emergency on Lake Hartwell RV Resort and Cabins, LLC, aka Lake Hartwell Resort and Cabins, LLC, Lake Hartwell 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, 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, 2<sup>nd</sup> Floor, Greenville, SC 29601 and on 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 *Fridberg*, September 26, 2025.

DATE: *September 26,* 2025



Dr. Linda Kennedy, J.D., B.S., B.A.  
P.O. Box 433  
Townville, SC 29689  
954-279-3785  
Pro se Appellant



Dr. Marsha Fink, J.D., B.A.  
P.O. Box 433  
Townville, SC 29689  
954-279-3785  
Pro se Appellant

RECEIVED

Sep 26 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the 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; Ray Grenier; Grant Ferrendelli; and Charles Carpenter

Respondents.

Appellate Case No. 2025-000859


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DATE: September 26 2025



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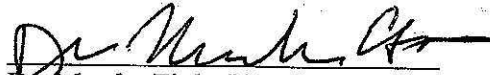
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Pro se Appellant

# CUSTOMER'S RECEIPT



SEE BACK OF THIS RECEIPT FOR IMPORTANT CLAIM INFORMATION

Pay to Clerk of Ct of Appeals  
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33

# POSTAL MONEY ORDER



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Year, Month, Day  
2025-09-25

Post Office  
296465

U.S. Dollars and Cents

**\$50.00**

Fifty Dollars and 00/100 \*\*\*\*\*

Amount

Clerk

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Columbia, SC 29201  
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Del Kennedy & Da H. Fink  
PO Box 433  
Townville, SC 29689



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⑆0000119⑆

38093273627⑆

- \* Mailed Today, September 26, 2025
- \* Our entire motion was hacked yesterday & the computer "bricked" & can no longer work ... destroying many documents. We had to recreate this brief from scratch.
- \* 2 exhibits @ the end & all Service of Process copies after that.