THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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Oct 27 2025
SC Court of Appeals

Linda Kennedy and Marsha Fink, Appellants

v.

Lake Hartwell Resort and Cabins, LLC, a/k/a Lake Hartwell Resort and Cabins, a/k/a Lake Hartwell Campers and Cabins, a/k/a Lake Hartwell Management, a/k/a Chris Vellanti, a/k/a Christopher Vellanti; Christopher Vellanti, as a Member and Personally; Yvonne Goldman, as a General Manager and Personally; Frank Pellegrini; Fritzie Maroto; Jennifer Burdette; Marsha Stamm; Allen Riha; Ray Grenier; Grant Ferrendelli; and Charles Carpenter, Respondents.

Appellate Case No. 2025-000859

Objection to Style

MOTION FOR INDIVIDUALIZED ACCOMODATIONS PER EXTRAORDINARY CIRCUMSTANCE AND OTHERWISE, AND OTHER APPLICABLE LAWS TO COMPLY WITH PLAINTIFFS'-APPELLANTS' RIGHTS TO MEANINGFUL DUE PROCESS AND EQUAL PROTECTION, AND TO PROTECT THEIR RIGHTS TO A FULL PRESENTION OF THE APPEAL, WITH STAY WHILE REVIEWING AND FINDING IN OUR FAVOR

NOTICE OF SOME OBJECTIONS TO APPEALS COURT RULINGS

COME NOW, DR. LINDA KENNEDY AND DR. MARSHA FINK, *PRO SE* APPELLANTS, with ADA QUALIFIED DISABILITIES WITH PROOF SUMBITTED THROUGH IN CAMERA ATTACHMENTS ONLY TO THE MEDICAL RECORDS, (hereafter, Dr. Kennedy and Dr. Fink and we or us or I or P-Appellants), WHO MUST TAKE FINITE TIME FROM THEIR WORK, TO ADDRESS AND READRESS CONTINUING NONCOMPLIANCE WITH THE ADA/CONSTITUTION AND OTHER LAWS AND CANONS, pursuant to South Carolina Constitution, Article V, s 9, and all SC Constitution and U.S. Constitution on Due Process, Equal Protection and Access to the Courts, SCRCP 6(b)(1), SCACR Rules 240, 221, and **42**

U.S.C. § 12131-12134 and the entire Americans With Disabilities Act, Title II; **28 C.F.R. Part 35**; Rule 240, South Carolina Appellate Court Rules and the South Carolina Judicial Branch Administrative Office of the Courts on ADA Compliance, and the SC Court-System Guidelines and Resources Summary (Ex 10) **with links provided to the full documents, DOJ Title II Technical Assistance Manual, s 11-3-6100, letter from an Certified ADA ADVOCATE (Ex 12), who is not practicing law, but stating the reasons that we fall under the law, that must be followed as a part of her advocacy job regarding violations of the ADA and CFR,** and we are demand granting of this motion by law.

All provided are rules and laws of South Carolina and the Federal System that show that **BLOCKS OF EXPANSION OF TIME AND PAGES as per ADA laws and Constitutional Due Process, Equal Protection, Right to Access to the Courts and other basis, and also fairly and unbiasedly deal with the Complexity/Voluminous of this case by *Pro Se* Disabled litigants,** which otherwise, creates a judicially mandated **"Legal Impossibility"**[1] **to comply** with the September 30, 2025 as hard as we try. This Order in question is a 2 sentence Order in response to our 37 pages of law and explanation on the subject, plus two exhibits, which Unconstitutional Order claims that only Extraordinary Circumstances will be considered for a continuance, without taking individual needs of the ADA disabled

[1] Legal Impossibility in its a blanket statement even after not giving us our personalized reasonable accommodations, after we had discussed how it was important to have blocks of time/pages and not just minimal granting of time with no addition of pages (e.g., no more continuances except "extraordinary circumstances"...which means, regardless of disability we have already shown in this and the underlying court) creates a *legal impossibility* for disabled litigants to meaningfully participate, effectively predetermining adverse outcomes, and proving our claim that we are fighting one continuous LMCE and not separate stages of a legal process, with the court using the same illusion of giving due process, without actually giving meaningful or even legal due process.

litigants, their *Pro Se* Status, and the Complexity of their case/volume of their case, and other factors outlined below, into consideration where disabilities greatly affect their abilities to do so, with only short dates/pages have been granted, without regard to our ADA Qualifying Disabilities explained or regard to our reasonable accommodations demanded due to these disabilities are considered as our individual needs at issue. Blocks of time/pages were rejected outright even though they were given in the Murdaugh Appeal and others also, even though they do not list ADA disabilities as reason for same and these extensions were shown unnecessary. We have described and do so in detail herein with proofs attached that our only way to have our individual needs addressed so that we can participate in this appeal, by right, must be granted to comply with these laws and our conditions mostly caused by the underlying courts and exacerbated by them and this court for ignoring such ADA protections that are directly related to any dismissal of our meritorious case that is troubling to the SC legal system if we go forward by right.

The Courts have been asked several times if they want copies of the medical reports to prove ADA Disabilities and have remained silent. We have provided them repeatedly to the underlying court anyway, and Mcintosh has called us and our doctors with no prior history with us, "LIARS." We are submitting the most relevant herein even though the Court has also remained silent when asked the same question. We intend to leave NO DOUBT as to our disabilities in issue here, that the Courts caused or exacerbated to then use them as weapons against us in denying individual needs so we have an opportunity to Appeal and be heard in the underlying courts and Supreme Court, who have all exercised great amounts of Discrimination against us.

WE ARE PERFECTLY ABLE TO APPEAL, BUT OUR DISABILITIES ARE STOPPING US FROM BEING ABLE TO COMPLY WITH BIASED AND UNFAIR IMPOSSIBILITIES HANDED DOWN FROM THE COURT DUE TO OUR DISABILTIES AND THAT OVERRIDE COMMON SENSE ALONE, BY LMITING PAGES AND TIMES AS THIS COURT HAS DONE IN THIS 9/30/25 ORDER CLAIMING ONLY "EXTRAORDINARY CIRCUMSTANCES" WILL ALLOW FOR ANY EXTENSIONS, CONSIDERING OUR ADA DISABILITIES AND THE COMPLEXITIES/VOLUME OF EVIDENCE IN THIS CASE, AND OTHER FACTORS. TO WEAPONIZE OUR DISABILTIES CAUSED BY THE COURT AGAISNT US IN ORDER TO DISMISS OUR APPEAL WHEN WE CAN DO THE APPEAL WITH THE SOME OF THE LEAST RESTRICTIVE REASONABLE ACCOMMODATIONS THAT CAN BE GIVEN...WHERE OTHER CASES ARE GIVEN THESE REQUESTS WITHOUT ADA DISABILTIES, VIOLATES MANDATORY COMPLIANCE WITH THE LAWS OF SC AND THE U.S. SUPREME COURT.

We have already pled in our last motion, 9/26/25, the full meaning of the American's with Disabilities Act and how we fit under it without question. We Object to the two sentence Order dated 9/30/25, all incorporated by reference, and remind this court that **42 U.S.C. § 12132** states that "*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.* Further, Judicial Immunity cannot be used to insulate the Judges in the ADA violations of this matter. All Disabilities at issue, but the vertigo, because Dr. Kennedy can't drive herself to the ER when it happens, and I am unable to drive due to having to go on Seizure medication to fight off the torture of EXTRAORDINARY sleep deprivation perpetrated against us as a strategy to weaponize our disabilities the Court causes and are exacerbating, and the denial of reasonable accommodations are to force us into a predetermined loss to save the SC Legal Machine Criminal Enterprise (LMCE). See also **CFR s 35.130(a)** on General Prohibitions Against Discrimination and s 35.130(b)(7)(i) on Reasonable Modifications including policies, practices and procedure to avoid Discrimination. Please also see **Tennessee v. Lane, 541 U.S. 509 (2004), applying to State Courts access to judicial proceedings; DOJ Title II Technical Assistance Manual, s 11-3-6100 (reasonable accommodations include scheduling, format, or procedural modifications where disabilities limit endurance or speed of performance; South Carolina Administrative Order 2003-2008 (directing the courts that qualified individuals with Disabilities MUST be provided reasonable modifications to ensure access to all juridical programs and services, and not just the Murdaughs and other Aristocratic or steered cases for favorable, LMCE goals). See also ADA Advocate letter of one trying to assist the Courts in ADA Compliance.**

Plaintiffs-Appellants are completely competent and fully able to accomplish and manage their appeal, but for reasonable accommodations demanded by law. We have also objected to the 30 day and no extension in pages, stating the same arguments, plus reminding the Court that a disability is not temporary but will remain throughout the case as long as the Court is not taking individual needs into consideration, and even then, the results of that will speak for itself, if we need more pages/time thereafter. These demands are an estimate and not seen through an imaginary crystal ball. But we believe that being able to rest and sleep instead of being put on an impossible 24/7 abusive work schedule, that common sense would say is impossible, that we cannot meet such unfair and biased Orders and Court Demands that obviously favor the Defense/Judges and other State Actors and agents involved in the RACKETEERING described. We believe that even without disabilities a normal litigant probably could not meet this and other Order demands, but we know that certainly with our disabilities we cannot meet the impossibilities.

Further, the complexity of our case, the voluminous amounts of documents, the repetitive nature of these impossible, Unconstitutional Orders, forcing us to continue to get the necessary arguments and laws and facts researched and written in an organized and full manner combined with the short dates and restrictive page limits creates and imposes an intentional, functional barrier to meaningful due process, equal protection, selective enforcement, and predetermined outcome with a Deception by Perception of a fair hearing when no such process has occurred in the Trial Court, Appeals Court and the Supreme Court, under the ADA, and the Constitutionals of the U.S. and SC.

Blanket Orders that refuse to acknowledge any ADA compliance or reasonable accommodations individually considered, and are silent as to them even after clarifications are requested, so that this Court does not have to consider the ADA, or grant real accommodations requested, is an Unconstitutional Order. The Court must take into account the blocks of time/pages needed as individual needs, as reasonable and state continuances given only with Extraordinary Circumstances provided, without individualized consideration, violates Title II on its face. *Tennessee v. Lane*, 541 U.S. 509, 531 (2004); *S.J. v. State of New York*, 464 F.3d 227 (2d Cir. 2006). SC Code Ann. S 44-20-10 et seq. mirrors federal ADA obligations, requiring public entities, including courts, to provide reasonable accommodations. The Trial Court tried the same trickery, which is one of many Frauds on the Court to get a predetermined outcome by weaponizing the disabilities they caused.

So even though the ADA does not allow for Extraordinary Circumstance language such as in this 9/30/25 Order, all of our circumstances are Extraordinary thus far, unless being able to see, type, read, avoid seizures and so forth are not Extraordinary, especially when caused and exacerbated by biased Court actions which this Motion is going to give a few samples of this herein.

Now Dr. Kennedy is experiencing Vertigo with a BP reading of 197/97, from the combination of these abuses, including lack of sleep, against her and Dr. Fink is also having limb/eye problems to go along with the seizures created and exacerbated by the Courts that has stopped her from even driving.

Although "extraordinary" is wrongfully used in this Order, which is Unconstitutional under the law in this circumstance, **the legal meaning of EXTRAORDINARY** is that the circumstances go beyond what is "usual, customary, regular, or common," and " not regular[ly] appearing in usual cases or for usual purposes." Black's Law Dictionary, 11th Ed. 2019. Certainly, these disabilities, although not required to be, must be considered Extraordinary and perhaps some deadly emergency possibilities, with consistent VERY high blood pressure, vertigo, and seizures,[2] along with the others...not being able to see, write,

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[2] The ADA Advocate is being cautious with the word "seizure" because of its personal nature for Dr. Fink, and has chosen her descriptions very carefully so as not to embarrass Dr. Fink. We have used all these words because we have to document how Unconstitutional this process is not fair, not unbiased, and not impartial,

etc., fit the **Extraordinary** definition. Must we have to strap up for an unfair battle to P-Appellants potential death just to get a chance to access a fair, impartial and unbiased Court and a just result, and to rightly be made whole in the U.S. S.C. and VA? So, what is really at stake here if the courts have to fight, and ignore laws to do so, against the litigants to stop them from winning and telling the truth? Obviously, there are interests beyond being a neutral arbiter in these cases, which proves the LMCE exists and we are fighting it, under color of law.

Further, the SC Administrative Office of the Court (AOC) **(EX. 10)** with Supreme Court approval has even published guidance on ADA accommodations, emphasizing individualized evaluations of requests for continuances, filing assistance, and procedural flexibility. Our disabilities, which we have documented and with more available if needed, constitute CAUSE SHOWN requiring reasonable extensions. In our case, IN BLOCKS of time/increased pages for filing deadlines, motions, or hearings. Denial of our requests for accommodations without individualized assessment constitutes **abuse of discretion.** *State v. Smith*, 436 S.C. 96, 99, 867 S.E. 2d 1, 3 (Ct App 2021). The Court of Appeals said it yourselves: you must consider all relevant facts and/or law....that covers our disabilities, and the Complexity/Volume of the case, along with other issues brought up in other motions/objections. See: https://www.disabilityrightssc.org/resource/accessibility-in-the-sc-court-system/

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but is pushing a predetermined outcome for the LMCE. We have asked many times that if this Court cannot act fairly, they must recuse upon their own motion.

As a part of the 14th Amendment to the U.S. Constitution, denying access to the Court process because of disability effectively deprives us of meaningful participation, violating due process. *Tennessee* at 541; *Haines v. Kerner*, 404 U.S. 519 (1972).

Further, *pro se* litigants are entitled to liberal construction of filing an additional procedural leniency when disabilities impede compliance with standard deadlines *Haynes*, 404 US at 520. The combination of process status and disability heightens the necessity for **individualized accommodations, including continuances** and in our case **BLOCKS** of time/pages, because the continual short dating and page limits are only making our disabilities worse as there is never enough time to complete anything. Thus, we end up rushing and then having to almost start over correcting in the next short continuance, and without page extensions needed for reasons given elsewhere which are EXTRAORINDARY Circumstances that allow for individual needs of the disabled to be met for meaningful due process and a full appeal presentation per the laws of the U.S. and SC.

One of the major issues here is that a Court must consider **individual circumstances**, and not make *de facto* Order that voids the ADA, which is not the option of the Court. Declaring in an Order that continuances will be provided only in **"EXTRAORDINARY CIRCUMSTANCES,"** shows that no reasonable accommodations would be even considered in providing or ever considering our demands based on individual circumstances under the ADA, or working with us so the Court could understand what is needed to help us receive meaningful due process and protect our alleged right to a full Appeal Presentation by law, obviously breaks the entire reason for the ADA. This Order then is Unconstitutional on its face and we, of course, object to that Order and need our individual circumstances for blocks of time/pages to be accepted as reasonable accommodations and even accept it as Extraordinary Circumstances under these facts, even though that statement violates the act.

This Order has **created a legal impossibility** in that we cannot physically comply. "The blanket refusal to grant any continuance for litigants with disabilities, without individualized assessment, creates a *de facto* bar to meaningful participation. This is akin to the false-dilemma, *Simmons v. South Carolina*, 512 U.S. 154 (1994), where the State prevented consideration of critical information and steered the outcome. Similarly, here the court policy allows no accommodations and effectively predetermines the outcome for disabled litigants, denying due process of law."

"South Carolina precedent requires procedures that do not grant one party untethered power to shape the outcome," (see *Langford v. South Carolina*, 400 S.C. 421 (2012). A continuing statement or Judicial behavior that refuses all of our disability-based continuances in the underlying case, and this appeal/supreme court. Given that there has been no attempt by these courts to specifically grant reasonable accommodations and refusal to provide our individualized reasonable accommodations that we have requested for great cause shown, with no attempt by the Court to even ask questions about the manner we need these accommodations per ADA requirements and common sense, this has deprived disabled litigants an unfair and EXTRAORDINARILY biased right to meaningful due process and the right to fully present our appeal, in the ADA requirement for meaningful access to the courts — thereby violating due process, ADA, and RICO, Civil Rights and other laws.

The blatant acts by these courts again proves further that we are fighting an entire SC LMCE and not just in a Plaintiffs v. Defendants underlying case we first thought we were addressing, as we started this case by filing on 3/17/22. At that time, we had no knowledge that the trial court judges and other State Actors, Allianz, Defendants and the agents of same were actually participants in the underlying case, and refused to disclose,[3] report each other for criminal activity, and instead presided over our case with financial and retaliatory interests. We further gave the Supreme Court and the Appeal Court fair chance to operate in clear absence of LMCE control. We have seen that the LMCE we are actually fighting under the objected style of this case is actually systemic, endemic and involves institutional corruption of SC State Actors, including Judges and Courts in a closed system

[3] Judicial Duty to Disclose: A very brief summary is that if a judge knows of misconduct by a colleague judge or a lawyer that raises a substantial question of fitness (e.g., dishonesty, bias, corruption), the judge must take "appropriate action." These claims are made by both J. Cordell Maddox who had supervisory authority in this case, and claimed he must report, in his sworn statement to the Judicial Merit Selection Commission, response to Question 10, dated November 16, 2014, [redacted] 1-2; and Judge Carmen Mullen who took on supervisory authority in the Murdaugh frauds, and she stated it was her duty to report misconduct immediately s it was her duty in her sworn statement to the Judicial Merit Selection Commission, response to Question 10, dated November 5, 2014, [redacted] 1-2. Both trigger **Canon 3 and, 3B(3)**, and the LMCE misconduct involves serious crimes and disciplinary matters (which triggers the "arrest/charge" disclosure clause). Further, the general ethical Canons (Canon 1: uphold integrity; Canon 2: avoid impropriety) imply an obligation to maintain institutional integrity. This goes for **all Judges involved in this case**.

Lawyer Duty to Disclose: A very brief summary is that if a lawyer **knows**, since they are involved, that they or another lawyer committed rule-violating misconduct raising a substantial question of honesty/trustworthiness/fitness, the lawyer **must** report. If the lawyer knows a judge committed misconduct raising a substantial question of fitness, the lawyer **must** also report. The lawyer must self-report in certain circumstances (charges, discipline elsewhere). Also, under Rule 3.3 (candor to tribunal) and other rules there may be disclosure obligations in court proceedings to avoid Fraud on the Court. See SCRPC **8.3 and 8.4** for starters.

where there is no accountability for such criminal acts by these Judges and others documented bad acts, in the underlying case, under color of law, with all involved waiving their Judicial and State Actor Immunity.

This 9/30/25 Legally Impossibility Order would be like the Court insisting that we sprint around Columbia for 30 minutes against Olympian Usain Bolt and beat him, or lose our case. It just cannot be physically accomplished by us, no matter how hard we try.[4]

The law does not compel impossibilities (lex non cogit ad impossibilia) is a well-established concept in law. This Legal Impossibility Deception by Perception, often identified and opposed by the **"No false-dilemma procedures,"** ***Simmons v. South Carolina*, 512 U.S 154 (1994)**, is made to appear as a fair appeal or trial was brought forth. This is accomplished with great bias and prejudice by the Courts to make such an impossible Order to control the outcome. It has been done by weaponizing our disabilities created by the underlying court with great intention and maliciousness, along with all Courts involved exacerbating while ignoring the reality of these disabilities by using limited pages/times that do not comply with the ADA or common sense to further harm us physically and create the impossibility to deny us meaningful due process/full appeal. This was done repeatedly in the underlying LMCE court (see illegal Evidentiary Hearing without a 12b6 final hearing as just one of many examples), and such actions waive the Court's immunity under these circumstances herein and others also showing extreme bias and

[4] We cannot even sprint at all with our disabilities, let alone for 30 minutes and against a Gold medalist. It just cannot be done, and this Order demanding a Legal Impossibility is created that shows bias and prejudice against us that waives the Court's immunity under these circumstances herein.

prejudice. These are accomplished by the Courts creating fundamental barriers in disguise.

***Boddie v. Connecticut*, 401 U.S. 371 (1971)**: The Supreme Court held a State cannot condition access to a civil remedy (divorce) on payment of fees where that requirement would effectively bar indigent litigants from court. Put differently: the State may not create procedures that make access illusory.

***Bounds v. Smith*, 430 U.S. 817 (1977)**: The Court recognized a constitutional right of meaningful access to the courts (prisoners must have law libraries or alternatives). The core rule: access must be real, not theoretical.

***Tennessee v. Lane*, 541 U.S. 509 (2004)**: Title II (ADA) and due process require that people with disabilities are not to be denied physical or programmatic access to the courts; this involved the Court approved injunctive relief where courthouse procedures effectively excluded disabled persons. This is directly on point for this ADA-based continuance/participation claim.

***Simmons v. South Carolina*, 512 U.S. 154 (1994)**: The Court rejected a procedure that created a **false dilemma** for the jury by withholding critical information and thereby tilting the outcome; the case is an analogy showing that procedure cannot be crafted so that it produces a one-sided or predetermined result.

South Carolina authority (procedural/due-process cases & administrative guidance): South Carolina courts have recognized that procedures that deprive litigants of meaningful process can be an abuse of discretion See **Ex 10**, the summary of the SC AOC's

ADA guidance requires *individualized accommodations* which is useful here where the Branch's own policy contradicts an "extraordinary circumstances" policy or statement against us. See link: https://www.disabilityrightssc.org/resource/accessibility-in-the-sc-court-system/

URGENT STATEMENT OF EXTRAORDINARY CIRCUMSTANCES AND DEMAND FOR THE REASONABLE INDIVIDUALIZED ACCOMMODATIONS REQUESTED IN BLOCKS OF TIME/PAGES NEEDED: WE CANNOT PARTICIPATE IN OUR APPEAL IF WE CANNOT SEE SCREENS, TYPE, AND ARE EXPERIENCING PRE-SEIZURE SYMPTOMS TRYING TO BEAT A COMPLETELY DISCRIMINATORY AND PUNITIVE DEADLINE AND PAGE LIMITS INTENDED TO KEEP US FROM PRESENTING A FULL APPEAL PRESENTATION AND RECEIVE MEANINFUL DUE PROCESS THAT WILL SHOW THE TRUTH OF HOW THE COURTS DISMANTLED OUR MERITORIOUS CASE TO SAVE THEIR OWN CRIMINAL ACTIONS IN THE UNDERLYING CASE, WHILE STEALING OUR AWARD, UNDER COLOR OF LAW, WITH THE ASSISTANCE OF THE LEGAL MACHINE CRIMINAL ENTERPRISE.

DR. KENNEDY IS NOW EXPERIENCING EMERGENCY VERTIGO WITHOUT WARNING WITH SPINNING ROOMS AND FALLING OR HAVING TO GRAB STABLE FURNITURE WHEN STANDING UP. FURTHER, BOTH OF US ARE PHYSICALLY SUFFERING FROM MORE EXTREME SLEEP DEPRIVATION AS PUNISHMENT AND TO WEAKEN US FROM TELLING THE TRUTH ABOUT WHAT HAPPENED TO US, HOW OUR AWARD WAS STOLEN BY STATE ACTOR RACKETEERS, AS IN THE MURDAUGH CASE, AND THE RACKETEERS, INCLUDING PRESIDING JUDGES, DO NOT WANT TO RETURN OUR STOLEN AWARD.

THESE ARE <u>EXTRAORDINARY CIRCUMSTANCES</u> THAT THE COURTS ARE INVOLVED IN CAUSING US TO NOT BE ABLE TO READ SCREENS AND MOST OTHER PRINT, UNABLE TO PHYSICALLY TYPE, AND NOW ARE DEALING WITH PHYSICAL VERITIGO AND PHYSICAL PRE-SEIZURE SYMPTOMS ALL DUE TO COURT INFLICTED AND REPEATED SLEEP DEPRIVATION. THIS IS KNOWN TO CAUSE US TO TRY TO MEET LEGAL IMPOSSIBLITY DEADLINES FORCED ON US BY THE COURTS AND COURT FORCED PAGE LIMITS TO OBSTRUCT JUSTICE THROUGH WEAPONIZING THE ADA AGAINST US. THIS SHOULD BE SEEN AS EXTRAORDINARY CIRCUMSTANCES AND THE REASONABLE DEMANDS WE HAVE DEMANDED MUST BE GRANTED. WE HAVE ASKED FOR BLOCKS OF TIME AND PAGES SO WE HAVE A CHANCE TO PRESENT A FULL APPEAL WITH MEANINGFUL DUE PROCESS, AS THESE 30 DAY INCREMENTS ARE NOT ENOUGH TO PUT TOGETHER A FULL PRESENTATION AND WE NEED FULL BLOCKS OF TIME TO DO SO. NOR ARE THE 50 PAGE LIMITS ENOUGH PAGES TO PRESENT OUR CASE FULLY OR EVEN IN PART. THE ADA IS NOT A DISCRETIONARY ACT FOR THE COURTS, BUT REQUIRES COMPLIANCE. See our 37 page Motion plus two exhibits stating all this law on the issues and law provided. We have repeatedly given our medicals in the lower court and have sent some to this court also, of ADA qualified disabilities medicals caused by the court itself.

<u>FOR IN CAMERA REVIEW, EYES, ARMS, KIDNEY FOR DR. KENNEDY</u>

Eyes: Ex 1A: All eye care Dr. Kennedy and to a lesser degree I have to use to try to get through a day of staring at these screens and trying to read documents, some thin fluid, and some various degrees of gel in the solution, until the tube which is like putting Jello in the eyes, that is used when we need to close our eyes for a couple of hours. There is also a special eye covering on our glasses that blocks out harmful light including blue light.

Ex. 1B is one of several flexible very dark shades that are used for dilated pupils, that Dr. Kennedy wears almost all of the daylight hours outside and sometimes inside the home. The medical report on the eyes was already given to this and the lower court but we provide it here also in EX 1C.

Limbs: Ex. 2A, B, C, D, E, are pictures of Dr. Kennedy's limbs in casts (2A-B) up to her elbows from the doctor where she could not type at all, and the next pictures (2C-D) are some of Dr. Kennedy's hand, wrist, thumbs, arms and elbow gear that she has to wear on both limbs to try to type, which is almost impossible to do so because they are bulky, but helps her ability to type a bit longer than without this gear.

Then once the pain builds to a certain level, she can no longer type at all even with prednisone Ex 2E-F. The diagnosis of the limbs is "*Cubital tunnel syndrome of both upper extremities*", and "*De Quevain's tenosynovitis, bilateral.*" Ex. 2G-H. These reports were given to the lower court and this court but is provided again here, talking about the diagnosis and the need for surgery if it does not heal on its own, which it has not even during short breaks.

This process with the eyes and limbs happens each day with a cumulative effect on them, making Dr. Kennedy's typing, readings, and limb/eye work time less each day without rest.

Kidneys: Further, Dr. Kennedy CT scan results that shows, just as Dr. Kennedy and I reported to the court, with a Kidney report and surgery, **(Ex 3A) with two stones, 13 mm and 5 mm and hydronephrosis, blood in urine (3B) and an infections above the stones in the kidney that may have gotten into the blood stream (3B) notes,** and that she has a new T9 compressed vertebrae **on 9/3/25** in follow up **(Ex 3C)** after surgery, which is right where her back supports her arms being extended to type. They did not do a neck exam which would have shown another back surgery with hardware.

These are not our only disabilities. We are older, and physical issues we may have been able to avoid in our youth are not possible when the body becomes more brittle. It is just a fact. This additional disability with Dr. Kennedy's back is very painful and joins 4 other back/neck surgeries and is making this entire process very painful for her, and lifting all these boxes and so forth on short dates, bending and so forth adding to the pain, when Dr. Kennedy has to sustain in sitting and lifting positions for long periods of time to do the Appeal. It can be done, but not with the tight schedules/pages this Court is purposely imposing making this a Legal Impossibility for Dr. Kennedy to comply. Dr. Kennedy is forced to take more Prednisone to try to sustain the pain in her limbs and back due to this appeal and forced short dates. Taking Prednisone while fighting cancer is incredibly bad for Dr. Kennedy to do and not recommended by the medical team due to the cortisol increases, one with cancer is to avoid, not take, and certainly not be forced to take by these judges with no good reason to force such torture and purposely forcing Dr. Kennedy to further ruin her body and progress she made in getting healthy. This court is continuing to force Dr. Kennedy to take drastic steps not advised by her medical team, so she even has a chance to write and see to be able to put all this together with Dr. Fink. It makes it impossible to do this on the short dates this Court is forcing, making this a Legal Impossibility to do this physically without reasonable accommodations on page blocks and time blocks that are geared toward Disabled, *pro se* litigants to have a meaningful Due Process time to fully Appeal.

The cause and story of Dr. Kennedy's medical issues she is dealing with now, but the compression fracture, and Dr. Fink's seizures that were caused and exacerbated by the lower court and are continuing to this day, started in November 28, 2023 *Sua sponte* surprise hearing Mcintosh called, while overriding a Judge's Order in place from June 9, 2023. Ex 4 A, B, C.

Plaintiffs were notified by the RACKETEERING Scheduling Clerk, Beasley,[5] that they were to argue their entire case filed from 3/17/22 to that date, even though we had an attorney, who was caught colluding, still on the case and who kept the truth of the case a secret. The June 9, 2023 Order said that no further hearings would occur until we could show how Michael Dodd had colluded with the Defense attorneys and he could try to withdrawal. That Order in place was ignored by Mcintosh, and even though we had not seen our case since April 12, 2022 when Dodd was hired, and where he would not keep us informed no matter how hard we tried, we suddenly had to learn the entire case, and Dodd still picked and chose what he would Argue (Ex 5 A, B), which became obvious he was going to argue only what he could do for himself (withdrawal), and to help Defense win (the

[5] RACKETEER Beasley since got fired/quit when caught in another trick of hiding an Order from us so we would default on it, that we caught between she and the RACKETEERING Clerk of Court, Thomason hiding it.

motion to amend...not the amended complaint they already agreed to...but just the motion to try to knock our amendment out on this motion portion of the filing, where the Defense frivolously claimed that Dodd didn't comply with Virgin Island Custom as the reason his motion should not be accepted...thus getting rid of our Amended Complaint that was not Defense friendly.

Defense did not let us be in charge of our own 2nd amended complaint, where we would write what really happened and the causes of action against all Defendants listed, versus Dodd secretly allowing the Defense to ghost write our amended complaints that were written Defense-friendly and could be dismissed any time they chose. Further, Defense wanted us to drop causes of action and many Defendants, and Dodd was telling us we didn't have a claim against them when they were the leaders and had admissions in Group Texts that we have. This was attempted because Defense defaulted on these Defendants, and Dodd wasn't telling us, but trying to save their case so they could tag team to dismiss us by trusting Dodd's alleged legal advice that was for them not us.

Mcintosh showed he was part of this Collusion when he Unconstitutionally was forcing us to argue our full case with our attorney still on the case, but working against our interests to help Defense and we learned then also Dodd/Defense were helping the Judges to get rid of our case all together due to this collusion that Defense Group Texts said they were all part of the underlying case against us...part of the Causes of Action, but presiding over our case to end it by any means, with financial and retaliation interests that should have made them recuse, but they would not. This case became more than just Dodd/Defense fighting us, as Mcintosh made that clear starting with his November 28, 2023 Unconstitutional *Sua sponte* notice, and refusing our Entry of Judgments starting in the middle of November 2023, when we were quickly reviewing the case and seeing the defaults that Dodd ignored and never told us about, but tried to get us drop those defendants who defaulted. And there was no new Order in place to overturn the June 9, 2023 Order we were under, which a Judge cannot overturn another Judges Order without cause.

In this new November 28, 2023 hearing, we were given very little time, which is the strategy of the SC Courts, (and others) to prepare, review the case and/or hire another attorney. Mcintosh was just ignoring the June 9, 2023 Order of another Judge and not replacing it with an Order or reason because this entire process of representing ourselves with our attorney still on the case was very Unconstitutionally forced on us. (See **6A, B, C, D, E,** for our Notice and objections to this Unconstitutional hearing while Dodd/Defense made no objections because it was clear this was going to be the predetermined outcome they were waiting for). When they realized all the quick coming and filings we did on all the ways we won the case, they tried to seal the case in those areas and made up a completely fabricated reason to dismiss us on January 11, 2024, without our entries of Judgment ever getting heard. This January 11, 2024 hearing was another short dated holiday closing hearing that Judge Sprouse closed the courtroom so those that came to witness the hearing were not allowed to...because it was a kangaroo court...which is covered outside of this document. But Allianz, Dodd/Defense and the Judges had to collude together to make this claim work, in an incredible amount of *ex parte* communications.

For this entire fraud on the court Unconstitutional hearing, we had to stay up all night, ever other night, and went into the hearing having no sleep going on 4 days straight but filed numerous motions on limited court time due to the holidays. In that time, we had to quickly review, we found out that Dodd had ignored defaults by Defense that showed we already won the case several times over but for Dodd saving them. We filed numerous Entries of Judgment for that and other hearings that the Court would not hear and stacked Defense motions to dismiss without hearing the defaults, because the Courts, Dodd/Defense were not going to let us win no matter how many times we actually won and filed based on Mcintosh telling us that we had to argue our own case in spite of Dodd being present.

Meanwhile Dodd was not in communications with us in any way since mid-June 2023, and was openly working with Defense to undercut our case. There is much more evidence, but this is just a quick summary of how the malicious and intentional sleep deprivation against us started and continued throughout the case. We cannot be sleep deprived to that degree any longer and it is considered Torture Internationally, Nationally, and by the State and Medical Societies.

<u>In CAMERA REVIEW for Dr. Fink Exhibits:</u>

This 11/28/23 fraud on the court date was the first of many seizures she had during this EXTRAORDINARY CIRCUMSTANCE of intentional and malicious sleep deprivation to weaken the targets, and to punish us for not giving up and for being attorney whistleblowers against the Legal Machine Criminal Enterprise in Virginia and now SC. This is why Virginia is a part of this underlying assault against us that was made known by the Defendant admissions to us in writing. The RACKETEERING is a large part of this case.

I was so affected by the Extraordinary Sleep Deprivation, that I had a seizure walking to the Plaintiffs' table, and fell to the floor hard, losing a hearing aid and both contacts. An Ambulance had to come get me and I woke up about ½ hour after arriving to the ER, very confused and very sensitive to light and sound. The Doctors stated that these were caused by Sleep Deprivation, which was not a surprise and told me to not stay up like that again. I had another one on August 22, 2024 coming into the glass panels of the courthouse for the same reasons...EXTRAORDINARY SLEEP DEPREVATION SIMILAR TO NOVEMBER 2023. I was taken by ambulance, unconscious from the courthouse. The Court personnel were witnesses to this including being taken by Ambulance to the hospital.

I had a couple other late pre-seizure moments, where Dr. Kennedy recognized the signs, during preparation for the case with little sleep over many days, and another one on or about February 6, 2025 (Ex 7), on the way to the courthouse where Dr. Kennedy had to drive me unconscious to the ER. Several of these are witnessed, and we asked the Court to preserve the recordings, but they ignore any duties they have to the public. But they may be preserved. If that is acting, then I am in the wrong business. Those falls left serious marks. The Court will not report the incidences to the State and we have also tried to do so and got the run-around.

I have had to go on seizure medicine (Ex 8) to try to stop the seizures, but if this happens...sleep deprivation like we have experienced in malicious and intentional ways that are very predictable, therefore anyone who does this, knows what they are doing to us, and cannot claim plausible deniability. I am at my limit now. I am having pre-seizure symptoms now due to extreme Sleep Deprivation as the Court will not work with us to give us the reasonable accommodations we need as in blocks of time and block pages needed to help us not have to rush and go into this Sleep Deprivation cycle that seems to be an intentional act by the SC Courts to prevent us from receiving justice against the LMCE and our stolen award and so forth by the LMCE in the 10th Circ.

From these falls and lifting and moving evidence boxes constantly, I also have suffered 5 newer compression fractures (Ex. 9A, B) and am wearing a specialized back brace (Ex 10), and it is hard for me to sit and lift boxes. I attribute this to my falls regarding the sleep deprivation that caused my very predictable seizures over and over again.

The number of boxes we have had to lift in the amount of about 10K-20K documents, which fills two rooms, shows the voluminous and complexity of this case, much which was caused by the Courts presiding over a case they should be defendants in as well as the attorneys protecting them and other state actors, Mcintosh's friends attacking us, Allianz and other RACKETEERS involvement and so forth. This happening over these many years, shows that all of these RACKETEERS and more have continued to try to stop us from bringing forth a very meritorious case with admissions against interests by defendants. This case continues to this day.

Further, videos, audios, transcripts, and so forth are all a part of this evidence. Dr. Fink has to take Seizure medication causing her to be homebound unless Dr. Kennedy can drive her. Dr. Kennedy is now suffering from vertigo related directly to this sleep deprivation, and it comes upon her without notice, making all of this very punishing with the Courts keeping us EXTRAORDINARILY SLEEP DEPRIVED with knowledge of what that does. Many of Dr. Fink's reports have been filed in Camera in the underlying court also.

We need **at least** 90-days time with the court being open to another renewal, and 200 pages, with the Court being open to additional pages, similar to the Murdaugh appeal FOR SUCH EXTRAORDINARY CIRCUMSTANCES AS THIS CASE AND OUR DISABILTIES, COMPLEXITIES OF THE ISSUES, VOLUMINOUS DOCUMENTS, ETC.

Bottom line, a ***pro se*** **litigant with a disability** has the right to request accommodations, and the court **must engage** in an **interactive process** to determine what is reasonable. We have repeatedly demanded **blocks** of time/pages due to the types of Disabilities that we have,...even more than discussed, with most of the troubling ones affecting us in this case, which have been and are continuing to be caused by the Lower Judges and the Appeals/Supreme Judges and exacerbated even more by all courts involved to WEAPONIZE our DISABILITIES AGAINST us for a PREDETERMINED OUTCOME for the LMCE who stole our award and much worse.

This Court simply dismissing the law by saying the Court is not granting further continuances unless "extraordinary circumstances" constitutes **discriminatory policy and/or practice** if it effectively excludes disabled litigants from meaningful participation, which it is and we are now further tortiously deprived of sleep which brings on Dr. Fink's seizures, and Dr. Kennedy limbs/eyes/vertigo issues that make such a biased and weaponized blanket statement a LEGAL IMPOSSIBILITY for us because we are not physically able to comply. Further, we have shown extraordinary circumstances in many different ways with many more documents to leave no doubt if there is any now.

Further, I am suffering from Pre-seizure symptoms right now in spite of having to be on seizure medication due to these Torturous acts by the court, caused by the court ordering Legal Impossibilities like these Orders stating no continuances/no increase in pages in spite of many good causes shown, including the ADA reasons, which are not up to the Court's discretion to allow violations. ADA compliance is not discretionary, and violations relate to due process and access to the Courts and so forth, which waives immunity for violators, along with other RACKETEERING issues.

Dr. Kennedy is now additionally suffering from debilitating vertigo with this extreme eye-strain, even when she tries to lay down and close her eyes, in an attempt to give her body a short break. She has been throwing up, which obviously is also NOT NORMAL. This is now added to the litany of health issues Dr. Kennedy and I are suffering (many caused by the courts, including the underlying court as Legal Machine Criminal Enterprise strategies to rid itself of this very troubling case).

As a reminder, among all other ADA qualifying disabilities that are very serious, Dr. Kennedy's severely damaged upper limbs: Hands, wrists, arms, thumbs, fingers, elbows, and her damaged eyes as well as her cancer, and genetic kidney stones , and her four back/neck surgeries and a new compression fracture in her mid-back that occurred while having the last kidney surgery, that makes it even harder to stretch out her arms and type, and my seizures brought on by EXTRAORDINARY and intentional amounts of sleep deprivation caused by the court/LMCE's imposition of unreasonable time deadlines and work load, have continued to cause both of us to stay up all night several nights in a row trying to argue the case. Obviously, not being able to see, type, and in the process of passing out into a seizure, are reasons to not give us such Legally Impossible Orders that cannot be reached under these conditions, when we are unable to even function we are so exhausted and abilities so targeted and made ineffective, with the threat of losing our case if we cannot meet these Legal Impossibilities with the Courts using these restrictive time/page frames.

All of these ADA violations create their own Legal Impossibility if this court imposes on us such demands to complete and meet the deadline to file the brief and produce a full designation of matters which are sabotaging our ability to present a full appeal with these disabilities, resulting in this Court Unconstitutionally denying us the meaningful opportunity to present our case in the same way that McIntosh and your Legal Machine Criminal Enterprise robbed Dr Kennedy and I of our right to present our case to a jury by using illegal evidentiary deceptions, times/pages, when the evidentiary hearing could not even be held at that time and for those reasons and under those parameters, by law and rule. This is the same trick!

Through prior motions, letters, and objections, we have documented and presented this court with more than enough logical, common sense and reasonable rationale to grant **BLOCKS** of time/pages needed, just as this Court granted the Attorney General/Murdaugh that was not only very generous and in blocks of time extensions and enormous page limit increases, but without even a good cause given for such generosity by this Court, and with the AG even ignoring these limits with no negative repercussions.

Therefore, we are demanding that we be given blocks of time (not thirty days at a time, which is only making it harder for us to finish) within which to direct toward the finish line, as well as increased page limits, i.e. at least 200, that are reasonable within which to begin to present what we thought was over 6,000, or more pages, but see now it is more like 10,000 pages 20,000 pages of documents, and transcribing over videos and audios and other documents to begin to have a chance to meaningfully present our case.

To remind the court, just 24 hours of sleep deprivation is considered torture, and makes the target of this punishment abilities equal to one legally drunk (0.08).

When this punishment is repeated over and over again, the abilities of the target affects critical thinking and abilities more and more, with no "catch up on our sleep" a possibility by just sleeping for the same amount that one lost sleep. Days and days of sleep deprivation over a long period of time between the trial and appeals court, is Torture, and violates all sense of due process and Human Rights in International, Federal, State Courts and even in the American Medical Association statements on Sleep Deprivation as a crisis.[6]

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[6] **Sleep Is a Human Right, and Its Deprivation Is Torture,** Caitlyn Tabor, JD, MBE and Katherine R. Peeler, MD, MA, **October 24, 2024,** Sleep Is a Human Right, and Its Deprivation Is Torture | Journal of Ethics | American Medical Association, https://journalofethics.ama-assn.org/article/sleep-human-right-and-its-deprivation-torture/2024-10#:~:text=This%20commentary%20explores%20the%20intersection%20of%20sleep%20deprivation%2C,deprivation%20as%20a%20means%20of%20coercion%20and%20abuse.

When discussing Sleep Deprivation as Torture, "[b]ased on the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (UNCAT), torture is characterized by 4 critical elements: (1) **"severe pain or suffering" (either physical or mental)**, (2) **intentionality of the perpetrator to deliberately inflict such pain,** (3) **a specific purpose** (such as 'obtaining from him ... information or a confession,' **intimidation, or punishment)**, and (4) **involvement of persons in an "official capacity."** **(Emphasis Added where appropriate and relevant.) Emphasis added when extraordinarily relevant.**

The law is clear that the U.S. Constitution, Amendment VIII, acknowledges Plaintiffs-Appellants' right to NOT be subject to government Cruel and Unusual Punishment. And this alleged right also involves the deliberate indifference to serious medical needs of Plaintiffs-Appellants by Judges, which is the nicest claim Plaintiffs-Appellants can make. It is much worse than indifference. It is intentional and malicious and repeated over and over again. **Immunity does not apply in such cases**, especially when combined with fraud on the court and Constitutional violations.

A combination of ADA violations caused by sleep deprivation by the underlying Judges and now these Appeals Judges (and Supreme Court Judges, See FN 5), pushing

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Further, Sleep Deprivation is considered Torture by the Human Rights Counsel of the United Nations and the American Medical Associate calls sleep deprivation a crisis (all quoted thoroughly to the lower court and the SCBAR).
Additionally, see Sleep Deprivation and Driving: Parallels with Alcohol Impairment, NeuroLaunch Editorial Team, August 26, 2024, https://neurolaunch.com/is-being-sleep-deprived-like-being-drunk/

Plaintiffs-Appellants to almost total physical exhaustion, almost blindness, unable to use limbs to type, and all the pain this has brought, and now vertigo without notice, and to try to cause more seizures in Fink under the same conditions, in order to weaponize the disabilities the Courts caused and exacerbated to create a victory for Judges/Defense, and further punish two whistle blowers who won't give up, is outrageous!

This Court is working totally outside their jurisdiction when they are limiting Plaintiffs-Appellants' meaningful due process and right to fully appeal their case, and as punishment and to weaken the target.[7] This EXTRAORDINARY AMOUNT OF sleep deprivation directly and proximately caused Dr. Fink's seizures (two in Court with ambulances), and with that same EXTRAODINARY AMOUNT OF sleep deprivation directly and proximately caused Dr. Kennedy's limited use of her limbs and eyes on computer screens with nerve damage in both. And now, Dr. Kennedy has to decide that if vertigo happens, and won't go away, how she will get from the country to an ER when these vertigo spells hit without warning other than see can barely see screens or document print. I can't drive her and there is no uber, or Ambulance that can do the job here. What if it is her heart? Or a Stroke warning? This is what these Courts are trying to cause by ignoring the ADA laws that protect us from such ruthless behavior, just to win.

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[7] The SC Supreme Court suggest Plaintiffs-Appellants to just quit if they are concerned for their physical health due to what the lower court judges are doing to them, like what bullies say...that if it is so bad, quit! That pushes their goals or harming the targets so badly they would force them to quit. It tells on the motive of the pronouncer and is not a rational solution and certainly should not come from a court that should be fair, impartial and unbiased...that the Supreme Court needs us to quit to save their LMCE. It is also what the underlying Defendants said, and the second set of attackers for Mcintosh said to Plaintiffs-Appellants in 2025, before they escaped another round of danger from Mcintosh friends.

Extreme sleep deprivation is a torture by itself even when it doesn't cause these other weaknesses that soften the target and allow all the Judges then to weaponize the disabilities they caused/exacerbated to cause P-A to lose because of impossible deadlines and pages. The fact that all these court's intentionally and maliciously caused lack of sleep to such a degree not even experienced in prisons and in some terrorist's camps, and then weaponize the disability causing, the resulting injuries, **goes into the very dark corners of judicial misconduct and fraud on the court** to get rid of a case and punish the whistleblowers. Further, the law includes in torture, **deliberately disrupting senses or personality.**

In, Keenan v Hall" 83 F.3d 1083 (9th Cir. 1996), and *LeMaire v Maass, 745 F. Supp. 623 (D. Or. 1990)* victims of sleep-deprivation by State Actors, as crimes against humanity, their Unconstitutional acts of subjecting individuals to constant illumination, to torture inmates to sleep deprivation, the Court emphasized the harm caused by disturbing sleep patterns and other such heinous results on innocent people. In *LeMaire*, Chief Judge Owen Panner noted that **"[t]here is no legitimate penological justification for requiring plaintiff to suffer physical . . . harm by living in constant illumination.** This is the law and International, National, State and the AMA recognize this as torture.

This practice of sleep deprivation and then weaponizing the disabilities that the Court intentionally and maliciously caused are clearly inhumane acts, serving no valid purpose, especially when purposely, intentionally and maliciously being perpetrated by biased Judges with interests who are in the 10th Circ., Appeals and Supreme Court system to punish and weaken the disfavored party to protect its LMCE interests, and is

unconstitutional. In addition, the Court **violating the ADA Title II** qualifying Disabilities including the ones they have caused to punish and weaken the Plaintiffs-Appellants and then weaponize these disabilities against Plaintiffs-Appellants in the underlying case and on Appeal/Supremes, **the court apparently doesn't think these are Extraordinary Circumstances which, on its face, flies in the face of the law** (Unlawful Order 9/30/25, which means the Appeals LMCE is not going to stop or expose the 10th Cir. LMCE for doing the same thing in spite of the law, humane practices and common sense of Judges the People would want to be in office and not acting like tyrants and inflicting pain upon litigants). The Appeals court (Supreme and underlying court) are **creating known illegalities** to protect each other with other LMCE entities protecting them. This is most likely going to be a matter for the Jury of Public Opinion as SC is infested with the LMCE RACKETEERS.

Trying to weaken the target so they cannot appeal and trying to punish and further retaliate against the LMCE serves no legal, valid purpose. They only protect the LMCE and further provide them their thirst for vengeance against actions protected by the alleged 1st Amendment right of free speech and association, retaliation, deprivation of meaningful due process and equal protections for that speech, Civil Rights Act of 1871, 1983 and 1985.

Further, the **Fourteenth Amendment** guarantees that no person shall be deprived of life, liberty, or property without **due process of law**. Denying ADA accommodations translates to: Denial of meaningful access to the courts, *De facto* exclusion from the legal process, Prejudice in outcomes because the litigant cannot adequately present their case with the disabilities that are not given ADA rights.

Courts have recognized that due process requires **reasonable modifications** to procedures when necessary for participation: *S.H. v. State of New York*, 464 F.3d 227 (2d Cir. 2006) – Courts must make accommodations for disabilities to ensure meaningful access. *Tennessee v. Lane*, 541 U.S. 509 (2004) – Denial of access due to disability may violate due process.

And the fact that the Disabled litigants have ***Pro Se* Litigant Status** does not remove the right to ADA accommodations as these LMCE Courts would love to do as there is an extra layer of hate for *pro Se* litigants who refuse to use their LMCE, knowing it is corrupt. In fact, *pro se* litigants are **more vulnerable** to procedural disadvantages if that were possible in this case. Since the LMCE was already retaliating against whistleblowers against the legal system, they already had plenty of hate, but being *pro se* does make it worse, if the lawyers were honest. Courts have some leeway in interpreting filings ***liberally*** for *pro se* parties (*Haines v. Kerner*, 404 U.S. 519 (1972), but because the higher courts are showing bias for the LMCE predetermined outcome, any leeway they exercise to not allow for meaningful due process while ignoring the ADA laws they are under is *de facto* proof that they are not neutral and have interests in the case, which calls for the Judges to be honest and **recuse themselves voluntarily. However, the right to reasonable accommodation is separate from Court leeway and NOT OPTIONAL**, even for *pro se* litigants. The law must be followed as the ADA has declared, and the Court MUST MAKE REASONABLE ACCOMMODATIONS, especially those that are so nonintrusive, such as blocks of time/pages, where there is no fight, and if suddenly the Defense does fight after total silence, then that gives more credibility to the *ex parte* claims as they are prevalent and not disciplined in the LMCE. This is further reason the Appeals/Supreme Courts **must recuse.**

A blanket policy or statement of no continuances but for "**EXTRAORDINARY CIRCUMSTANCES**" effectively **prevents *pro se* disabled litigants from having a fair chance** to litigate under their particular disabilities where they have demanded blocks of time/space as explained herein and why, with the Court totally ignoring the ADA needs that are reasonable and reasonably explained, especially when most of the problem stems from what the lower courts did and exacerbated, and the appeal and supreme court additionally exacerbated, **which is actionable under ADA and due process doctrines, and RICO, CIVIL RIGHTS and other laws and will lead to no immunity when taken together and with other causes of action intended to be pursued if this nonsense doesn't end with** Plaintiffs-Appellants **being made whole at this level**. Plaintiffs-Appellants are exhausted from what your courts did to Plaintiffs-Appellants which is very illegal and criminal. **The ADA violations themselves** are actionable under § 1983 (see *Holbrook v. City of Alpharetta*, 112 F.3d 1522, 1531 (11th Cir. 1997), recognizing the overlap).

Dr. Kennedy and I are **demanding** that this court cease and desist from violating our Constitutional rights to meaningful due process and equal protection and cease and desist from violating our civil rights protected under the Americans with Disabilities Act, and breaking fundamental Human Rights through Torture by intentional Sleep Deprivation, and with that, forcing us to again spend all-nighters staring at computer and phone screens almost nonstop as we have been for this month, and typing almost nonstop that caused more disabilities in the underlying court and now this court, that cannot even be corrected without surgery for Dr. Kennedy and may never correct my seizures even with medication where I can't even drive. Vertigo and my 5 compression fractures are just adding to the litany of injuries we have sustained just for trying to get justice in SC Courts.

If we cannot see, type, read, and go into seizures due to extraordinary overworking and circumstances Order by this Court, then how can we finish if the Court won't respect our legally qualifying Disabilities under the ADA, meant for *pro se* litigants like us, which is why judicial immunity is waived without such granting of this type of Order. We have made some reasonable accommodations that are not intrusive since the Defense is not even responding and this Court has taken their plěce as prosecutor by not waiting to see if they respond before quickly dismissing our Motions. Further, we recommend that we file more of a Motion-type appeal, with the list of cases and so forth, than having to do all the extra work and fanfare, taking much time and finite energy from our ability to work within the range that our disabilities more readily allow, that otherwise, makes this a much harder process for us to finish.

WHEREFORE, we need a **block expansion of time/pages** (90 days/200 pages) as indicated, with the understanding we may need more as we get closer to that time, and a stay on this matter, with is the normal course when a motion is made, until we receive our granting of this reasonable demand, to allow for a meaningful due process that allows for a fully presented appeal. Further, we demand the court to stay open-minded if we need more time/pages due to Plaintiffs-Appellants' need to rest for these disabilities that cannot be forced beyond what is capable and where rest and sleep are mandatory, as we cannot control these physical disabilities nor whether health requires sleep, which nobody hearing this case is being involuntarily sleep deprived and injured due to this unfair practice. We use no crystal balls in our estimates, and need the Court to comply with the ADA Advocate who knows best how to assist in compliance, so we do not continue to be frustrated in our purpose to get justice finally.

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954-279-3785

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

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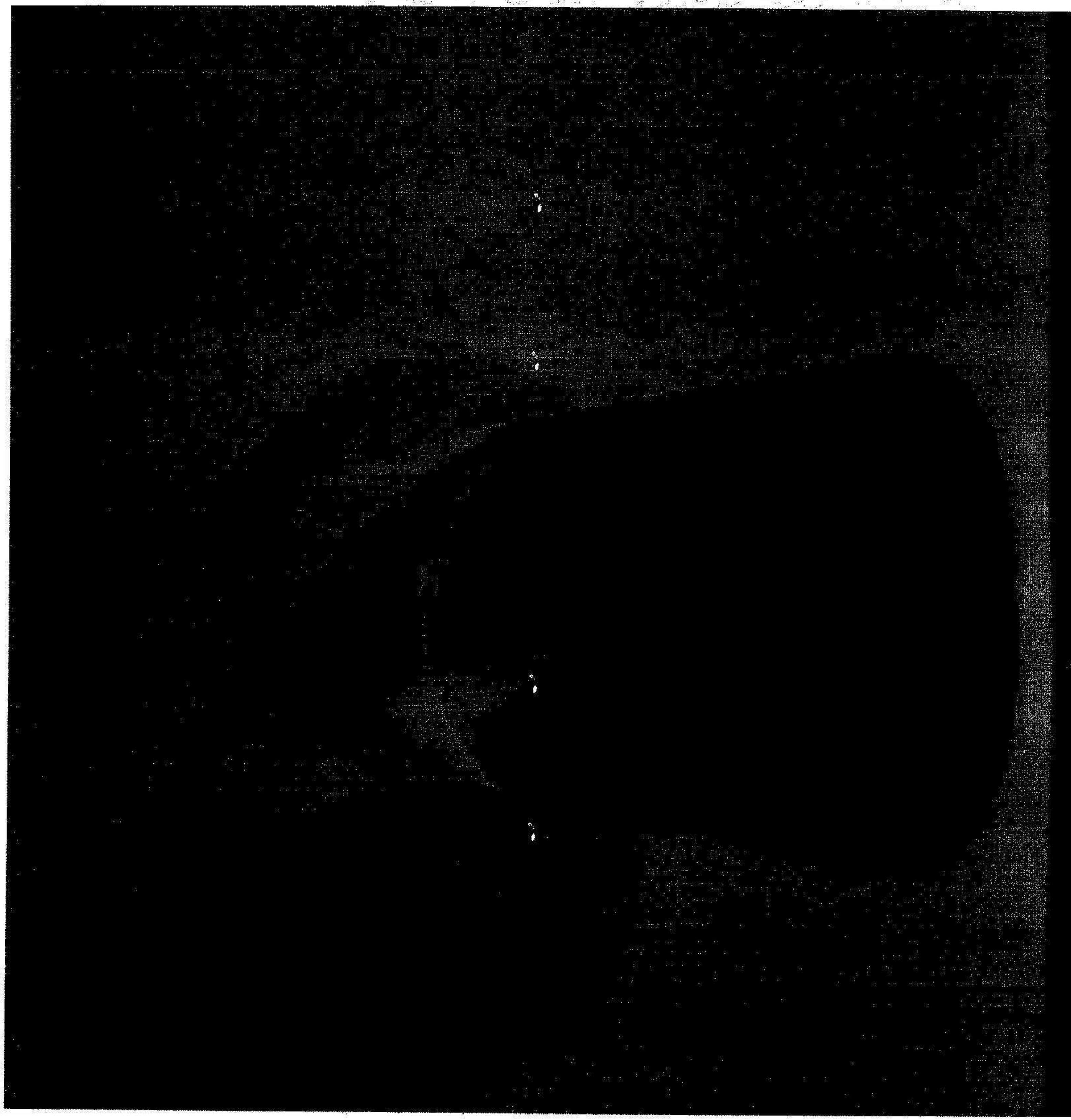
Different Eye treatment

Ex 1B



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06/27/24	Linda Kennedy Collins	Wearden, Steven	92015	H52.223	Refraction	$70.00
06/27/24	Linda Kennedy Collins	Wearden, Steven	83861-QW	H04.123	Microfluid analy tears	$40.00
06/27/24					Cash	-$70.00

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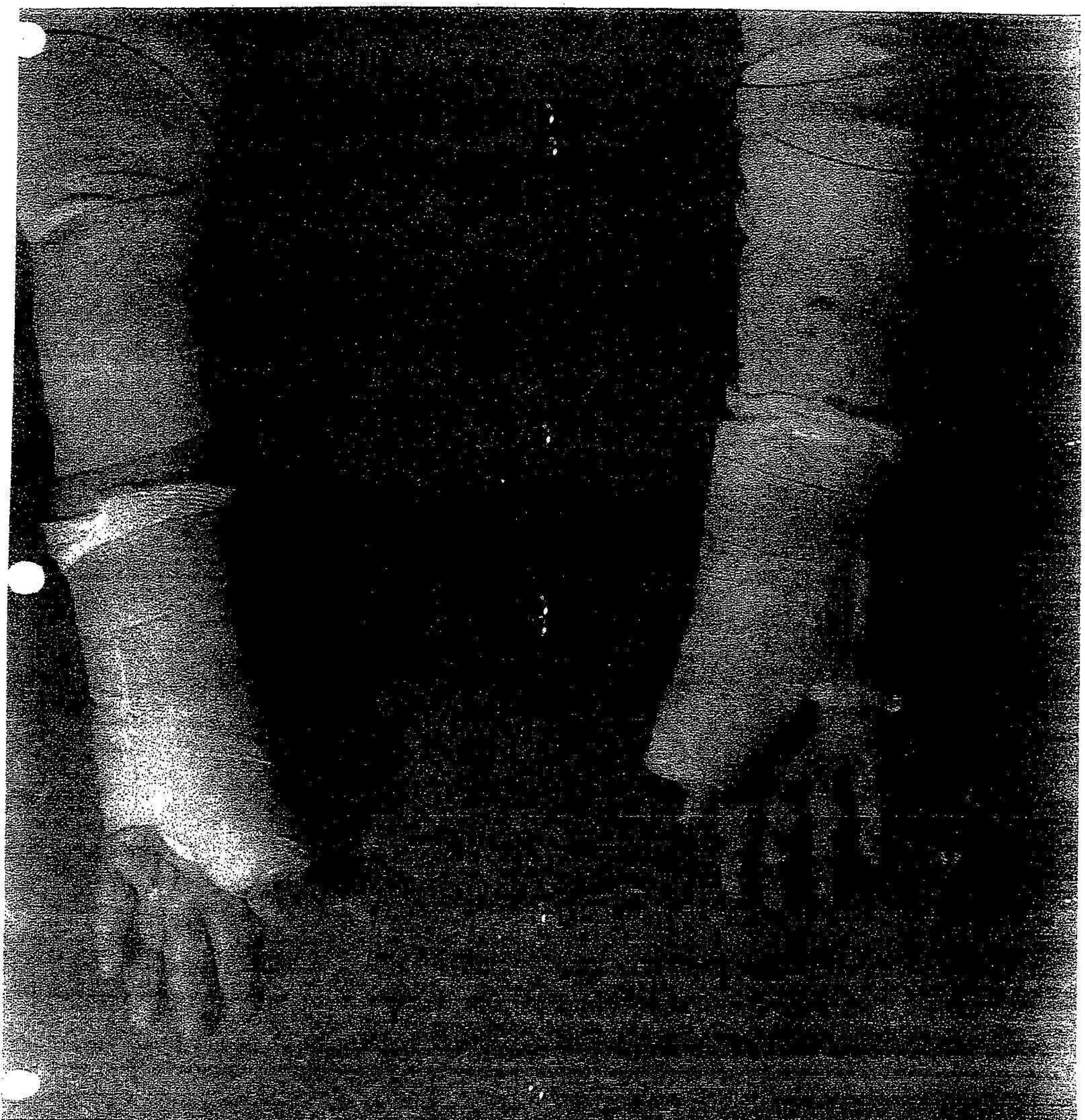

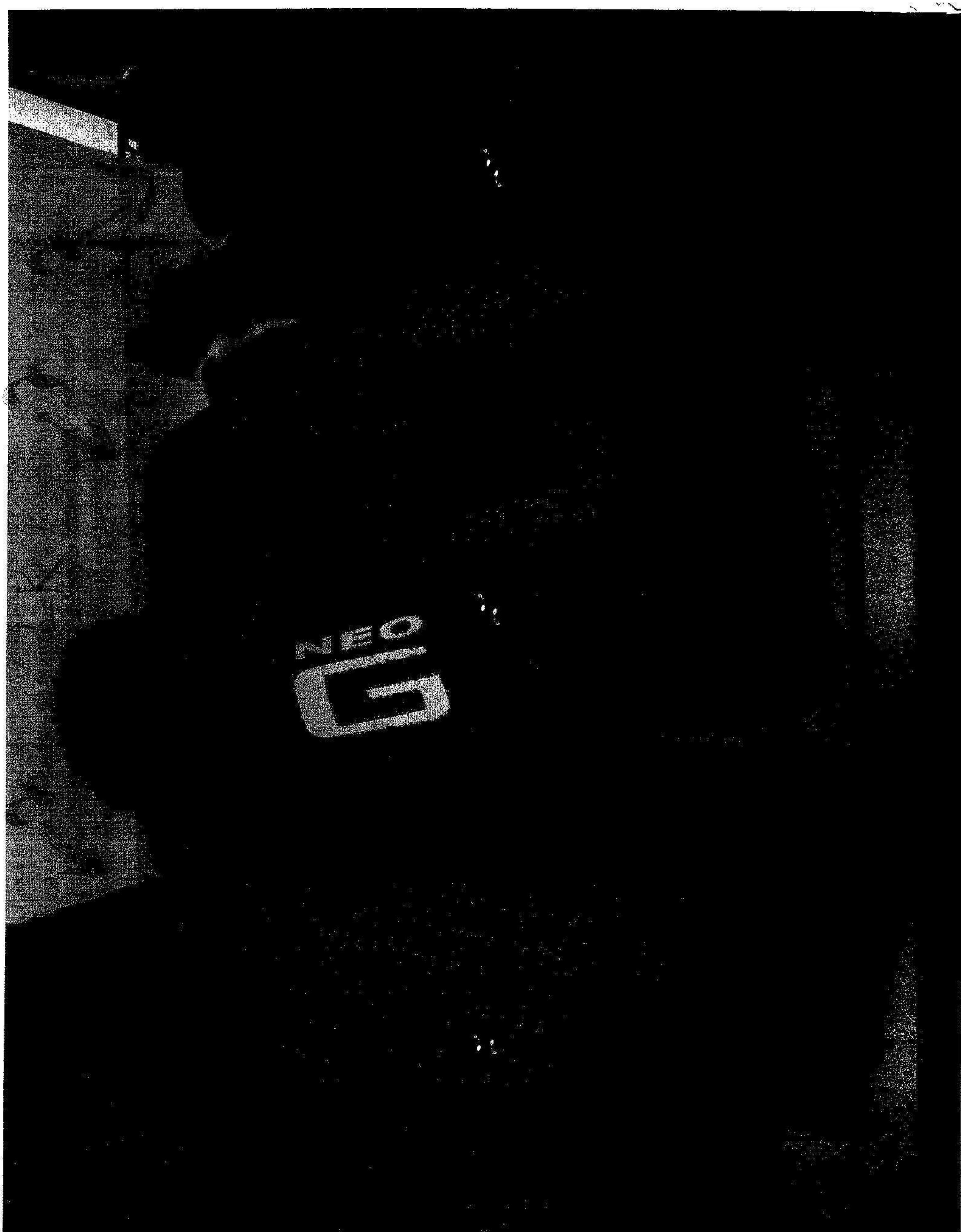
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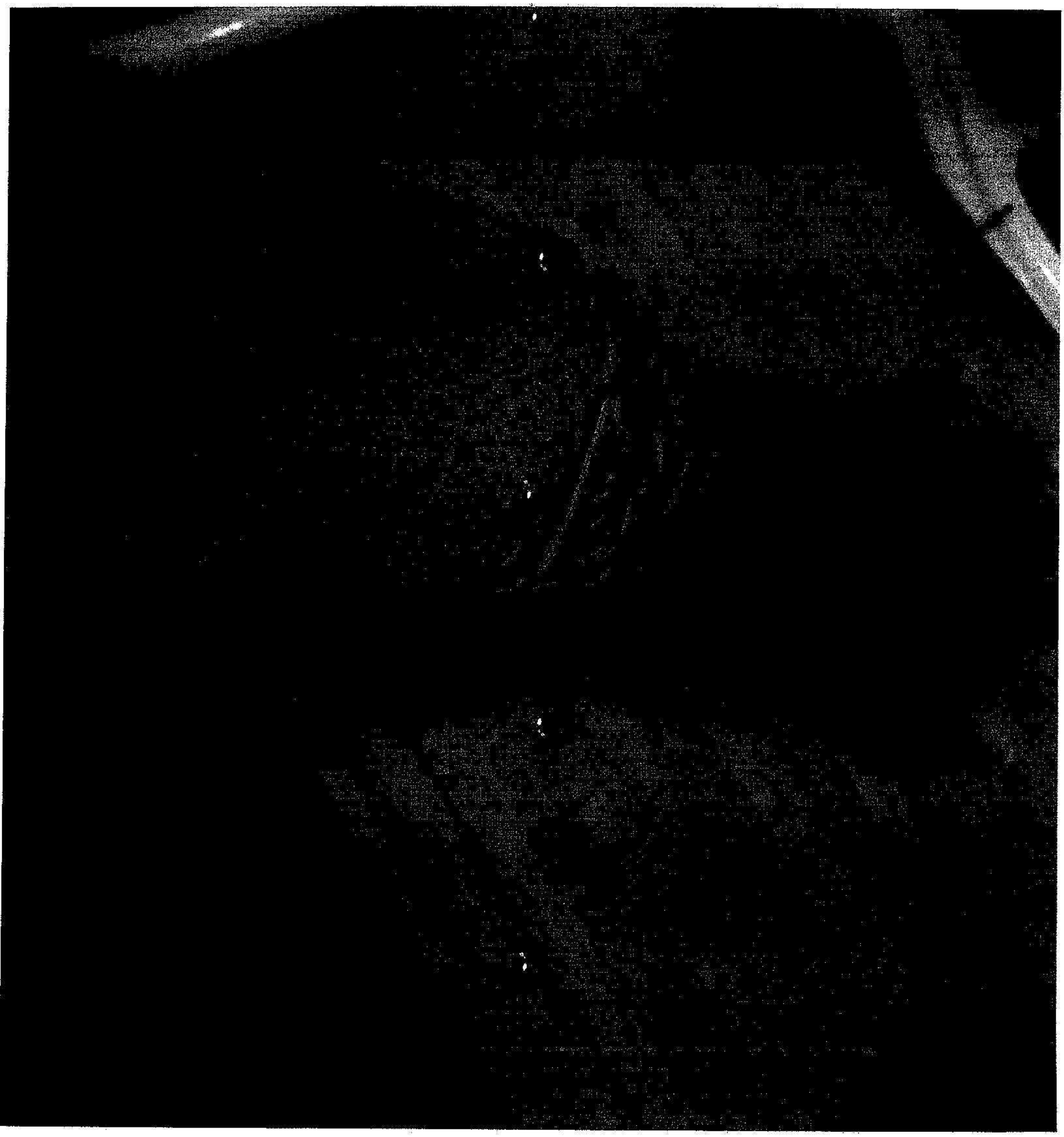

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PREDNISONE 20 MG TABLET

NDC: 00378-0642-05 DAW: 0
QTY: **23 EA**
CAP: **Safety** MFR PKG: **Yes**
REFILL: 0 Refills
MFR: MYLAN
PRSCBR: Russell Ross
DAYS SUPPLY: 10
DATE FILLED: 12/12/23

[redacted]

Notes from the Pharmacy

CVS pharmacy™

OPEN HERE

Promised: 9/8/25, **11:23 AM**
 # Scripts: 01

27 1619080 000 000 00 0000135

ACUTE

KE 27

Kennedy-Collins, Lind
410 Oakdale Rd, Townville, SC 29689
DOB: 3/59 TEL: (954) 279-3785

Prescription Information

MORNING / MIDDAY / EVENING / BEDTIME — SEE DIRECTIONS	**PREDNISONE 20 MG TABLET** Common brand(s): Deltasone Take 3 every day for 3 days, then 2 every day for 3 days, then 1 every day for 3 days
▲PHARMACY ADVICE See back for more information	**Important Information** - Take this medication with food. - If pregnant or becoming so discuss use of drug with your doctor. - Take or use this exactly as directed. Do not skip doses or discontinue.

Receipt & Refill Information

CVS Pharmacy STORE#: 4173
1302 Hwy 72-221 East
Greenwood, SC 29649

STORE TEL: (864) 223-1891
RX: 1619080 00

INSURANCE INFORMATION:
TRICARE
TP: 39750 GR: DODA AUTH#: 327265222336693864

RETAIL PRICE: $13.99

PREDNISONE 20 MG TABLET

NDC: 70954-0060-20 **DAW:** 0
QTY: **18 EA**
CAP: **Safety** MFR PKG: **Yes**

[redacted]
MFR: NOVITIUM/ANI PH
PRSCBR: Teresa Brown
DAYS SUPPLY: 9
DATE FILLED: 9/8/25

[redacted]

Notes from the Pharmacy

PRIVACY: An important notice related to the privacy of your information is included with this label. Please acknowledge receipt of this notice by signing in store or sign/mail the back of this label to the address in the notice.

CVS pharmacy

OPEN HERE

ZG

predniSONE 20 mg oral tablet (predniSONE)

Take 2 tab(s)(40 Milligram) oral daily for 7 Days, 0 refills authorized

Other Reported Medications

No medications documented

New Medications this Visit

New Prescriptions

acetaminophen/butalbital/caffeine 325 mg-50 mg-40 mg oral tablet (acetaminophen/butalbital/caffeine)

Take 1 tab(s) oral every 4 hours for 5 Days for headache, 0 refills authorized

predniSONE 20 mg oral tablet (predniSONE)

Take 2 tab(s)(40 Milligram) oral daily for 7 Days, 0 refills authorized

Medications Administered During Your Visit

No medications documented

Vitals and Measurements this Visit (last charted value for your 12/03/2023 visit)

Height:: 67 in
Weight:: 218 lb
Body Mass Index:: 34.14 kg/m2
BSA: 2.16 m2
Temperature Temporal: 97.3 DegF
Systolic Blood Pressure: 158 mmHg
Diastolic Blood Pressure: 86 mmHg
Mean Arterial Pressure: 110 mmHg
Peripheral Pulse Rate: 69 bpm
Oxygen Saturation: 98 %
Respiratory Rate: 20 br/min

Laboratory and Radiology this Visit (last charted value for your 12/03/2023 visit)

No Laboratory and Radiology documented

Orders this Visit

No visit orders documented

Diagnoses this Visit

Acute tension headache (G44.209)
Cubital tunnel syndrome of both upper extremities (G56.23)
De Quervain's tenosynovitis, bilateral (M65.4)

Referral and Consult Requests this Visit

No Referral or Consults documented

Procedures Documented this Visit

No Procedures documented

Smoking Status

No Smoking Status documented

Future Appointments
No Future Appointments Scheduled

Patient Education Materials Provided this Visit

No Patient Education documented

Additional Visit Comments:

11:55

3A

Test Details

wo Contrast

Collected on Aug 26, 2025
4:18 PM

Results

Impression

1. Moderate right-sided hydronephrosis. A 13 mm stone is present in the distal ureter.
2. Mild to moderate left-sided hydronephrosis. A 5 mm stone is present in the distal ureter.

Signed by: 8/26/2025 4:29

11:56

B

Test Details

Collected on Aug 26, 2025
3:05 PM

Results

Compare result trends

WBC, UA

View trends

Normal range: 0 - 5 /HPF

84 High

0 5

RBC, UA

View trends

Normal range: 0 - 2 /HPF

Value **>182** High

11:50

Test Details

Unremarkable as visualized.
Bones/joints: Posterior fusion of L4 to S1 is present. No evidence of loosening or fracture of the hardware. Multilevel degenerative changes of the spine are present. There is a compression fracture of T9.
Soft tissues: Unremarkable.

Learn more about CT Abdomen Pelvis wo Contrast

Additional information

3C
Sept 3
2025
followup

4A

ELECTRONICALLY FILED - 2023 Jun 09 11:49 AM - ANDERSON - COMMON PLEAS - CASE#2022CP0400592

STATE OF SOUTH CAROLINA COUNTY OF ANDERSON	IN THE COURT OF COMMON PLEAS TENTH JUDICIAL CIRCUIT
Linda Kennedy and Marsha Fink, Plaintiff, vs. Lake Hartwell RV Resort and Cabins LLC, Christopher Vellanti and Yvonne Goldman, And Frank Pellegrini, Fritzie Maroto, Jennifer, Burdette, Marsha Stamm, Allen Riha, and Ray Grenier, Grant Ferrendelli, and Charles Carpenter, Defendants.	CIVIL CASE NO. 2022-CP-04-00592 **MOTION/ORDER FOR CONTINUANCE**

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

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

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

IT IS SO ORDERED.

WE SO MOVE:

The Dodd Law Firm, LLC

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

WE DO NOT OPPOSE:

s/G. Robert DeLoach, III

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

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

Judge's Signature Page to Follow

ELECTRONICALLY FILED - 2023 Jun 09 11:49 AM - ANDERSON - COMMON PLEAS - CASE#2022CP0400592

4C

ELECTRONICALLY FILED - 2023 Jun 09 11:49 AM - ANDERSON - COMMON PLEAS - CASE#2022CP0400592

Anderson Common Pleas

Case Caption: Linda Kennedy , plaintiff, et al VS Lake Hartwell Rv Resort And Cabins Llc , defendant, et al

Case Number: 2022CP0400592

Type: Order/Continuance

s/R. Scott Sprouse, Judge #2752

Tenth Judicial Circuit

5A

ELECTRONICALLY FILED - 2023 Nov 03 11:17 AM - ANDERSON - COMMON PLEAS - CASE#2022CP0400592

STATE OF SOUTH CAROLINA COUNTY OF ANDERSON Linda Kennedy and Marsha Fink, Plaintiffs, vs. Lake Hartwell RV Resort and Cabins LLC, Christopher Vellanti, Yvonne Goldman, Frank Pellegrini, Fritzie Maroto, Jennifer Burdette, Marsha Stamm, Allen Riha, Ray Grenier, Grant Ferrendelli, and Charles Carpenter, Defendants.	IN THE COURT OF COMMON PLEAS TENTH JUDICIAL CIRCUIT CIVIL CASE NO. 2022-CP-04-00592 **NOTICE OF HEARING**

TO THE PARTIES NAMED ABOVE:

YOU WILL PLEASE TAKE NOTICE that a hearing has been scheduled before The Honorable R. Lawton McIntosh, at 2:30PM on November 28, 2023 at the Historic Anderson County Courthouse, located at 101 S. Main Street, Anderson SC 29624, to hear Plaintiff's counsel's motion to be relieved as counsel and also Plaintiff's motion to amend at which time and place you are advised to appear and take part in as you deem appropriate.

THE DODD LAW FIRM, LLC

By: s/ *Michael B. Dodd*

Michael B. Dodd (S.C. Bar No. 100599)
13 Sevier Street
Greenville, SC 29605
Telephone: (864) 747-5607
Facsimile: (864) 243-8255
Email: michael@thedoddlawfirm.com

ATTORNEY FOR THE PLAINTIFFS

November 3, 2023
Greenville, SC

Just the motion which the defense claimed
the defense didn't comply
Dodd didn't it [illegible]
is virgin island
custom as the
defense

they all had to stop the amendment

ELECTRONICALLY FILED - 2023 Nov 03 11:17 AM - ANDERSON - COMMON PLEAS - CASE#2022CP0400592

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SERVICE INFORMATION FOR PLAINTIFFS:

Linda Kennedy
1121 South Military Trail
#238
Deerfield Beach, Fl. 33442

Phone: 954-279-3785
Email: sosofunny1959@gmail.com
pmadjoe@gmail.com

Marsha Fink
1121 South Military Trail
#238
Deerfield Beach, Fl. 33442

Phone: 513-613-5292
Email: kingjbrown1963@gmail.com

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23 NOV 20 PM 12:24:32
Anderson, SC COC, CP /GS

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF
COMMON PLEAS	)	
COUNTY OF ANDERSON	)	TENTH JUDICIAL
CIRCUIT	)	
	)	
Linda Kennedy and Marsha Fink,	)	
	)	CIVIL CASE NO.
	)	2022-CP-04-00592
Plaintiffs,	)	(JURY TRIAL DEMANDED)
vs.	)	NOTICE OF HEARING
	)	
	)	
Lake Hartwell RV Resort and Cabins LLC,	)	
Christopher Vellanti, Corporately, as an	)	
Corporately, and	)	
Individually as an	)	
Individual,	)	
Yvonne Goldman, Corporately, as an	)	
The General Manager, and	)	
Individually,	)	
Frank Pellegrini, Fritzie Maroto,	)	
Jennifer Burdette,		

A TRUE COPY
NOV 20 2023
C. Reena Thomason
CLERK OF COURT

Marsha Stamm,[1] corporately, and as an individually,

Allen Riha,[2] corporately, and as an individual)

Ray Grenier,)

Grant Ferrendelli,)

and)

Charles Carpenter,)

Defendants.)

TO THE PARTIES NAMED ABOVE:

YOU WILL PLEASE TAKE NOTE that a hearing has been set over Plaintiffs many objections, and vilations of their Due Process Rights of the hearing scheduled for November 28, 2023, and the also the order of the hearing presentations.[3] Plaintiffs will have the following heard, but are

[1] Defendant Stamm has Defaulted and Plaintiffs have Motioned to Strike and Demanded Entry of Default against Stamm for all Damages herein, that this Court must enter and Plaintiffs do not waive this Default.

[2] Defendant Riha has Defaulted and Plaintiffs have Motioned to Strike and Demanded Entry of Default against Riha for all Damages herein, that this Court must enter and Plaintiffs do not waive this Default.

[3] This Courts overriding the prior Order in Place with short notice of a hearing, with many closing of Court, even further limiting Plaintiffs timelines to prepare for a massive increase in amounts of work Plaintiffs have had to perform to prepare for Motions that are not even ripe to be heard, but, if permitted, could manipulate a Dismissal of Plaintiffs case, through procedural engineering, cloaked otherwise. This hearing, without their attorney and without their file or Notice of hearing by Dodd, until much later, is causing Plaintiffs to have no time to finish preparing their presention on Dodd's withdraw, and all Plaintiffs evidence proving this was a bad faith Motion to collude further with Defense and others, to ruin Plaintiffs case, and make sure Plaintiffs are not prepared for the very detailed presentation necessary on the issues that were supposed to be heard first and by themselves, with these other matters (Motions to Dismiss, not even ripe for hearing yet) are heard at a latter date and time giving Plaintifs and their new attorney time to learn the issues, research and write/present at that later time. Plaintives were attempting to to clean up their file from Dodd and Defense's collusion and resulting carnage, where they were trying to maximize profits while ruining Plaintiffs very meritorious case, and to then. Once clean up, Plaitnitffs would then present the case to an honest, competent lawyer to try again to hire a good attorney who would be willing to take the case on due to Plaintiffs cleaning up the case, and making the new attorney's risk of taking the case without inheriting Dodd/Defense extraordinary liability and exposure. No matter the presentation orde, now, Plaintiffs have no time to finishing

kc

not limited to these Motions at this time, on protest and with many objections[4], and may have additional legal matters heard also.[5]

The matters to be heard by Plaintiffs, include, but are not limited to: Motion to Continue and letters, Motion to have the Hearing by Phone[6], Motions to Dismiss Defendants Motions to

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preparing the evidence necessary to have their motion matters heard fairly and completely, which is another violation of Plaintiffs Due Process Rights and inherent right to an honest proceeding not intended to force a predetermined outcome. Tis lack of redress of grievances in the U.S., has been addressed with the UN Human Rights Councel who confirmed that these rights are nonexistent in the U.S. and the U.S. member of the HRC has taken an oath to correct this big problem in the U.S. or be kicked out of the HRC. Plaintiffs are appealing to this Court, a higher Court, but also to the HCR and the U.S. members to step in and provide a neutral hearing and trier of facts, if Plaintiffs are not going to get that here in the U.S.

[4] Plaintiffs allegedly have a right to a fair and imperial hearing and this alleged right has been trampled upon and repeatedly violated in obvious ways by triers of facts, lawyers and others who have outside interests, included financial and retaliatory interest, and have manipulated this entire process to be heard, fairly and honestly with no predetermined outcome already planned.

[5] The Court gave this surpise scheduling Order and Motions hearing to pile on Plaintiffs numerous matters that take a long time to prepare for even if Plaintiffs had their file, and these matters are obviously not ripe for hearing, since the superceding motions will determine if these are even properly before the Court, and if these attorneys are even legally able to argue, in order to unjustly dismiss Plaintiffs case. These superceding Motions that must be heard first and at a different time than the other motions not yet ripe, and Plaintiffs have requested a Continuance so they can actually have these matters heard in the proper order and at the proper times, AND actually finish preparing for what was to be heard first which has not even been addressed by them since they have had to spend all time dealing with issues not ripe due to the biased Order that interfered with the logical Order in place on June 9, 2023. No Court personnel will get back to Plaintiffs in time to inform them of the results of their contacts with the Court, or at all, for Plaintiffs to change their course and be able to prepare for the superceding issues at this point,and therefore a Motion for a Continuance has been filed for good cause and legally sufficient reasons, including Dodd will not argue matters he is over, and if he did, he would only help the other colluding attorneys anyway. Plaintiffs cannot hire another attorney as long as they cannot get their file and have these superceding motions heard and Plaintiffs are granted their reasonable requests under the circumstances.

[6] Due to Plaintiffs past history in this case, involving collusion between Judges, other State Actors, and Defendants meeting unilaterally, and in secret and then interfering with Plaintiffs prior case before the Magistrate in Obstructing Justice, which is not covered under any part of Immunity, no matter what legal rights it may offer, and that this collusion permitted Defedants to force Plaintiffs into a courtroom on proven frivolous grounds, as a diversion for Defendnats to attempt to steal Plaintiffs camper, break and enter and steal the contents therein, attempt to Kidnap and assault Plaintiffs house and dog sitter, threatened that they would shoot Plaitniffs and ask questions later, attempted to steal Plaintiffs dogs and hold them hostage until Plaintiffs dropped their case against Defendants, and shut their mouths regarding illegal activity that Defendants were involved in that were never prosecuted by this same group of state actors, and then tried to burn Plaintiffs camper down with Plaintiffs and Kennedy's dogs inside, and so forth, with the State Actors, including judges approval, or lack of action to protect Plaintiffs, Plaintiffs

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Dismiss on several grounds; Motions for a More Definite Statement regarding Defedants Motions to Dismiss;

Motion for Defendant Attorneys to rewrite their Motions to Dismiss in Particularity so Plaintiffs have time to read, research, and address them per Due Process; Motion for Writ of Mandamus, Motion to Recuse all Judges; All Motions and letters Opposing Dodd's Motion to be Relieved as Counsel and Plaintiffs explanation for the reasons why the withdrawal attempt occurred, and related issues filed between June 2023, through November 28, 2023, including, but not limited to, Plaintiffs Joint Amended Motion and Motions and letters to Oppose Dodd's Motion To Be Relieved as Counsel; Plaintiffs Joint Motion to Intervene in the Lanier case; Plaintiffs Joint Motions to have a Neutral Judge to Determine Attorneys' Conflicts of Interests, and Appropriate Action thereto, Plaintiffs Motion to Stay all Matters in Plaintiffs and Laniers case Until all Matters in the Dodd Motion to be Reived as Counsel and Plaintiffs Motions and Letters to Oppose herein, are Heard and Determined First on a new set of dates fairly scheduled; Plaintiffs Joint Motion For Allianz Corporate and Specialty and any other Allianz Organization to Interplead all Policy Limits in this Matter into the Court, Before Any Payouts Were Made, To Provide An Accounting of Where these Funds Where All Funds Went To Whom and How Much And More Explained in the Motion, Plaintiffs Motion for This Court to Order Defense to Disclose Attorneys Disclose Actually Clients, Dates or Representation, Settlements Given to Whom/Amount, and Which Clients/Former Clients are or are not Cooperating Defense and/or in Default, Plaintiffs Joint Motion for Sanctions and Extreme Remedies to Protect Plaintiffs.

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have solid and proven reasons to believe they, Kennedy's dog, and their property and otherwise are in repeated Danger if they are not being heard at their temporary and part time residences, attending to their property rather than at the Court where state actors had long ago interfered in Plaintiffs underlying Magistrate case, and have shown extreme bias here, to protect other colluders and their protectors, who tried to ruin Plaintiffs case, with no help from the Courts, who again turned a blind eye, and so forth

[7] Plaintiffs request Plaintiffs and the Court appoint a neutral special trier of facts and motions, with Plaintiffs copying the United Nations Human Rights Counsel, as lack of redress and due process are fundamental to the U.S. re-entry and commitment to abide by the HRC Charter or be removed, and Judges interfering and Obstruction of Justice in the underlying matter in the Magistrate Court that is now being repeated here again in this case for many unlawful reasons, with this Court protecting the lawyers who were involved in the most recent collusion and obstruction in this case beginning on or about April 12, 2023, where the Judges, other government officials who interfered with and Obstruction of Justice in Plaintiffs underlying Magistrate case, and these lawyers/bar and others have a financial interest in the outcome of this case and also are retaliating against Plaintiffs for their Legal Reform activities, which repeated retaliation by the legal system into Plaintiffs lives, has been a plan, pattern and practice of Judges and others' against Plaintiff for many years where Plaintiffs has kept the evidence of each event to lay a foundation for these claims in this case, if Plaintiffs saw the same plan, pattern and practice herein.

6E

Unless a Continuance is Granted, in the interest of Justice and Due Process, this hearing will be at 9:30 A.M. at the Historic Anderson County Courthouse, located at 101 S. Main Street, Anderson SC 29624, 2nd Floor, to hear Plaintiffs proceeding without the assistance of counsel, because he refuses in spite of his duty to represent Plaintiffs zealously, nor provide Plaintiffs with their file, nor notice Plaintiffs of his Notice not to argue matters he is required to argue where Plaintiffs alleged attorney filed and signed and/or adopted these matters. You are Noticed to appear at the location and time indicated above. Plaintiff jointly filing:

Linda Kennedy
Linda Kennedy

Marsha Fink

Mailing Address: 410 Oakdale Rd, Townville, SC 23689
Joint Email: [illegible]@gmail.com
Joint Phone: 954 279 3785

Certificate of Service:

Plaintiffs affirm that on 20th day of November, 2023, Plaintiffs have mailed a true and accurate copy of this Notice to the attorneys the attorneys address in the Court's submission of its notice to all attorneys, by U.S. Mail, 1st Class, Postage Prepaid.

Linda Kennedy Linda Kennedy

Marsha Fink

[redacted]

Patient name:FINK, MARSHA E **Patient numb**[redacted]

Admitting Diagnosis : Seizure-like activity (H*

You're a hospital outpatient receiving observation services. You're not an inpatient because:
You require hospital care for evaluation and/or treatment of the above diagnosis that is expected to span less than a total of two days, and your doctor has deemed observation to be the appropriate level of care.
Other:

Being an outpatient may affect what you pay in a hospital:

- When you're a hospital outpatient, your observation stay is covered under Medicare Part B.

- For Part B services, you generally pay:
  - A copayment for each outpatient hospital service you get. Part B copayments may vary by type of service.

  - 20% of the Medicare-approved amount for most doctor services, after the Part B deductible.

Observation services may affect coverage and payment of your care after you leave the hospital:

- If you need skilled nursing facility (SNF) care after you leave the hospital, Medicare Part A will only cover SNF care if you've had a 3-day minimum, medically necessary, inpatient hospital stay for a related illness or injury. An inpatient hospital stay begins the day the hospital admits you as an inpatient based on a doctor's order and doesn't include the day you're discharged.

- If you have Medicaid, a Medicare Advantage plan or other health plan, Medicaid or the plan may have different rules for SNF coverage after you leave the hospital. Check with Medicaid or your plan.

NOTE: Medicare Part A generally doesn't cover outpatient hospital services, like an observation stay. However, Part A will generally cover medically necessary inpatient services if the hospital admits you as an inpatient based on a doctor's order. In most cases, you'll pay a one-time deductible for all of your inpatient hospital services for the first 60 days you're in a hospital.

If you have any questions about your observation services, ask the hospital staff member giving you this notice or the doctor providing your hospital care. You can also ask to speak with someone from the hospital's utilization or discharge planning department.

You can also call 1-800-MEDICARE (1-800-633-4227). TTY users should call 1-877-486-2048

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Promised: 2/7/25, 2:29 PM
Scripts: 01

FI 43

27 2673449 000 000 00 0000000

Fink, Marsha
11 Regency Hill Dr, Greenville SC
DOB: 2/50 TEL: (864) 283-9915

Counsel: New Drug

Prescription Information

MORNING: 1 TABLET
MIDDAY:
EVENING: 1 TABLET
BEDTIME:

PHARMACY ADVICE
See back for more information

LEVETIRACETAM 500 MG TABLET
Common brand(s): Keppra

Take 1 tablet by mouth twice a day

Important Information
- May cause drowsiness and dizziness. Careful using vehicle, vessel, machines.
- If pregnant or becoming so discuss use of drug with your doctor.
- This drug may have a bitter taste if chewed or crushed. Swallow whole.
- Do not chew or crush before swallowing.
- Call doctor if you experience mood changes, sadness, depression or fear.

Seizure medicine

Receipt & Refill Information

CVS Pharmacy
2814 N Main St.
Anderson, SC 29621
STORE#: 4111

STORE TEL: (864) 224-3562
RX: 2673449 00

INSURANCE INFORMATION:
PDP BN610502 PNMEDDAET
TP: 22370 GR: RXAETD AUTH#: 250384009302757999

RETAIL PRICE: $434.99

LEVETIRACETAM 500 MG TABLET

NDC: 64980-0605-12 DAW: 0
QTY: 180 EA
CAP: Safety MFR PKG: Yes
REFILL: 0 Refills
MFR: RISING PHARM
PRSCBR: Taylor Petree
DAYS SUPPLY: 90
DATE FILLED: 2/7/25

AMOUNT DUE: $0.00

Notes from the Pharmacy

CVS pharmacy

OPEN HERE

BACK 9A

Discharge Instructions

Please follow-up with the neurosurgeon regarding your lumbar fractures. I have placed an MRI to further characterize these. As we discussed you also have an [redacted] which will need further evaluation as well. I have placed an order for a CT of the [redacted] Please have this followed up by your primary doctor. You also have some [redacted] to the [redacted] the CT scan. This is not the best test to determine this so we have placed an order fo[redacted]
If you develop any new or worsening pain please return here immediately.

Your Appointments

Friday October 24, 2025 10:15 AM
New Patient Appointment w[redacted]
[redacted]

[redacted]

Other instructions

*SMG Referral to Neurosurgery
Complete by: Oct 13, 2025

CT [redacted]
Complete by: Oct 13, 2025

MRI Lumbar Spine without Contrast
Complete by: Oct 13, 2025

Name: Marsha E Fink | DOB [redacted]

9B

CT ABDOMEN AND PELVIS W IV CONTRAST

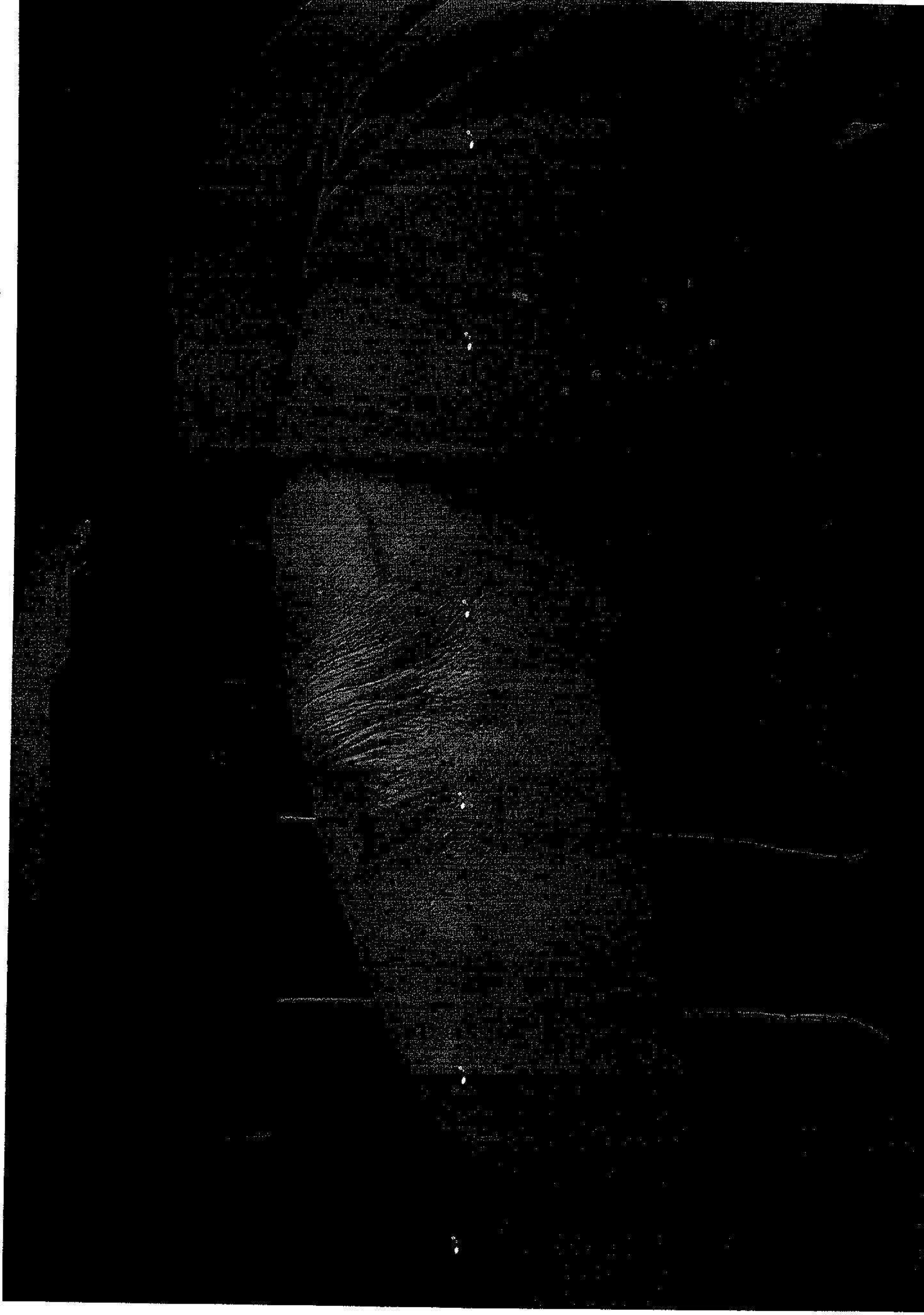
Collected on Oct 06, 2025 12:23 PM

Results New

Impression

1. Compression deformities at all levels of the lumbar vertebra, some of which may be acute in nature. Recommend follow-up MRI for further assessment.
2. Indeterminate left adrenal nodule for which non urgent CT adrenal protocol is recommended.
3. Mild asymmetric components of nodularity within the left breast with some left lateral skin thickening. Recommend correlation with dedicated mammograms and clinical inspection.

Bones: Compression deformity of the superior endplate of L1 with evidence of mild gas seen within the anterior superior endplate which may suggest acute/subacute compression deformity. Additional compression deformities involving L2, L3, L4 and L5 of indeterminate chronicity. Chronic appearing compression deformity of the superior endplate of T11.



9C

Ex 10A

APPENDIX: SOUTH CAROLINA JUDICIAL BRANCH / AOC ADA COMPLIANCE GUIDELINES

I. Overview

The South Carolina Judicial Branch, through its Administrative Office of the Courts (AOC), formally recognizes that Title II of the Americans with Disabilities Act (ADA) applies to all state court programs, services, and activities. The Branch's published policy promises reasonable accommodations to ensure meaningful participation by persons with disabilities.

Source: South Carolina Judicial Branch, ADA Compliance (SC Courts 2025), https://www.sccourts.org/ada-compliance

II. Key Published Provisions (Quoted Directly)

Non-Discrimination Commitment
"The South Carolina Judicial Branch will not discriminate against qualified individuals with disabilities in its services, programs, or activities."

Effective Communication
"Upon request, the South Carolina Judicial Branch will provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the Judicial Branch's programs, services, and activities. Such aids and services include qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments."

Modification of Policies and Procedures
"The South Carolina Judicial Branch will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities."

Requests for Accommodation
"Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the South Carolina Judicial Branch, should contact: Cynthia Benjamin, M.Ed., Court Interpreter Manager, 1220 Sumter Street, Suite 200, Columbia, SC 29201, (803) 734-1800 (Tel.), (803) 734-1821 (Fax), as soon as possible but no later than 48 hours before the scheduled event."

Undue Burden Exception
"The ADA does not require the South Carolina Judicial Branch to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden."

Ex 10 B

Complaint Procedure
"Complaints that a program, service, or activity of the South Carolina Judicial Branch is not accessible to persons with disabilities should be directed to the Court Interpreter Manager at the address above."

III. Related Guidance from Disability Rights South Carolina

Disability Rights SC, the state's federally authorized Protection & Advocacy agency, summarizes the Judicial Branch's ADA duties in Accessibility in the South Carolina Court System: Source: Disability Rights South Carolina, Accessibility in the SC Court System (2024), https://www.disabilityrightssc.org/resource/accessibility-in-the-sc-court-system/accessibility.

- Title II Applicability: South Carolina courts are public entities under Title II of the ADA and must not exclude people with disabilities from services, programs, or activities.
- Reasonable Modifications: Courts must modify policies, practices, or procedures when necessary to provide equal opportunity—unless doing so would fundamentally alter the program or impose undue burden.
- Examples of Accommodations: Remote participation, extended time, breaks, flexible scheduling, or assistance with forms.
- Request Process: Requests may be made by the individual or someone acting on their behalf, with as much advance notice as possible, ideally at least two business days before the proceeding.
- Enforcement & Complaints: If a court fails to provide reasonable accommodation, a complaint may be filed with the SC Judicial Branch Court Interpreter Manager or with the U.S. Department of Justice, Civil Rights Division.

IV. Legal Integration

These guidelines confirm that South Carolina's own AOC policies require individualized evaluation and reasonable modification of procedures. Therefore, any blanket refusal of continuances or scheduling accommodations—especially where disability documentation exists—directly violates both Title II of the ADA and the Judicial Branch's own ADA policy. Such failure also offends due-process guarantees of meaningful access to courts recognized in Tennessee v. Lane, 541 U.S. 509 (2004).

V. Exhibits (Recommended Attachments)

Exhibit	Description	Source / URL
A	Full printout of South Carolina Judicial Branch – ADA Compliance page	https://www.sccourts.org/ada-compliance
B	Accessibility in	https://www.disabilityrightssc.org/resource/accessibility-

Ex 10c

	the South Carolina Court System (Disability Rights SC summary)	in-the-sc-court-system/accessibility
C	Contact letter/email to Court Interpreter Manager requesting accommodation	To be attached by Plaintiff
D	Medical or professional verification of disability	To be attached by Plaintiff

Ex 11 A-1

JUDICIAL MERIT SELECTION COMMISSION Sworn Statement to be included in Transcript of Public Hearings

Circuit Court
(Incumbent)

Full Name: Jesse Cordell Maddox, Jr.
Business Address: P.O. Box 8002
100 South Main Street (29624)
Anderson, SC 29622
Business Telephone: 864-260-4636

1. Why do you want to serve another term as a Circuit Court Judge?

I enjoy my job. I have always believed in public service. The learning curve for a Circuit Court Judge is long. After twelve full years on the bench, I believe that I have reached a peak of competence. If a person can enjoy a job and that job is useful to the community, that is the height of job satisfaction.

The bottom line is that I feel very satisfied with the job of Circuit Court Judge and wish to continue on the bench.

2. Do you plan to serve your full term if re-elected?

Yes

3. Do you have any plans to return to private practice one day?

No

4. Have you met the Constitutional requirements for this position regarding age, residence, and years of practice?

Yes

5. What is your philosophy regarding *ex parte* communications? Are there circumstances under which you could envision *ex parte* communications being tolerated?

I do not participate, except as allowed by The Canons of Ethics and State Law, in any ex parte communication regarding substantive matters before the court.

If I believe that a communication arises to the level of ex parte communication, I inform all parties of the communication.

As previously stated, this issue has become a problem as a result of Internet connectivity.

I do my best to avoid contact from pro se litigants and criminal defendants via email, etc.

6. What is your philosophy on recusal, especially in situations in which lawyer-legislators, former associates, or law partners are to appear before you?

As a practice, I disclose <u>any</u> matter that might require recusal immediately. Basically, I rely on 3(e) of the Canons in situations where recusal is an issue.

EXHIBIT
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ExhA-2

The most difficult issue arises very rarely. This situation involves a party's perceived need for recusal. If I believe my involvement creates an appearance of impropriety, I will always recuse myself. The above assumes that the recusal is not sought to delay the matter.

After 13 years, I do not have any issues with former law partners or associates. Finally, if a matter arises during a trial that may cause recusal, I allow the parties and their attorneys to discuss the matter outside my presence and then summarize their decision on the record. I usually will grant a legitimate request for recusal.

Lawyers/legislators receive no special treatment in regard to recusal.

7. If you disclosed something that had the appearance of bias, but you believed it would not actually prejudice your impartiality, what deference would you give a party that requested your recusal? Would you grant such a motion?

Quite frankly, I would give deference to a party seeking recusal because of a perceived impartiality.

That situation is rare, but in most instances I would recuse myself.

8. How would you handle the appearance of impropriety because of the financial or social involvement of your spouse or a close relative?

If my spouse, child or family member residing in my household, or within the third degree of relationship had an "economic interest or social involvement" in a case, I would recuse myself. Any minor or de minimis interest by the above family members should be disclosed to all parties. If I believed that the issue could inject the appearance of impartiality, I would almost always recuse myself.

9. What standards have you set for yourself regarding the acceptance of gifts or social hospitality?

I do not accepts gifts.

I attend Bar related activities and functions sponsored by the S.C. Trial Lawyers and the S.C. Defense Lawyers. I have always attempted to attend both functions or neither function in the same year. With the exception of allowed normal social hospitality, I do not accept food, meals or gifts. In accordance with Rule 4(D) of the Canons, I disclose yearly all amounts accepted by me or my family.

10. How would you handle a situation in which you became aware of misconduct of a lawyer or of a fellow judge?

With great sadness, I would inform the appropriate authority if I believe a judge or attorney had violated their applicable canons or codes.

EX 11B-7

JUDICIAL MERIT SELECTION COMMISSION
Sworn Statement to be included in Transcript of Public Hearings

Circuit Court
(Incumbent)

Full Name: Carmen Tevis Mullen
Business Address: Beaufort County Courthouse
100 Ribaut Road, Beaufort, SC 29901
Business Telephone: (843) 255-5070

1. Why do you want to serve another term as a Circuit Court Judge?
   I have enjoyed my time on the Circuit Court bench and will continue to work hard for the people of South Carolina.
2. Do you plan to serve your full term if re-elected?
   Yes.
3. Do you have any plans to return to private practice one day?
   No.
4. Have you met the Constitutional requirements for this position regarding age, residence, and years of practice?
   Yes.
5. What is your philosophy regarding *ex parte* communications? Are there circumstances under which you could envision *ex parte* communications being tolerated?
   Ex parte communication is not allowed in my court. Scheduling matters are addressed to my law cler. Matters of substance require all counsel to be present.
6. What is your philosophy on recusal, especially in situations in which lawyer-legislators, former associates, or law partners are to appear before you?
   I am guided by the principle of transparent impartiality and avoiding the appearance of impropriety. I do not believe recusal is necessary simply because someone is represented by a legislator or a former associate. Neither would affect my impartiality.
7. If you disclosed something that had the appearance of bias, but you believed it would not actually prejudice your impartiality, what deference would you give a party that requested your recusal? Would you grant such a motion?
   I give a full hearing and open discussion. If it rose to the level of the litigant believing they would not be fairly treated, I would recuse myself. Otherwise, I would give the parties and attorney reassurance of my impartiality after a full discussion of the issues.
8. How would you handle the appearance of impropriety because of the financial or social involvement of your spouse or a close relative?

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Ex11B-2

Again, I would give a full hearing. If there were an appearance of impropriety, I would recuse myself.

9. What standards have you set for yourself regarding the acceptance of gifts or social hospitality?

I pay my own way.

10. How would you handle a situation in which you became aware of misconduct of a lawyer or of a fellow judge?

I have a duty to report it to the Office of Disciplinary Counsel immediately.

11. Are you affiliated with any political parties, boards or commissions that, if you were re-elected, would need to be re-evaluated?

No.

12. Do you have any business activities that you would envision remaining involved with if reelected to the bench?

No.

13. How do you handle the drafting of orders?

I sometimes request my law clerk draft an order and edit or draft myself.

14. What methods do you use to ensure that you and your staff meet deadlines?

We share a calendar in Outlook with all deadlines and events listed.

15. What is your philosophy on "judicial activism," and what effect should judges have in setting or promoting public policy?

I don't believe in it. My duty as a judge is to apply current statutes, not to rewrite them. Legislators are elected by the public and can best represent the public's interests and therefore, best effect public policy.

16. Canon 4 allows a judge to engage in activities to improve the law, legal system, and administration of justice. What activities do you plan to undertake to further this improvement of the legal system?

I hope to have time to teach at local colleges/universities on law related subjects and write law-related articles for publication.

17. Do you feel that the pressure of serving as a judge strains personal relationships (i.e. spouse, children, friends, or relatives)? How do you address this?

I do not believe serving as a judge places a strain on my person relationships. Occasionally, court requires long hours, but I am fortunate my entire family in incredibly supportive.

Ex. 12A

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

IN RE: Janice Wolk Grenadier
Pro Se / Intervener
Certified ADA Advocate & Mediator
15 W. Spring St.
Alexandria, VA 22301
202-368-7178
adaadvocate4@gmail.com

ADA ADVOCATE'S NOTICE AND REQUEST FOR REASONABLE ACCOMMODATIONS ON BEHALF OF APPELLANTS

COMES NOW, *Janice Wolk Grenadier*, **Certified ADA Advocate & Mediator**, submitting this request pursuant to **Title II of the Americans with Disabilities Act (42 U.S.C. §§ 12131–12134)** and **28 C.F.R. Part 35**, to facilitate the provision of reasonable accommodations ensuring **meaningful access to the Court** for the above-named appellants, **Linda Kennedy and Marsha Fink**.

This submission is made **in my capacity as an ADA Advocate, not as legal counsel**, and solely to assist the Court in ensuring compliance with the ADA, due process, and equal access standards established under federal and state law.

Ex 12B

I. BACKGROUND AND PURPOSE

Both appellants have **documented physical disabilities** substantially limiting their ability to meet the short time and page limitations imposed by current appellate deadlines. This disabilitie does not impede them from answering - only in a timely manner.

Their conditions include impairments affecting **vision, upper-limb mobility, and physical endurance.** These impairments are physical in nature and have been **exacerbated by medically documented sleep deprivation** and **extended screen use** resulting from complex litigation, that includes by all appearance desperation of constitutional rights.

The appellants are **fully competent** and capable of managing their appeal independently. However, the combination of voluminous records (exceeding 10,000 pages) and repetitive, short extension cycles creates a **functional barrier** to equal participation under the ADA.

II. LEGAL FRAMEWORK

1. **Title II, 42 U.S.C. § 12132:**

   "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."

2. **28 C.F.R. § 35.130(a)** — General Prohibition Against Discrimination

   A court, as a public entity, must ensure that no qualified individual is denied participation or benefit due to disability.

3. **28 C.F.R. § 35.130(b)(7)(i)** — Reasonable Modifications

The entity shall make reasonable modifications in policies, practices, or procedures when necessary to avoid discrimination.

Tennessee v. Lane, 541 U.S. 509 (2004):
The U.S. Supreme Court held that Title II of the ADA applies to state courts and guarantees **meaningful access to judicial proceedings**.

DOJ Title II Technical Assistance Manual, § II-3.6100:
Recognizes that reasonable accommodations include **scheduling, format, or procedural modifications** where disabilities limit endurance or speed of performance.

South Carolina Administrative Order 2003-08 (ADA Compliance in the Courts):
Directs that qualified individuals with disabilities must be provided reasonable modifications to ensure access to all judicial programs and services.

Ex 12 C

III. REQUESTED ACCOMMODATIONS

To ensure equal access, Appellants request that the Court provide:

Time Accommodation
— Filing deadlines to be set in **90-day intervals ("blocks of time")** rather than repeated 30-day extensions, allowing sufficient time for recovery and document preparation without injury recurrence.

1. **Page-Limit Accommodation**
   — Permission to file an **Appellants' Opening Brief up to 200 pages** in length, with supplemental allowance as needed, due to the complexity and size of the record and multiple intertwined factual and procedural issues.

2. **Interactive ADA Coordination**
   — Engagement by the Court's **ADA Coordinator**, as required under **28 C.F.R. § 35.107**, to document and confirm the implementation of these accommodations through the interactive process.

These accommodations are **reasonable, narrowly tailored, and impose no prejudice** upon any party, while ensuring the appellants' right to equal participation and meaningful review.

IV. CLARIFICATION OF ADVOCATE ROLE

This request is submitted **by a Certified ADA Advocate assisting the Court and the litigants solely in the coordination of disability accommodations.**

I am **not acting as counsel**, am **not providing legal representation**, and make no appearance on the merits of the appeal.

This submission is made in the **public interest and in furtherance of compliance** with Title II of the ADA and corresponding state mandates.

V. CONCLUSION

WHEREFORE, the undersigned respectfully requests that the Court:

1. Grant the appellants **90-day filing intervals** for all appellate submissions;
2. Approve a **200-page principal brief limit**;
3. Direct ADA coordination with the parties to ensure continuing compliance; and
4. Grant such other accommodations as may be required to ensure full and equal access to the appellate process.

Ex 12D

Respectfully submitted,

/s/ Janice Wolk Grenadier[1]
Certified ADA Advocate & Mediator
Founder: JudicialPedia.com
15 W. Spring Street
Alexandria, VA 22301
Email: adaadvocate4@gmail.com
Phone: 202-368-7178

Certificate of Service

[1] ADA Disclosure: Janice Wolk Grenadier ("JWG") is a Certified ADA Advocate, not an attorney, and therefore does not provide legal representation or legal advice. Her role is consistent with the rights guaranteed under Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. §§ 12131–12134), and its implementing regulation (28 C.F.R. Part 35), which mandates that individuals with disabilities must be afforded equal access to judicial services, programs, and activities.

In line with 28 C.F.R. § 35.130(b)(7), courts and court-related entities must make reasonable modifications in policies, practices, or procedures when such modifications are necessary to avoid discrimination on the basis of disability. The assistance of a Certified ADA Advocate such as JWG may constitute a reasonable modification where the party affected is Pro Se, indigent, or experiencing legal abuse, psychological trauma, or other barriers impairing meaningful access to justice.

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Oct 27 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

PROOF OF SERVICE

Objection to Style

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 INDIVIDUALIZED ACCOMODATIONS PER EXTRAORDINARY CIRCUMSTANCE AND OTHERWISE, AND OTHER APPLICABLE LAWS TO COMPLY WITH PLAINTIFFS'-APPELLANTS' RIGHTS TO MEANINGFUL DUE PROCESS AND EQUAL PROTECTION, AND TO PROTECT THEIR RIGHTS TO A FULL PRESENTION OF THE APPEAL, WITH STAY WHILE REVIEWING AND FINDING IN OUR FAVOR AND**

NOTICE OF SOME OBJECTIONS TO APPEALS COURT RULINGS 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, 2nd 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 October 27, 2025.

DATE: October 27, 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.
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