

1. Cover Letter in Exclusive Equity

[Your Name/Mark: **Samuel-Tucker: Collins Jr.**, Steward Trustee]

STCJ Network Revocable Living Trust

2398 Hotel Street

Alcolu, South Carolina 29001

November 20, 2025

Clerk of Court

South Carolina Court of Appeals

1220 Senate Street

Columbia, SC 29201

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SC Court of Appeals

Re: Appeal—Steward Trustee of STCJ Network Revocable Living Trust v. West Palmetto Holdings
Docket No. [to be assigned in equity and conscience jurisdiction]

Dear Clerk:

I write in my capacity as Steward Trustee of the STCJ Network Revocable Living Trust, invoking the jurisdiction of conscience, fiduciary duty, and exclusive equity. Enclosed please find the following filings submitted for lodgment:

- Notice of Appeal in Exclusive Equity
- Supporting affidavit of record assembly and private service
- Table of Contents and Exhibits as listed
- Verification of service on all respondents
- Proof of request for exemplified copy of order and record from the lower court

This matter concerns breaches of fiduciary duty and trust-res injury arising from the order of the Honorable Clifton Newman issued May 30, 2025 in the Clarendon County Court of Common Pleas (Case No. 2024-CV-14-100503). The order was unsigned initially, was later signed after remittitur, and the lower tribunal declined to entertain the Verified Bill in Equity De Novo lodged with the Resident Judge of Lee County. In consequence, I have at the proper time appealed.

My aim is not to relitigate legal damage claims but to preserve the trust-res, enforce the maxims of equity (“when the law side hath finished, equity begins”; “equity will not suffer a wrong without a remedy”), and obtain the relief appropriate in conscience and equity (accounting, restitution, redistribution of trust-res, injunctive relief). I respectfully request that the Court docket this appeal, note the equity posture of the filings, and issue entry confirmation of receipt.

Thank you for your assistance. Please advise me if additional procedural items are required.

Respectfully submitted,

By: Samuel Tucker Collins Jr.
Samuel-Tucker: Collins Jr., Grantee Absolute
Steward Trustee, STCJ Network Revocable Living Trust
All rights reserved, without prejudice



Office of the Clerk of Court

Lee County

Teresa A. Brown, Clerk

P.O. Box 387 • Bishopville, SC 29010
Phone: (803) 484-5341 • Fax: (803) 484-1632

Cheryl K. Watkins
Deputy Clerk
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Caroline Mehm
Court Coordinator
General Sessions
(803) 484-5341 ext. 315

Jackie Howard
Family Court
(803) 484-5341 ext. 316

November 19, 2025

To: Samuel Collins

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SC Court of Appeals

I consulted with Judge Doby on 11/19/2025 about Mr. Collins documents. Without breaking the seal on the envelope and looking at these documents. Judge Doby advised that any lawsuit must be filed with the appropriate Clerk of Court prior to consideration by any judge.

These papers are not filed. No decision or consideration will be granted.

Along with this letter I am returning all the documents you gave to me on 11/18/25.

Sincerely,

Cheryl K. Watkins

Cheryl K. Watkins

11/20/2025 (CP) STC

Documents received by Mr. Samuel Collins on 11/19/25

Collins, Samuel Tucker, Steward Trustee

I Samuel Collins, Trustee For the STCT Network Revocable
Living Trust Lodged w/ MS. ~~Sheryl~~ ^{Watt} Deputy Clerk for Lee County
~~Judge~~ Court a Bill IN Equity Demovo Sealed & unopened
Within the Sealed Lodgement is Verified Bill in Equity
Petition to Stay Proceedings, Petition to be heard In Chambers
by a Special Judge Pursuan to [S.C. 14-5-920 & [14-5-930]

Samuel Collins, Trustee
STCT Network Revoc. Living Trust.

803-410-6608

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SC Court of Appeals

This is to verify that Mr. Samuel
Collins left documents with me
to give to Judge Bryan Dobson
11/18/25

Chuck K. Watkins

CONFIDENTIAL MEMORANDUM OF LODGMENT IN EXCLUSIVE EQUITY

To: Hon. S. Bryan Doby, Resident Judge
From: Samuel-Tucker: Collins Jr., Subrogee / 'Steward' Trustee – STCJ Network Revocable 'Living' Trust
Re: Verified Lodgment in Exclusive Equity – Chambers / In Camera
Date: November 18, 2025 ^{JTC}

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SC Court of Appeals

To the Honorable Judge Doby:

This memorandum accompanies a sealed Verified Bill in Exclusive Equity De Novo, tendered under conscience, not law, for in camera review and possible Special Judge appointment and Special Term designation, **as contemplated in [S.C. Code § 14-5-310 and § 14-5-220]**

[14-5-920 & 14-5-930]

This matter arises solely under the doctrines of trust, conscience, and Exclusive Equity, wherein the court is respectfully called to act **in personam**, not in rem, to protect the res of the private trust and the duties of its lawful Trustee from **trespass**.

The Verified Bill and supporting instruments were previously lodged with the Clerk of the Court of Common Pleas, Clarendon County, and received under seal, as attested by Clerk Shanita Brangman on August 18, 2025, and subsequently stamped by the South Carolina Court of Appeals, which also received a parallel lodgment. This confirms **acceptance of the matter at both levels**, though no review occurred by a conscience-seated judge.

A final order was issued at law on October 23, 2025, by Judge Clifton Newman, who was reassigned in absence of another presiding judge. Said order was issued without equitable or conscience jurisdiction. I respectfully assert that this further affirms the **absence of remedy in law**, and solidifies necessity for equitable intervention, **as preserved under the [Judicature Acts of 1873 and 1875]**, where Exclusive Equity prevails where law fails.

Furthermore, I hereby challenge the standing of any attorney, including James Page, to appear in this matter without first demonstrating authority and capacity to proceed in Exclusive Equity. This Court is respectfully reminded that no presumption of legal representation attaches in conscience proceedings. Equity demands clean hands and true party interest, and will not allow colorable authority or commercial status to cloak defects in standing.

Maxims:

- *"Exclusive Equity sees not a fiction."*
- *"Exclusive Equity will not allow a statute to be used as a cloak for fraud."*

I appear not as a petitioner under statutory law, but as **Subrogee** and 'Steward' Trustee, having received the burdens and duties of the res, and therefore the rights to its equitable protection. As such, I stand in full conscience capacity under the doctrine of subrogation, and invoke the

Court's **exclusive equitable jurisdiction** to remedy the injury and trespasses where law offers none.

The enclosed materials include:

- Verified Bill in Exclusive Equity De Novo
- Affidavit of Lodgment and Clerk Acceptance
- Petition to Compel Proof of Standing
- Supporting Exhibits (Lodged under Private Seal)

This memorandum is submitted respectfully and privately, for conscience and chambers consideration.

With Honor and Clarity,

By: Samuel-Tucker: Collins Jr

Samuel-Tucker: Collins Jr.
Subrogee & 'Steward' Trustee
STCJ Network Revocable Living Trust
Clarendon County, South Carolina

Notice: This memorandum and attached lodgments are not public filings, but private and conscience-based presentations under Exclusive Equity. All service has been executed privately and with acknowledgment.

Footnote:

This lodgment invokes Exclusive Equity as preserved under the Judicature Acts and S.C. Code § 14-5-310 and § 14-5-220. The conscience of the Court, not the rules of pleading or form, shall determine sufficiency.

— Pomeroy: "Where law sleeps, equity must awaken."