

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

RECEIVED
FEB 12 2026
SC Court of Appeals

Linda Kennedy and Marsha Fink

Appellants

v

OBJECTIONS FROM AN OUTSOURCED
LAWYER FROM PARTNER BECKY
LAFFITTE'S FIRM, AS A TOTAL CONFLICT
OF INTEREST AND SHE NEEDS TO BE
DISQUALIFIED IMMEDIATELY

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

Not Proofed due to Disabilities.

Standing Objection to the Style of the Case

COMES NOW DR. LINDA KENENDY, AND DR. MARSHA FINK, Pro se, (hereinafter, "P-
Appellants), fighting many Disabilities that are greatly affected their ability to proceed

without their demand for REASONABLE ACCOMMODATIONS, NEVER RULED UPON, and note these objections herein.

As is known by the Court, a Ms. Jasmin Smith, Lawyer in the Laffitte firm, Objections are **NOT A MOTION**. . .NOTICES OF OBJECTIONS ARE NOTICES AND a Ms. Smith who should not be a part of this case, IGNORED THE ACTUAL ADA MOTION IN YOUR NON-ORDER LETTER ON OR ABOUT JANUARY 20, 2026, to help the Courts NOT HEAR a Federal, mandatory compliance Motion regarding the clearing up of the purposeful Vague Orders from the Court in the past that are evading having to provide these Reasonable Accommodations. Please stop Obstructing P-Appellant meaningful due process and right to a full Appeal Presentation.

OBJECTIONS In Regard to a Jasmin Smith, a Laffitte Lawyer, acting as an alleged Deputy Clerk for the Appeals Court, which it appears she is not and has not been since the mid-2000's, and is writing and filing in P-Appellants a letter, positioning it as an alleged Order (small "o") within the correspondence she sent, which it isn't an Order, nor is the opinion from the Judges or signed by the Judges as necessary when dealing with anything more than administrative/ministerial work, and you are not authorized to refuse to take action on or twist what is a Motion/Notice of Objection and even leave out the most important part of the document. . .the MOTION which is not the Objection clearly.

If the Court is planning to break a Federal Law mandated for compliance in SC, tied to Federal Money and to Constitutional Due Process and Fraud on the Court claims within

the ADA side-stepping, a judge(s) need to do it in a REAL Order, that is appealable and reviewable in Courts and other agencies and venues, and is clear, not vague.

P-Appellants OBJECT to the outsourcing judicial duties with Ms. Smith manipulating a false writing of an alleged “order” by letter, obstructing P-Appellants right to a fair and neutral hearing, where Orders are not Orders but letters that are not Orders.

P-Appellants OBJECT to any involvement of Ms. Smith in our case as their are very large conflicts that create an actual impropriety and not just an appearance, which neither have to be proven, but are the opinion of a “reasonable man.”

P-Appellants **OBJECT** to someone speaking as a judge who is not, and alleges to be a current SC Appeals Court Deputy Clerk when her own records and the state state otherwise. This appears to be yet another outrageous trick of the SC LMCE Courts and needs to cease and desist.

P-Appellants **OBJECT** to targeting P-Appellants and their meritorious Murdaugh-Style case, a partner of a Laffitte attorney, to be involved in P-Appellants case, when the Murdaugh/Laffitte criminal convictions and their frauds on the People, are a part part of P-Appellants facts, issues, and legal arguments. A conflict of interest/appearance and actual impropriety.

P-Appellants **OBJECT to an alleged current** Deputy Clerk, who cannot give Orders or write letters where they are determining the future of P-Appellants case, in Obstruction of Justice. Ms Smith cannot claim orders or give judicial opinions, and refuse to provide an Order from a Judge and signed by a Judge, with a real Opinion by a Judge, which is

mandatory in court proceedings to preserve the record and make clear to P-Appellants the Orders in clear, not ambiguous language, that must also be based on the real facts and real motions, and not continues to use knowingly fake rather than real law, (which, as you know, is not Rule 221(c) used by Appeals Courts for the remitter of a case back to Trail Courts, and obviously not relevant herein).

P-Appellants **OBJECT** to using Rule 221(c) improperly after notice, to do all of the following: to illegally clean up all the vague Opinions and other misquotes, erasing quotes to avoid letting the record reflect and appear as P-Appellants demanding a REAL, CLEAR ADA opinion granting/denying, reasons, and clearly taking into account P-Appellant individual needs, that they explained in detail as P-Appellants provided way more material and information than is required by law, including two letters from an ADA Advocate, and so forth, but still no Opinion. Appellate Courts and especially outsource contractors, cannot lawfully recast a clarification request as “reconsideration” under the wrong law.” The law is clear that substance controls over form. Clarification requests are not reconsiderations or rehearing even when using the right law.

P-Appellants further, OBJECT to accept procedural mislabeling or erasing labeling where the Motion is purposely confused with Objections where Objections are not a motion and the actual motion demanding clarification on the ADA Order, is erased from the record by making the Order a letter, quoting alleged “Motion of Objections, instead of the ADA demand for clarity, and where a letter is not an Order. Appellate Courts cannot lawfully recast a clarification request as anything but that, and then also use the wrong law to do it.” The law is clear that substance controls over form. And purposeful vagueness is a

Constitutional due process combined to ADA noncompliance, weaponizing P-Appellants Disabilities the Courts cause against their right to meaningful due process and their right to present a full Appeal.

P-Appellants further OBJECT to: The improper refusal of the Appeals (and Trial and Supreme Court, to rule by falsely calling the request a “reconsideration” or not addressing the actual Motion for ADA reasonable accommodations construed most favorably to the Disabled, for block-90 days and 200 pages necessary to overcome some of the Disabilities enough to present a due process full Appeal; The misuse of Rule 221(c) (trial-court rule) instead of Rule 241 which is not ripe for usage yet, SCACR; The fact that the issue was never ruled upon in the first place; The ADA reasonable accommodation request is the least restrictive means, given to physically healthy litigants like in the Murdaugh case; The disparate treatment compared to high-profile cases even when they do not have ADA Disabilities, is discriminatory Desperate Treatment, (e.g., Murdaugh); The due process and access-to-courts violations; The institutional conflict of interest in concealing trial-court criminality, and the use of a Laffitte Attorney, where Murdaugh/Laffitte and others involved in the Murdaugh case are in issue in this case raises more intentional Conflicts of Interest, and Ms. Smith needs to disqualify and leave P-Appellants and their case alone.

P-Appellants Object to the Courts refusing to clarify, ADA Reasonable Accommodation requests, that must be liberally granted and construed in favor of the Disabled. This seems like such an easy task, that if the Judges wanted their ruling/nonruling to be clear, logic then says, the Courts, are purposely trying to obstruct justice and make what must be clear, unclear and vague, with the newest trick to outsouse

to Laffitte's firm, and have an old clerk from 10 or more years ago, suddenly writing letters in our record, claiming to be Orders which is ludicrous. This demands recusals as the Court cannot be biased and neutral at the same time, and P-Appellants have seen enough of the bias to be convinced that a reasonable man would see it too.

Please note these Objections in our record by a real Clerk. . .that are not Motions, but for building the most bizarre record to tag alone with whatever that was at the Trial Court LMCE. Thank you.

 1/30/26

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Respondents.

Appellate Case No. 2025-000859

PROOF OF SERVICE

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 the **NOTICE OF OBJECTIONS** 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 January 30, 2026.

DATE: January 30, 2026



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Attn: Emily Heid

Handwritten: WJN
02/11/26



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