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**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

**APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas**

**The Honorable Daniel Coble, Chief Administrative Judge**

**Civil Action No.: 2026-CP-40-00645**

**Appeal Number: 2026-000348**

**Ubong Christopher Ubokudom.....Petitioner/Appellant,**

**v.**

**University of South Carolina .....Defendant/Respondent.**

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**Petitioner’s Reply to Respondent’s Return to Petition for Writ of Mandamus**

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- C. *Wall v. S.C. Dep't of Health & Env't Control*, 438 S.C. 302, 882 S.E.2d 163 (Ct. App. 2022) (Irreparable Harm and Injunctions).

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## INTRODUCTION

Petitioner, Ubong Christopher Ubokudom, appearing *pro se*, respectfully submits this Reply to the Respondent's Return regarding **Appellate Case No. 2026-000348**.

**Denial of Fault: By the University stating they deny any fault on this matter when the evidence is so obvious is insulting and hurtful to my daughter and I.** Because of their inability to identify the mistake and correct the problem, it is clear that they do not see this matter as an emergency for my daughter and I, and this is extremely disheartening. Their paralysis and their lack of initiative to take steps to correct their errors continues to inflict even more irreparable harm on us. Petitioner respectfully requests that the Court consider the merits of the Petition based on the undisputed facts presented in this case. Their blatant denial justifies the means in which I have taken to seek judicial intervention and justifies the judgement I have asked for in the second amended complaint. For a University to act with such recklessness, gross negligence, and willful and wanton neglect is inconceivable when the evidence has been so apparent; their conduct must be reflected in the relief granted by this Court. The Respondent's continual denial has created a state of **collateral liability**, as their conduct continues to inflict **direct and indirect irreparable harm** upon both the Petitioner and his minor daughter. By failing to acknowledge their fault and not acting accordingly, the University has moved beyond mere administrative delay and into a space of active, daily damage to the petitioner's educational interests and the legal interests of both the Petitioner and his daughter. **We need immediate relief, and it is clear we cannot wait for the University to take actions to provide us with the relief we need through direct communication. Judicial intervention is warranted to provide my daughter with the justice she deserves and provide me with an opportunity to advocate for my daughter through a legal education— it is the only remaining path to justice for my daughter.**

The Respondent's refusal to perform a simple administrative correction—despite the undeniable physical evidence of my student status—defies all institutional logic and standard academic procedure. This persistent obstruction suggests that the University is not merely acting with negligence, but is potentially acting under the influence of external pressures or interests aimed at preventing the Petitioner's entry into the legal profession. The targeted nature of this interference, combined with the University's tactical silence, creates a strong inference of bad faith. It appears that the University has abandoned its educational mission in favor of a calculated effort to obstruct the Petitioner's academic progression and, by extension, his ability to seek justice for his minor daughter.

The petitioner was treated differently than other students, as the University required the petitioner to make a payment for a debt before releasing his transcript. The University is utilizing coercive tactics that violate the public policy of the State of South Carolina. By withholding a transcript to collect a housing debt, the University is acting in bad faith and in breach of its contractual obligations to its students. Furthermore, the University did not uphold its end of the contractual agreement and the Petitioner is currently deprived of the \$961.00 now, which should be utilized for his active law school applications.

Institutions are supposed to promote the academic progression of their students, not obstruct it—**and in turn, obstruct justice.** Their actions may prevent the petitioner's successful progression into law school and prevent him from having the opportunity to represent his daughter in their current litigation. This situation is more than a legal dispute; it is a direct threat to my family's future.

## **I. STATEMENT OF ISSUES ON APPEAL**

1. Whether the Respondent's own affidavits, which admit that Petitioner was "accepted and registered for classes," create a ministerial duty to report Petitioner's status as "Registered/Withdrawn" rather than "Never Enrolled"?
2. Whether Respondent's continued reporting of "Never Enrolled" to the Law School Admission Council (LSAC)—despite physical evidence of Petitioner's student ID and financial payments—constitutes arbitrary and capricious government action?
3. Whether Petitioner has established irreparable harm justifying an Emergency Writ of Mandamus when the current reporting creates a "credibility trap" that effectively bars Petitioner from law school admission and professional licensure?
4. Whether the University's acceptance of \$961.01 specifically for "transcript release" and "housing debt" creates a binding obligation to provide the services associated with student status?
5. Whether Respondent's continued reporting of "Never Enrolled" constitutes a breach of ministerial duty when internal records explicitly admit enrollment?
6. The University's Registrar admitted in correspondence on January 20, 2026, that Petitioner "applied, were accepted, you registered and attended [classes]". This internal admission directly contradicts the "Official Non-Enrollment Letter" issued that same day.
7. Whether the University's refusal to release accurate records is "arbitrary and capricious" in light of Petitioner's full financial performance?
8. Petitioner entered a signed Repayment Agreement on January 12, 2026, wherein the University agreed to restore account status and release records. Official Receipt #655761 confirms Petitioner's performance of this contract via a \$961.01 payment.
9. Whether a "Never Enrolled" status is factually sustainable when federal funding and physical identification prove student status?
10. Official University Account Statements for the Spring 2025 term show a "\$0.00 Balance" and indicate that federal Pell Grant funding was attached to that term. Furthermore, Petitioner possesses a physical University Identification Card (USCID T07579056), which serves as physical proof of an established student record.
11. Whether Respondent's conduct establishes "Irreparable Harm" and a "Credibility Trap" for law school admissions?
12. The University's "No Record" falsehood was published to third-party services like Parchment. This has resulted in immediate career obstruction, evidenced by the Harvard Law School Notice (Feb 23, 2026), threatening the total destruction of Petitioner's professional future.
13. Whether University officials acted with subjective malice in obstructing Petitioner's legal career?
14. Internal communications from a University official on January 16, 2026, explicitly stated they "fail to see how [releasing a transcript] would benefit" the Petitioner. Such

statements demonstrate an intentional and malicious intent to obstruct Petitioner's professional life and personal safety obligations.

## II. STATEMENT OF THE CASE

- A. Petitioner initiated this action on February 17, 2026, by filing a Petition for Writ of Mandamus after a Motion for an Emergency Temporary Restraining Order (TRO) was denied due lack of proof of service in the Court of Common Pleas for Richland County. The action seeks to compel the Respondent, the University of South Carolina (“USC”), to correct its administrative records and cease the defamatory reporting of Petitioner as “Never Enrolled” to the Law School Admission Council (LSAC).
- B. On February 13, 2026, the trial court issued an order denying the Emergency TRO on procedural grounds, citing a lack of proof of service. However, Respondent had been served, which was evident in the electronic notifications represented in the Judge’s orders on February 13, 2026. Plaintiff filed another Renewed Emergency TRO on February 13, 2026, however, following the trial court’s failure to schedule an emergency hearing and the subsequent administrative paralysis in the lower court, Petitioner sought relief from this Court via an Emergency Petition for Writ of Mandamus and Motion for TRO on February 17, 2026.
- C. Despite Petitioner’s repeated attempts—totaling no fewer than fifteen (15) separate communications—to coordinate a briefing schedule and hearing with Respondent’s counsel, Respondent remained non-responsive until the filing of its Return on February 27, 2026.
- D. On February 20, 2026, Petitioner served a Second Amended Complaint increasing the prayer for relief to \$1,000,000,000.00 to reflect the escalating reputational damage and the destruction of Petitioner’s professional career path caused by Respondent’s continued misrepresentations. This matter now comes before this Court for a determination on the merits of the Emergency Petition.

## III. STATEMENT OF FACTS

- A. **Acceptance and Registration** In late 2024, Petitioner applied for and was accepted into the University of South Carolina for the Spring 2025 semester. As admitted by the Respondent in the **Attachments 4A and 4B, (Ex. A, ¶ 4) & (Ex. B, ¶ 4)**, Petitioner was not merely an applicant, but was "**accepted and registered for classes.**" Consistent with this status, the University issued Petitioner a Student ID card, granted access to the "Self Service Carolina" student portal, and authorized the receipt of Financial Aid.
- B. **Academic Participation and Graded Coursework** During the Spring 2025 semester, Petitioner actively participated in his registered curriculum, including **Journalism 398** and **Spanish 109**. Contrary to Respondent’s assertions that no records exist, Petitioner completed coursework and received preliminary grades in these subjects. While

Respondent argues that "semester grades" were not finalized due to a mid-term administrative drop, the underlying academic activity and registration are historical facts that the University's record-keeping system currently suppresses.

- C. **Financial Transactions and Housing Debt** Respondent's claim that Petitioner was "never enrolled" is contradicted by their financial demands. Respondent maintained a "Housing Debt" against the Petitioner—a debt that can only be incurred by a student authorized to utilize University facilities. On or about December 2025, Petitioner entered into a **Repayment Agreement (Ex. G, Attachment 3)** and paid **\$961.01** to the University. This payment was made under the express representation by University staff that the "hold" on Petitioner's account would be lifted and his transcript released.
- D. **Administrative Misrepresentation to Third Parties** Despite the aforementioned registration, Student ID issuance, and acceptance of nearly \$1,000.00 in fees, Respondent issued a communication to the **Law School Admission Council (LSAC)** stating that Petitioner was "**Never Enrolled.**" This statement is factually inconsistent with the University's internal records and the sworn affidavits of its own Registrar and Bursar, both of whom acknowledge Petitioner was "registered."
- E. **Selective Enforcement of Policy** While Respondent argues that withholding the record is "standard procedure" under University Policy FINA 8.00, Petitioner was informed by administrative staff within the Office of the Registrar that the University does not, in practice, withhold transcripts solely due to outstanding debt. The University's refusal to provide a "Letter of Standing" or a transcript reflecting a "Withdrawal (W)" status—rather than a total erasure of his existence—constitutes an arbitrary and capricious application of administrative policy.
- F. **Irreparable Professional Harm** As a result of Respondent's inaccurate reporting, Petitioner is currently blocked from the Law School admission cycle. Because LSAC requires the disclosure of all institutions attended, Petitioner is trapped in a "credibility gap" created by the University: he must disclose his attendance at USC to remain ethical, but the University's "Never Enrolled" report makes his disclosure appear fraudulent. This administrative paralysis prevents Petitioner from pursuing his legal education and his stated goal of advocating for the civil rights of his minor daughter.
- G. Respondent's assertion that Petitioner was 'never enrolled' is not only factually false based on their own registration records but is also an attempt to circumvent the record-keeping standards established by the **Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g**. As a federally-funded institution, USC is required to maintain accurate 'Education Records' for all registered students. Their report of 'Never Enrolled' to a third party (LSAC) is a violation of the administrative accuracy required by both State and Federal standards.

#### IV. STANDARD OF REVIEW

- A. Writ of Mandamus A writ of mandamus is an extraordinary duty that lies to compel a public officer to perform a ministerial duty. *City of Rock Hill v. Thompson*, 306 S.C. 490, 412 S.E.2d 426 (1991). To prevail, the Petitioner must demonstrate: (1) a specific legal right; (2) a corresponding ministerial duty on the part of the Respondent; and (3) the absence of any other appropriate or adequate remedy. *Id.* A duty is "ministerial" when it is "prescribed and defined by law with such precision and certainty as to leave nothing to the exercise of discretion or judgment." *S.C. Dep't of Soc. Servs. v. J.N.T.*, 440 S.C. 191, 890 S.E.2d 589 (Ct. App. 2023).
- B. Preliminary Injunctive Relief The standard for granting an emergency injunction or TRO requires the Petitioner to show: (1) a likelihood of success on the merits; (2) a threat of irreparable harm if the injunction is not granted; and (3) that the Petitioner has no adequate remedy at law. *Wall v. S.C. Dep't of Health & Env't Control*, 438 S.C. 302, 882 S.E.2d 163 (Ct. App. 2022). In balancing the equities, the Court must consider whether the harm to the Petitioner outweighs any potential burden on the Respondent.
- C. Arbitrary and Capricious Standard Administrative actions by a state institution may be set aside if they are "arbitrary, capricious, or characterized by an abuse of discretion." *Porter v. S.C. Pub. Serv. Comm'n*, 333 S.C. 12, 507 S.E.2d 329 (1998). An action is arbitrary when it is "without a rational basis" or is "founded on prejudice or preference rather than on reason." *Id.*

## V. ARGUMENT

Petitioner, Ubong Christopher Ubokudom, appearing *pro se*, respectfully submits this Reply to Respondent's Return. Respondent's defense rests on a semantic shell game—claiming Petitioner was "never enrolled" while simultaneously admitting in sworn affidavits that he was accepted, registered, and billed.

### A. RESPONDENT'S OWN EXHIBITS PROVE THE "ENROLLMENT" WAS REAL

1. Respondent's Return hinges on the claim that Petitioner has no transcript because he was "never enrolled." Yet, Respondent's own evidence contradicts this:
2. **Affidavit of University Registrar (Ex. A, ¶ 4):** "Plaintiff attempted to enroll... He was **accepted and registered for classes.**"
3. **Affidavit of University Bursar (Ex. B, ¶ 4):** "Plaintiff attempted to enroll... He was **accepted and registered for classes.**"
4. In the affidavits the University mentions I attempted to enroll. You can't attempt to enroll. You are either enrolled or not enrolled. Their conversations in emails contradict their affidavit statements. This can be found in email communication between the University and I, Exhibit A of attachment 3.
5. **The Contradiction:** One cannot be "registered for classes" without being a student. Respondent issued a **Student ID Card** (Exhibit B, attachment 3) and accepted **Financial Aid** (Exhibit I, attachment 3). To tell LSAC that Petitioner was "never enrolled" is a documented falsehood that constitutes **Fraud and Defamation.**
6. In Affidavit B, #10., the University states "in full compliance with the standard procedure for non-payment of tuition, plaintiff was dropped from class rolls. A student removed from class rolls due to non-payment of tuition received no course grades for that semester. The tuition, academic fees, and financial aid were thus removed from this account, and his partial loan payment was returned to the lender." This is a contradiction because they sent a letter to LSAC stating I was never enrolled as a student. But in other emails stated I was enrolled. Even if they don't grant W's because of the policy they mention, they are still misrepresenting me to LSAC by stating I was never enrolled and committing defamation and fraud.
7. Even with this statement in # 15., in Affidavit B. "The termination of plaintiff's enrollment and the resulting lack of a transcript for the spring 2025 semester arises entirely from the standard procedure for handling non-payment." The University admits that I was enrolled.
8. The fact that the University is doubling down on the fact that I was never enrolled and not a student although my University ID and financial aid state otherwise is clearly an engagement in negligent, wrongful, unlawful, and indifferent conduct towards me. The

University staff members should not be at fault at all. The University is entirely at fault for having their staff members complete affidavits despite the evidence being so apparent. The University staff members should have never been placed in this situation and the University should have simply owned up to making an error.

9. Per Vocabulary.com the following is the definition of enrollment: Enrollment means the process of matriculating, or formally becoming a student at a university. **Once I was admitted, received a housing assignment, and a meal plan I was officially a student.**
10. **Under the federal Family Educational Rights and Privacy Act (FERPA)**, which the University is bound by law to follow, 'Education Records' are defined as records directly related to a student and maintained by an educational institution. Because Petitioner was accepted and registered (as admitted in Respondent's Affidavits), a protected education record was created under federal standards. USC's attempt to 'delete' this status for state-court purposes violates the standard of care expected of a public university.

#### **B. The Fact of Enrollment is Irrefutable**

1. **Physical Evidence:** Petitioner was issued an official University Student ID, which serves as a prima facie confirmation of student status and access to University resources.
2. **Standard Practice:** No accredited University in the United States erases the historical records of a former student or claims a student never attended once a record has been created.
3. **The Transcript Contract:** As established in Exhibit G attachment 3, the University entered into a contract to release transcripts, an act they would not perform for a non-student.

#### **C. THE "NON-PAYMENT" ARGUMENT IS A RED HERRING**

1. **The \$961.00 Fact:** Respondent admits they took \$961.00 from Petitioner to release a transcript. If no transcript existed to be released, taking the money was **Theft by Deception.**
2. **The "W" (Withdrawal) Standard:** In Paragraph 15 of the Return, Respondent admits the "lack of a transcript... arises entirely from the standard procedure for handling non-payment." This proves the lack of a record is an **administrative choice**, not a biological or physical impossibility. Respondent has the power to issue a record reflecting the registration; they are simply choosing to suppress it.

#### **D. ACTUAL AND REPUTATIONAL HARM (LSAC AND DEFAMATION)**

1. Respondent's suggestion that Petitioner simply "remove USC" from his LSAC profile is an invitation to commit **Academic Fraud.** \* LSAC requires applicants to list **all** institutions attended. Because USC issued an ID and registered Petitioner for classes, he *must* list them.

2. By USC sending a "Never Enrolled" letter to LSAC, they have created a "Credibility Gap" that suggests Petitioner is lying on his law school applications. This is **Defamation Per Se** and has stalled Petitioner's ability to secure scholarships and admission, causing **Irreparable Harm**.

#### **E. THE \$961.00 "DEBT" VS. "REFUND" CONTRADICTION**

1. Respondent's Exhibit G in attachment 3 shows a "Repayment Agreement" signed in **January 2026**. If Petitioner was "never a student" and "never enrolled," there would be no basis for a debt, no basis for a repayment agreement, and no basis for the University to hold \$961.00. Respondent cannot have it both ways: either Petitioner was a student who owed money, or he was a stranger they defrauded of \$961.00.

#### **F. THE "ACADEMIC INTEGRITY" DEFENSE: DEFAMATION PER SE**

1. Respondent's Return callously suggests that Petitioner should simply "remove USC" from his LSAC profile. This is not a solution; it is an invitation to commit **Academic Fraud**.
2. **The Ethics Trap:** LSAC mandates that applicants list **every** institution attended, regardless of whether credit was earned. Because USC admitted Petitioner, registered him for classes, and issued him a permanent Student ID (Exhibit B, attachment 3), Petitioner is legally and ethically bound by LSAC's Rules of Conduct to disclose this attendance.
3. **Defamation Per Se:** By reporting a "Never Enrolled" status to LSAC in the face of Petitioner's mandatory disclosure, Respondent has created a "Credibility Gap." This discrepancy makes Petitioner—a prospective law student—appear dishonest to admission boards. Imputing a lack of integrity in one's profession or trade constitutes **Defamation Per Se** under South Carolina law (citing *Holtzscheiter v. Thomson Newspapers, Inc.*).
4. **The "Credibility Trap" as Irreparable Harm:** Respondent's suggestion that Petitioner should simply "misrepresent" his history by omitting USC further demonstrates their arbitrary and capricious approach. Petitioner has been forced to submit "Addendums of Explanation" to every law school he has applied to, which halts the review of his file. This delay causes immediate and irreparable harm by:
  - A. Excluding Petitioner from merit-based scholarship considerations as funds are depleted;
  - B. Preventing the review of his application while class seats are filled by other candidates; and
  - C. Creating a permanent "character and fitness" red flag that will haunt Petitioner through the Bar Admission process.

## G. REFUTING THE "NO GRADED COURSEWORK" NARRATIVE

1. Respondent claims Petitioner has no "grades." This is a lie.
2. The petitioner received grades for **Journalism 398** and **Spanish 109**. While he did not receive "semester grades" because the University dropped him mid-term for non-payment, the coursework and attendance records exist.
3. USC is intentionally suppressing the "W" (Withdrawal) status that other students receive, choosing instead to "erase" Petitioner's existence to avoid accountability.

## H. Unequal Treatment and Discriminatory Standards

1. Respondent argues that his transcript should not reflect "W" (Withdrawal) grades for the relevant period, Petitioner asserts he is being held to a different standard than other students.
2. **Disparate Treatment:** In standard University procedure, students facing similar administrative or personal exigencies are routinely granted "W" grades to reflect their withdrawal from courses.
3. **Unnecessary Litigation:** Other students in the same situation are not forced to seek extraordinary legal remedies or file Writs of Mandamus simply to have their academic records accurately reflect their history. The Respondent's refusal to apply standard record-keeping practices to the Petitioner constitutes a violation of his legal rights as a student.
4. Every university in the U.S is required to release transcripts for former students even if a degree or diploma is not granted.

## I. THE "COLLATERAL LIABILITY" OF ADMINISTRATIVE PARALYSIS

1. **Tactical Delay as Irreparable Harm:** As detailed in the Declaration of Petitioner (Attachment 1), Petitioner has made fifteen (15) documented attempts to resolve this administrative error. Respondent's strategy of "silence and extension" is more than mere bureaucracy; it is a tactical attempt to "run out the clock" on the Fall 2026 Law School cycle. Under South Carolina law, a delay that effectively destroys a person's professional opportunity constitutes irreparable harm for which there is no adequate remedy at law (*Wall v. S.C. Dep't of Health & Env't Control*).
2. **The Lower Court's Overlooked Service:** The Trial Court's initial denial of the Emergency TRO was predicated on a factual error—the mistaken belief that Respondent had not been properly served. As shown in the record, Respondent had been served; the Trial Court's failure to recognize this service resulted in an 80-day delay that has left Petitioner without a forum for relief, necessitating this Court's immediate intervention.

3. **The Family Impact and the "Gatekeeping" Defense:** Respondent callously dismisses the impact of this delay on Petitioner's ability to represent his daughter's interests. While Respondent notes that a licensed lawyer must represent the daughter, they ignore the central issue: Respondent is "blocking the gate" to that very license. By reporting "Never Enrolled," Respondent has created a "character and fitness" barrier that prevents Petitioner from entering the legal profession to provide the advocacy his family requires.
4. **Equity and Public Interest:** The Respondent's conduct—accepting a \$961.01 payment for a "transcript release" while simultaneously reporting "No Record" to the LSAC—is the definition of bad faith. This Court should consider the direct impact on Petitioner's daughter and his future career as a primary factor in granting the requested relief, as the public interest is never served by allowing a state institution to maintain a demonstrably false record.

**J. Notice of Second Amended Complaint and Increased Damages** Petitioner notifies this Court that he has served and filed a **Motion to Amend Complaint** and a **Second Amended Complaint** in the trial court.

1. **Reflecting Cumulative Harm:** The amendment changes the compensation amount to reflect the severe and extended harm caused by the Respondent's actions.
2. **Harm to Petitioner and Minor Child:** The Respondent's continued denial of accurate records has not only stalled the Petitioner's professional life but has caused direct emotional and legal harm to his minor daughter, as the Petitioner's ability to advocate for her depends on his own academic and professional standing.
3. **Fact of Enrollment.** Petitioner's Student ID and the University's own transcript release contract (Exhibit B and Exhibit G, attachment 3) irrefutably confirms his status as a student. No University in America erases the historical records of a former student.
4. **Disparate Treatment.** Other students in similar situations are routinely granted Withdrawal ("W") grades without being forced to seek a Writ of Mandamus. Petitioner is being held to a discriminatory and unnecessary standard.

#### **K. REBUTTAL: THE "NON-ENROLLMENT" FICTION VS. PHYSICAL EVIDENCE**

1. Respondent's Return rests on a blatant factual misrepresentation: the claim that Petitioner "never enrolled." This is not an administrative opinion; it is a demonstrable falsehood that constitutes **Defamation Per Se**.
2. **The Enrollment Reality:** Legally and factually, enrollment occurs at the moment a student is accepted, signs an enrollment contract, and is assigned courses. As shown in **Exhibit B (Student ID)** and **Exhibit G (Financial Receipt)**, the University treated Petitioner as a student for all purposes—including housing, ID issuance, and debt collection—until it became convenient to deny his existence to the LSAC.

3. **The "Graded Coursework" Contradiction:** Respondent's assertion that Petitioner had "no graded coursework" is factually incorrect. Petitioner received specific grades for **Journalism 398** and **Spanish 109** during his period of attendance. While these may not have resulted in final "semester grades" due to the mid-term withdrawal, the existence of this coursework further confirms the University's internal records are being selectively reported to this Court.
4. **Policy vs. Duty:** Respondent argues their "policy" prevents issuing "W" grades for non-payment. While Petitioner disputes this as being contrary to standard academic practice, the central issue remains: **The University cannot use a grading policy as a license to lie about the fact of attendance.**
5. If the University chooses not to list "W"s, they are still under a **ministerial duty** to report a status that is factually true—such as "Registered/Withdrawn" or "Withdrawn for Non-Payment." Reporting "Never Enrolled" to the LSAC is an affirmative misrepresentation that creates a permanent, false "black mark" on Petitioner's character and fitness.

#### L. ESCALATION OF DAMAGES AND COLLATERAL LIABILITY

1. The Petitioner's Second Amended Complaint, submitted herewith as a supplemental filing, formally increases the demand for damages to **\$1,000,000,000.00 (One Billion Dollars)**. This escalation is not merely a reflection of the initial administrative errors, but a direct consequence of the Respondent's continued, willful, and wanton refusal to remedy these errors in the face of an active emergency.
2. The Respondent's lack of urgency and persistent inaction has created a state of **collateral liability**, as their conduct continues to inflict direct and indirect irreparable harm upon both the Petitioner and his minor daughter. By failing to act, the University has moved beyond mere administrative delay and into a space of active, daily damage to the Petitioner's educational interests and the legal interests of both the Petitioner and his daughter.

#### M. *RES IPSA LOQUITUR*: THE EVIDENCE SPEAKS FOR ITSELF

1. Petitioner's status as a student is not a complex factual dispute requiring discovery or weeks of investigation; rather, it is a matter of **Res Ipsa Loquitur**—the evidence speaks for itself.
2. The University's position is defeated by a simple, undeniable syllogism:
  - **Major Premise:** The University of South Carolina issues official Student Identification Cards only to individuals who are admitted and enrolled as students.
  - **Minor Premise:** Petitioner possesses an official University Identification Card (**USCID T07579056**) featuring his name and photograph (Exhibit B).

- **Conclusion:** Petitioner was an admitted and enrolled student.
- 3. It is a logical and administrative impossibility for an individual to "never exist" in a university's system while simultaneously possessing a permanent, photo-bearing credential issued by that same system.
- 4. It should not take a public university more than one hour to correct an administrative record for a student who was clearly admitted, enrolled, issued a housing contract, and assigned a unique USCID. The University's continued refusal to acknowledge this "speaking fact" is the very definition of **arbitrary and capricious conduct** that warrants the immediate issuance of a Writ of Mandamus.

## **O. REBUTTAL TO RESPONDENT'S ARGUMENT REGARDING ENTITLEMENT TO MANDAMUS AND INJUNCTIVE RELIEF**

Respondent argues that Petitioner fails to meet the high bar for a Writ of Mandamus or an Emergency TRO. This argument is based on a fundamental mischaracterization of both the facts and the law.

### **1. Petitioner Has a Clear Legal Right to an Accurate Academic Record**

- A. Respondent asserts that because Petitioner was dropped for non-payment, no "duty" exists to provide a transcript. This is legally incorrect.
- B. **The "Registration" Right:** Respondent's own Affidavits (Ex. A and B, ¶ 4) admit Petitioner was "**accepted and registered for classes.**" Under South Carolina law and University policy, "Registration" is a distinct administrative act that creates a record.
- C. **Ministerial vs. Discretionary:** While a University has *discretion* over what grades to award, it has a **ministerial duty** to accurately report a student's status. Reporting "Never Enrolled" to LSAC when the University's own records show "Registered" is a breach of that ministerial duty. Mandamus is appropriate here to compel the University to perform the non-discretionary act of correcting a demonstrably false status.
- D. Respondent claims that withholding Petitioner's record is 'standard procedure' for non-payment. However, Petitioner was informed by a staff member within the Office of the Registrar that the University **does not withhold transcripts solely due to outstanding debt.** This suggests that the University's current refusal is not a 'standard' administrative act, but rather an **arbitrary and discriminatory** application of policy specifically targeted at the Petitioner.
- E. Respondent's own Exhibits provide the 'smoking gun' regarding Petitioner's status. Exhibit H, attachment 3 and attachment 4 (Bursar Affidavit) confirms that Petitioner paid **\$961.00** toward a housing debt. Legally, one cannot owe 'student housing debt' unless one is a student. By accepting nearly \$1,000 to resolve a housing balance and promising a transcript release in return, the University **judicially admitted** that Petitioner was an

enrolled student. They cannot now claim Petitioner 'never existed' in their system simply because it is legally convenient for their defense.

## 2. Irreparable Harm: The "Credibility Trap"

- A. Respondent callously suggests that Petitioner suffers no harm because he can simply "remove USC" from his LSAC application. This is a dangerous invitation to commit academic fraud.
- B. **Mandatory Reporting:** LSAC and Law School Admission Boards require applicants to disclose *every* institution attended. Because USC issued Petitioner a Student ID and accepted \$961.00 in payments, Petitioner is ethically and legally bound to list USC.
- C. **The Defamation Harm:** By USC reporting "Never Enrolled," they create a direct conflict with Petitioner's sworn application. This makes Petitioner appear dishonest to every law school in the country. This loss of professional reputation and the potential permanent bar from the legal profession constitutes **irreparable harm** that money damages alone cannot fix.
- D. **Personal Statement:** Petitioner holds the Columbia, South Carolina community in high regard. The decision to initiate this action was made only after exhausting all other avenues and was born of the necessity to protect the legal rights of the Petitioner and his minor daughter. While it is regrettable that external administrative failures have necessitated this level of judicial intervention, Petitioner seeks a resolution that restores a functional relationship with the institution. When I was accepted and enrolled at the University of South Carolina, I was proud to be a student and was excited to be provided with all the benefits and opportunities of a USC education. However, in order for the University to maintain the esteem and honor I have long held for it, the institution must act in accordance with its mission and do what is best for its students.

## 3. LIKELIHOOD OF SUCCESS ON THE MERITS

- A. Respondent's defense is built on a fatal logical contradiction. They cannot argue, on one hand, that Petitioner was "never a student," while arguing, on the other hand, that he owes over a thousand dollars in "**housing debt**" (as seen in the Bursar's Affidavit, Attachment 4B).
- B. **The Financial Estoppel:** If Petitioner was "never enrolled," he could not, as a matter of law or University policy, incur a housing debt or a tuition balance. By asserting these debts exist—and by accepting Petitioner's **\$961.01 payment** toward the housing debt (Exhibit G)—the University has made a **judicial admission** that Petitioner was a registered student.
- C. **The "Smoking Gun":** If Petitioner owed tuition and was subsequently dropped from courses due to non-payment, he was, by definition, a **registered student** at the time the debt was incurred. One cannot "withdraw" or be "dropped" from a status one never held.

- D. Petitioner is highly likely to succeed on the merits because Respondent's own exhibits and affidavits provide the "smoking gun" evidence that proves Petitioner's status. The University is attempting to enjoy the financial benefits of Petitioner's enrollment (by collecting fees) while denying the administrative obligations of that same enrollment. This is the definition of **arbitrary and capricious conduct**.

#### **4. THE BALANCE OF EQUITIES FAVORS THE PETITIONER**

- A. The "harm" to the University in accurately reporting a student as "Registered/Withdrawn" is **de minimis**. It requires nothing more than a simple clerical data entry correction to reflect the reality already admitted in the University's own internal records and affidavits.
- B. In stark contrast, the "harm" to the Petitioner is **total and irreparable**. The University's refusal to correct the record has resulted in:
- The potential destruction of Petitioner's Fall 2026 Law School aspirations;
  - A permanent "character and fitness" cloud over his professional reputation; and
  - The obstruction of his ability to gain the legal licensure necessary to advocate for his minor daughter's civil rights and safety.
- C. There is no public interest served by allowing a state institution to maintain and publish a demonstrably false administrative record. Because the University faces no prejudice by being forced to tell the truth, while the Petitioner faces the ruin of his professional future, the balance of hardships tips **decidedly** in favor of the Petitioner.

## **VI. CONCLUSION**

**R. PRAYER FOR RELIEF** Petitioner respectfully requests that this Court reject the Respondent's denials, grant the Writ of Mandamus, and order the immediate correction of Petitioner's records as requested in the Proposed Order.

**Petitioner respectfully requests that this Court:**

1. **Issue a Writ of Mandamus** directing the lower court to vacate the May 4, 2026, hearing date and schedule an immediate hearing on the merits of the underlying emergency motions, as the current delay constitutes a denial of a clear legal right;
2. **Order the Lower Court to schedule an immediate Rule 16(b) Initial Scheduling Conference** to establish a strict, expedited timeline for discovery, the mandatory production of Petitioner's academic records, and the filing of further motions;

3. **Grant an Emergency Temporary Restraining Order and Preliminary Injunction** to immediately prevent the Respondent from further misrepresenting the Petitioner's academic status and to compel the immediate release of accurate records during the pendency of this litigation;
4. **Order the Respondent to pay the sum of \$961.00** to the Petitioner immediately, representing the reimbursement of fees paid for transcripts and records that the Respondent has failed to provide or has accurately suppressed, causing direct financial loss;
5. **Grant the Proposed Second Amended Order** in its entirety; and
6. **Take notice of the Second Amended Complaint** and the \$1,000,000,000.00 in sought damages as part of the evolving record of harm, which reflects the additional damages and extended harm caused to the Petitioner and his minor daughter due to these ongoing delays.

**Respectfully,**

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Dated: 3/1/26

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**Ubong Christopher Ubokudom**  
P.O. Box 1594  
Columbia, SC 29202

**Pro Se Plaintiff**

**FORM 7**  
**PROOF OF SERVICE OF Petitioner’s Reply to Respondent’s Return to Petition for Writ  
of Mandamus and supporting documents**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Daniel Coble, Circuit Court Judge  
**Civil Action No.: 2026-CP-40-00645**  
**Appeal Number: 2026-000348**

**RECEIVED**

**Mar 02 2026**

**SC Court of Appeals**

Ubong Christopher Ubokudom , Appellant

v.

University of South Carolina, Respondent.

**PROOF OF SERVICE**

The undersigned hereby certifies that on March 1, 2026, a copy of the foregoing Motion to immediately grant petition, Petitioner’s Reply to Respondent’s Return to Petition for Writ of Mandamus, Attachment 1 (Declaration Petitioner), Attachment 2 ( Email log) Attachment 3 (Supplemental motion to file leave to amend Second Amended Complaint supporting documents: Memorandum in support of the motion and exhibits A-K, Attachment 4A Exhibit A – Affidavit of University Registrar, Attachment 4B Exhibit B – Affidavit of University Bursar, and Second Amended Proposed Order was duly served upon the Respondent concurrently via email and will be hand delivered on March 2, 2026 to:

Jacob Biltoft  
3700 Forest Dr.  
Columbia, SC 29204

Respectfully,



Dated: 3/1/26

**Ubong Christopher Ubokudom**  
P.O. Box 1594  
Columbia, SC 29202  
**Pro Se Plaintiff**

**STATE OF SOUTH CAROLINA IN THE COURT OF APPEALS**

Ubong Christopher Ubokudom, Appellant, v. The University of South Carolina,  
Respondent.

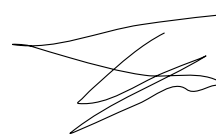
**Appellate Case No.: 2026-000348**

**ATTACHMENT INDEX**

- **Attachment 1:** Declaration of Petitioner.
- **Attachment 2:** Email Log documenting attempts at communication with Respondent’s counsel.
- **Attachment 3:** Supplemental Motion for Leave to Amend Second Amended Complaint and supporting documents, including Exhibits A-L.
- **Attachment 4A:** Exhibit A – Affidavit of University Registrar.
- **Attachment 4B:** Exhibit B – Affidavit of University Bursar.

**Respectfully,**

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Dated: 3/1/26

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**Ubong Christopher Ubokudom**

P.O. Box 1594  
Columbia, SC 29202

**Pro Se Plaintiff**