

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

SAMUEL TUCKER COLLINS, JR.,
the living man,

RCVD - USDC COLA S/
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Petitioner,

v. Case No. 2:26-mc-00086-RMG-MGB

Appellate Case No. 2025-002352
REBECCA MASSEY and
SHANITA BRANGMAN)

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SC Court of Appeals

Respondents.

PETITIONER'S LOCAL RULE 26.01 ANSWERS TO INTERROGATORIES

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None. Petitioner has filed no complaint and asserts no claims against any party. This is a miscellaneous docket for equitable lodgment purposes only, ancillary to Petitioner's pending state court appeal. The equitable doctrine of subrogation has been invoked by Petitioner in his Plea of Release (Dkt. No. 5) as an equitable principle, not as a basis for any claim by a third party.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: This is not a civil action. Petitioner has filed no complaint and asserts no claims requiring trial. This miscellaneous docket exists solely for equitable lodgment and record preservation ancillary to state court proceedings.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: Petitioner is a natural person, not a publicly owned company. This subsection does not apply.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: This miscellaneous docket was filed in the Charleston Division because the underlying state court proceedings involve real property located in Clarendon County, South Carolina, and the state court appeals are pending in Columbia, South Carolina. The Charleston Division is the proper venue for this ancillary miscellaneous proceeding.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

ANSWER: Yes. This miscellaneous docket is ancillary to **Collins v. West Palmetto Holdings, LLC**, South Carolina Court of Appeals Case No. 2025-002352, and the underlying Clarendon County proceedings:

- Magistrate Court Case No. CC 2024-CV-1410-100503
- Court of Common Pleas Case No. CC 2024-CP-1400-368

These state proceedings involve a writ of ejectment against Petitioner's real property. This federal miscellaneous docket exists to lodge equitable filings, preserve rights, and document proceedings related to that state action. The state court appeal remains pending.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable. This is not a civil action against any defendant. Respondents Massey and Brangman were named solely to satisfy administrative filing requirements. Petitioner has filed a Response to Court Order (filed March 11, 2026) withdrawing any and all claims against these individuals and clarifying that they are not proper parties to this miscellaneous proceeding. No amended summons or pleading is contemplated.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Petitioner makes no contention of liability against any party at this time. This miscellaneous docket is not an action for liability. Petitioner has, however, filed a Supplemental Lodgment: Equitable Bill of Revocation of Trust and Demand for Accounting naming certain individuals as Respondents and co-trustees in equity, not as defendants in a civil action for

damages. That filing seeks equitable relief—revocation, accounting, constructive trust, and injunction—not legal liability.

(H) [Parties or Intervenor in a Diversity Case.] In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to the party or intervenor.

ANSWER: Not applicable. Jurisdiction is not based on diversity of citizenship under 28 U.S.C. § 1332(a). This is a miscellaneous proceeding ancillary to state court litigation, invoking the Court's inherent equity jurisdiction.

I declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge and belief.

Executed this 12th day of March, 2026.

By: Samuel Tucker Collins Jr

Samuel Tucker Collins, Jr.
Grantor, Grantor-Beneficiary, and Grantee Absolute
2398 Hotel Street
Alcolu, South Carolina 29001
(803) 410-6608
stcnetwork@proton.me

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petitioner's Local Rule 26.01 Answers to Interrogatories was served upon the following by U.S. Mail on this 12th day of March, 2026:

Recipient

Address

Rebecca Massey, Clarendon County Register of Deeds

411 Sunset Drive, Manning, SC 29102

Shanita Brangman, Clerk of Court

3 West Keitt Street, Manning, SC 29102

Samuel Tucker Collins Jr

Samuel Tucker Collins, Jr.
Grantor, Grantor-Beneficiary, and Grantee Absolute

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