

STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

B. Alex Hyman, Circuit Court Judge

Appellate Case No. 2026-000493

---

**RECEIVED**

MAR 16 2026

SC Court of Appeals

The Hebert Daniel Tidik Revocable Living Trust,  
Brad Tidik,

Plaintiffs,

v.

Carol Tidik, Karen Tidik Sorensen, Jane Doe 1

Defendants.

of which Brad Tidik is the Appellant,

and

Carol Tidik, Karen Tidik Sorensen, Jane Doe 1 are the Respondents.

---

APPELLANTS MOTION AND BRIEF FOR RECONSIDERATION

---

Brad Tidik  
420 Eureka Rd.  
#352  
Wyandotte, Michigan 48192  
(734) 552-1452  
Appellant

TABLE OF CONTENTS

Table of Authorities.....1

Statement of Issues on Rehearing.....1

Parties to the Case.....2

Statement of the Case.....3

Facts of the Case.....3

Standard of Review.....3

Arguments

1. HAS THE COURT OF APPEALS COMITTED ERROR BY ORDERING THAT APPELLANTS INTERLUCTORY APPEALS ARE MANDATORILY DISMISSED INSTEAD OF APPLYING THE "ABUSE OF DISCRETION" STANDARD?.....4

2. HAS THIS COURT COMITTED ERROR BY FAILING TO RULE UPON DENIAL OF APPELLANTS REMOTE HEARING MOTION THAT DENIES RIGHTS OF DUE PROCESS, ACCESS TO THE COURT, AND EQUAL PROTECTION OF THE LAW?..4

3. DOES DENIAL OF DISCOVERY BY THE TRIAL COURT AFFECT THE SUBSTANCIAL RIGHS OF APELLANT TO SUCH AN EXTENT THAT FURTHER ACTIONS IN THE TRIAL COURT ARE FUTILE AS THIS CASE WILL BE INSTANTLY REVERSED ON ANY FINAL ORDER?.....4

4. DOES APPELLANT MEET REQUIREMENTS OF COMPELLING REASONS UNDER SOUTH CAROLINA LAW AND JUDICIAL BRANCH RULES?.....5

5. DOES APPELLANT MEET THE REQUIREMENTS OF COMPELLING REASONS UNDER FEDERAL LAW?.....8

6. WITH THE COURT MAINTAINING MORAL OR OTHER OBJECTIONS TO RCT, OR ADA, THROUGH IMPOSSIBLE STANDARDS THEN ARE THERE ALTERNATE METHODS TO ACCESS THE COURT HAVING EQUAL PROTECTION OF THE LAW FOR ALL PARITES?.....8

Conclusion.....9

Request for Relief.....9

TABLE OF AUTHORITIES

UNITED STATES CONSTITUTION

*U.S. Constitution*, 14th Amendment.....3,7

UNITED STATES CASES

*Boddie v. Connecticut*, 401 U.S. 371(1971).....3,6,7

UNITED STATES STATUTES

*Title II of the Americans with Disabilities Act* (1990).....3,6,8

SOUTH CAROLINA CASES

*Hagood v. Sommerville*, 362 S.C. 191 (2005).....3

*Hamm v. S.C. Pub. Serv. Comm'n*, 312 S.C. 238, 241,439 S.E.2d 852, 853 (1994).....3,4,5

*In re Remote Communication Tech.*, 2021-09-21-01, Appellate Case 2021-001032 (2021).....3,6,7

*Patel v. Patel*, 359 S.C. 515 (2004).....5

SOUTH CAROLINA STATUTES

SC Code § 14-3-330 (2024).....3,7

SOUTH CAROLINA OTHER AUTHORITIES

<https://www.sccourts.org/ada-compliance>.....3,6

## STATEMENT OF ISSUES ON REHEARING

1. HAS THE COURT OF APPEALS COMITTED ERROR BY ORDERING THAT APPELLANTS INTERLUCTORY APPEALS ARE MANDATORILY DISMISSED INSTEAD OF APPLYING THE "ABUSE OF DISCRETION" STANDARD?
2. HAS THIS COURT COMITTED ERROR BY FAILING TO RULE UPON DENIAL OF APPELLANTS REMOTE HEARING MOTION THAT DENIES RIGHTS OF DUE PROCESS, ACCESS TO THE COURT, AND EQUAL PROTECTION OF THE LAW?
3. DOES DENIAL OF DISCOVERY BY THE TRIAL COURT AFFECT THE SUBSTANCIAL RIGHS OF APELLANT TO SUCH AN EXTENT THAT FURTHER ACTIONS IN THE TRIAL COURT ARE FUTILE AS THIS CASE WILL BE INSTANTLY REVERSED ON ANY FINAL ORDER?
4. DOES APPELLANT MEET REQUIREMENTS OF COMPELLING REASONS UNDER SOUTH CAROLINA LAW AND JUDICIAL BRANCH RULES?
5. DOES APPELLANT MEET THE REQUIREMENTS OF COMPELLING REASONS UNDER FEDERAL LAW?
6. WITH THE COURT MAINTAINING MORAL OR OTHER OBJECTIONS TO RCT, OR ADA, THROUGH IMPOSSIBLE STANDARDS THEN ARE THERE ALTERNATE METHODS TO ACCESS THE COURT HAVING EQUAL PROTECTION OF THE LAW FOR ALL PARITES?

## PARTIES TO THE CASE

The Hebert Daniel Tidik Revocable Living Trust, Plaintiff-Appellant: Claiming fraud and misconduct by Respondents.

Brad Tidik, Plaintiff-Appellant: Claiming fraud and misconduct by Respondents.

Carol Tidik, Defendant-Respondent: Acted Voluntarily or Involuntarily to cause damage to Appellants, represented by Karen Tidik Sorensen who holds Power of Attorney of Respondent.

Karen Tidik Sorensen, Defendant-Respondent (hereinafter KTS): Acted to cause damage to Appellants, and is Trustee of Appellant The Hebert Daniel Tidik Revocable Living Trust, holds Power of Attorney of Respondent Carol Tidik

Jane Doe 1, Defendant-Respondent: Acted to cause damage to Appellants, Identity known to Respondent Karen Tidik Sorensen who refuses provide the identity of Respondent.

## STATEMENT OF THE CASE

On March 6, 2026 this court issued an order dismissing Appellants Claim of Appeal by a general ruling that Interlocutory Appeals must be mandatorily dismissed, in opposition to Abuse of Discretion standard claimed by Appellants. This court also failed to rule upon Appellants claim of denial of rights including Access to the Court that must be answered by this court.

## FACTS OF THE CASE

The trial court has effectively barred any means for Appellants to pursue this case and therefore the case is effectively terminated for Appellants. Upon the entry of any final order these exact Appellants claims will be brought forth on appeal, and being wholly unrelated to any facts of the case, will mandate instant reversal by this court.

The trial court has denied all discovery to date including discovery for the identity of Respondent Jane Doe 1. The 15th Circuit Court has *sua sponte* instituted general court polices for all cases that are an unlawful under State and Federal laws in denying Access to the Courts.

## STANDARD OF REVIEW

The standard of review for this interlocutory appeal is Abuse of Discretion by the trial court. *Hamm v. S.C. Pub. Serv. Comm'n*, 312 S.C. 238, 241,439 S.E.2d 852, 853 (1994)

Orders affecting a substantial right that effectively renders Appellants case moot as being unable to pursue facts and evidence to litigate the case, and therefore effectively ending the case for Appellants. *Hagood v. Sommerville*, 362 S.C. 191 (2005), SC Code § 14-3-330 (2024)

Appellant rights to Federal and State of Due Process, Access to the Courts, and Equal Protection of the Law for must be protected by the court. *U.S. Constitution*, 14th Amendment, *Boddie v. Connecticut*, 401 U.S. 371(1971), Title II of the Americans with Disabilities Act of 1990, *In re Remote Communication Tech.*, 2021-09-21-01, Appellate Case 2021-001032 (S.C. Sep 21, 2021), SC Code § 43-33-20 (2024), <https://www.sccourts.org/ada-compliance>

## ARGUMENTS

1. HAS THE COURT OF APPEALS COMITTED ERROR BY ORDERING THAT APPELLANTS INTERLUCTORY APPEALS ARE MANDATORILY DISMISSED INSTEAD OF APPLYING THE "ABUSE OF DISCRETION" STANDARD?

This court committed error in its March 6, 2026 order as Appellants claim of "Abuse of Discretion" by a trial court is immediately subject to appeal and therefore this courts order is required to be reversed. *Hamm v. S.C. Pub. Serv. Comm'n*, 312 S.C. 238, 241,439 S.E.2d 852, 853 (1994) **Exhibit A**

2. HAS THIS COURT COMITTED ERROR BY FAILING TO RULE UPON DENIAL OF APPELLANTS REMOTE HEARING MOTION THAT DENIES RIGHTS OF DUE PROCESS, ACCESS TO THE COURT, AND EQUAL PROTECTION OF THE LAW?

This court has committed error in its March 6, 2026 order as Appellants Claim of Appeal that contains in part the trial court order specified only as "Remote Hearing". **Exhibit B** Appellants claim of "Abuse of Discretion" by the trial court in simultaneously denying Access to the Court as stated herein is immediately appealable and this courts order must be reversed. *Hamm v. S.C. Pub. Serv. Comm'n*, 312 S.C. 238, 241,439 S.E.2d 852, 853 (1994)

Appellant had even noticed the trial court of the issues surrounding the sudden policy change by the 15th Circuit Court and the effect on Appellant. This is contained in Appellants trial court Motion for Rehearing in a "Interlocutory Appeal" section. **Exhibit C**

3. DOES DENIAL OF DISCOVERY BY THE TRIAL COURT AFFECT THE SUBSTANCIAL RIGHS OF APELLANT TO SUCH AN EXTENT THAT FURTHER ACTIONS IN THE TRIAL COURT ARE FUTILE AS THIS CASE WILL BE INSTANTLY REVERSED ON ANY FINAL ORDER?

Appellant had filed a Motion to Compel Discovery for Respondent Karen Tidik Sorensen (hereinafter KTS) that is Denied without comment by the trial court.

This motion requested that Respondent KTS is to be compelled to provide actual and specific answers to Appellant interrogatories. **Exhibit D**

Of critical importance to Appellants case, is that even though KTS has full knowledge Respondent Jane Doe 1, the trial court has ruled that Respondent KTS is not required to specifically answer the question of Respondent Jane Doe 1 as within Appellant Discovery being:

“3. Has the Defendant known as Jane Doe 1 ever been present at 4361 Copperhead Rd., Conway, SC to the best of your knowledge, information and belief.”

Appellants allege that Respondent KTS has already committed perjury and should she answer in the negative to this specific question then Plaintiff will move for 3<sup>rd</sup> party Interrogatories of Allen Thomas, Caroline Thomas, Stephanie Thomas, and others, to prove such perjury of the knowledge that Respondent KTS does have of Respondent Jane Doe 1. The above named are also Appellants witnesses in general items 7-10. **Exhibit D**

The Denial by the of discovery for Appellant by the trial court while allowing Respondent KTS to conceal the identity of Respondent Jane Doe 1 effectively terminates the majority of Appellants complaint. **Exhibit E**

What really is of stunning importance relating to the fraud shown from Appellants complaint is in that the property transfer of Respondent KTS is notarized by a Daryl Sorensen - whose name is one and the same as the husband of Respondent KTS. **Exhibit F**

Appellants now have no access to testimony and facts as stated in the complaint being "Undue Influence, Breach of Fiduciary Duty, Intentional Interference With Inheritance" and is such an Abuse of Discretion by the trial court that appellants case is rendered as futile to such an extent that it would be mandatorily reversed on appeal, and as such is immediately appealable. *Hamm v. S.C. Pub. Serv. Comm'n*, 312 S.C. 238, 241, 439 S.E.2d 852, 853 (1994) The trial court may also be ".. reasonably be questioned when his factual findings are not supported by the record." *Patel v. Patel*, 359 S.C. 515, 517 (2004)

4. DOES APPELLANT MEET THAR REQUIREMENTS OF COMPELLING REASONS UNDER SOUTH CAROLINA LAW AND JUDICIAL BRANCH RULES?

Appellant provides compelling reasons that this matter qualifies for RCT per *In re Remote Communication Tech.*, 2021-09-21-01, Appellate Case 2021-001032 (S.C. Sep 21, 2021),

(a), (2), (6) in that:

- a. Appellant Plaintiff is disabled per State and Federal law.
- b. Appellant is indigent per State and Federal law.
- c. Appellant receives Public Assistance per State and Federal law.
- d. Appellant is proceeding *in forma pauperis* in this matter.

Plaintiff has other compelling reasons that this matter is held RCT as per *In re Remote Communication Tech.*, 2021-09-21-01, Appellate Case 2021-001032 (S.C. Sep 21, 2021) in that:

- a. Appellant resides in The State of Michigan, and not in the State of South Carolina.
- b. Appellant is Indigent under State and Federal guidelines and unable to travel to South Carolina.
- c. Appellant is Disabled under State and Federal guidelines and unable to travel to SC.
- d. Any hearing up until the instant orders of 2025 were by RCT.
- e. Appellant was encouraged to select the venue of South Carolina as per its published RCT/ADA polices when the case was filed. <https://www.sccourts.org/ada-compliance>. **Exhibit G**

This recognized by the South Carolina Judicial Branch <https://www.sccourts.org/ada-compliance> as stated:

- a. "In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the South Carolina Judicial Branch will not discriminate against qualified individuals..."
- b. "*Effective Communication*: The South Carolina Judicial Branch will generally, upon request, provide appropriate aids and services leading to effective communication..."

c. "*Modifications to 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 engage in all of its programs, services, and activities."

Appellant protections to Due Process, Access to the Court, and Equal Protection of the Law are recognized per: *In re Remote Communication Tech.*, 2021-09-21-01, Appellate Case 2021-001032 (S.C. Sep 21, 2021), SC Code § 43-33-20 (2024):

a. (2) Constitutional Rights of Parties "...judges should not allow (or disallow) RCT to be used in a manner which would violate the rights of parties..."(emphasis added)

b. (6) Authority.. "permit...RCT unless the judge finds the use of RCT would likely to cause substantial prejudice to a party."

With Appellant denied the right to Access to the Court, while granting Respondents the right to Access the Court, also violates the right to Equal Protection of the Law.

Since the trial court made no substantive order as to the reason for denying Appellant access to the court, Appellant contacted the court clerks Brett Moorman and/or Jennifer Anderson who are familiar and stated that Appellant Motion to compel was Denied to Appellant only and exclusively for his inability appear in person. **Exhibit H**

Appellant was instructed by the above clerks the Horry County Court of Common Pleas had now instituted its own local Administrative Rules restricting RCT.

Appellant made demand of the clerk who stated the Local Rules to provide them, but this request is unanswered to this day as it appears no such Local Rule exists. **Exhibit I**

By all parameters Appellant Brad Tidik meets the standards for constitutionally rights to of Access to the Court. *Boddie v. Connecticut*, 401 U.S. 371(1971)

5. IS APPELLANT MEET THE REQUIREMENTS OF COMPELLING REASONS UNDER FEDERAL LAW?

Due Process, Access to the Courts, and Equal Protection of the Law are rights protected by the United States Constitution and have been denied Appellant. *Constitution*, 14th Amendment, *Boddie v. Connecticut*, 401 U.S. 371(1971), *Title II of the Americans with Disabilities Act* (1990)

Appellant also will preserve on appeal all FOIA requests with such stated in the trial court for cases that have, or have not, been held by RCT that has not yet been provided.

It must be noted that while barring all RCT hearings the trial court continues to mandate Settlement Hearings to be held by RCT in a bizarre twist involving Access to the Courts and as related to said unidentified local Local Administrative Rules as referenced herein.

6. WITH THE COURT MAINTAINING MORAL OR OTHER OBJECTIONS TO RCT, OR ADA, THROUGH IMPOSSIBLE STANDARDS THEN ARE THERE ALTERNATE METHODS TO ACCESS THE COURT HAVING EQUAL PROTECTION OF THE LAW FOR ALL PARITES?

Appellant has suggested in his motions that if the trial court has moral objections to ADA, RTC and/or the 14th Amendment then the court could simply:

- a. Require all parties to brief any motions to Appellate standards, and
- b. For the court to issue any order to Appellate standards, to the trial court that

Access to the Court must be made equal for all parties. By all parameters Appellant Brad Tidik meets the standards for constitutionally rights to of Access to the Court. *Boddie v. Connecticut*, 401 U.S. 371(1971)

## CONCLUSION

The Abuse of Discretion by the trial court in Denying Appellant even basic Discovery that renders further trial court proceedings as futile. Any final order of the trial court will require this case will be mandatory sent back for new proceedings, not based on any set of facts, but only on procedure that denied Appellants the ability to even gain or prove such facts.

With the trial court refusing, modifying, denying and objecting to the use of RTC/ADA and proceeding to Deny Appellants motions only and exclusively for it being an impossibility for Appellants to appear in person, while allowing Respondents to proceed, means that further trial court proceedings must, again, be mandatory reversed by this court.

## REQUEST FOR RELIEF

WHEREFORE, Appellant Brad Tidik requests that the orders Denying the Motions to Compel Discovery are reversed in their entirety and/or that they are Remanded to the trial for orders reflecting the finding of fact and conclusions of law of appropriate form for review by this court as to why discovery should not be compelled.

THAT, the Motions to Compel Discovery and Remote Hearing are reversed and/or remanded for orders reflecting the finding of fact and conclusions of law of as to why Appellant is denied protected provisions to access to the court, while the trial court simultaneously allows only the Respondents to access the court.

THAT, the trial court is instructed to insure Access to the Court and under the auspices of Due Process, and Equal Protection of the Law for Appellant.

Respectfully Submitted,

*Brad Tidik*

Appellant  
March, 11 2026

STATE OF SOUTH CAROLINA  
In The Court of Appeals  
Appellate Case No. 2026-000493

The Hebert Daniel Tidik Revocable Living Trust,  
Brad Tidik,

Plaintiffs,

v.

Carol Tidik, Karen Tidik Sorensen, Jane Doe 1

Defendants.

of which Brad Tidik is the Appellant,

and

Carol Tidik, Karen Tidik Sorensen, Jane Doe 1 are the Respondents.

RECEIVED

MAR 16 2026

SC Court of Appeals

RECORD ON REHEARING

Exhibit A - Order of Court of Appeals, March 6, 2026

Exhibit B - Trial Court Rehearing Order

Exhibit C - Trial Court Motion for Rehearing

---

Exhibit D - Specif Interrogatories to Respondent

---

Exhibit E - Trial Court Dismissal Order

Exhibit F - Respondent Deed as fraudulent

Exhibit G - South Carolina Judicial Branch: ADA compliance

Exhibit H - Appellant Affidavit

Exhibit I - 15th Circuit Local Administrative Order email

# The South Carolina Court of Appeals

The Hebert Daniel Tidik Revocable Living Trust and  
Brad Tidik, Plaintiffs,

v.

Carol Tidik, Karen Tidik Sorensen, and Jane Doe 1,  
Defendants,

of which Brad Tidik is the Appellant,

and

Karen Tidik Sorensen is the Respondent.

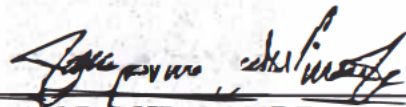
Appellate Case No. 2026-000493

---

## ORDER

---

This appeal arises out of an order of the circuit court denying Appellant's motion to compel discovery. Because the underlying order is not immediately appealable, this appeal is dismissed. *See Hamm v. S.C. Pub. Serv. Comm'n*, 312 S.C. 238, 241, 439 S.E.2d 852, 853 (1994) (holding discovery orders are interlocutory and not immediately appealable). The remittitur will be sent as provided by Rule 221(b) of the South Carolina Appellate Court Rules.

 , J.  
FOR THE COURT

Columbia, South Carolina

**FILED**  
**Mar 06 2026**

FORM 4

STATE OF SOUTH CAROLINA  
COUNTY OF Horry  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2023CP2605959

Brad Tidik et al  
PLAINTIFF(S)

Carol Tidik et al  
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  
 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED:  See attached order (formal order to follow)  Statement of Judgment by the Court:

Plaintiff's Motion/Rehearing/Relief from Judgment and Remote Hearing filed on 12/11/2025 is DENIED.

ORDER INFORMATION

This order  ends  does not end the case.  See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 02/04/2026 .

Brad Tidik for Brad Tidik  
Jane Doe 1  
Herbert Daniel Tidik Revocable Living Trust  
Carol Tidik  
Brad Tidik for Brad Tidik

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
COUNTY OF HORRY	)	FIFTEENTH JUDICIAL CIRCUIT
	)	
	)	Civil Action No.: 2023-CP-26-05959
The Hebert Daniel Tidik Revocable Living Trust,	)	
Brad Tidik,	)	
	)	
Plaintiffs	)	
v.	)	
	)	
Carol Tidik, Karen Tidik Sorensen, Jane Doe 1	)	
	)	
Defendants	)	
_____	)	

**MOTION FOR REHEARING/RELIEF FROM JUDGMENT OR ORDER  
MOTION FOR REMOTE/WEBEX HEARING**

NOW COMES, Plaintiff Brad Tidik (Plaintiff) and requests Rehearing/Relief from Order/Strike Order of November 19, 2025 Denying Plaintiffs Motion to Compel Discovery.

**STATEMENT OF FACTS**

1. Plaintiff filed his individual Motion to Compel Discovery specifically as a Remote/Webex hearing per per the Motion and Information Coversheet.(Exhibit)

2. Whilst preparing for the hearing of November 19, 2025 Plaintiff noticed that the Clerk of the Court had made an error in not scheduling Plaintiff motion per the Motion and Information Coversheet as being a Remote/Webex hearing and contacted Anderson.jennifer@horrycounty.gov to make correction.

3. Anderson.jennifer@horrycounty.gov responded to Plaintiff that the court *sua sponte* changed this hearing and told Plaintiff that there was some sort of Administrative Order barring Plaintiff from remote hearing.

4. Plaintiff then sent an email to Anderson.jennifer@horrycounty.gov for here to provide this Administrative Order she stated and/or a public source that Plaintiff could access.

4. Having no response from Anderson.jennifer@horrycounty.gov and as she previously informed the parties by email that electronic filings by Plaintiff were not considered filing with the court, Plaintiff now being as a lower class of litigant without equal access the court, Plaintiff then Noticed the Court by mail.(Exhibit)

6. Plaintiff then mailed his Remote Hearing Notice to the Court and as the Court proceeded with the now *ex parte* hearing it is apparent that Plaintiff has suffered Actual Damage from the Court having placed Plaintiff as a lower class litigant than other parties without equal access in service of filings with the court.

7. On November 28, 2025 received an order denying his Motion to Compel Discovery, postmarked of November 25, 2025 from the Clerk of the Court, and the instant motion is filed.

#### INTERLUCTORY APPEAL

8. For the Court to deny Plaintiff Motion to Compel Discovery the case is effectively ended by the court for the following non-exhaustive reasons:

a. The court has ruled that Defendant KTS is not required to specifically answer to the question of weather Jane Doe 1 was at the residence as directly related to Plaintiff claims within his Complaint being:

“3. Has the Defendant known as Jane Doe 1 ever been been present at 4361 Copperhead Rd., Conway, SC to the best of your knowledge, information and belief.”

b. Plaintiff alleges that Defendant KTS has already committed perjury in her alternate answer and should she answer in the negative to this specific question then Plaintiff will move for 3<sup>rd</sup> party Interrogatories of Allen Thomas, Caroline Thomas, Stephanie Thomas, and others to prove such perjury. The Denial by the Court of Plaintiff to identify Jane Doe 1 effectively terminates a portion of Plaintiff Complaint thus allowing for Interlocutory Appeal.

9. The Court has denied to compel in total any answers whatsoever to the set of Interrogatories relating to Herbert Tidik medical records, and such refusal again makes the case, terminal for Plaintiff, and effectively terminates the case for Plaintiff thus allowing for Interlocutory Appeal.

10. The constitutionality of a two-tier justice system denying equal access must be resolved on Appeal.

#### REQUEST FOR RELIEF

WHEREFORE, Plaintiff Brad Tidik and requests order Denying his Motion to Compel Discovery is Rehearing/Relief from Order/Strike Order in favor of Plaintiff.

THAT, Reasonable Accommodation is made for Plaintiff Disability and inability to attend with this matter being held by Remote/Webex hearing.

*Brad Tidik*  
Brad Tidik

STATE OF SOUTH CAROLINA )  
 ) IN THE COURT OF COMMON PLEAS  
 COUNTY OF HORRY ) FIFTEENTH JUDICIAL CIRCUIT  
 )  
 ) Civil Action No.: 2023-CP-26-05959  
 )  
 The Hebert Daniel Tidik Revocable Living Trust, )  
 Brad Tidik, )  
 ) Plaintiffs )  
 ) **MOTION AND INFORMATION**  
 v. ) **FORM AND COVERSHEET**  
 )  
 )  
 Carol Tidik, Karen Tidik Sorensen, Jane Doe I )  
 ) Defendants )  
 )  
 \_\_\_\_\_ )

Plaintiff's Attorney: None Address: 420 Eureka Rd. #352 Wyandotte, MI 48183 Phone: 734-552-1452 E-mail: deer1888@yahoo.com	Defendant's Attorney: Luther O. McCutchen, III Bar No. 3763 Address: 4610 Oleander Drive, Ste. 203 Myrtle Beach, SC 29577 Phone: 843- 449-3411 E-mail: lom@lawyersatthebeach.com
--	--

**MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)**  
 **FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)**  
 **PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)**

**SECTION I: Hearing Information**

Nature of Motion: MOTION TO COMPEL DISCOVERY

Estimated Time Needed: 30 min – REMOTE AUDIO HEARING Court Reporter Needed:  YES /  NO

**SECTION II: Motion/Order Type**

Written motion attached  
 Form Motion/Order  
 I hereby move for relief or action by the court as set forth in the attached proposed order.

\_\_\_\_\_  
 Signature of Attorney for  Plaintiff /  Defendant      Date submitted

**SECTION III: Motion Fee**

PAID – AMOUNT: \$ \_\_\_\_\_  
 EXEMPT:

Indigent Status     State Agency v. Indigent Party  
 Proposed order submitted at request of the court; or,  
 reduced to writing from motion made in open court per judge's instructions  
 Name of Court Reporter: \_\_\_\_\_  
 Other: \_\_\_\_\_

<p style="text-align: center;"><b>JUDGE'S SECTION</b></p> <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____  Date: _____
--	-------------------------------------

**CLERK'S VERIFICATION**

Collected by: \_\_\_\_\_ Date Filed: \_\_\_\_\_  
 MOTION FEE COLLECTED: \$ \_\_\_\_\_  
 CONTESTED – AMOUNT DUE: \$ \_\_\_\_\_

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF HORRY )  
 )  
 The Hebert Daniel Tidik Revocable Living Trust )  
 Brad Tidik )  
 Plaintiffs )  
 v. )  
 )  
 Carol Tidik, Karen Tidik Sorensen, Jane Doe 1 )  
 Defendants )  
 \_\_\_\_\_ )

IN THE COURT OF COMMOM PLEAS  
 FIFTEENTH JUDICIAL CIRCUIT  
 Civil Action No.: 2023-CP-26-05959

**REQUEST FOR SPECIFIC ANSWERS TO:  
 INTERROGATORIES TO DEFENDANT KAREN TIDIK SORENSEN – DOE 1**

NOW COMES Plaintiffs in their REQUEST FOR SPECIFIC ANSWERS TO: INTERROGATORIES TO DEFENDANT KAREN TIDIK SORENSEN – DOE 1 and as per Court Instruction and Rules being that Specific Answers should be sought before bringing Motion to Compel Discovery against Defendants say as follows to be answered within Thirty (30) days:

The Herbert Daniel Tidik Revocable Living )  
 Trust, Brad Tidik, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 Carol Tidik, Karen Tidik Sorensen, Jane )  
 Doe 1, )

**DEFENDANT SORENSON'S ANSWERS TO  
 PLAINTIFF'S INTERROGATORIES  
 TO DEFENDANT KAREN TIDIK  
 SORENSEN – DOE 1**

1. Is the Defendant known as Jane Doe 1 as stated in the Complaint a daughter by birth of Carol Tidik to the best of your knowledge, information and belief.

**ANSWER:** This answering Defendant objects to Interrogatory No. 1 on the grounds that it calls for This answering Defendant to determine the intent of Plaintiff. Notwithstanding said objection, upon information and belief, Jane Doe 1 was a daughter of Carol Tidik who was born when Carol Tidik was very young, was given up for adoption, and the records sealed. This was mentioned to Defendant Sorensen one time when she was young. Defendant has no further knowledge.

**Plaintiffs Request for Specific Answer:**

A. State at what ages, or approximately what ages that you that Jane Doe 1 was “mentioned” in the answer by you Karen Tidik Sorensen (KTS).

B. State all persons that have “mentioned” Jane Doe 1 to you (KTS).

**Answer to Objection:**

C: There is no provision in SC law for KTS to refuse to answer the question using the excuse that KTS must "determine the intent of Plaintiff(s)" and the court must order such to be answered should KTS fail/refuse to answer.

D. Notwithstanding the above, Plaintiffs will state that it is common knowledge of Defendant Jane Doe 1 having Visitation to South Carolina with the full knowledge of Defendant Karen Tidik Sorensen (KTS) and the claim and the intent is to prove this and said concealment and conspiracy to defraud Plaintiffs.

2. State where and when the Defendant known as Jane Doe 1 has been present in the State of South Carolina to the best of your knowledge, information and belief.

**ANSWER:** This answering Defendant objects to Interrogatory No. 2 on the grounds that it is overly broad and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, see answer to Interrogatory No. 1.

**Plaintiffs Request for Specific Answer:**

A. This Interrogatory being wholly separate and not asked or answered in Interrogatory No. 1: Plaintiffs specifically require KTS answer as to KTS having knowledge of Jane Doe 1 being present in South Carolina.

**Answer to Objection:**

B. This Interrogatory is not "overly broad" as it is highly specific and concise as to whether, or not, KTS has knowledge specific to Defendant Jane Doe 1 being wholly separate and not asked or answered in Interrogatory No. 1.

C. This Interrogatory is "reasonably calculated to lead to the discovery of admissible evidence" of the concealment and conspiracy to defraud Plaintiffs by KTS and Jane Doe 1 as it is common knowledge that KTS has full knowledge of Jane Doe 1 and this Honorable court ordering third party Discovery as necessary for those above listed in said wills and trusts and others should KTS fail/refuse to answer truthfully being the following will answer that KTS:

- a. Personally met with Jane Doe,
- b. Received invitations from Jane Doe 1
- c. Received phone calls and correspondence from Jane Doe 1
- d. Have direct knowledge from KTS as to KTS contacts and knowledge of Jane Doe 1

3. Has the Defendant known as Jane Doe 1 ever been present at 4361 Copperhead Rd., Conway, SC to the best of your knowledge, information and belief.

**ANSWER:** This answering Defendant objects to Interrogatory No. 3 on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, see answer to Interrogatory No. 1.

**Plaintiffs Request for Specific Answer:**

A. This Interrogatory being wholly separate and not asked or answered in Interrogatory No. 1: Plaintiffs specifically require KTS answer as to KTS having knowledge, or not, of Jane Doe 1 ever being present at 4341 Copperhead Rd., Conway, South Carolina.

**Answer to Objection:**

B. This Interrogatory is “reasonably calculated to lead to the discovery of admissible evidence” of the concealment and conspiracy to defraud Plaintiffs by KTS and Jane Doe 1 as it is common knowledge that KTS has full knowledge of Jane Doe 1 and this Honorable court ordering third party Discovery as necessary for thus below listed in said wills and trusts and others should KTS fail/refuse to answer truthfully being the following:

- a. Allen Thomas
- b. Caroline Thomas
- c. Stephanie Thomas
- d. Daryl Sorensen
- e. Others, including health professionals and caretakers of Herbert and Carol Tidik and their Records.

4. State where and when the Defendant known as Jane Doe 1 has been present in the State of Michigan to the best of your knowledge, information and belief.

**ANSWER:** This answering Defendant objects to Interrogatory No. 4 on the grounds that it is irrelevant to the facts pled in this case and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, see answer to Interrogatory No. 1.

**Plaintiffs Request for Specific Answer:**

A. This Interrogatory being wholly separate and not asked or answered in Interrogatory No. 1: Plaintiffs specifically require KTS answer as to KTS having knowledge, or not, of Jane Doe 1 ever being present in the State of Michigan.

**Answer to Objection:**

B. This Interrogatory is “reasonably calculated to lead to the discovery of admissible evidence” of the concealment and conspiracy to defraud Plaintiffs by KTS and Jane Doe 1 and Plaintiffs include herein and by reference the Answer to Objection of Interrogatory Nos. 1- 3 above and including matters of the necessity of future third party Discovery.

5. Has the person known as Allen Thomas, being named in The Hebert [sic] Daniel Tidik Revocable Living Trust, ever met in person the Defendant known as Jane Doe 1 and state where and when.

**ANSWER:** This answering Defendant objects to Interrogatory No. 5 on the grounds that it is irrelevant to the facts pled in this case and not reasonably calculated to lead to the discovery of admissible evidence. Further, notwithstanding said objection, see answer to Interrogatory No. 1.

**Plaintiffs Request for Specific Answer:**

A. This Interrogatory being wholly separate and not asked in Interrogatory No. 1: Plaintiffs specifically require KTS answer as to KTS having knowledge, or not, of Allen Thomas meeting in person Jane Doe 1.

**Answer to Objection:**

B. Using the Identifier that the "Allan Thomas", present or past husband of KTS, is the one and same named in the "Herbert Daniel Tidik Revocable Living Trust" as to avoid any confusion as to the person so named is wholly irrelevant and frivolous as a basis for refusing to answer and the court must order such to be answered should KTS fail/refuse to answer.

C. This Interrogatory is "reasonably calculated to lead to the discovery of admissible evidence" of the concealment and conspiracy to defraud Plaintiffs by KTS and Jane Doe 1 and Plaintiffs include herein and by reference the Answer to Objection of Interrogatory Nos. 1- 3 above and including of the necessity of future third party Discovery and general knowledge that Allan Thomas has visitation with Jane Doe 1 in SC.

6. Were/are you married to Allen Thomas and if not state the date of any divorce.

**ANSWER:** This answering Defendant objects to Interrogatory No. 6 on the grounds that Defendant's former marital status is irrelevant to the facts pled in this case and not reasonably calculated to lead to the discovery of admissible evidence.

**Plaintiffs Request for Specific Answer:**

A. Plaintiffs specifically require KTS answer if she is currently married to Alan Thomas and if not, then the date of and divorce.

**Answer to Objection:**

B. Allen Thomas has exclusive knowledge is opposition to the claims of KTS and as Alan Thomas, being not in the line of inheritance, is bizarrely named in the "Herbert Daniel Tidik Revocable Living Trust" the dates of any divorce are highly indicative of the mental states, coercion, and conspiracy to defraud of KTS and Jane Doe 1 and as such this date is absolutely "reasonably calculated to lead to the discovery of admissible evidence".

C. Divorce records are public records and as such there is no reasonable explanation as to why Defendant KTS would not answer this as it is absolutely necessary for this question to be asked as foundation for the knowledge of Allen Thomas as he is named as searches of the State and location of the Divorce show as unknown and as such this must be answered.

7. State with respect to Allen Thomas (1) last known home address (2) telephone number (3) business address and telephone number (4) name and address of their employer (5) their relationship with you.

ANSWER: See answer to Interrogatory No. 6.

**Plaintiffs Request for Specific Answer:**

A. Plaintiffs specifically require KTS answer of the information for contact, service, location, and knowledge, of Alan Thomas as listed in 1-5 above.

**Answer to Objection:**

B. Allen Thomas has exclusive knowledge is opposition to the claims of KTS and as Alan Thomas, being not in the line of inheritance, is bizarrely named in the "Herbert Daniel Tidik Revocable Living Trust" the dates of any divorce are highly indicative of the mental states, coercion, and conspiracy to defraud of KTS and Jane Doe 1 and as such this date is absolutely "reasonably calculated to lead to the discovery of admissible evidence" and as such this must be answered.

8. Has the person known as Caroline Thomas, being included in The Hebert [sic] Daniel Tidik Revocable Living Trust, ever met in person, and what is their specific knowledge of, Defendant known as Jane Doe 1, state what, where and when to the best of your knowledge, information and belief.

ANSWER: Defendant objects to Interrogatory No. 8 on the grounds that it is irrelevant to the facts pled in this case, which specifically regard the death of Carol Tidik, and is not reasonably calculated to lead to the discovery of admissible evidence. This answering Defendant further objects on the grounds that one should not be reasonably expected to know what knowledge another person has of another person.

9. State with respect to Caroline Thomas (1) their name, (2) their last known home address and telephone number, (3) their business address and telephone number, (4) the name and address of their employer, and (5) their relationship with you.

ANSWER: Defendant objects to Interrogatory No. 9 on the grounds that it is irrelevant to the facts pled in this case and not reasonably calculated to lead to the discovery of admissible evidence.

10. Has the person known as Stephanie Thomas, being included in The Hebert [sic] Daniel Tidik Revocable Living Trust, ever met in person, and what is their specific knowledge of,

Defendant known as Jane Doe 1, state what, where and when, to the best of your knowledge, information and belief.

**ANSWER:** Defendant objects to Interrogatory No. 10 on the grounds that it is irrelevant to the facts pled in this case, which specifically regard the death of Carol Tidik, and is not reasonably calculated to lead to the discovery of admissible evidence. This answering Defendant further objects on the grounds that one should not be reasonably expected to know what knowledge another person has of another person.

11. State with respect to Stephanie Thomas (1) their name, (2) their last known home address and telephone number, (3) their business address and telephone number, (4) the name and address of their employer, and (5) their relationship with you.

**ANSWER:** Defendant objects to Interrogatory No. 11 on the grounds that it is irrelevant to the facts pled in this case and not reasonably calculated to lead to the discovery of admissible evidence.

### **Interrogatories 8-11**

#### **Plaintiffs Request for Specific Answer:**

A. Plaintiffs specifically require KTS answer of the information for the contact, service, and knowledge of those in 8-11 above being, Caroline Thomas, Stephanie Thomas.

#### **Answer to Objection - Relevance:**

B. This Interrogatory is "reasonably calculated to lead to the discovery of admissible evidence" of the concealment and conspiracy to defraud Plaintiffs by KTS and Jane Doe 1 as it is common knowledge that KTS has full knowledge of Jane Doe 1 visitation in SC and this Honorable court ordering third party Discovery as necessary for those above listed in said wills and trusts and others should KTS fail/refuse to answer truthfully being the following will answer that KTS:

- a. Personally met with Jane Doe,
- b. Received invitations from Jane Doe 1
- c. Received phone calls and correspondence from Jane Doe 1
- d. Have direct knowledge from KTS as to KTS contacts and knowledge of Jane Doe 1

#### **Answer to Objection – Reasonable Knowledge:**

C. KTS has objected "it should not be reasonably expected to know what knowledge one person has of another person" and this objection is highly fraudulent in that KTS has every reason to know what knowledge of Jane Doe 1 that Caroline Thomas and Stephanie Thomas have being that:

- a. Caroline Thomas and Stephanie Thomas are the daughters of KTS.
- b. It is general knowledge Caroline Thomas and Stephanie Thomas were present in when Jane Doe 1 had visitation in Conway, SC.
- c. That Jane Doe 1 is the Aunt of Caroline Thomas and Stephanie Thomas.

d. That KTS has given full knowledge, information and visitation to Caroline Thomas and Stephanie Thomas for their Aunt, KTS Sister, Jane Doe 1 regardless as to answer given in Interrogatory 1 above and as such this must be answered.

12. State any and all other persons that may have met, have knowledge, or have contact with the Defendant known as Jane Doe 1, and include all unrelated persons such as caretakers, friends, persons of the church, etc., including where and when.

ANSWER: See answer to Interrogatory No. 1.

**Plaintiffs Request for Specific Answer:**

A. Plaintiffs specifically require KTS answer as to KTS having knowledge, or not, of Jane Doe 1 having contact with persons so listed.

**Answer to Objection:**

B: It is of common knowledge that KTS maintained strict "no contact" provisions of the heavily dementia afflicted Herbert and Carol Tidik, being that Herbert died of dementia from long term MS, and Carol having a long term brain shunt to drain excess fluid from her brain, with said "no contact" instructions given to Caretakers and others that any phone messages, letters, and/or other means of contact are to be exclusively denied to Herbert and Carol, but to only be given to KTS, who lived next door, for determination as to weather KTS would allow any contact, and as such these persons are indispensable to establish the factors relating to fraud and claims in this matter and must be answered.

C. The above listed persons will also state that said contacts, messages and correspondence of Jane Doe 1 were also given to KTS furthering the knowledge of KTS and Jane Doe 1.

13. State how and when the Defendant known as Jane Doe 1 was informed of the death of Herbert Tidik to the best of your knowledge, information and belief.

ANSWER: This answering Defendant objects to Interrogatory No. 14 on the grounds that there is no requirement to notify a person not a beneficiary to the Trust of the death of the original Settlor and/or Trustee. Notwithstanding this objection see answer to Interrogatory No. 1.

14. State how and when the Defendant known as Jane Doe 1 was informed of the Death of Carol Tidik to the best of your knowledge, information and belief.

ANSWER: This answering Defendant objects to Interrogatory No. 14 on the grounds that there is no requirement to notify a person not a beneficiary to the Trust of the death of the original Settlor and/or Trustee. Notwithstanding this objection see answer to Interrogatory No. 1.

**Interrogatories 13-14**

**Plaintiffs Request for Specific Answer:**

A. Plaintiffs specifically require KTS answer as to KTS having knowledge, or not, of how Jane Doe 1 being the sister of KTS was informed or notified of the deaths of Herbert Tidik and Carol Tidik being that they are of a parental nature to KTS and Jane Doe 1.

**Answer to Objection:**

B. it is wholly irrelevant as to any "requirement" as the interrogatory is highly specific as to how and when Jane Doe 1 was informed of the deaths – and if KTS has no knowledge then KTS can simply say so under the penalties of perjury and as such KTS must be ordered to answer as to such.

C. The above is not withstanding the Legal, Fiduciary, and Moral duties of KTS to notify any and all persons as to their inclusions in any wills or Trusts lest any and all Statutory times are tolled until such notifications are made per South Carolina law, and not withstanding that no public Obituaries are published in furtherance of this.

15. State with respect to the Defendant known as Jane Doe 1 (1) their name, (2) their last known home address and telephone number, (3) their business address and telephone number, (4) the name and address of their employer, and (5) their relationship with you (6) their location to the best of your knowledge, information and belief.

**ANSWER:** Defendant objects to Interrogatory No. 15 on the grounds that it is irrelevant to the facts pled in this case and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, see answer to Interrogatory No. 1.

**Plaintiffs Request for Specific Answer:**

A. Plaintiffs specifically require KTS answer as to KTS having knowledge, or not, of Jane Doe 1 as above.

**Answer to Objection:**

B. The answers of 1-14 above are included herein and by reference as to show the true nature of the case.

*Brad Tidik*  
Brad Tidik  
Plaintiff

Dated: 03/04/2025

Exhibits E, F, G, H, I

STATE OF SOUTH CAROLINA  
COUNTY OF Horry  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2023CP2605959

Brad Tidik et al  
PLAINTIFF(S)

Carol Tidik et al  
DEFENDANT(S)

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  
 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order (formal order to follow)  Statement of Judgment by the Court:

Plaintiff's Motion to Compel is Denied.

**ORDER INFORMATION**

This order  ends  does not end the case.  See Page 2 for additional information.

**For Clerk of Court Office Use Only**

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 11/19/2025 .

Brad Tidik for Brad Tidik  
Jane Doe 1  
Herbert Daniel Tidik Revocable Living Trust  
Carol Tidik  
Brad Tidik for Brad Tidik

**NAMES OF TRADITIONAL FILERS SERVED BY MAIL**





A certified true copy, attest

*Marion D. Foxworth III*

Marion D. Foxworth, III  
Registrar

Ex F

Deed BK: 4358 PG: 1797 Doctype: 001 11/04/2020 at 08:43:57 AM, 2 OF 5 EXEMPT  
ELECTRONICALLY RECORDED Marion D. Foxworth III, Horry County, SC Registrar of  
Deeds

and its or their successors, or his, her and their heirs, (as the case may be), and all persons  
whomsoever lawfully claiming, or to claim the same or any part thereof.

Witness the execution hereof by grantor this 15 day of July in the year of our Lord Two  
Thousand and Twenty and in the Two Hundred and Forty-Fifth year of the Sovereignty and  
Independence of the United States of America.

Signed, Sealed and Delivered  
in Presence of :

*David J. Stulbs*  
Witness # 1

*Carol E. Tidik* (L.S.)  
Herbert D. Tidik as Trustee for the Herbert  
Tidik Revocable Living Trust, as amended,  
dated June 18, 1998 by Carol E. Tidik his  
Attorney in Fact

*[Signature]*  
Witness # 2 (Notary)

STATE OF SOUTH CAROLINA )  
  )     ACKNOWLEDGMENT  
COUNTY OF HORRY            )

I the undersigned Notary Public, do hereby certify that the above named grantor(s) personally  
appeared before me this day and acknowledged the due execution of the foregoing instrument.  
Witness my hand and official seal this 15 day of July 2020.

*[Signature]*  
Notary Public Signature  
My Commission Expires: 2/6/30

DJ Sorenson  
Notary Public Printed Name and Seal



## ADA Compliance

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the South Carolina Judicial Branch will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

- **Employment:** The South Carolina Judicial Branch does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the ADA.
- **Effective Communication:** The South Carolina Judicial Branch will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the South Carolina Judicial Branch's programs, services, and activities, including 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.
- **Modifications to 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 engage in all of its programs, services, and activities. For example, individuals with service animals are welcomed in South Carolina Judicial Branch offices, even where pets are generally prohibited.

Exhibit G

STATE OF SOUTH CAROLINA  
In The Court of Appeals  
Appellate Case No. 2026-000493

The Hebert Daniel Tidik Revocable Living Trust,  
Brad Tidik,

Plaintiffs,

v.

Carol Tidik, Karen Tidik Sorensen, Jane Doe 1

Defendants.

of which Brad Tidik is the Appellant,

and

Carol Tidik, Karen Tidik Sorensen, Jane Doe 1 are the Respondents.

**AFFADIVIT OF APPELLANT**

I, Brad Tidik, Affiant swears as follows:

I ma informed by the clerks of the Horry County Court of Common Pleas being Brett Moorman and/or Jennifer Anderson who are familiar and stated that Appellant Motion to Compel was Denied to Appellant only and exclusively for his inability appear in person.

As I have been informed by the clerk of the court that no Record of the proceedings was kept that Luther McCutchen will also testify to the same above as true.

I declare under the penalties of perjury that the above is true to the best of my knowledge, information, and belief.

This Day of March, 11, 2026

*Brad Tidik*  
Brad Tidik  
Affiant

EXHIBIT I

Re: Correct Notice of Hearing

From: br (deer1888@yahoo.com)

To: anderson.jennifer@horrycountysc.gov

Date: Wednesday, November 12, 2025 at 04:34 PM EST

Hi Jennifer

Could you please provide me a copy of this Administrative Order. or direct me as to where it can be found.

This is a quite serious issue that extend through the entire case including base batters such as selection of venue, etc.

Thank you

Brad Tidik

On Wednesday, November 12, 2025 at 04:25:12 PM EST, Anderson, Jennifer <anderson.jennifer@horrycountysc.gov> wrote:

Yes, all motions are now being heard IN PERSON. As far as forever, I can not answer that for that is not my decision. Our Chief Admin Judge has ordered that all hearings will be heard in person until further notice. Therefore, you will need to be here on the day and time that is on your notice. Thanks!

**From:** br <deer1888@yahoo.com>

**Sent:** Wednesday, November 12, 2025 4:21 PM

**To:** Anderson, Jennifer <Anderson.Jennifer@horrycountysc.gov>

**Subject:** Re: Correct Notice of Hearing

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jennifer,

I wanted to clarify your Webex statement:

STATE OF SOUTH CAROLINA  
In The Court of Appeals  
Appellate Case No. 2026-000493

The Hebert Daniel Tidik Revocable Living Trust,  
Brad Tidik,

Plaintiffs,

v.

Carol Tidik, Karen Tidik Sorensen, Jane Doe 1

Defendants.

of which Brad Tidik is the Appellant,

and

Carol Tidik, Karen Tidik Sorensen, Jane Doe 1 are the Respondents.

**RECEIVED**

MAR 16 2026

SC Court of Appeals

**CERTIFICATE OF SERVICE**

I Brad Tidik do hereby certify that I served upon Luther O. McCutchen III, Attorney for Defendants on \_\_\_ March, 11 2026 \_\_\_:

APPELLANTS MOTION AND BRIEF FOR RECONSIDERATION

by sending such documents via mail to:

Luther McCutchen, 4610 Oleander Drive, Ste. 203 Myrtle Beach, SC 29577 (843) 449-3411  
South Carolina Court of Appeals Clerk, P.O. Box 11629 Columbia, SC 29211

The undersigned states under the penalties of perjury that the foregoing is true to the best of my knowledge, information, and belief.

*Brad Tidik*

Brad Tidik  
420 Eureka Rd.  
#352  
Wyandotte, MI  
48192

C: 734-552-1452  
Deer1888@yahoo.com

400 Eureka Rd  
# 352  
Wyandotte, MI  
48192



**Retail**  
U.S. POSTAGE PAID  
FCM LG ENV  
WYANDOTTE, MI 48192  
MAR 11, 2026  
**\$8.58**  
RDC 99  
92323A502036-89

South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC  
29211

RECEIVED  
MAR 16 2026  
SC Court of Appeals

