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MAR 31 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

Linda Kennedy and Marsha Fink

Appellants

Appellants Motion: "MANDATORY RECUSAL

For Fraud on the Court Challenge"

v.

Lake Hartwell Resort and Cabins, LLC, a/k/a Lake Hartwell Resort and Cabins, a/k/a Lake Hartwell Campers and Cabins, a/k/a Lake Hartwell Management, a/k/a Chris Vellanti, a/k/a Christopher Vellanti; Christopher Vellanti, as a Member and Personally; Yvonne Goldman, as a

General Manager and Personally; Frank Pellegrini; Fritzie Maroto; Jennifer Burdette; Marsha Stamm; Allen Riha; Ray Grenier; Grant Ferrendelli; and Charles Carpenter

Respondents.

Appellate Case No. 2025-000859

Trial Court Case No., 2022 CP 0400592

Dr. Linda Kennedy and Dr. Marsha Fink Object to the erroneous style of the case that is not the Record filing for the legally related back motion.

954-279-3785.

Disclaimers: ***Not proofread*** *due to* ***ADA Qualifying Disabilities intentionally and maliciously caused and weaponized by the SC Judges with financial and other interests in their case,*** *making it hard for litigants to see and (along with other physical disabilities handicapping P-Appellant's without Reasonable Accommodations granted). These ADA Qualified Disabilities cause P-Appellants great disadvantages and lack Equal*

Protection and violate the ADA Laws that ***MANDATE*** *Courts to comply, and cause P-Appellant's great pain and lesser functions without reasonable accommodations granted by law, due to these same judges. P-Appellants briefs and Motions since 2024 have mainly been cut/paste from other documents written or submitted with few corrections due to these Disabilities caused and weaponized by these Judges and their refusal to honor ADA Reasonable Accommodations by law for their own advantages in spite of ADA Advocates submitting letters to guide them in the Mandatory compliance laws they ignore. P-Appellant's are more than capable when they have the reasonable accommodations which are least restrictive and granted to the Murdaugh lawyers when no disabilities are even claimed through Selective Prosecution of these cases as seen herein. P-Appellant's case tells on what really happened in the Murdaugh and the Prosecutor/Defense/Murdaugh/ Supremes all want to free or greatly reduce Murdaugh's punishment as a fellow Aristocrat in this Aristocratic/Groomed Elite, Entrenched Oligarchy, where the law is a mere suggestion, while they are running a Legal Machine Criminal Enterprise (LMCE) as seen herein through the Murdaugh/Laffitte cases, P-Appellants case, and many others (****See Asbestos Docket as one example****, where this is the other reason why the Courts want to bury P-Appellants case, because they describe and show Insurance Fraud and Insurance Reserve Fraud in P-Appellant's case, Murdaugh/Laffitte's cases, and in the Asbestos Docket, and how this Entrench Aristocratic/Groomed Elite are able to run a Legal Machine Legal Enterprise (LMCE) out of the State, under color of law). This Appeals Court is taking cases handed off to them from Trial Courts, to continue the same bad faith tactics to refuse and obstruct their appeals, and the court can because they purposely do not analyze SMJ Adjudication as a Condition Precedent to receiving Constitutional power to hear a case, so they can cover for each-others crimes, and instead treat Constitutional guarantees as mere suggestions, and because the Supremes oversee all secret discipline of lawyers and judges to make sure there is no punishment for ignoring the Constitution, they have crated quite a tax-free, for profit LMCE for themselves and their Aristocratic/Groomed Elite Colleagues).*

Anyone who wants to complaint of length, repetition, lack of organization, spelling and so forth, get the courts to follow the law so P-Appellants can get mandatory (not discretionary) Reasonable Accommodations that are least restrictive and require less than the Court gave Murdaugh without disabilities, especially when the 10th Cir Judges caused and weaponized these disabilities against two elderly cancer fighting survivors with physical health issues. These Judges need to try to write/type when these Judges can't see screens or type when they cannot use their hands thumbs, wrists arms and elbows because their fellow judges physically abused them. .. where both need surgery to fix due to the abuse P-Appellants have endured by these Judges to try to save their meritorious case. Then complain. This is P-Appellants best when one of the two is having seizures also for lack of sleep, again,

caused by the same Judges and weaponized also by these court protecting the LMCE who are trying to win on taking advantage of the Elderly and Disabled in Abuse and Exploitation bad acts..

COMES NOW, Dr. Linda Kennedy, J.D., B.S., B.A. and Dr. Marsha Fink, J.D., B.A., Plaintiff-Appellants (hereinafter "P-Appellants"), Jointly and Pro Se, and move a NEUTRAL Court/Judges for mandatory recusal and disqualification of all judges currently involved in this case, and all Attorneys/firms that were assigned to this matter, pursuant to Rule 2.11 of the South Carolina Code of Judicial Conduct; Rule 241, SCACR, and not Rule 221, SCACR, (which the latter governs rehearing and interlocutory posture and is inapplicable to this appellate proceeding as repeatedly explained to the Court and their unlawful Laffitte agent); the Due Process Clause of the Fourteenth Amendment to the United States Constitution; Article I, §§ 3 and 9 of the South Carolina Constitution; Title II of the Americans with Disabilities Act, 42 U.S.C. § 12132; and controlling United States Supreme Court precedent, and demand this Court for mandatorily recuse and disqualification all judges in the Appeals and Supreme Court and of course the Trial Court, as required by the United States Constitution, the South Carolina Constitution, the Americans with Disabilities Act, and controlling law.

This mandatory recusal of Judges and lawyers who have committed fraud on this court by the court and its agents in collusion, causing a severe lack of neutrality, and systemic bias and ties the **court's conduct itself as evidence requiring disqualification**.

Contingent with this Motion, the P-Appellants have filed a SMJ Adjudication Challenge based on Fraud on the Court by the Court already. This SMJ Challenge is

focused on the Court and Judges themselves; therefore, the Court/Judges of the Appeals and the Supreme Court, and all attorneys/firms who were involved (all listed attorneys and firms) cannot hear nor participate in these Motions and must hire their own outside counsel to respond or default. N or can the present mandatorily recused Judges select the Judges to hear this matter. This entire SMJ Challenge filed earlier is incorporated by reference with all of its exhibits in this present recusal motion and vise versa.

Further, the continuing actions and Frauds on the Court by the Court, have continued, trying to keep P-Appellants limited in their meaningful Due Process and ability to fully present a complete Appeal that involves Constitutional violations by the Trial Court and the Appeals/Supreme Courts, to keep P-Appellants from having a De Novo hearing on all matters constitutional. . .which is the situation with the underlying case, and in this Appeal and a Supreme Court Writ of Mandamus.

This continuing Court fraud has exacerbated P-Appellants Disabilities greatly and are now continuing to weaponize these Disabilities that were caused by the underlying Judges intentionally and maliciously, and further weaponized and weakened P-Appellants. P-Appellants have other Physical Disabilities that are now in play because continued abuse to elderly have consequences and have accumulative effects on P-Appellants. The Court is ignoring and refusing to address the actual ADA reasonable accommodations, by not mentioning them until this forced last Order that further shows they are not going to comply with the ADA because they cannot allow P-Appellants a full Appeal Presentation for reasons stated.

In this shorter Motion, P-Appellants are using writing aids, voice, and cut/paste from other writings, but are not able to screen and proof for accuracy. They believe the Constitutional Structural Violations and lack of SMJ Adjudication analysis are so obviously exposing the Courts that small mistakes in this unreviewed and more difficult writing due to the accumulation of Disabilities described in Ex. 6 of the SMJ Challenge Motion filed earlier in this Court, and will more than substantiate the situation and extremely cruel and inhuman actions of the Appeal Court showing its bias and distain for P-Appellants for being long-time Legal Reformers against the Courts lack of Constitutional Adherence to the law, that they use as mere "suggestions" in spite of their oath, and source of Constitutional power. In addition to what has been said:

MOTION FOR MANDATORY RECUSAL AND DISQUALIFICATION OF THE SOUTH CAROLINA APPELLATE COURT AND SUPREME COURT JUDGES AND ATTORNEYS/FIRMS THAT TOOK PART IN ANY ACTION IN THIS MATTER AT THE TRIAL COURT OR AT THE APPEALS COURT, WHO MUST HIRE OUTSIDE COUNSEL AND RESPOND OR DEFAULT AGAIN.

I. INTRODUCTION

P-Appellants demand for the **mandatory recusal and disqualification** of all judges currently presiding over this matter in the South Carolina appellate courts which includes but is not limited to all Appeals and Supreme Court Judges and all attorneys and firms that have taken any part in P-Appellants case, on the grounds that:

1. The courts have **denied and obstructed reasonable accommodations required under the Americans with Disabilities Act ("ADA")**, 42 U.S.C. § 12101 et seq.;

2. The courts have **acted in a non-neutral, adversarial role while maintaining adjudicatory authority**;

3. The courts have **mischaracterized filings, misapplied procedural rules (notably Rule 221, SCACR), and denied the right to respond**;

4. The courts have **used non-orders and third-party communications to obstruct appellate rights**;

5. The courts have **denied meaningful access to the courts through page and time restrictions incompatible with disability and case complexity large volume of documents needing attention while P-Appellants are legally and physical disabled, some of which by the intentional and malicious acts of the underlying court with exacerbation and weaponizing by all Courts involved**; and

6. The courts have **created both the appearance and reality of institutional bias and self-interest**, creating Frauds on the Court and questions of SMJ, including conduct consistent with an enterprise under RICO.

7. Attorneys took part in all Frauds on the court at the lower level and cannot continue to participate in this matter nor can their firms, all of whom are going to be sued for RICO and were being sued in the underlying case, but for the Courts/corrupt RACKETEERING Judges blocking its filing. See SMJ Challenge Ex. 7, 11.

Under binding federal and South Carolina law, these actions require **mandatory—not discretionary—recusal**/disqualification.

II. CONTROLLING CONSTITUTIONAL PRINCIPLES: NO JUDGE MAY SIT IN HIS OWN CAUSE

"No man is allowed to be a judge in his own cause." In re Murchison, 349 U.S. 133, 136 (1955).

"Our system of law has always endeavored to prevent even the probability of unfairness." *Id.*

"A fair trial in a fair tribunal is a basic requirement of due process." *Id.*

Further:

"The Due Process Clause...demands recusal even when a judge 'has no actual bias.'" Caperton v. A.T. Massey Coal Co., 556 U.S. 868, 883 (2009).

III. JUDICIAL ROLE CANNOT MERGE WITH ADVERSARIAL CONTROL OR PROCEDURAL MANIPULATION

"Having been a part of [the accusatory process herein], the judge cannot... be wholly disinterested." *In re Murchison*, 349 U.S. at 137.

"The probability of unfairness is too high where the same person serves as accuser and adjudicator." Withrow v. Larkin, 421 U.S. 35, 47 (1975).

A. Denial of Right to Respond Through CONTINUED Misuse of Rule 221, when that rule applies to interlocutory appeals from the Trial Court, which this is not obvious.

The courts have **systematically denied Movants the right to reply** by:

- Recharacterizing filings seeking Constitutional **clarification for vagueness or response** as "reconsideration" under Rule 221(c);
- Invoking **Rule 221, SCACR**, which governs rehearing and interlocutory posture involving trial court remand and this has been repeatedly pointed out to no avail;
- Using Rule 221 to **terminate further argument**, despite the case being **fully post-trial and in the appellate phase is obvious bias and agenda driven**.

Rule 221 is inapplicable. The proper framework is **Rule 241, SCACR**, which governs appellate procedures without reference to interlocutory remand.

This deliberate misuse functions to:

- **Block reply rights of P-Appellants by claiming they are trying to get a reheaing or reconsideration when this is not true and the Court knows this and frequently tries this trick on other litigants also**;
- **Prevent correction of purposeful judicial misstatements so they can frustrate P-Appellants into not receiving the right to a meaningful, full Appeal Presentation that will bring up the horrendous Constitutional Crisis SC is in when it covers for Judges who twist and pretzel bend the law and procedure so much, that it is not recognizable, all to get predetermined results to feed its LMCE..**

- Convert the court into an **unanswerable adversary, and redistribution of weath financial institution under the LMCE**.

This violates due process: "The opportunity to be heard must be... at a meaningful time and in a meaningful manner." Mathews v. Eldridge, 424 U.S. 319, 333 (1976).

IV. ADA VIOLATIONS: FAILURE OF INDIVIDUALIZED, MEANINGFUL ACCOMMODATION

A. Governing Law

"No qualified individual with a disability shall... be denied the benefits of the services... of a public entity." 42 U.S.C. § 12132. All ADA Reasonable Accommodations P-Appellants have demanded are just two. . .Time of 90 days of block time, and 200 pages to attempt to fully summarize the voluminous Constitutional Violations that occurred in the underlying case through RACKETEERNG by Judges, Lawyers Allianz Insurance and many others (See SMJ Challenge footnotes where many are listed), least restrictive and not once granted, but denied through the deceitful hiding and appearance of compliance when they have not done so at all.

"A public entity shall make reasonable modifications... necessary to avoid discrimination." 28 C.F.R. § 35.130(b)(7)(i).

Accommodations must be **individualized and effective**. Tennessee v. Lane, 541 U.S. 509, 531 (2004). P-Appellants explained the need for those specific accommodations and provided medical support and past history since the Judges maliciously and intentional caused these Physical disabilities that weakened their ability to write/see screens and so

forth among many other Physical Disabilities two elderly ladies fighting cancer would have plus others. See Ex. 6 of the SMJ Challenge

B. Systematic Noncompliance

Movants provided **specific, individualized requests**, after explaining why these are necessary, ncluding:

- **90-day block scheduling** (to manage disability-related limitations);
- **200-page briefing limit** (due to extreme record volume and complexity).
- **Right to revisit as the time gets closer to see if additional time/pages are necessary in good faith.**

The courts:

- Ignored individualized needs;
- Provided only **minimum default allowances** (e.g., 30 day continuance as of course. . .not considering ADA Accommodations, and 50 pages);
- Issued **fragmented continuances**, not block time as a matter of course and not in response to the ADA Reasonable Accommodation demand;
- Refused to formally rule on ADA requests;
- Forced repeated filings at **$50 per motion** to seek clarity, causing further Elder and Disabled Exploitation and further abuse;

- Engaged in **constructive denial** by refusing clear ADA rulings, which were actually not present at all.

Two independent ADA advocates submitted written compliance demands. The courts:

- Ignored those communications;
- Failed to engage in any interactive ADA process;
- Never issued a clear ADA determination, even this last Order by Judge Kristi Curtis who for the first time said the words "ADA" in the title, but then didn't address it again in the writing and made general statements about giving P-Appellants enough time and that they were not going to budge on the 50 pages, because if they do, they give P-Appellants room to outline the many Constitutional violations of the Trial, Appeal and the Supremes against P-Appellants ADA rights and the right to a meaningful due process and full Appeal presentation whether ADA Disabled or otherwise. They have granted these page and block times to other litigants who do not have disabilities and have less complexities and voluminous numbers of documents to review.

C. Harm Caused by Denial

The denial of accommodations has caused:

- Documented greater **physical injury** (nerve damage, spinal injury, surgical necessity, seizures, cancer issues and so forth);

- Sleep deprivation and medical deterioration that qualifies under torture in USA and International Human Rights forums and violates SC Law. Williams v. Benjamin, 77 F.3d 756, 761 (4th Cir. 1996), where sleep deprivation was used to unnecessarily create, "wanton infliction of pain" ; Also see Hope v. Peter, 536 U.S. 730 (2002); Porter v. Clarke, 923 F.3e 348 (4th Cir. 2019).

- Inability to meaningfully present clai s in written or spoken form without reasonable accommodations until the case is over and P-Appellants an get enough surgeries to try to correct or limit the physical problems.. . which is **JUST WRONG!**

This violates the ADA's requirement of **meaningful access**, not theoretical access.

V. USE OF NON-ORDERS, MISNAMED ORDERS, TWISTED AND OUT OF CONTEXT ORDERS, AND THIRD-PARTY LAWYERS AS OBSTRUCTION AND POSING AS A JUDGE, AND THEN THIS LAWYER/COURT CHANGING THE APPEALS WEBSITE TO BACK DATE AN ALLEGED ENTRY OF THE LAWYER AS A DEPUTY CLERK WHERE P-APPEALLNATS ALREADY SAVED THE META DATA AND CODE TO SHOW THIS LAWYER WAS NOT ON THE STAFF OR THE APPEALS COURT ALLEGEDLY UNTIL MUCH LATER, IN LISTINGS ON THE WEBSITE THAT ARE STILL NOT TRUE.

The courts improperly:

- Used a **letter from outside counsel** (a firm associated with Russell Laffitte as a Partner in to Attorney Becky Laffitte) as purported "orders" that were not Orders and could not be appealed, which was the Appeals Judges goal to avoid Constitutional Review;

- Avoided issuing formal judicial Orders repeatedly by not filing Motions and mislabeling motions or stating no response in the record with no Order to Motions;
- Attempted to **coerce rushed compliance with reduced page limits (50 pages)**;
- Prevented appeal by using **non-appealable communications**.

This conduct:

- Deprives Movants of appellate rights;
- Constitutes **procedural deception**;
- Demonstrates **adversarial manipulation by the court itself proving its extreme bias and interests in this case as claimed through the LMCE**.

VI. SOUTH CAROLINA CONSTITUTIONAL VIOLATIONS

"No person shall be deprived of... property without due process of law." S.C. Const. art. I, § 3.

A court cannot:

- Use procedure to **extinguish substantive rights**; Not regarding ADA demands, and not using evidentiary hearings and other sua sponte deceptions by the lower court that this court is trying to block such enormous predetermined outcome attempts at trial.
- Deny access through **manipulated rules and false labeling**. Again, these Unconstituional acts using deception and manipulation is self-evident of the need

for mandatory recusal by all who have done this to P-Appellants. . .Trial Court judge, Appeals Judges, Supreme Judges and the lawyers/firms and others that RACKETEER with them.

VII. SOUTH CAROLINA CODE OF JUDICIAL CONDUCT: MANDATORY DISQUALIFICATION

"A judge shall disqualify himself... where impartiality might reasonably be questioned." Rule 2.11(A).

"A judge shall perform... duties impartially." Rule 2.2.

"A judge shall not allow... interests to influence conduct." Rule 2.4(B).

"The test is whether an objective observer would question impartiality." State v. Bryant, 372 S.C. at 312.

Here, the courts have:

- Acted as both **decision-maker and adversary**;
- Controlled filings and responses and done so deceptively;
- Blocked ADA compliance and done so deceptively;
- Manipulated procedure to favor opposing parties.

Recusal is therefore mandatory.

VIII. COMPARATIVE TREATMENT DEMONSTRATES BIAS

In high-profile cases such as that involving Alex Murdaugh:

- Courts granted **hundreds of pages**;
- Allowed **extended, block-based continuances**;
- Did so **without ADA claims**.

Here, despite:

- Greater complexity,
- Massive evidentiary volume,
- Documented physical disabilities and they were even caused by the intentional and malicious acts of the Judges who then weaponized the Disabilities to try to win on more nefarious grounds,

Movants are restricted to **minimal pages and fragmented time**.

This disparity evidences **preferential treatment to the lower court judges and lawyes and others, who predetermined the outcome through RACKETEERING and extreme systemic bias consistent with their loyalties to the LMCE, tax-free, profit making illegal enterprise under color of law.**

IX. STRUCTURAL AND INSTITUTIONAL CONFLICT: RICO IMPLICATIONS

Under federal law:

It is unlawful to conduct an enterprise through a pattern of racketeering activity.18 U.S.C. § 1962(c).

A "pattern" includes repeated acts such as:

- Obstruction of justice;
- Mail and wire fraud;
- Deprivation of rights under color of law.

Here, the record reflects:

- Coordinated procedural manipulation;
- Protection of aligned parties;
- Suppression of claims exposing systemic misconduct;
- Physical injuries maliciously and intentional caused by the judges to weaken the target, two older cancer fighters, and then weaponized the weakness to gain predetermined outcomes;
- Financial and institutional interests tied to underlying schemes.

This constitutes evidence of a **Legal Machine Criminal Enterprise (LMCE)** operating under color of law in SC, along with much other evidence of the Entrenchments of fellow Aristocrats/Groomed Elite in positions of power and/or ability to feign cases for profit, including, state sponsored Award theft in P-Appellants case with a scammers like Murdaugh/Laffitte/Mullen and so forth taken part as the state in feigned hearings , state sponsored Asbestos scams; .

Where judges are **participants and protectors of such an enterprise (LMCE)**, recusal is constitutionally required and these RACKETEERS need to turn themselves and each other in for neutral investigation and prosecution under their Canons and Rules.

X. THE COURTS' OWN CONDUCT IS DISQUALIFYING

"Justice must satisfy the appearance of justice." Offutt v. United States, 348 U.S. 11, 14 (1954).

The courts' actions demonstrate:

- Bias;
- Procedural obstruction;
- ADA violations;
- Case fixing/feigning;
- Pilfering of Litigant awards, inheritances and so forth;
- Institutional self-protection.

This independently mandates recusal. Immunity is destroyed.

XI. RIGHTS ARE NOT REQUESTED—THEY ARE DEMANDED

P-Appellants do not "request" accommodations or due process.

These rights are:

- Guaranteed by the **U.S. Constitution**;
- Guaranteed by the **South Carolina Constitution**;
- Mandated by **federal statute (ADA)**.

Judges are:

- **Public servants bound by oath**, not discretionary gatekeepers of rights. Guaranteed rights that cannot be abridge or infringed upon are not guaranteed when they are treated by the Courts/Judges as "mere suggestions." This is an obvious. serious violation of the Constitutions.

The consistent reframing of demands as "requests" is itself a tool of **power preservation and rights dilution** that were used most recently in Judge Kristi Curis in Constructive denial of ADA Reasonable Accommodations without saying so. Ex. 6.

XII. Attorneys/firms must also disqualify now. They are material witnesses and Defendants and cannot participate in the case. Further, and although P-Appellants cannot read enough or sort enough to get to the Motion they filed in Trial Court, but SC law states that opposing attorneys can be forced to disqualify if they are in a conflict of interest on their own side. For all these reasons, Attorneys/Firms must disqualify and hire independent counsel to represent them.

XIII. All Motions filed by P-Appellants that have been Ordered against them must be sticken from the records and a default entered against Attorneys and MGC/GCC firms as a Judge cannot allow no response form the opposition and answer in its place, becoming both a

Judges and a prosecutor and blocking P-Appellants reply using the wrong rule 221(c), because Rule 241 does not help them end Constitutionally permitted Replys by P-Appellants.

XII. RELIEF REQUESTED

Movants respectfully demand:

1. **Immediate mandatory recusal** of all appellate and Supreme Court judges involved;
2. Appointment of **neutral, out-of-system adjudicators, without Trial, Appeal or Supremes involvement or further manipulation**;
    - Recognition and enforcement of ADA accommodations:
    - **90-day block scheduling;**
    - **200-page briefing limit**;
    - **Default all opposition, and enter judgment for P**-Appellants who can provide their Entries of Judgment from the Trail court.
        1. **For not responding to Motions and defaulting.**
        2. **For orchestrated malfeasance between Courts/Judges and Lawyer/Firms continuing to try to get a predetermined outcome on appeal that they received in the Trail Court.**
        3. Vacatur of all procedurally defective rulings;
        4. Recognition of full **de novo constitutional review rights**;

5. Correction of the Style of the case to reflect a granted Rule 15 amended complaint that related back, along with its style of the case.

3. Any further relief necessary to restore **due process and equal protection**.

XIV. CONCLUSION

"A fair trial in a fair tribunal is a basic requirement of due process." *In re Murchison*, 349 U.S. at 136.

Where courts:

- Deny ADA rights as a Constitutional and Structural Due process Equal Protectoin and Access to the Courts issue,
- Block responses,
- Refuse to make and Order,
- Misuse procedural rules,
- Act as adversaries,
- Coordinate and speak for the adversaries,
- Use deception and obstruction of justice to predetermine the outcome against P-Appellants, and more. . . .

recusal is not discretionary—it is mandatory.

The Constitution requires it. The law demands it. The record proves it.

Submitted

Dr. Marsha Fink, J.D., B.A
P.O. Box 433
Townville, SC 29689
954-279-3785

Date: March 23, 2026

PLEASE USE EMAIL FOR EASE AND TO GET THE ATTENTION OF P-APPELLANTS AND HARD COPY AS A COPY OF THE EMAIL. Sosofunny1959@gmail.com**, and please keep the tricks of mailing elsewhere to obstruct justice away from this case and P-Appellants, who know these tricks occur in SC government.**

Dr. Linda Kennedy, J.D., B.S., B.A.
P.O. Box 433
Townville, SC 29689
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Date: March 23, 2026

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Respondents.

Appellate Case No. 2025-000859

PROOF OF SERVICE

Dr. Linda Kennedy, J.D., B.S., B.A. and Dr. Marsha Fink, J.D., B.A., *pro se*, certify that we have served copies of **Motion for Mandatory Recusal** on Lake Hartwell RV Resort and Cabins, LLC, aka Lake Hartwell Resort and Cabins, LLC, Lake Hartwell Resort and Cabins, Lake Hartwell Resort and Cabins, Lake Hartwell Campers and Cabins, Lake Hartwell Management, Christopher Vellanti, Other, Christopher Vellanti, Corporately, as the Sole Member, Manager Employee and Individually, Yvonne Goldman, as General Manager, Employee and Individually, Jennifer Burdette, as Employee and Individually, Frank Pellegrini, as Employee and Individually, Fritzie Maroto (Moroto, other, Pellegrini) as Employee and Individually, Ray Grenier, as Independent Contractor and Individually, Grant Ferrendelli, as Independent Contractor and Individually and Charles Carpenter, as Employee and Individually, who are represented by Michael Neubauer, Esquire and Robert Mebane, Esquire of McAngus, Goudelock and Courie, LLC, 201 West McBee Avenue, 2nd Floor, Greenville, SC 29601 and on Marsha Stamm, as Co-Assistant Manager and Individually, Allen Riha, as Co-Assistant Manager and Individually, who are represented by James Cox, III, and Trevor Hughey, Grier, Cox and Cranshaw, LLC, 2001 Assembly Street, Suite 204, Columbia, SC 29201 by depositing copies of it in the United States Mail, first class postage prepaid to their respective attorneys on March 23, 2026.

DATE: March 23, 2026

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