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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

Motion to Request Professional Verification Transcript Accuracy and to

Disclose Abuses of Process

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Case No. 2022CP2604125

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Victoria Joy Stevens, Appellant

v.

Charles Ard, Respondent

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Motion to Request Professional Verification Transcript Accuracy and to

Disclose Abuses of Process

Victoria Joy Stevens, Pro se

Victoria Joy Stevens  
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Attorney for Respondent

## **MOTION FOR ORDER TO VERIFY TRANSCRIPT ACCURACY AND TO DISCLOSE ABUSES OF PROCESS**

Comes now Victoria Joy Stevens, Plaintiff, Pro se, pursuant to Rule 207 of the South Carolina Appellate Court Rules, respectfully moves this Honorable Court for an Order requiring the court reporter to professionally verify the accuracy of the transcript of the common Pleas hearing, case #2022CP2694125, Stevens v Ard, held on June 9, 2025 and June 10, 2025, while disclosing abuses of process.

### **Facts of Appeal**

1. On June 9 and 10, 2025, a Common Pleas Hearing on construction negligence and sexual harassment was held before this Court. Said construction negligence was relative to work performed by Defendant Charles Ard, the client of Attorney Lawrence B. Smith. This Hearing was presided over by Judge B. Alex Hyman, whom Defense Counsel, Lawrence B. Smith delayed a case filed June 27, 2022, nearly three years in order to have hear this case. During these three years the
2. Plaintiff has been faced with daily dangers bathing.
3. Said hearing was pursuant to accommodations medically necessary for the Plaintiff to perform her A.D.L.s after 4 knee replacements and a right hip replacement. Plaintiff Victoria Stevens sustained injuries 3/20/90 which left her comatose year and a half, with multiple residual injuries. **(Medical Statement evidence files #46 and 48)**

Said Hearing was delayed for nearly three years per Opposing Counsel, Lawrence B. Smith, of Rivertown Law from June 27, 2022 until June 9 & 10, 2025 in order to get the Judge that Opposing Counsel wanted. Mr. Smith knew of Plaintiff's disability from her complaint **(evidence pages 44 and 45)**, but proceeded sans attention to legal mandate.

In South Carolina, civil hearings can be delayed without a formal motion to continue through mechanisms like scheduling orders, mediation delays, or written consent of parties. Key rules include 10-day notice for motions (Rule

6), 21-45 day scheduling windows for temporary relief (Rule 21), and scheduling orders that set trial dates, often allowing extensions if approved by the court.

5. In South Carolina, an attorney representing an unlicensed builder in a construction negligence lawsuit is bound by strict ethical mandates to not unduly delay proceedings, despite a client's potential desire to delay or avoid liability. Key mandates and rules include:

**A. Rule 3.2 - Expediting Litigation (SCACR 407):** Attorneys are required to make reasonable efforts to expedite litigation consistent with the interests of the client. A lawyer cannot delay a matter simply for the sake of frustration or for the personal convenience of the client.

**B. Rule 4.4 - Respect for Rights of Third Persons (SCACR 407):** In representing a client, a lawyer shall not use means that have no substantial purpose other than to embarrass, delay, or burden a third person.

**C. S.C. Code §15-36-10 - Frivolous Proceedings Sanctions:** An attorney can be sanctioned for filing pleadings or motions that are "interposed for delay" or that a reasonable attorney would believe are "intended merely to harass or injure the other party".

**D. Unlicensed Contractor Limitations:** While a builder being unlicensed does not absolve the owner of liability for negligence, an unlicensed contractor in South Carolina is barred from bringing an action to enforce a contract. Attorney Smith in Defendant's Answers Last paragraph, beginning Wherefore, states However, this does not give the attorney license to utilize dilatory tactics in defending a negligence suit.

**E. Unlicensed Status Context:** If an unlicensed contractor is sued for negligence, their attorney must abide by the South Carolina Rules of Professional Conduct, which prioritize court efficiency and fairness over a client's wish to stall a lawsuit, even if the client is facing severe consequences such as having to refund fees or stop working due to a "cease and desist" order from the Licensing Board. Attorney Smith did not follow Legal Mandate

6. On September 4, 2026, the Plaintiff received the written transcript of this proceeding produced by Court Reporter Kay H. Richardson. Said court reporter proceeded sans attention to legal mandate. In South Carolina, court reporters are responsible for creating accurate, verbatim records of legal proceedings using stenotype or voice-writing, often requiring digital backups. They must be neutral, professional, and adhere to strict confidentiality and filing, including delivering transcripts within 60 days of a request. Ms. Richardson's copy, delivered to me did not reflect what occurred in Court, nor things the Judge said. I am an Honors Graduate, with a cumulative 3.6 GPA. My memory is verbatim memory, I recall events, their sequence, and phrases well. Moreover, I retain that which violates particulars pertinent to the subject of discussion. That comes from being raised in an environment full of Attorneys, and hearing them dissect arguments for flaws. Moreover, I called Ms. Richardson regarding this, she was adamant that is what the tapes said, therefore due to the fact all notes, tapes, and recordings are in her possession and must be maintained. I request Professional Review of said tapes so that justice can be attained.

#### **Key Legal Mandates for South Carolina Court Reporters**

**A. Recording Requirements:** Reporters must record all testimony and proceedings verbatim using stenotype or steno mask (voice writing). Digital audio backup recorders are required in addition to the primary recording method.

**B. Record Retention & Maintenance:** Official reporters are responsible for filing and safely keeping records. They must maintain all notes, tapes, and recordings as stipulated by the SC Court Reporter Manual.

**C. Transcript Deadlines:** Transcripts must be delivered no later than 60 days after the request date. Requests are generally processed in the order received, with priority given to criminal appeals, termination of parental rights, and specific child custody cases.

**D. Reporting Income:** Court reporters must report gross income from fees quarterly (January 1, April 1, July 1, October 1) to the Office of Court Administration.

**E. Equipment Responsibility:** Each reporter must provide their own equipment, including computers, software, and recording tools at their own expense.

**F. Confidentiality & Professionalism:** Court reporters must remain neutral, avoid influencing trials, and maintain professional behavior.


**G. Mandatory Reporting:** As legal professionals in South Carolina, they are considered mandated reporters for child abuse or neglect, requiring them to report such cases if they learn of them in their professional capacity.

7. Upon review, the Plaintiff has identified material inaccuracies in the transcript that do not accurately reflect the record of the proceedings.
8. Specific examples of inaccuracies are as follows; these parts of the trial are totally altered:
  - A. The Jury came back with a verdict awarding me the monies I spent on repairs. This is totally omitted from transcripts.
  - B. Judge Hyman told the Jury, verbatim, that they were, "Ruling on Emotion, not law." The Jury was sent back. A JNOV was issued. This is totally omitted from transcripts.
  - C. Judge violates Judicial Canon # which ensures impartiality, by saying to my witness, "You owe Ms. Stevens lots, so you'll say anything for her...". This is totally omitted from transcripts.
  - D. The Judge said I had never mentioned sexual harassment, **page line ,in transcripts** therefore it was not an arguable issue. Mentioned within my initial complaint to court, (**pages 44 and 45 in evidence**).
9. These inaccuracies are material to this case; however this, along with all case related abuses of process, criminal misconduct affects the future outcome of appeal. It is necessary I bring these anomalies to appellate review together. I do this so that a pattern of purposeful error, and malicious intent can be established.
10. The Plaintiff requests that the Court order an independent, professional transcription service or a court-appointed reporter to compare the transcript with the original audio recording.
11. Also unjust is the fact on my Civil Coversheet, **evidence #42**, filed with Court 6/27/22, a trial is demanded. In as much as a Judge violated Court Rules, and ethical canons within my trial why is he allowed a JNOV, and why is that not in transcripts?

12. Is it not evident from the involvement of three entities in said trial that justice was the least among this courts worries? I implore you to use professional methods to verify the validity of transcripts, as well as records of cases to find out the frequency with which Opposing Counsel has cases heard by Judge Hyman.
13. Furthermore, and subsequently valuable to justice being served, I request you request the frequency with Which Judge Hyman utilizes the services of Court Reporter Kay H. Richardson.
14. **WHEREFORE**, Plaintiff requests that this Court:
  - A. Order the court reporter to produce the original audio recording.
  - B. Order an independent verification of the transcript by a certified forensic court reporter.
  - C. Verify frequency with which Attorney L. Bradly Smith of Rivertown Law schedules his cases to be heard by Judge B. Alex Hyman.
  - D. Verify the frequency with which Judge B. Alex Hyman utilizes Court Reporter Kay H. Richardson to transcribed cases over which he presides.
  - E. Grant such other relief as the Court deems just.

In closing, fabrication of rules and records by a judge and court reporter is a severe misuse of the judicial system, constituting abuse of process and potential criminal misconduct. Discussed legal process was perverted for an improper, ulterior purpose, such as intentional harm, and case victory, rather than the intended administration of justice. Inasmuch as my family owns Horry County's oldest Law firm, my brother was a state certified mediator and arbitrator, I am well researched; my Masters' is in Policy, but I have permanent disability; I feel this done out of intentional malice for a Pro se litigant. What totally baffles me is how any of those named in this Motion could be involved in such? I plead with this court to protect the sovereignty of these courts, investigate and please use professionals with experience in audio replication, as well as awarding punitive damages for the pain, daily dangers, cost excessive, and time consuming debacle faced by a Pro se litigant.

Respectfully submitted,

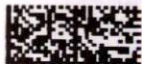


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4/6/2026

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