

Apr 15 2026

SC Court of Appeals

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Subject: APPELLANT'S EMERGENCY OMNIBUS MOTION FOR ENTRY OF JUDGMENT AND SUMMARY REVERSAL PURSUANT TO RULE 240 AND RULE 221(b), SCACR
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STATE OF SOUTH CAROLINA IN THE COURT OF APPEALS Tony Williams,
Appellant,

v. Lowe's Home Centers, LLC, et al., Respondents.

Appellate Case Nos.: 2026-00317 & 2026-00079 (*Consolidated for Purposes of this Motion*)

APPELLANT'S EMERGENCY OMNIBUS MOTION FOR ENTRY OF JUDGMENT AND SUMMARY REVERSAL PURSUANT TO RULE 240 AND RULE 221(b), SCACR ---

I. INTRODUCTION: THE DOCTRINE OF CORPORATE NULLITY Appellant Tony Williams, a 100% disabled veteran appearing *pro se*, moves this Honorable Court for an entry of final judgment and summary reversal. This motion is predicated upon the fatal application of the "Corporate Nullity" doctrine. The Respondents, Lowe's Home Centers, LLC ("Lowe's"), have effectively withdrawn from these proceedings by failing to maintain authorized legal representation.

Lowe's has knowingly allowed its lead counsel to lapse into "Status N (Former)" while attempting to "groom" the record through unauthorized interlopers. Consequently, the Respondents are in a state of total procedural abandonment. The \$30,000,000.00 liquidated debt must now be reduced to a final judgment to preserve the integrity of the appellate process.

II. ARGUMENT AND PROPER RULE APPLICATION 1. Proper Application of Rule 240, SCACR: The Procedural Bar Under Rule 240, SCACR, an Appellant may move for non-dispositional relief to correct the record and strike unauthorized filings.

- **The Reality:** The C-Track record confirms that Andrew Melling is "Status N (Former)" and Michelle Gaston has no Order of Substitution.
- **The Bar:** Because the Clerk of Court officially issued a "No Action Taken" notice on April 13, 2026, regarding the Respondents' filings, there is no valid defense currently "before" this Court. Per Rule 240, the Appellant's motion for Summary Reversal stands **uncontested** as a matter of law.

2. Proper Application of Rule 221(b), SCACR: The Jurisdictional Lock Pursuant to Rule 221(b), SCACR, the filing of the Notice of Intent to File Petition for Certiorari on April 13, 2026, stayed the issuance of the remittitur as a matter of law.

- **The Effect:** This Court retains **exclusive jurisdiction** over the record. The Circuit Court is currently divested of any authority to proceed.
- **The Result:** The Respondents' attempt to "groom" Case No. 2025-CP-07-01666 for a May 5th hearing in Beaufort County is a jurisdictional nullity. Any order generated in the lower court while the remittitur is stayed under **Rule 221(b)** is void *ab initio*.

3. Vicarious Liability and Corporate Ratification Lowe's had actual notice of the **Certified Default** in Case No. 01666. By failing to secure unconflicted, authorized counsel, Lowe's has **ratified** the default and the subsequent Unauthorized Practice of Law (UPL) by its agents. A corporation cannot proceed *pro se*, and Lowe's intentional silence is a forfeiture of its right to participate. *Lexington County v. Southern Bell Tel. & Tel. Co.*, 281 S.C. 315 (1984).

III. CONCLUSION: THE EQUITABLE DEMAND FOR FINALITY The "Identity Split" created by the Respondents has resulted in a total abandonment of the defense. They have relied on automated "Ghost Orders" while remaining in a state of financial and procedural deficiency. Equity and the strict application of the **Appellate Court Rules** demand a final resolution.

WHEREFORE, Appellant respectfully demands that this Court:

1. **ENTER SUMMARY REVERSAL** for the liquidated sum of **\$30,000,000.00**;
2. **STRIKE** the unauthorized May 5, 2026, hearing roster as a jurisdictional nullity; and
3. **ISSUE THE REMITTITUR** solely for the purpose of executing the judgment.

Respectfully Submitted, s/ Tony Williams

Appellant Pro Se / 100% Disabled Veteran Dated: April 15, 2026

IV. VERIFICATION I, Tony Williams, verify that the facts regarding the "**Status N**" designation and the "**No Action Taken**" status (as evidenced in the April 13, 2026 C-Track Record) are true and correct.

s/ Tony Williams