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Apr 27 2026

SC Court of Appeals

Samuel Tucker Collins, Jr.

Steward Trustee, STCJ Network Revocable Living Trust
2398 Hotel Street (homeless – address for mailing purposes)
Alcolu, South Carolina 29001
(803) 410-6608
stcjnetwork@proton.me

April 25, 2026

VIA HAND DELIVERY & EMAIL

Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Samuel T. Collins, Jr. v. West Palmetto Holdings, LLC

Appellate Case No. 2025-002352

Response to Court's April 16, 2026 Order and Status Update Regarding Transcript and Notice of Change of Address

Dear Clerk of Court:

The undersigned, **Samuel Tucker Collins, Jr.**, appearing as **Steward Trustee of the STCJ Network Revocable Living Trust (the real party in interest) and in his own proper person (*in propria persona*), in a fiduciary capacity, not as an attorney for any person or entity**, respectfully submits this response to the Court's April 16, 2026 order and cover letter, and provides the following status update regarding the transcript and notifies the court of a change of address.

Dear Clerk of Court:

The undersigned, **Samuel Tucker Collins, Jr.**, appearing as **Steward Trustee of the STCJ Network Revocable Living Trust (the real party in interest) and in his own proper person (*in propria persona*), in a fiduciary capacity, not as an attorney for any person or entity**, respectfully submits this response to the Court's April 16, 2026 order and cover letter, provides the following status update regarding the transcript, and notifies the Court of a change of address.

NOTICE OF CHANGE OF ADDRESS

Effective immediately, the undersigned's mailing address for all correspondence related to this appeal is:

**P.O. Box 161
Alcolu, South Carolina 29001**

All previous addresses (including 2398 Hotel Street, Alcolu, SC) are no longer valid for mail delivery. The undersigned requests that the Court and all parties update their records accordingly.

I. RECEIPT OF TRANSCRIPT

The transcript of the May 30, 2025, hearing before the Honorable Clifton B. Newman was received by the undersigned via **email on March 24, 2026**. A true and correct copy of the transcript is attached hereto as **Exhibit A** and is being filed concurrently with this response.

The undersigned confirms that the transcript is certified and complete.

II. REASON FOR DELAY IN FORMAL FILING

Due to the extraordinary circumstances surrounding the forcible eviction of the undersigned and his family, including his 80-year-old mother, wife, and minor daughter on **March 17, 2026**, the undersigned has been homeless since that date. During and after the eviction, all of the undersigned's court documents, legal papers, and personal belongings were commingled in garbage bags and scattered among three different locations: two friends' homes and a storage unit. This caused extreme disorganization and delay in assembling and filing the transcript and other documents with the Court.

The undersigned has now assembled the necessary documents and is filing the transcript with this response. No prejudice to Respondent has resulted from this delay.

III. THE COURT'S APRIL 16, 2026 ORDER – NOTED

The undersigned acknowledges the Court's April 16, 2026 order denying his "Motion to Remand with Temporary Stay Request." The undersigned notes his objection to the denial and preserves all equitable claims raised therein for further review. However, in

compliance with the Court's directive, the undersigned will now proceed with the main appeal.

IV. REQUEST FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF

Under Rule 208(b)(1), SCACR, the appellant's brief is due 30 days after the transcript is filed. The undersigned respectfully requests a **60-day extension** from the date of this filing to file his appellant's brief, for the following reasons:

1. The undersigned is **pro se** and appears in a fiduciary capacity as Steward Trustee.
2. The undersigned has been **homeless since March 17, 2026**, and is still in the process of stabilizing housing and accessing his legal documents.
3. The case involves complex equitable issues, including subject-matter jurisdiction, the magistrate's lack of authority, the availability of equitable defenses in ejectment, and the Court's refusal to recognize the trust's interest in the property.
4. An extension will not prejudice Respondent, as the appeal has been pending for several months and Respondent has been represented by counsel throughout.

The undersigned requests that the Court grant an extension until **June 20, 2026** (60 days from the date of this filing) to file the appellant's brief.

V. RESERVATION OF EQUITABLE RIGHTS

The undersigned appears in **equity**, not merely at law. He has invoked exclusive equity jurisdiction, filed equitable pleadings (including a Plea of Release, Supplemental Lodgment, and Notice of Lis Pendens), and tendered equitable security. He does not waive any equitable rights or claims by complying with the Court's procedural directives. To the extent any statute, rule, or order conflicts with equitable principles, equity shall prevail.

All rights under UCC 1-308 are expressly reserved.

VI. EQUITABLE DECLARATION

The undersigned declares, in equity and under the authority of the court of conscience, that the foregoing statements are true and correct to the best of his knowledge and

belief, and that he comes before this Court with clean hands and in good faith, seeking only the protection of his rights and the preservation of the trust res.

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VII. CERTIFICATE OF SERVICE

SC Court of Appeals

I, Samuel Tucker Collins, Jr., Steward Trustee, hereby certify that on this 21st day of April, 2026, a true and correct copy of the foregoing **Response to Court’s April 16, 2026 Order and Status Update Regarding Transcript**, together with the attached transcript (Exhibit A), was served upon the following parties by the methods indicated:

Party	Address	Method of Service
James Martin Page, Esquire Bell, Carrington, Price & Gregg, LLC	339 Heyward Street, Second Floor Columbia, South Carolina 29201	☒ Hand Delivery ☒ Certified Mail, Return Receipt Requested

I further certify that the foregoing Certificate of Service complies with Rule 262, SCACR, and Form 7 of Appendix C, Part 2, SCACR.

Executed this 25th day of April, 2026, at Alcolu, South Carolina.

By: Samuel Tucker Collins, Jr.
Samuel Tucker Collins, Jr.

Steward Trustee, STCJ Network Revocable Living Trust

Appearing in his own proper person (in propria persona), in a fiduciary capacity, not as an attorney for any person or entity

Exhibit A: Transcript of May 30, 2025 hearing (certified)