

In the United States district court of South Carolina

Miranda mitchum plaintiff

630 levee drive

Moncks corner sc

29461

David hayes Defendant

Roman Hammes attorney for defendant

215 West 2 nd South Street

Summerville sc

29483

Plaintiffs independent action for relief from judgment and request for jury trial and to vacate a void state judgement due to fraud upon the court and lack of subject matter jurisdiction and violation of fourteenth amendment of due process

Motion to vacate void judgement pursuant to FRCP 60 b4

This is a federal question because it involves violations of due process the state court acted without subject matter jurisdiction rendering it void .

I Miranda mitchum moves this court pursuant to FRCP 60 b4 to vacate state judgement case number 2024-cp-08-03108 in Berkeley County Common pleas This state court judgement is void due to lack of subject matter jurisdiction. The subject matter vin in exhibit A attached to this is vin number WHC10015GA-AB that won summary judgment .This is a phantom subject as no subject exists with this number . The correct vin number attached to this is WHC010015GA-AB .This violated the fourteenth amendment of the constitution of due process.

I entered a option to purchase with seller David hayes on July 19 2018 and Miranda mitchum a buyer in his office in the afternoon at swamp fox agency 1122 pinopolis road moncks corner sc 29461.He stated he was the owner attached in exhibit C contract of option to purchase . Also attached is exhibit J is the bill of sale when David hayes bought the subject matter of WHC010015GA-AB .David hayes was not the owner and did not have that right to sell under South Carolina law 16-30-240 it is illegal to obtain money under false pretenses .This fraudulent inducement led to the contract of sale on December 13 2022 at the office of Chris

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May 05 2026

SC Court of Appeals

louden In The afternoon. Chris louden attorney for David hayes was present as well as David hayes seller and Miranda mitchum buyer and notary Mary worth these where the only people in the office at that time at the address of attorney Chris louden at 223 heatley street moncks corner sc 29461. The July 19 2018 option to purchase led to the contract of sale on December 13 2022 attached in exhibit D which is void under south Carolina law adams v j creel and sons inc 320 s.c 274. Not only is this fraudulent inducement rendering this void but this is also a incorrect phantom subject .

Fraudulent inducement is fraud on the court .

Void judgement can be attacked at any time or any court directly or collaterally .As seen in precedents Oak Park National bank vs peoples has light and coke company .

The Rucker – Feldman doctrine does not apply to void judgements because the state never had authority to act in the first place due to lack of subject matter jurisdiction And particularly when validity of the judgement is fraud on the court

The Rucker – Feldman doctrine does not apply because the judgement is void on its face due to lack of jurisdiction Not just incorrectly decided.

- Attached to this in exhibit this is the actual vin which is WHC010015GA-AB

Demand for jury trial under FRP 38 request a jury trial

Prayer for relief Miranda mitchum plaintiffs requests the court vacate judgement and set a jury trial also plaintiff demands compensatory damages in the amount of 72,000 and a demand for punitive damages for 144,000 for fraud and violation of due process and fraudulent inducement total amount of 216,000

I declare under penalty of perjury the foregoing is true and correct

May 5, 2026
Miranda Mitchum
630 Levee Drive
Moncks Corner, SC
29461