

RECEIVED

May 18 2026

SC Court of Appeals

EXHIBIT

A

Affidavit of USC Registrar

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
)	Civil Action No. 2026-CP-40-00645
)	
Ubong Christopher Ubokudom,)	
)	
Plaintiff,)	AFFIDAVIT OF ELAINE BELESKY
)	
v.)	
)	
University of South Carolina,)	
)	
Defendant.)	
_____)	

I, Elaine Belesky, do declare under penalty of perjury under the laws of the United States of America that the following statements are true and correct:

1. I am currently employed by the University of South Carolina as the Interim University Registrar
2. In my position as Registrar, I oversee student registration, class scheduling, and the generation and transmittal of student transcripts.
3. I am familiar with the allegations in Plaintiff's Complaint and have reviewed materials related to the Plaintiff's history with the University of South Carolina.
4. Plaintiff attempted to enroll in the spring semester of 2025. He was accepted and registered for classes.
5. A prospective student remains enrolled only after payment of tuition for that semester. Pursuant to University policy, a student who does not pay tuition will not receive any grade entered for the registered classes that semester. [Attachment 1- FINA 8.00].

6. When a student is enrolled following payment of tuition and affirmatively withdraws during the designated time period, a grade of "W" is entered for the course withdrawn from.

7. Plaintiff was dropped from class rolls since he did not fully pay tuition. Plaintiff therefore received no grades for the Spring 2025 semester; his only semester registered at the University.

8. In January of 2026, Plaintiff requested an official transcript from the University for his prospective law school applications with the Law School Admissions Council ("LSAC"). Upon receipt of this request, the Registrar office discovered a hold placed on any release of records due to non-payment of his outstanding room and board bill.

9. The University eventually accepted a partial payment of the debt and removed the hold. After the hold was lifted, the Registrar's office discovered that Plaintiff had no transcript for any coursework at the University of South Carolina due to non-payment of tuition for his only semester registered. Plaintiff's transcript requests were cancelled and, upon information and belief, the University requested that the transcript vendor service "Parchment" refund Plaintiff's transcript request fees. [Attachment 2 - Parchment service Cancellation and Email Request].

10. Upon Plaintiff's continued requests to send documentation to LSAC after lifting the hold on his account, the University submitted a timely communication to LSAC correctly informing them that Plaintiff was not enrolled and has no record of graded coursework for his sole semester registered at USC. [Attachment 3- Academic Certification Letter]. Upon information and belief, the University did not retain a stamped copy of this letter; the Plaintiff's marked copy is attached herewith.

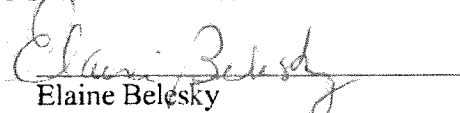
11. Though Plaintiff had transfer credits from another institution, Plaintiff still never fully enrolled and had no graded coursework at USC. The University has properly responded to his requests and has provided LSAC with timely and accurate documentation.

12. I never engaged in any negligent, wrongful, unlawful, or indifferent conduct towards Plaintiff, and I do not know of anyone who engaged in any negligent, wrongful, unlawful, or indifferent conduct towards Plaintiff.

13. The termination of Plaintiff's attempted enrollment and the resulting lack of a transcript for the Spring 2025 semester arises entirely from the standard procedure for handling non-payment. No University of South Carolina personnel acted with any discriminatory animus, gross negligence, deliberate indifference, or unlawful motivation.

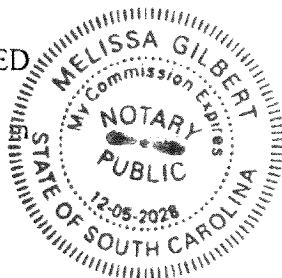
14. I did not violate the rights of Plaintiff, and I do not know of anyone who violated the rights of Plaintiff.

FURTHER AFFIANT SAYETH NOT.


Elaine Belesky
(Affiant)

SWORN TO AND SUBSCRIBED
BEFORE ME

This 24 day of February, 2026,
Columbia, South Carolina.





NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission expires: 12.5.28

ATTACHMENT

1

FINA 8.00

ADMINISTRATIVE DIVISION FINA Administration and Finance		POLICY NUMBER FINA 8.00	
POLICY TITLE Tuition, Academic, and All Other Fees			
SCOPE OF POLICY USC System		DATE OF REVISION April 14, 2025	
RESPONSIBLE OFFICER Executive Vice President for Administration and Chief Financial Officer		ADMINISTRATIVE OFFICE University Finance - Bursar	

PURPOSE

This policy governs the establishment of tuition, related fees, fee waivers, fines, deposits and any other fees. The University of South Carolina will follow policies and procedures consistent with the requirements of the State of South Carolina Code of Laws, Code of Regulations, governing agencies and University Policy.

POLICY STATEMENT

All students are required to review, understand, and adhere to university regulations, procedures, requirements, and deadlines as described in all official university publications pertaining to enrollment and associated financial responsibilities.

The Board of Trustees must approve all tuition and academic fees, fee waivers, and deposits through annual process managed by the University Budget Office. Other fees that are non-academic must be approved by an appropriate official of the university as outlined by related university policies listed in Section III.

Tuition and academic fees of the University are approved annually for all degree programs.

No department is authorized to levy or exempt any fees at the University without the approval of the Executive Vice President for Administration and Chief Financial Officer or to collect any fees without the approval of the Associate Vice President and University Bursar. The Associate Vice President and University Bursar must approve procedures for the collection of fees. See policy FINA 8.10 Receipt and Handling of University Payments.

Any office or department seeking to apply payments to a University issued account must likewise be approved by the Associate Vice President and University Bursar. The Associate Vice President and University Bursar must also approve the procedures for the collection of said payments.

All charges are due on the date that they are incurred, or the due date indicated on the bill, ticket, invoice or statement.

A complete listing of tuition and fees is available electronically on the University Bursar's website and the University Budget Document. Tuition and Fees information is also contained in the University's Undergraduate Bulletin or can be obtained from the Bursar's office.

Students are assessed tuition and academic fees according to their residency status and program in which they are enrolled, and the degree(s) being pursued.

Students must officially register and pay for assessed tuition and fees before attending class, laboratory or clinic.

Any student who fails to pay all required registration fees on or before the last date to change a course schedule (as indicated in the university calendar) may be dropped from class rolls.

Any student who fails to relieve any other indebtedness to the university or to any of its auxiliary agencies on the date such obligations become due may not be permitted to remain in university residence halls or be issued a diploma or degree or be allowed to register for subsequent semesters.

PROCEDURES

- A. Budget Process: A request for fees is announced each year during the annual budget process by the University Budget Office. All requests for establishing, collecting or exempting fees, or rewording official description of assessment must be submitted in writing. Requests for changes to the schedule of tuition and fees will be submitted through the Budget office to the Executive Vice President for Administration and Chief Financial Officer to the Board of Trustees for approval.
- B. The Tuition and Fee schedule, once approved by the Board of Trustees, will be posted on the University Bursar's website and included in the official Budget Document.
- C. Each semester, assessments of tuition and fees will be posted to each student's account. It is the responsibility of the student to pay the assessed tuition and fees, and other charges on the account by the due date, or the date incurred, whichever is later.

RELATED UNIVERSITY, STATE AND FEDERAL POLICIES

ACAF 3.50 Academic Bulletins and Planning Calendar

FINA 8.03 Free Tuition and Reduction of Fees

FINA 8.04 Tuition Award Program

FINA 8.05 Law School Educational Fee Waiver

FINA 8.10 Receipt and Handling of University Payments

HISTORY OF REVISIONS

DATE OF REVISION	REASON FOR REVISION
November 1, 2006	New Policy Approval
April 14, 2016	To update policy in regard to the OneCarolina Project, departmental name changes, and reorganization.
April 14, 2025	To update policy in regard to new federal transcript law and note that students are not allowed to register for classes if they have an outstanding balance. To update position titles.

ATTACHMENT

2

Parchment Refund

----- Forwarded message -----

From: Parchment [REDACTED]

Date: Wed, Jan 14, 2026 at 11:28 AM

Subject: Transcript Request Canceled

To: Ubong Ubokudom [REDACTED]



Order Canceled

Dear Ubong,

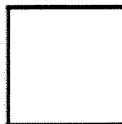
This email is to let you know that your order TR9IA8HH has been canceled.

We have received the request for your official University of South Carolina transcript. There is no record of enrollment on file. Therefore, this transcript order has been cancelled. If you have any questions, you may call Office of the University Registrar at [REDACTED].

A credit for the amount of this item is being applied to your Parchment account and can be accessed for other credentials ordered from the same institution.

If you have any questions, please contact University of South Carolina directly.

Thank you,
The Parchment Team



We're here if you need us

 Outlook

Ubong Christopher Ubokudom

From Jones, Kristen <[REDACTED]>

Date Thu 2/26/2026 9:01 AM

To Belesky, Elaine <[REDACTED]>

Cc Bomar, Teresa <[REDACTED]>

Elaine,

Please see the refund documentation below that I received from Parchment.

Thank you,

Kristen T. Jones
Assistant Registrar for Academic Records

[REDACTED] | [sc.edu/registrar](mailto:[REDACTED]@sc.edu/registrar)

Office of the University Registrar
University of South Carolina
1244 Blossom Street, Suite 106
Columbia, SC 29208



UNIVERSITY OF
South Carolina

From: membersupport@parchment.com <membersupport@parchment.com>

Sent: Thursday, February 26, 2026 8:56 AM

To: Jones, Kristen <[REDACTED]>

Cc: molly.mclean@instructure.com <molly.mclean@instructure.com>; Bomar, Teresa <[REDACTED]>

Subject: Parchment Support Suggested Solution: Case # 13651080 [ref:!00DA00lbsk.!500TU0shpsz:ref]

Good Morning,

I have issued a refund in the amount of \$49.25 for order TR9IA8LI back to the card used to purchase this document. Please allow 3-10 business days for it to show back up at the financial institution. Below is a screenshot of the refund transaction as requested.

None

[Redacted]

[Redacted]

[Redacted]

Apply Credit

Transaction ID 6967B8AD00F145A2000013E6000115AA525053BB
Payment Gateway Chase Orbital USD
Transaction Date January 14, 2026 7:31 AM PST
Transaction Type Credit Card

TRANSACTION TOTAL \$49.25
REFUNDED TOTAL \$49.25

DATE	APPLIED BY	TYPE	AMOUNT
Feb 26, 2026 5:49:26 AM PST	cherie.barnes@instructure.com	REFUND	\$49.25

BILLING INFORMATION

FOR

First Name Ubong
Middle Name -
Last Name Ubokudom
DOB [Redacted]
Last 4 SSN [Redacted]
Unique ID (Student ID) [Redacted]
Name When Enrolled Ubong Ubokudom
Email [Redacted]
Address [Redacted]

View Complete Learner Profile

Please let me know if there is anything else I can do to assist you.

I hope you have a great weekend coming up!

Warm Regards,

Cherie

ref:!00DA00lbsk!500TU0shpsz:ref

ATTACHMENT

3

Letter to LSAC

C12

January 20, 2026

To Whom It May Concern:

An academic certification for:

UBONG C UBOKUDOM

This student was never enrolled as a student at the University of South Carolina.



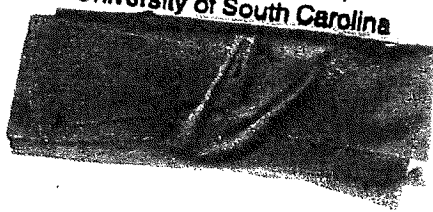
This certification is valid only when it bears the imprinted seal of the University of South Carolina and the signature of the Registrar. If you need to discuss this information, please call the Office of the University Registrar at [REDACTED]

Our certification system is designed to expedite the sharing of academic information with many agencies and companies. We appreciate your accepting this certification since hand-processed special forms slow our response.

END OF CERTIFICATION



A true copy of the record on file in the Office of the University Registrar, University of South Carolina



EXHIBIT

B

Affidavit of Bursar

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)
)
Ubong Christopher Ubokudom,)
)
Plaintiff,)
)
v.)
)
University of South Carolina,)
)
Defendant.)
_____)

IN THE COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT

Civil Action No. 2026-CP-40-00645

AFFIDAVIT OF NICOLE PRESSLEY

I, Nicole Pressley, do declare under penalty of perjury under the laws of the United States of America that the following statements are true and correct:

1. I am currently employed by the University of South Carolina as the University Bursar and the Associate Vice President for Administration and Finance.
2. In my position as University Bursar, I oversee the collecting and analyzing of student fees and payments, billing, and accounts payable.
3. I am familiar with the allegations in Plaintiff's Complaint and have reviewed materials related to the Plaintiff's billing and payment history with the University of South Carolina.
4. Plaintiff attempted to enroll in the spring semester of 2025. He was accepted and registered for classes.
5. Plaintiff had access to the tuition bill for this Spring 2025 semester beginning on December 18, 2024, via the "Self Service Carolina" student portal. The deadline for payment of tuition for the Spring 2025 semester was January 28, 2025.

6. Plaintiff's full bill for the Spring 2025 semester, inclusive of tuition and housing-related charges, totaled \$29,844.71.

7. Plaintiff submitted partial payment via a federal student loan totaling \$4,863.00.

8. Following dispersal of Plaintiff's federal loan, the remaining balance the time was \$24,981.71. This remainder was due in full by January 28, 2025.

9. Plaintiff did not pay tuition by the deadline January 28, 2025.

10. In full compliance with the standard procedure for non-payment of tuition, Plaintiff was dropped from class rolls. A student removed from class rolls due to non-payment of tuition receives no course grades for that semester. The tuition, academic fees, and financial aid were thus removed from his account, and his partial loan payment was returned to the lender.

11. Plaintiff incurred a debt to the University totaling \$1,922.01 for the housing and meal plan utilized by Plaintiff prior to removal for non-payment and late payment fee.

12. Due to the outstanding debt, the University placed a hold on the dispersal of any records of Plaintiff, if any, pursuant to standard procedure.

13. On or about January 12, 2026, Plaintiff agreed to a structured repayment schedule with the University [Attachment 1], pursuant to which Plaintiff agreed to pay half of the outstanding balance (\$961.00) immediately and to pay the remainder in six monthly installments. Immediately upon payment of the first half of the debt on or about January 12, 2026, the University lifted the hold on his account.

14. I never engaged in any negligent, wrongful, unlawful, or indifferent conduct towards Plaintiff, and I do not know of anyone who engaged in any negligent, wrongful, unlawful, or indifferent conduct towards Plaintiff.


15. The termination of Plaintiff's enrollment and the resulting lack of a transcript for the Spring 2025 semester arises entirely from the standard procedure for handling non-payment. No University of South Carolina personnel acted with any discriminatory animus, gross negligence, deliberate indifference, or unlawful motivation.

16. I did not violate the rights of Plaintiff, and I do not know of anyone who violated the rights of Plaintiff.

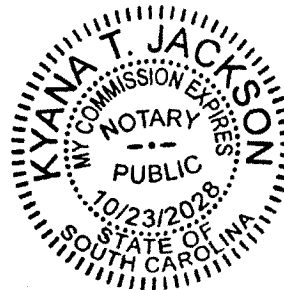
FURTHER AFFIANT SAYETH NOT.

Nicole Pressley
(Affiant)

SWORN TO AND SUBSCRIBED
BEFORE ME
This 26 day of February, 2026, in
Columbia, South Carolina.



NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission expires: 10/23/2028



ATTACHMENT

1

Repayment Agreement



Student Customer Services
OFFICE OF THE BURSAR

UNIVERSITY OF SOUTH CAROLINA
OFFICE OF THE BURSAR
REPAYMENT AGREEMENT

Student's Name: Mr. Ubong C Ubokudom

Student ID #: [REDACTED]

I, **Mr. Ubong C. Ubokudom**, do hereby agree to repay the University of South Carolina the total sum of **\$1,922.01**, incurred during the **Spring 2025** term. I agree to pay a **down payment of \$961.00 January 12th 2026** and the remaining balance of **\$961.01** through **six (6) monthly installments of \$160.16 on the 15th of each month starting in February 15, 2026**. This down payment represents half of the outstanding balance.

Payments may be made online at my.sc.edu via the Payment Gateway using a credit or debit card (a **2.5% processing fee** applies per payment) or by electronic check. Payments may also be made by **cashier's check or money order**, mailed to the address provided below, or made **in person**.

Per the University Bursar, the transcript hold will be released upon payment of **\$961.00**, which may be paid either in a lump sum or through at least **three (3) consecutive monthly payments** totaling that amount. Once the hold is removed and the transcript is sent to the Law School Admission Council, the hold will be reinstated **10 days later** until the remaining balance has been paid in full.

I further understand that, in accordance with University policy, a **HOLD has been or will be placed** on my student records. This HOLD will prevent me from requesting transcripts, registering for future terms, or receiving my diploma until all outstanding debts to the University are fully satisfied if the repayment terms above are not met.

I also understand that until **valid payments are received per repayment terms and applied to my account**, collection activity may proceed. I further acknowledge that if I am unable to make a scheduled payment at any time during the repayment period, I must **notify the Bursar's Office within 24 hours**. I understand that the University reserves the right to declare the **entire remaining balance immediately due and payable** in the event of a missed payment per repayment terms. Any waiver of this right for one default shall not constitute a waiver for subsequent defaults.

If legal action becomes necessary to enforce this agreement, I agree to pay any **reasonable attorney's fees and associated costs** as determined by the court.

By signing below, I acknowledge that I have read, understood, and agree to all terms and conditions stated herein.

[Signature]
Authorized Bursar Signature
1/12/2026
Date

[Signature]
Student's Signature
1/12/26
Date

Current Address: [REDACTED]
City: [REDACTED]
Telephone: [REDACTED]
Email address: [REDACTED]

Payments may be made in Bursar's Office [REDACTED] from 8:30 a.m. until 5:00 p.m. Monday through Friday.
Payments may be mailed to: [REDACTED] Payments may be made online: [REDACTED]
Bursar's Office Student Customer Services Marketplace

Contact Bursar's Office at [REDACTED] or email [REDACTED] if you have questions or comments regarding this repayment agreement.

EXHIBIT C

**MOTION FOR
TEMPORARY
RESTRAINING ORDER
AND PRELIMINARY
INJUNCTION**

STATE OF SOUTH CAROLINA

COUNTY OF Richland

IN THE COURT OF COMMON PLEAS
5th JUDICIAL CIRCUIT

CASE NO.: 2026CP4000645

Uzany Christopher Uzokudom
Plaintiff,

MOTION AND ORDER INFORMATION
FORM AND COVERSHEET

vs.
University of South Carolina
Defendant.

Plaintiff's Attorney: _____ Bar No. <u>Pro Se</u> Address: <u>P.O. Box 7594</u> <u>Columbia, SC 29202</u> Phone: _____ Fax _____ E-mail: _____ Other: <u>cubok1@gmail.com</u> <u>2489527833</u>	Defendant's Attorney: _____ Bar No. _____ Address: _____ Phone: _____ Fax _____ E-mail: _____ Other: _____									
<input checked="" type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and II) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input checked="" type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)										
SECTION I: Hearing Information Nature of Motion: <u>Temporary Restraining Order/Preliminary Injunction</u> Estimated Time Needed: <u>N/A</u> Court Reporter Needed: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO										
SECTION II: Motion/Order Type <input checked="" type="checkbox"/> Written motion attached <input checked="" type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order. <div style="display: flex; justify-content: space-between;"> <div> <u>[Signature]</u> Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant </div> <div> <u>2/3/26</u> Date submitted </div> </div>										
SECTION III: Motion Fee <input type="checkbox"/> PAID - AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: (check reason) <table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Rule to Show Cause in Child or Spousal Support</td> </tr> <tr> <td><input type="checkbox"/> Domestic Abuse or Abuse and Neglect</td> </tr> <tr> <td><input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party</td> </tr> <tr> <td><input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief</td> </tr> <tr> <td><input type="checkbox"/> Motion for Stay in Bankruptcy</td> </tr> <tr> <td><input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCF)</td> </tr> <tr> <td><input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions</td> </tr> <tr> <td>Name of Court Reporter: _____</td> </tr> <tr> <td><input type="checkbox"/> Other: _____</td> </tr> </table>		<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support	<input type="checkbox"/> Domestic Abuse or Abuse and Neglect	<input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party	<input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief	<input type="checkbox"/> Motion for Stay in Bankruptcy	<input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCF)	<input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions	Name of Court Reporter: _____	<input type="checkbox"/> Other: _____
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<input type="checkbox"/> Domestic Abuse or Abuse and Neglect										
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<input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief										
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Name of Court Reporter: _____										
<input type="checkbox"/> Other: _____										
JUDGE'S SECTION <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____									
CLERK'S VERIFICATION Collected by: <u>le</u> Date Filed: <u>2/3/26</u> <input type="checkbox"/> MOTION FEE COLLECTED: \$ _____ <input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____										

RICHLAND COUNTY
 FILED
 2026 FEB -3 PM 3:51
 JEANETTE W. McGRIBB
 C.C., G.S., & F.C.

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

FOR RICHLAND COUNTY

Ubong Christopher Ubokudom,
Plaintiff,

v.

University of South Carolina,
Defendant.

JEANETTE W. MERRIDG
C.C.P. G.S. 2-101
2026 FEB -3 PM 3:51
RICHLAND COUNTY
FILED

MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Plaintiff **Ubong Christopher Ubokudom** ("Plaintiff"), proceeding pro se, respectfully moves this Court pursuant to Rule 65, SCRCP, for the issuance of a **Temporary Restraining Order ("TRO") and Preliminary Injunction** against Defendant **University of South Carolina ("USC")**, and in support states as follows:

I. INTRODUCTION

This case arises from USC's refusal to provide Plaintiff with an accurate academic transcript or enrollment record reflecting his Spring 2025 enrollment and administrative withdrawal, despite Plaintiff's admission, enrollment, attendance, and repeated good-faith efforts to obtain his transcript through official channels.

Instead, USC retroactively erased Plaintiff's academic record, conditioned transcript access on re-enrollment and payment of disputed charges, and affirmatively informed

third parties—including the Law School Admission Council (“LSAC”)—that Plaintiff “never attended” the University.

This conduct has caused **immediate and irreparable harm**, including disruption of Plaintiff’s LSAT preparation, loss of scholarship opportunities, missed deadlines, severe emotional distress, and interference with Plaintiff’s ability to apply to law school. Absent emergency injunctive relief, these harms will continue and cannot be remedied by money alone.

II. FACTUAL BACKGROUND (SUMMARY)

1. Plaintiff was formally admitted to the University of South Carolina and enrolled as an undergraduate student for the Spring 2025 semester.
2. Plaintiff registered for courses, attended classes, completed coursework, and received graded assignments from course instructors.
3. Plaintiff was approved for and charged **on-campus housing and a university meal plan**, benefits available only to enrolled students.
4. Federal financial aid was originated and transmitted in connection with Plaintiff’s enrollment. Those funds were later returned after Plaintiff’s courses were administratively removed for nonpayment on or about January 28, 2025.
5. Beginning **November 28, 2025**, Plaintiff made multiple good-faith attempts to obtain his official transcript through **Parchment Transcript Services**, including requests on:
 - o November 28, 2025
 - o December 3, 2025
 - o January 12, 2026
 - o January 14, 2026
 - o January 16, 2026

Although I paid \$961, the University only sent a transcript to LSAC on or around January 13, 2026, and has canceled or rejected all subsequent transcript requests. I was informed that requests were on hold due to a debt owed to the University, despite my dispute of the charges. This conduct demonstrates that without Court intervention, the University will continue to block access to my academic records, causing irreparable harm to my law school applications and scholarship opportunities.

6. Each request was canceled after USC reported that Plaintiff had “no record of enrollment.”
7. USC represented that transcript access would be permitted upon partial payment of Plaintiff’s outstanding housing balance. Plaintiff relied on this representation and paid \$961.
8. USC initially transmitted an official transcript to LSAC, then later retracted it, claimed it was sent “in error,” canceled transcript orders, refunded transcript fees, and instructed LSAC that Plaintiff “never attended” USC.
9. USC has taken inconsistent and contradictory positions, including acknowledging that Plaintiff registered and attended classes while simultaneously asserting that he has “no academic record” and “nothing to produce.”

USC’s treatment of Plaintiff departed from its normal practices and was inconsistent with the manner in which similarly situated students are handled. Upon information and belief, Plaintiff was subjected to heightened scrutiny and unequal treatment, including the retroactive erasure of his enrollment, based on impermissible considerations. This unequal treatment further demonstrates the arbitrary nature of USC’s conduct.

III. IRREPARABLE HARM AND EMOTIONAL DISTRESS

10. Plaintiff is actively applying to law schools and scholarships through LSAC, which requires disclosure of **every institution attended**, regardless of whether credit was earned.
11. Plaintiff took the **LSAT on January 8, 2026**, and completed the **LSAT argumentative writing portion on January 12, 2026**, during the height of this

dispute.

12. USC's actions materially interfered with Plaintiff's ability to prepare for the LSAT, as Plaintiff was forced to divert substantial time and mental energy toward resolving transcript issues, communicating with USC, and preparing this litigation instead of studying.

13. The LSAT score is a critical determinant of law school admissions and scholarship awards. The higher the score, the greater the likelihood of receiving substantial scholarships.

14. As a direct result of USC's conduct:

- Plaintiff's LSAT preparation was impaired;
- Plaintiff missed scholarship application deadlines that required complete transcripts;
- Plaintiff was unable to apply for certain scholarships altogether; and
- Plaintiff's competitiveness for merit-based financial aid was diminished.

15. Beyond these concrete harms, USC's conduct has imposed a **severe emotional and physical toll** on Plaintiff. The prolonged uncertainty, shifting explanations, and repeated denials of access to his own academic record caused substantial stress during a critical stage of Plaintiff's professional development.

The discriminatory and unequal nature of USC's conduct has compounded Plaintiff's emotional distress by creating uncertainty, reputational risk, and fear of being accused of dishonesty in the law school admissions process. This harm is immediate, ongoing, and not compensable by money damages.

16. This harm is **ongoing**, time-sensitive, and **cannot be remedied retroactively** once admissions and scholarship deadlines pass.

IV. LEGAL STANDARD

Under Rule 65, SCRPC, a TRO or preliminary injunction is appropriate where the movant demonstrates:

1. A likelihood of success on the merits;
 2. Irreparable harm absent injunctive relief;
 3. That the balance of equities favors the movant; and
 4. That the injunction serves the public interest.
-

V. ARGUMENT

A. Likelihood of Success on the Merits

USC concedes that Plaintiff registered for courses and attended classes, yet refuses to maintain or disclose an accurate enrollment record. USC further accepted payment tied to transcript access and then reversed course.

These actions support Plaintiff's claims for declaratory relief, breach of implied contract, promissory estoppel, and arbitrary and capricious agency action.

B. Irreparable Harm

Loss of educational opportunity, impairment of standardized-test preparation, missed scholarship deadlines, and reputational harm in the law school admissions process constitute irreparable injury for which monetary damages alone are insufficient.

The irreparable harm is further exacerbated by USC's unequal and discriminatory treatment of Plaintiff, which undermines basic fairness and cannot be remedied once admissions and scholarship deadlines pass.

C. Balance of Equities

The relief requested requires USC only to provide an accurate historical record. The burden on USC is minimal compared to the devastating and permanent consequences Plaintiff faces without relief.

D. Public Interest

The public interest favors transparency, fair treatment by public universities, and accurate academic recordkeeping.

VI. REQUESTED RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Issue a **Temporary Restraining Order** enjoining USC from:
 - a. Representing to LSAC or any third party that Plaintiff “never attended” USC; and
 - b. Conditioning transcript or enrollment record access on re-enrollment or payment of disputed charges;
2. Issue a **Preliminary Injunction** requiring USC to:
 - a. Prepare and release an unofficial transcript or enrollment record reflecting Plaintiff’s Spring 2025 enrollment and administrative withdrawal; and
 - b. Fulfill Plaintiff’s official transcript requests through Parchment or an equivalent method;
3. Order the **immediate release and use of the \$961 payment** upon grant of the TRO;
4. Preserve Plaintiff’s claims for **monetary damages in the amount of \$200,000**, exclusive of costs and interest;
5. Set this matter for an expedited hearing; and
6. Plaintiff respectfully requests that this Court issue an order requiring the University of South Carolina, its officers, employees, agents, and all others acting in concert with it, to preserve **unaltered** all records, electronic or paper, related to Plaintiff’s enrollment, courses, financial accounts, transcript requests, communications, or any other records referencing Plaintiff, Ubong Christopher

Ubokudom, and to take no action to destroy, modify, or remove such records pending further order of this Court.

7. Grant such other and further relief as the Court deems just and proper.

VERIFICATION IN SUPPORT OF TEMPORARY RESTRAINING ORDER

AND PRELIMINARY INJUNCTION

I, **Ubong Christopher Ubokudom**, being first duly sworn, depose and state as follows:

1. I am the Plaintiff in the above-captioned action.
2. I have read the Motion for Temporary Restraining Order and/or Preliminary Injunction and any supporting memorandum.
3. The factual statements contained therein are true and correct to the best of my knowledge, information, and belief.
4. Immediate and irreparable harm will result to Plaintiff absent emergency injunctive relief, including harm that cannot be adequately remedied by monetary damages.
5. This Verification is made in support of Plaintiff's request for temporary, preliminary, and permanent injunctive relief.

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

Executed this 30th day of January, 2026, in Columbia, South Carolina.

PLAINTIFF'S SIGNATURE:



Ubong Christopher Ubokudom
Plaintiff, Pro Se

Printed Name: Ubong Christopher Ubokudom

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Sworn to and subscribed before me this 30 day of January, 2026, by **Ubong Christopher Ubokudom**, who is personally known to me or who has produced satisfactory identification.

NOTARY PUBLIC SIGNATURE:

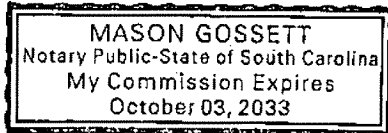
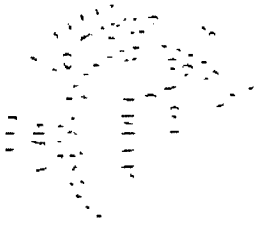
Mason Gossett

Notary Public for South Carolina

Printed Name: Mason Gossett

My Commission Expires: 10/03/2033

(Notarial Seal)



State of South Carolina
County of Richland

On this 30 day of January, 2026 before me personally appeared Ubong Christopher Ubokudom, who provided satisfactory evidence of his/her identification to be the person whose name is subscribed to this instrument and he/she acknowledged that he/she executed the foregoing instrument by his/her signature here.

[Signature]
Document Holder's Signature

EXHIBIT D

MOTION TO EXPEDITE CONSIDERATION

STATE OF SOUTH CAROLINA)
 COUNTY OF Richland)
Ulong Christopher Udo Kuduom)
 Plaintiff,)
 vs.)
University of South Carolina)
 Defendant.)

IN THE COURT OF COMMON PLEAS
5th JUDICIAL CIRCUIT
 CASE NO. 2026CP4000645

**MOTION AND ORDER INFORMATION
 FORM AND COVERSHEET**

Plaintiff's Attorney: <u>Pro Se</u> Bar No. _____ Address: <u>P.O. Box 1594</u> <u>Columbia SC 29202</u> Phone: _____ Fax _____ <u>cubok20@gmail.com</u> E-mail: _____ Other: <u>2989527833</u>	Defendant's Attorney: Bar No. _____ Address: _____ Phone: _____ Fax _____ E-mail: _____ Other: _____												
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input checked="" type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)													
SECTION I: Hearing Information Nature of Motion: <u>Emergency Motion to Expedite Consideration of This Motion</u> Estimated Time Needed: <u>N/A</u> Court Reporter Needed: <input type="checkbox"/> YES / <input checked="" type="checkbox"/> NO													
SECTION II: Motion/Order Type <input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.													
Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant Date submitted _____													
SECTION III: Motion Fee <input type="checkbox"/> PAID - AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: (check reason) <table border="0"> <tr> <td><input type="checkbox"/> Rule to Show Cause in Child or Spousal Support</td> <td><input type="checkbox"/> State Agency v. Indigent Party</td> </tr> <tr> <td><input type="checkbox"/> Domestic Abuse or Abuse and Neglect</td> <td><input type="checkbox"/> Post-Conviction Relief</td> </tr> <tr> <td><input type="checkbox"/> Indigent Status</td> <td><input type="checkbox"/> Motion for Stay in Bankruptcy</td> </tr> <tr> <td><input type="checkbox"/> Sexually Violent Predator Act</td> <td><input type="checkbox"/> Motion for Execution (Rule 69, SCRCP)</td> </tr> <tr> <td><input type="checkbox"/> Motion for Publication</td> <td><input type="checkbox"/> Proposed order submitted at request of the court; or,</td> </tr> <tr> <td><input type="checkbox"/> Proposed order submitted at request of the court; or,</td> <td>reduced to writing from motion made in open court per judge's instructions</td> </tr> </table> Name of Court Reporter: _____ <input type="checkbox"/> Other: _____		<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support	<input type="checkbox"/> State Agency v. Indigent Party	<input type="checkbox"/> Domestic Abuse or Abuse and Neglect	<input type="checkbox"/> Post-Conviction Relief	<input type="checkbox"/> Indigent Status	<input type="checkbox"/> Motion for Stay in Bankruptcy	<input type="checkbox"/> Sexually Violent Predator Act	<input type="checkbox"/> Motion for Execution (Rule 69, SCRCP)	<input type="checkbox"/> Motion for Publication	<input type="checkbox"/> Proposed order submitted at request of the court; or,	<input type="checkbox"/> Proposed order submitted at request of the court; or,	reduced to writing from motion made in open court per judge's instructions
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<input type="checkbox"/> Motion for Publication	<input type="checkbox"/> Proposed order submitted at request of the court; or,												
<input type="checkbox"/> Proposed order submitted at request of the court; or,	reduced to writing from motion made in open court per judge's instructions												
JUDGE'S SECTION <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____												
CLERK'S VERIFICATION Collected by: <u>Re</u> Date Filed <u>2/13/24</u> <input type="checkbox"/> MOTION FEE COLLECTED: \$ _____ <input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____													

RICHLAND COUNTY
 FILED
 2026 FEB 13 PM 3:54
 JEANETTE W. MCGIBBIE
 CLERK OF COURT

EMERGENCY MOTION TO EXPEDITE CONSIDERATION

STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
FOR RICHLAND COUNTY

Ubong Christopher Ubokudom,
Plaintiff,

v.

University of South Carolina,
Defendant.

Case No.:

2026 FEB -3 PM 3:54
JENNETTE W. MCBRIDE
C.O.R., G.S., & F.C.

RICHLAND COUNTY
FILED

EMERGENCY MOTION TO EXPEDITE CONSIDERATION OF PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER

Plaintiff Ubong Christopher Ubokudom, proceeding pro se, respectfully moves this Court for expedited consideration of his Motion for Temporary Restraining Order and Preliminary Injunction and states as follows:

1. Plaintiff is actively engaged in the law school admissions process through the Law School Admission Council (LSAC), which requires complete and accurate disclosure of all institutions attended.
2. Defendant University of South Carolina has represented to LSAC and others that Plaintiff "never attended" USC, while simultaneously refusing to provide an accurate enrollment or transcript record.
3. Plaintiff is subject to **imminent, non-extendable deadlines** for law school applications and scholarship consideration, many of which will permanently close absent immediate relief.

4. Delay in ruling on Plaintiff's Motion for Temporary Restraining Order will **effectively deny relief**, as even a later favorable ruling would not restore missed admissions cycles, scholarship opportunities, or reputational harm.
5. Plaintiff has submitted a verified motion, Rule 65(b) certification, and supporting materials demonstrating immediate and irreparable harm.
6. The relief requested is narrow, preserves the status quo, and imposes minimal burden on Defendant.

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Expedite consideration of Plaintiff's Motion for Temporary Restraining Order;
- B. Consider the Motion on an emergency basis without awaiting a full response, or in the alternative, set an expedited hearing at the earliest practicable date; and
- C. Grant such other and further relief as the Court deems just and proper.

Respectfully,



Dated: 1/30/26

Ubong Christopher Ubokudom
P.O. Box 1594
Columbia, SC 29202

Pro Se Plaintiff

EXHIBIT E

**REQUEST FOR STATUS
CONFERENCE
REGARDING PENDING
EMERGENCY MOTION
FOR TRO**

STATE OF SOUTH CAROLINA)
 COUNTY OF Richland)

IN THE COURT OF COMMON PLEAS
5th JUDICIAL CIRCUIT

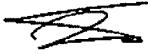
CASE NO.: 2026-CP-400-0645

Uwang Christopher UboKudom)
 Plaintiff,)

**MOTION AND ORDER INFORMATION
 FORM AND COVERSHEET.**

vs.)

University of South Carolina)
 Defendant.)

Plaintiff's Attorney: <u>Pro Se</u> , Bar No. _____ Address: <u>P.O. Box 1594, Columbia, SC 29202</u> Phone: _____ Fax _____ E-mail: _____ Other: _____	Defendant's Attorney: _____, Bar No. _____ Address: _____ Phone: _____ Fax _____ E-mail: _____ Other: _____										
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input checked="" type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)											
SECTION I: Hearing Information											
Nature of Motion: _____ Estimated Time Needed: _____ Court Reporter Needed: <input type="checkbox"/> YES/ <input checked="" type="checkbox"/> NO											
SECTION II: Motion/Order Type											
<input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order. <div style="text-align: center;">  Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff/ <input type="checkbox"/> Defendant Date submitted: <u>2/10/20</u> </div>											
SECTION III: Motion Fee											
<input type="checkbox"/> PAID - AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: (check reason) <table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Rule to Show Cause in Child or Spousal Support</td> <td><input type="checkbox"/> State Agency v. Indigent Party</td> </tr> <tr> <td><input type="checkbox"/> Domestic Abuse or Abuse and Neglect</td> <td><input type="checkbox"/> Post-Conviction Relief</td> </tr> <tr> <td><input type="checkbox"/> Indigent Status</td> <td><input type="checkbox"/> Motion for Execution (Rule 69, SCRCP)</td> </tr> <tr> <td><input type="checkbox"/> Sexually Violent Predator Act</td> <td><input type="checkbox"/> Motion for Stay in Bankruptcy</td> </tr> <tr> <td><input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions</td> <td></td> </tr> </table> Name of Court Reporter: _____ <input type="checkbox"/> Other: _____		<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support	<input type="checkbox"/> State Agency v. Indigent Party	<input type="checkbox"/> Domestic Abuse or Abuse and Neglect	<input type="checkbox"/> Post-Conviction Relief	<input type="checkbox"/> Indigent Status	<input type="checkbox"/> Motion for Execution (Rule 69, SCRCP)	<input type="checkbox"/> Sexually Violent Predator Act	<input type="checkbox"/> Motion for Stay in Bankruptcy	<input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions	
<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support	<input type="checkbox"/> State Agency v. Indigent Party										
<input type="checkbox"/> Domestic Abuse or Abuse and Neglect	<input type="checkbox"/> Post-Conviction Relief										
<input type="checkbox"/> Indigent Status	<input type="checkbox"/> Motion for Execution (Rule 69, SCRCP)										
<input type="checkbox"/> Sexually Violent Predator Act	<input type="checkbox"/> Motion for Stay in Bankruptcy										
<input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions											
JUDGE'S SECTION	CLERK'S VERIFICATION										
<input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____, 20____										
Collected by: <u>EL 2/10/20</u> Date Filed: _____, 20____ <input checked="" type="checkbox"/> MOTION FEE COLLECTED: \$ <u>25.00</u> <input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____											

RICHLAND COUNTY
 FILED
 JENNIFER W. MERRIDE
 2026 FEB 10 AM 11:27

STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
FOR RICHLAND COUNTY

Ubong Christopher Ubokudom, *Plaintiff*, v. University of South Carolina, *Defendant*.

Case No.: 2026CP4000645

**PLAINTIFF'S REQUEST FOR STATUS CONFERENCE REGARDING
PENDING EMERGENCY MOTION FOR TRO**

TO: THE HONORABLE PRESIDING JUDGE OF THE FIFTH JUDICIAL CIRCUIT

Plaintiff, Ubong Christopher Ubokudom, appearing *pro se*, respectfully submits this administrative request for a status conference or expedited ruling regarding the **Motion for Temporary Restraining Order and Preliminary Injunction** filed in this matter. In support of this request, Plaintiff states:

1. **Emergency Nature of Relief:** This action involves a time-sensitive dispute regarding the release of academic transcripts necessary for law school applications.
2. **Imminent Deadline:** Multiple law school admissions and scholarship deadlines for the Fall 2026 cycle expire on or about **February 15, 2026**. Failure to submit these records by this date will result in the Plaintiff's automatic disqualification from the admissions cycle.
3. **Irreparable Harm:** As detailed in the pending motion and Plaintiff's Supplemental Affidavit, the harm caused by missing these deadlines is irreparable and cannot be remedied by monetary damages alone. **Specifically, the delay in Plaintiff's legal education directly impairs his ability to provide specialized legal advocacy for his minor child, who is the subject of pending litigation in this State. The time-sensitive nature of protecting a minor's legal interests constitutes a unique and irreparable harm that cannot be compensated by future monetary damages.**
4. **Purpose of Request:** Plaintiff respectfully requests a brief status conference or an expedited hearing date to ensure that the requested emergency relief—specifically the **Mandatory Letter of Correction** to the LSAC—can be adjudicated before the February 15 deadline.

2026 FEB 10 AM 11:27
JEANETTE V. MCBRIDE
C.C.P. 05 & FC
RICHLAND COUNTY
FILED

Respectfully,



Dated: 2/10/26

Ubong Christopher Ubokudom
P.O. Box 1594
Columbia, SC 29202

Pro Se Plaintiff

EXHIBIT F

ORDER

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



Richland Common Pleas

Case Caption: Ubong Christopher Ubokudom , plaintiff, et al vs University Of South Carolina
Case Number: 2026CP4000645
Type: Order/Electronic Form 4

So Ordered

s/ Daniel Coble, 2774

EXHIBIT G

RESPONSES TO

REQUESTS FOR

ADMISSION

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)
)
)
)
Ubong Christopher Ubokudom,)
)
)
Plaintiff,)
)
v.)
)
University of South Carolina,)
)
)
Defendant.)
_____)

**IN THE COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT**

Civil Action No. 2026-CP-40-00645

**DEFENDANT’S RESPONSES TO
PLAINTIFF’S REQUESTS FOR
ADMISSION**

TO: UBONG CHRISTOPHER UBOKUDOM, PRO SE PLAINTIFF:

Defendant University of South Carolina (hereinafter “Defendant”), by and through its undersigned attorneys, pursuant to Rule 36 of the South Carolina Rules of Civil Procedure, hereby responds to Plaintiff’s Requests for Admissions, as follows:

GENERAL OBJECTIONS

Defendant objects to the Plaintiff’s inclusion of the headings or alleged causes of action listed by the Plaintiff preceding the Requests for Admission, as they are mere legal conclusions and do not “relate to statements or opinions of fact or of the application of law to fact” as required by Rule 36, SCRPC. Defendant denies that Plaintiff has sufficiently pled or established any cause of action, denies that any Response set forth by Defendant below establishes any element of any cause of action listed, and denies that any Response serves as a concession that such a cause of action is sufficiently pled or shown. Defendant also states that no separate series of attached Exhibits accompanied these Requests and Defendant is not able to determine in every instance which specific document the Request references by letter/Exhibit heading. Defendant craves reference to the specific language set forth within

the document being referenced.

REQUESTS FOR ADMISSION

1. (Count I: Declaratory Judgment): Admit that University ID Card T07579056 (**Exhibit B**) was issued by the Defendant's ticketing or carding office as a result of the Plaintiff's status as a registered student.

RESPONSE: **Admit.**

2. (Count II: Breach of Implied Contract): Admit that the University's financial ledger for the Spring 2025 semester reflects a payment of **\$961.00 (Exhibit G)** applied toward the Plaintiff's student account.

RESPONSE: **Admit.**

3. (Count III: Promissory Estoppel): Admit that the University communicated to the Plaintiff that the payment of a \$961.00 housing balance (**Exhibit H**) was a requirement for the release of his academic records.

RESPONSE: **Denied as worded. In further responding, Defendant states that the release of the administrative hold placed on Plaintiff's account, not the production or release of any specific record or document, was contingent upon the above-mentioned payment. Defendant craves reference to the applicable USC policies and the language of the repayment agreement.**

4. (Count IV: Breach of Duty under SC APA): Admit that on January 20, 2026, the University issued a written admission stating that the Plaintiff "**registered and attended**" classes (**Exhibit A**).

RESPONSE: **Admit.**

5. (Count V: Specific Performance): Admit that the Defendant has the technical capability to transmit an electronic record to the LSAC or Parchment that accurately reflects the Plaintiff's registration history.

RESPONSE: Admit. Defendant has sent a communication to LSAC accurately reflecting the Plaintiff's USC academic record.

6. (Count VI: Gross Negligence): Admit that the Defendant's internal "USC Account Statement" for "Term: Spring 2025" (**Exhibit I**) shows a Federal Pell Grant was attached to the Plaintiff's student profile.

RESPONSE: Denied.

7. **RFA NO. 7 (Count VII: Defamation Per Se)**: Admit that the Defendant communicated to the Law School Admission Council (LSAC) that the Plaintiff has "**no official record of academic work**" or "**no enrollment history**" at the University.

RESPONSE: Admit.

8. (Count VIII: Breach of Contract w/ Fraudulent Act): Admit that the University's transmission of a "No Record" notice to the LSAC (**Exhibit K**) was sent despite the existence of the internal "Registered and Attended" status documented in **Exhibit A**.

RESPONSE: Denied as worded. Plaintiff registered for courses at USC and attended classes, and Plaintiff does not have any graded coursework or academic record with USC due to failure to pay tuition.

9. **RFA NO. 9 (Count I: Declaratory Judgment / Ref: Exhibit B)**: Admit that the **University ID Card (T07579056)** shown in Exhibit B is an authentic document generated by the Defendant's official systems and that its issuance requires a student to be "active" in the University's enrollment database at the time of printing.

RESPONSE: Denied. Defendant craves reference to the policies and procedures associated with issuance of "Carolina Card" student IDs.

Section 2: Requests for Admission of Fact (Limit: 20)

10. (Ref: Answer ¶ 5): Admit that the Defendant's internal "Banner" or Student Information System contains an entry for the Plaintiff for the Spring 2025 term with the status code

or notation "Registered and Attended."

RESPONSE: Denied.

11. (Ref: Answer ¶ 5): Admit that the Defendant certified the Plaintiff's enrollment for the Spring 2025 semester to the U.S. Department of Education for the purpose of receiving Federal Pell Grant funds.

RESPONSE: Denied. Records show only that Plaintiff received a student loan, not a Pell Grant.

12. (Ref: Answer ¶ 7): Admit that the Defendant's report to the Law School Admission Council (LSAC) stating "no enrollment history" was sent *after* the Defendant had already generated the internal record in Exhibit A admitting the Plaintiff "registered and attended."

RESPONSE: Upon information and belief, after thorough and good-faith analysis of all information and materials available to Defendant, Defendant lacks sufficient information to admit or deny this Request. Both communications took place on the same day.

13. (Ref: Answer ¶ 28): Admit that the Defendant has no evidence of any "external event" that physically prevented the Defendant from transmitting an accurate academic record to the LSAC.

RESPONSE: Defendant objects to this Request as it is vague and ambiguous regarding the definition of "external event" or "physically prevented" in context of the facts of this case. Subject to and not waiving this Objection, Defendant admits that it was not prevented from transmitting an accurate academic record to LSAC, and Defendant asserts that it did send an accurate record to LSAC.

14. (Ref: Answer ¶ 30): Admit that the Defendant accepted and has not refunded the \$961.00 payment (Exhibit G) made by the Plaintiff for a housing debt.

RESPONSE: Admit.

15. Admit that it is the official position of the University Registrar's office that it may withhold transcripts if it "fails to see how [releasing the record] would benefit" a student (**Exhibit J**).

RESPONSE: **Denied.**

16. (Count II: Breach of Implied Contract / Ref: Exhibit G): Admit that the Defendant's acceptance of \$961.00 from the Plaintiff (Exhibit G) created an obligation for the Defendant to maintain accurate and accessible administrative records for the Plaintiff for the Spring 2025 term.

RESPONSE: **Denied. In further responding, Defendant states that it did maintain accurate records regarding Plaintiff's Spring 2025 term. The amount paid was for Plaintiff's debt previously owed to Defendant.**

17. (Count III: Promissory Estoppel / Ref: Exhibit H): Admit that the email in **Exhibit H** constitutes a promise by the University that payment of the \$961.00 balance would result in the "updating" or "release" of the Plaintiff's academic records.

RESPONSE: **Denied.**

18. (Count IV: Breach of Duty under SC APA / Ref: Exhibit A & C): Admit that the Defendant has no administrative record or policy that justifies issuing an "Admission of Truth" (**Exhibit A**) and a "Non-Enrollment Letter" (**Exhibit C**) on the same day for the same student.

RESPONSE: **Defendant objects to this Request as it is vague and ambiguous regarding the information sought. Defendant also objects to the characterization via the quoted language regarding the documents referenced above, and Defendant craves reference to the specific language within those documents. Subject to and not waiving this Objection, Denied.**

19. (Count V: Specific Performance / Ref: Exhibit D): Admit that the "cancellation" of the transcript request shown in **Exhibit D** was initiated by a manual action or instruction provided by the Defendant to the Parchment service.

RESPONSE: **Defendant is unable to determine which "Exhibit D" is referenced above, as Plaintiff has submitted various filings with different attachments labeled "Exhibit D" with no specific exhibit attached with these Requests. Thus, Defendant is unable to determine which transcript request cancellation is referenced above, and Defendant therefore denies as worded. In further responding, Defendant states that the first three transcript requests from Plaintiff were affirmatively cancelled before Parchment involvement due to the account hold, and the fourth was cancelled or retracted after delivery to LSAC due to lack of a transcript containing USC coursework and the record containing only transfer coursework. Subsequent request cancellations were automated.**

20. (Count VI: Gross Negligence / Ref: Exhibit I): Admit that the Defendant's financial aid office received and processed **Federal Pell Grant** funds for the Plaintiff's "Term: Spring 2025" as shown in the official USC Account Statement (**Exhibit I**).

RESPONSE: Denied.

21. (Count VII: Defamation Per Se / Ref: Exhibit K): Admit that the statement "no official record of academic work" transmitted to the **LSAC (Exhibit K)** is factually inconsistent with the Defendant's internal records showing the Plaintiff "registered and attended."

RESPONSE: Denied.

22. (Count VIII: Breach of Contract w/ Fraudulent Act / Ref: Exhibit F): Admit that at the time the Defendant reported "no record" to third parties, the Defendant's agents were aware that the Plaintiff was using those records to apply to law schools.

RESPONSE: Admit to the extent the Request states that Defendant reported that Plaintiff had no USC academic record and that Defendant was aware Plaintiff was attempting to apply to law school. Defendant denies the remainder of this Request, and asserts that Plaintiff has no USC transcript.

23. (Count IX: IIED / Ref: Exhibit J & E): Admit that the statement in **Exhibit J** (failing to see how a transcript "would benefit" the Plaintiff) was made by a University official who had the authority to release or withhold the Plaintiff's records.

RESPONSE: Denied; the bursar office does not have the unilateral "authority to release or withhold the Plaintiff's records."

24. (Justification of Damages / Ref: Exhibit E): Admit that the Defendant has no evidence to contradict the fact that its administrative obstruction has directly interfered with the Plaintiff's court-ordered duty to represent his daughter in **Federal Case No. 3:25-cv-12608 (Exhibit E)**.

RESPONSE: Denied, and Defendant denies any "administrative obstruction."

25. (Destruction of Unique Opportunity): Admit that the Defendant was aware, via the **Harvard Law School notice (Exhibit F)**, that the Plaintiff possessed a unique and high-value professional opportunity that would be permanently forfeited if the Defendant reported "No Record" to the LSAC.

RESPONSE: Denied.

26. (Intentionality of the Block): Admit that the decision to report "No Record" to the LSAC was an intentional administrative choice made with the knowledge that it would prevent the Plaintiff from meeting the court-ordered requirement for counsel in **Federal Case No. 3:25-cv-12608**.

RESPONSE: Denied.

27. (Valuation of Federal Claims): Admit that the Defendant has no evidence to dispute the Plaintiff's valuation of damages in the amount of \$1,000,000,000.00, given the life-threatening risks and permanent physical injuries detailed in the Federal Case Packet (Exhibit E).

RESPONSE: Denied.

28. (Gatekeeping of Rights): Admit that by withholding the Plaintiff's records, the University acted as a "gatekeeper" to the Plaintiff's access to the federal judiciary and his ability to protect the constitutional rights of a minor child.

RESPONSE: Denied.

[SIGNATURE BLOCK APPEARS ON FOLLOWING PAGE]

29. (Lack of Mitigation): Admit that despite receiving the Plaintiff's formal grievances and evidence of enrollment (Exhibits A, B, and I), the Defendant took no steps to mitigate the Plaintiff's damages by issuing a temporary or corrected transcript to the LSAC.

RESPONSE: Denied as worded; Defendant denies that Plaintiff incurred any damages and denies that there is any transcript or enrollment status of Plaintiff to be "corrected." Defendant denies any liability and denies any breach of any duty.

s/Jacob A. Bilotft
Janet Brooks Holmes, Esq. (SC Bar # 11826)
Jacob A. Bilotft, Esq. (SC Bar # 105349)
The McKay Firm, P.A.
3700 Forest Dr., Ste. 404 (29204)
P. O. Box 7217
Columbia, SC 29202
P: (803) 256-4645
F: (803)765-1839
Attorneys for Defendant

Columbia, South Carolina
April 2, 2026

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
)	C/A No.: 2026-CP-40-00645
)	
Ubong Christopher Ubokudom,)	
)	
Plaintiff,)	CERTIFICATE OF SERVICE
)	
v.)	
)	
University of South Carolina,)	
)	
Defendant.)	
_____)	

The undersigned hereby certifies that on **April 2, 2026**, *Defendant's Responses to Plaintiff's Requests for Admission* was duly served upon the Plaintiff concurrently via email and Certified Mail to:

Ubong Christopher Ubokudom
P.O. Box 1594
Columbia, South Carolina 29202

cubok1@gmail.com

s/Jacob A. Biltoft
Jacob A. Biltoft
The McKay Firm, PA

EXHIBIT H

COS OF REQUESTS FOR ADMISSION

**STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT**

Ubong Christopher Ubokudom, Plaintiff,
v.
The University of South Carolina, Defendant.
Case No.: 2026-CP-40-00645

CERTIFICATE OF SERVICE

I, Ubong Christopher Ubokudom, Plaintiff *pro se*, hereby certify that on this **5th day of March, 2026**, I served a true and correct copy of the following documents:

1. **Plaintiff's First Set of Interrogatories to Defendant;**
2. **Plaintiff's First Set of Requests for Admission to Defendant.**
3. **Exhibit Index for Supplemental Second Amended Complaint**

Upon the Defendant's counsel of record via electronic delivery via email and hand delivery addressed as follows:

Jacob Biltoft, Esq. Jake Biltoft <jbiltoft@mckayfirm.com>

3700 Forest Dr.

Columbia, SC 29204

Pursuant to Rules 33 and 36 of the South Carolina Rules of Civil Procedure, Defendant's responses to the interrogatories and Requests for admissions are due within **thirty (30) days** of the date of service.

FILED
2026 MAR -5 PM 4:22
JEANETTE W. McNEEL
CLERK OF SUPERIOR COURT
BERNARD COUNTY

Respectfully,



Dated: 3/5/26

Ubong Christopher Ubokudom
P.O. Box 1594
Columbia, SC 29202

Pro Se Plaintiff