IN THE SUPREME COURT OF SOUTH CAROLINA

Caption: Linda Kennedy and Marsha Fink, Petitioners, v. Lake Hartwell Resort and Cabins, LLC, et al., Respondents

RECEIVED
JUN 08 2026
S.C. SUPREME COURT

Appellate Case No.: 2025-000859

Trial Court Case No.: 2022-CP-04-00592

PETITION FOR WRIT OF CERTIORARI

(Rule 242, SCACR)

NOTE REGARDING ADA / ACCESSIBILITY

Petitioners submit this filing under severe ADA-qualifying visual, limb, structural, neurological, cancer, and many other physical disabilities with the most relevant being intentionally caused, exacerbated, and weaponized by State actors and all SC courts in this case, to include the Supremes. Petitioners require least-restrictive reasonable accommodation (including 40 block time and 100 expanded pages to cover the facts of the underlying case never heard, through Fraud on the Court by the Court and Void ab initio Trial, Appeal and Supreme Court lack of Subject Matter Jurisdiction) and time to review records, with recovery time, to provide a meaningful and full presentation, and that denial of such accommodations has repeatedly been used to engineer procedural dismissals to hide substantive facts that involve corruption in SC Government/Courts.

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REASONABLE ACCOMMODATIONS DEMAND, 40 DAYS, 100 PAGES

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COURT RULES

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Rule 242, SCACR (Certiorari)

JUDICIAL CANONS / CODES OF JUDICIAL CONDUCT

South Carolina Code of Judicial Conduct, Canon 1

South Carolina Code of Judicial Conduct, Canon 2

South Carolina Code of Judicial Conduct, Canon

DEMAND FOR REASONABLE ACCOMMODATIONS DUE TO COURT CREATED DISABILITIES THAT CAUSE PETITIONERS SLOW WORKING, MINIMAL VISION, MINIMAL LIMB ACTION, BACK, HIP, SEIZURES AND MUCH MORE PLAYING A BIG PART IN HINDERING PETITIONERS ABILITIIES TO DO AS THEY WISH TO IN THIS DOCUMENT, WIHTOUT REASONABLE ACCOMMODATIONS OF 40 MORE DAYS, AND 50 MORE PAGES

CERTIFICATION OF ORDER RECEIPT / FINALITY / TIMELINE (RULE 242 AND EXHAUSTION)

The Answer should be simple, but in SC where this **MURDAUGH 2.0** exist and State Actor/Courts are trying to bury it without being heard on the merits, through deception, not in truth, and so this explanation of this Certification question/statement must be made part of this record for appeal and other RICO Act and Civil Rights claims and other claims, and violation addressed elsewhere, as there is no clear yes or now answer by law, but more tricks to not answer, or partially answer, that is not yet a full, Constitutional Order with Opinion to appeal.

Petitioners cannot clearly affirm or deny Certification matters, because they may be misstating the answer and do not want to be entrapped into another feigned claim by the State when in a case of deception infestation as this **MURDAUGH 2.0** case is sitting in, any answer could be wrong depending on the amount of Court twisting as they have been regularly involved

in feigning deceptions all along these cases that are relevant to **MURDAUGH 2.0**, thus far to stop the troubling merits of this case from being heard and fairly judged according to due process and this case, at all levels: Trial, Appeal and herein, are Void ab initio with protections that must be provided by a neutral court to protect Petitioners as innocent litigants not involved in these schemes documented through the Trial, Appeal and this Court already. . .which innocent litigants are the Petitioners. See below for the remedy to correctly close this matter, where it is late in time, but not yet too late for the Supremes to use its CONSTITUTIONAL power, its CONSTITUTIONAL inherent power, or ignoring the law all together, all of which are methods SC is using in everyday practice (Petitioners do not promote ignoring the law, but are making a point that cannot ignore the plain truth. A constitutional way to handle this third option is to settle-up!).

Petitioners certify that to the best of the Petitioner's knowledge: Under very biased and deceptive acts by the Court of Appeals submissions of perhaps a partial Order, to further manipulate procedure to their unbiased advantage, they may have presented a partial Order in incomplete Order and Letter, which is not an Order, without hearing, or making decisions on facts, law, and the Supreme Law of the Land, Constitutional law, and definitely without Subject Matter Jurisdiction (SMJ) via Oath to uphold the Constitutions as a prerequisite and condition precedent before having power to hear a case, and with the understanding that procedure cannot dismiss substantive law, and with the trial, appeal and Supreme Court's Fraud on the court and the clear lack of Neutrality, through another illegal attempt to deny and continue to sidestep the real issues for trial and appeal, and with the Appeals and Supremes actually arguing for the opposition rather than remaining neutral, including further weaponizing the American's with Disabilities Act, and related statutes and case law combined with Constitutional violations, as did

the Trial and Supremes also. The Appeals/Supremes actually mimicked the Trial Court's clear historical defiance to the law, that the upper courts are supposed to oversee in a Constitutional Republic. The Supremes did likewise in a very self-damaging, written response to Petitions Writ of Mandamus for emergency assistance, where this court suggested some very unlawful, Unconstitutional and biased "findings," that cannot be justified by law and some are criminal in nature showing the Supremes involvement in the outrageous conduct of the Trial Court that would not even pass a smell test.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because on or about 4/8/26, Petitioners filed a Rehearing and Rehearing en banc (Rehearing/en banc), even though there was no clear date to file, due to the ambiguity and partial Order insinuating that their would be no time to file a Rehearing/en banc. Petitioners filed the rehearing/en banc anyway so that the court could not later say that Petitioners missed a deadline they intentional made unclear through this deception. To avoid further trickery of the Courts by missing a deadline because of the improper, Unconstitutional and incomplete Order by design, to further try to deny and trick Petitioners into losing more Constitutional Rights by all dirty means possible (See 1st Cert filed with this Court).

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because the Appeals Court claimed they were Remittitur-ing the final Order, bypassing and blocking the Petitioners right to file for Rehearing/en banc and recall the remittitur, filed within 15 days along with a filing for inherent power to right to wrongs of more judicially created procedural chaos through, the Hegelian Dialectic, regarding all Substantive and Constitutional violations, including but not limited to the ADA and the Remittitur and inaccurate findings of fact and law by the Appeals Court based on an improper, feigned, and Fraud on the Court by the

Court and other agents, with Trial Court, Appeals Court and this Supreme Courts insistence on hearing cases where they are the issue for the Frauds, and where the cases are Void ab initio, and Voidable, and led to Defendant Defaults in the underlying matter, with these criminal and fraudulent acts continuing against Petitioners and their underlying **MURDAUGH 2.0** case, that is very troubling to the state of SC and its Legal Machine Criminal Enterprise (LMCE), if the truth be told and continue to be told. No response or no clear response has ever been given, again to Petitioner filings, as usual, from the Appeals Court.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because these actions by the Court continued to set Petitioners up again by the SC Courts, to deny Cert as late, through more trickery and Unconstitutionality, and through such vague alleged Orders or letters, or ignoring the issues all together, and lack of following its own law and procedure, dismissing on more court created chaos acting adversarial to Petitioners again and again due to financial and other interest in the outcome of Petitioners case. So, if Petitioners didn't file the 1st Cert, in spite of the Appeals Court tricks, that further wasted Petitioners limited physical ability, time and money, ($250), with the Courts trying to outspend Petitioners using tax payers money to fund their frauds and feigns against justice and The People. This continued exploitation and abuse of the Elderly and Disabled is not mere legal rhetoric, but a real, documented show of heavy-handedness, and criminality by a SC, Unconstitutional and entrenched Aristocratic/Groomed Elite Oligarchy serving itself from the beginning of SC in the colonies to this day, on the public dime, and protecting its illegal LMCE. The Courts/SC State Actors, have created such nonsense and a complete destruction of State and Federal Constitutional law and guaranteed Rights in SC that continue with these charades. Examples of same are the Murdaugh case (which Murdaugh SMJ bundle Petitioners filed in that case as it has

greatly affected Petitioners litigation, where obviously Petitioners have standing and foretold the outcome well in advance, and just waited for the perfect time to release song/video, **"MURDAUGH THE MUSICAL,"** describing this scam of the state in simple terms with much follow-up by Petitioners Legal Reform Team A, and the challenge is still open with this Court further hiding the filings of Petitioners, which is solid evidence in this case). Petitioners are told that the courts have reviewed **"MURDAUGH THE MUSICAL"** on YouTube, and have visited LegalMachineCriminalEnterprise.com, still under construction by Petitioners Legal Reform Team A, with many more teachings (songs, videos, seminars, books, etc. to help break free an oppressed public from this illegal Occupation) and further programs coming soon as Petitioners can direct others to post and take dictation and so forth, even when disabled to slowly create what they cannot do during this period of fighting the Occupation to get justice in spite of it.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because, again to not fall into more SC traps, Petitioner filed the 1st Cert to the Supremes costing $250 more dollars as SC's courts continue to abuse and exploit the Elderly and Disabled through illegal shenanigans. That 1st Cert, was based on **constructive dismissal by the Appeals Court, along with the contents summarized herein, and filed in this Supreme Court based on Petitioners having to fight the biased and opposition Courts just as they would Defendants themselves, and the Courts statement that they were remittituring the case to trial court, without waiting for P-A Motion to reconsider, by rehearing/en banc, just to check the boxes, which fits the absolute corruption in this MURDAUGH 2.0 case as a whole, and the other legal filings Petitioners have had to file against the Courts, to try to stop the extensive RACKETEERING by the State and Agents, of these cases by you Judges acting as an Oligarchy for a Legal Machine Criminal Enterprise (LMCE), which all has been more than**

proven by State actions taken. This 1st filing again was to try to stop the sabotage of Constitutional Rights of Petitioners to have their case heard on the merits and challenge any procedures that hijacked the merits and disabilities and especially court created disabilities weaponized to punish and to thwart Petitioners right to be heard/access to the courts, Due Process, Equal Protection and so forth.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because in all this court created chaos regularly and Unconstitutionally used by SC Courts to derail justice to litigants like Petitioners further, the Appeals Court did not answer the actual appeal that was already shredded/shaved by it, of the troubling merits, and further blocked from Petitioner arguing the criminal and Unconstitutional procedural hi-hacking, to more judicially created procedure to weaponize ADA Reasonable Accommodations. These were caused and exacerbated by the Courts, as partially causing the Subject Matter Jurisdiction/Fraud on the Court bundle filed by Petitioners, in the feigned Trial Court, Appeals Court and in the Supreme Court, along with in the Supreme Court Murdaugh and Asbestos feigned cases. These were then dismissed by the Judges in issue, that called for Mandatory Recusal.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because the Trial and Appeals Courts ignored these mandatory reviews by Neutral judges, and dismissed the SMJ bundle, and the appeal that never happened on the very next day simultaneously (3/24/26), against all basic jurisprudence and Constitutionally required action, without recusal and without opinion on SMJ bundle (footnoted dismissals) in the Unconstitutional Order on the Appeal. This is all just more Unconstitutionality by the SC Court System, (i.e., Legal Machine Criminal Enterprise (LMCE)), to use ERASURE to bury this troubling **MURDAUGH 2.0** case, (written in song, but not yet posted or showing video yet.

See, LMCE site, **"ERASURE"** song that explains the tricks of the Courts practice of Erasing laws and facts, with just a few of many examples given. This is also proof as to why SMJ Adjudication must come before any Judge touches any matter, and those matters can be dealt with before the Case continues with more of the same total breaking of laws by the Courts, to where the appeal isn't even about the merits any longer and the worse the Courts behavior, and then limit the response, the more the Courts can continue to break laws and feed its LMCE for its own personal tax-free profits in a system made to create these Legal Machine Criminal Enterprises and block all accountability, which is obviously not a Constitutional Republic overseen by the People.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because **AGAIN,** as the timeline and uncertainty of whether the Appeals Court actually Ordered or followed the Law/Facts/Rules to Order, more and more chaotic issues have been created by the Court itself, to intentionally, by a very hostile and biased Appeals Court with financial and other interests in the outcome, attempt to trick and confuse the due dates to force Petitioners default through bad faith, criminality and deception. Extreme Bias and mandatory recusal and Discippline are necessary to stop that, which logically, directly affects the entire process of a Constitutional Legal system, when the Appeals Court tries to confuse the deadlines.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because, although Petitioners expect nothing more than a box checking exercise, this continuing obstruction by the Courts themselves, also affects when Petitioner begin to prepare and file the Rule 242 certiorari, rehearing, and later federal exhaustion filings and other filings and actions taken for legal and nonviolent resolution.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because, Petitioners are unfortunately being put in the position where they have to think like criminals to be able to foresee the Courts next deceptions, to try to protect their case from SC Courts, even with the out using feigned claims and fake defaults that would be created if Petitioners did not submit the 1st Cert as they did.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because Petitioners allege the appellate court subverted clarity in due dates and ignoring all law and facts, through dismissal of the Appeal, perhaps, while threshold motions were pending, and through remittitur timing that created uncertainty about when the due date clock starts or whether the Appeals Court was continuing to railroad and take away more rights of Petitioners to actually have the Murdaugh 2.0 case heard at all in Trial, or Appeals Court.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because, further what was to be heard in the appeal was not heard. So an Order has not been given on the issues needing an Order. Petitioner filed a Subject Matter Jurisdiction challenge (SMJ), Fraud on the Court by the Court and others, and mandatory recusal (SMJ Bundle), since the issues involved were about the judges insisting on reviewing their own RACKETEERING malfeasance, who obviously were (and are) lacking neutrality and have committed fraud on the Court by the Court, evening in handling their own very serious matter, compromising the entire court process, and so forth, on 4/23/26.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because, the Constitutional issues to be heard were repeatedly sidestepped by the Appeals Court and then abruptly ruled on their own chase they created with the sidestepping

and lying about their "finding" on the ADA resasonable accommodations. . .a procedure that they refused to rule on, further wearing down Petitions into further complications regarding the Court created disabilities that were hindering a full effort by them and needing the reasonable accommodations requested BY LAW, and giving even more to the Murdaugh case than requested by Petitioners, when Murdaugh nor his attorneys claimed ADA reasonable accommodations, used to block Petitioners appeal on the merits and Constitutional Claims. So no Order on their right to appeal on the merits and Constitutional Claims was ever heard to be given an Order, even though what was given was not an Order on the issues even before them.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because Committing even more fraud on the Court by the Court, if it were possible, the Appeal's Court filed immediately upon receiving the SMJ Bundle which must cease all further Orders and findings, until a neutral court hears and decides all the issues, including if the case is Void ab intio before the Court with protections given to Petitioners. The alleged "finding" was issued the next day, one day later (4/24/26) with a dismissal of the Appeal itself, which they never heard, and could not be heard until the SMJ Bundle was heard on its own merits and by itself, by neutral judges. This as more court created bogus feigned procedure, through the Hegelian Dialectic Doctrine explained elsewhere and herein, and they added two footnoted dismissals of the SMJ Bundle documents that required independent review and a real Order and opinion not by this same court and judges who were the issue, along with all the others touching this case.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because basic Jurisprudence dictates that because SMJ halts the case from proceeding (see law school 101), and for Due Process Rights guaranteed by the Constitution and through

Judges oaths (see the Constitutions and the Oaths transcripts all state actors take), the Appeal itself and any decisions also had to be stayed and rescheduled ***AFTER*** an independent review of the SMJ Bundle filed, and was supposed to be heard by good faith neutral judges, and decided, not dismissed simultaneously and summarily by the same judges in issue of the SMJ Bundle the next day all in one push of the printer button.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because it is clear that these obvious criminal RACCKETEERING, are the coordinated effort of the SC Government to include, but not limited to, the Supremes trying to release the Murdaugh Feigned case alleged findings, starring Becky "Hier" Hill. This maneuver for Aristocratic Murdaugh's escape from justice, through the States feigned and RACKETEERING actions were affecting Petitioners right to a fair trial, appeal and now Cert. in their **MURDAUGH 2.0** case. See **"MURDAUGH THE MUSICAL"** song for a simple summary. See, **"ELECTION BY SELECTION HOEDOWN"** with video coming for the Fraudulent and Unconstitutional process of this Aristocratically entrenched Oligarchy choosing each other for Government office to avoid accountability, and continue to illegally and Unconstitutionally, Occupy SC. This Aristocratic Oligarchy did just that by releasing the obvious findings of Murdaugh based on the made for TV show trial and appeal.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because in this first set of chaotic actions to block Petitioners right to go through the motions in order to proceed beyond the SC Oligarchy, the Appeals Court simultaneously also sent a remittitur to the Trial Court to attempt to block and steal Petitioners right to rehearing/rehearing on banc/check boxes to escape SC Oligarchy, and created a purposefully unclear timeline of the due date to file Petitioners next box-checking document, whether

reconsideration/en banc, or whether a cert., for all other appeals/preservations, including the SC Supremes cert, to check that box of exhausting their opportunities, so Petitioners could begin the Federal court process with Federal Questions raised, and merits heard elsewhere, and other actions needing this box checking exercise completed as Petitioners generally would not demand criminals to find themselves corrupt, (yes "**CRIMINALS FIND THEMSELVES CORRUPT. . .NOT.** . . ," is a song coming soon). Doing so would not be logical or a good use of time and money, except it is required to check boxes of those who are not going to find against themselves, and don't appear wise enough to settle this because it is not ending for the next several years or until Petitioners receive real justice that increases with every additional effort it makes, to force the government to follow the law.[1]

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because Petitioners also responded the next day to the Appeals Court's confusing and Unconstitutional Order on many grounds, on 4/25/26 with a Motion for Neutral Tribunals/Judges to Review all Structural and other Constitutional issues, and Mandatory Recusal, SMJ Challenge, and Fraud on the Court by the Court, Dismissal and Herein and otherwise listed, calling for someone with inherent power and morality, if any, to get involved (See, Motion for NEUTRAL TRIBUNAL/JUDGES TO REVIEW ALL STRUCTURAL AND

[11] If petitioners are facing the bad faith strategy of being threaten with heaven, to where the state will just outlast the life expectancy of Petitioners, Petitioners do not find that troubling other than the ethical and moral sickness of anyone who would think that way. By then, the State will have spent more, and been exposed more and We the People will have been trained more in the ways of the emphasis by the Oligarchies of the "Perception" of Public Trust," that cannot exist with the well informed public, understanding the ills of Oligarchies and Secret Societies in SC, and all the secret crimes being covered up by the Aristocratic/Groomed Elite Entrenched SC Reign of terror from the beginning of SC existence in the colonies and those families and their ancestors responsible. Dying, while fighting such a noble cause is not going to work as a threat, as it is intended.

OTHER CONSTITUTIONAL ISSUES ANED RECUSAL, SMJ HALL ENGE AND FRAUD ON THE COURT, DISMISSAL, AND HEEREIN AND OTH ERWISE LISTED, Filed 3/25/26 and amended 4/8/26.). Still, no response to the reply from the Appeals Court, for the SMJ Bundle, wrongful Appeal dismissal and lying about the facts used, abuse of hearing their own case against themselves, representing the opposition as judges, refusing ADA Reasonable Accommodations, stealing the award, protecting Murdaugh and the LMCE, and more money exploited and extracted by the SC Courts, against the elderly and disabled forcing them to continually file due to the Unconstitutional acts and/or failures to act, etc., such as right now, where Petitioners cannot certify yes or no, but only give this explanation which is built on the prior explanation of the 1st Cert submission, that was equally unclear, vague and in violation of Constitutionally guaranteed rights through the Oaths of each of these judges.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because Plaintiffs within the 15 days filed for a Rehearing and Rehearing and en Banc, (Rehearing/en banc), with Oral Argument and ADA Reasonable Accommodations to even have time to file a real Motion, and to recall and vacate the remitter, further weaking Petitioners physical health the Trial, Appeals and Supremes have repeatedly weaponized, with unnecessary work, harm to physical Disabilities, expense for continual filings with no results or findings, at $50/each plus $250 (on many occasions), and still no response from anyone from the Appeals Court at that time. No reply from the Appeals Court.

Petitioners further certify that this uncertainty forced Petitioners to expend more money and great physical energy to continue to try to fight against the intentional chaos created by the SC Courts, to sabotage this **MURDAUGH 2.0** CASE, from ever seeing the light of day, to preserve rights under disability constraints while still lacking clarity of when finality begins for

higher review due to such continuously vague and Unconstitutional responses from the Appeals Court, and this uncertainty fits into all the other sabotage and feigned proceedings the SC courts have been involved in, including in this **MURDAUGH 2.0** case, to create a continued procedural, vague and legally impossible set of roadblock against Petitioners while further weaponizing their disabilities that the Court intentionally and maliciously created and exacerbated, by design. These continued obstructions (yes, **"JUDICAL OBSTUCTIONS"** is a song coming soon), by the Court created more of Petitioners exhaustion and pain beyond their physical abilities to produce as they wish they could, (so this and other documents are being written by cut/paste and microphone as much as possible and not proofread).

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because the SC Courts continued to further cause and aggravate injuries which is Unconstitutional as a punishment against Petitioners continuing to fight for Justice that exposed the SC Government/Courts for creating and profiting tax-free using the LMCE and the Murdaugh feigned case related to that direct Enterprise that had to be hidden by the State/Courts, while Aristocratic Murdaugh (and Laffitte's) sentences were/are greatly reduced.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because this Entrenchment is surrounding all parts of these situation from Bamberg, Taylor, many of the Aristocratic Laffitte's and their Board/Trustees, Boulware, McMaster, Dargon, Kittridge/Toal, Limehouse, Lay, Bland, Tinsley, Nautilus, Lloyd's of London group, Allianz, Mcintosh, Sprouse, Maddox, Wagner, McBride, Campbell, Cooley, Sosebee, Thomason, Hier/Hill, Varn, Deloach, Bransletter, Mullen, Westendorf, R. Crosby, Barnes, Gillespie Chewihng, Owen, R. Murdaugh, Dr. Maddox, SLED, T. Crosby, AG's office, Harpootlian, Lindler, Griffin, Parker, PMPED, Seckinger, S. Seckinger-Laffitte, Henderson, SCBar, Blitch,

VSB, Gergel, Newman, and so many more, on and in and outside the Courts, in all legal nonviolent ways going and going forward also. These and the many other names Petitioners brought up in their SMJ Bundle filings, in both Murdaugh and Asbestos cases, is all a part of the SC LMCE, where Petitioners are demanding ***No More Lies!*** This LMCE website tagline isn't about one thing someone said. The lie is the whole SC presentation, that SC runs a legal system, that it's neutral, that it serves the public, that its Constitutional and followed. In actuality, SC government is a family business that borrowed the vocabulary of justice in the colonial days up to and including today, so much so, that Petitioners can't even say if the **Murdaugh 2.0** case is ready for Certification with a straight face (See **GRAND MODEL'S GHOST, ELECTION BY SELECTION HOEDOWN, DISINFORMATION OCCUPATION, ERASURE, SCHEMING POLITICIAN, EQUITY LIQUIDITY, LITIGATION VORTEX, SHAME, BLAME, GAME, TYRANNY GRANNY, MURDAUGH THE MUSICAL, JUST-US HALL,** and more for summation to music and future video presentation using superior tools than the inivial video).

So as further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because these are serious issue as the People of SC are looking into federal intervention for the dozens of defiant times in SC history, to stop these treasonous and Unconstitutional action of the SC Courts, defined as "Tyranny," by the framers according to Aristocratically approved history, where no accountability exited against SC Government, and their operated only one Branch of Government, as one entrenched Aristocratic/Groomed Elite Oligarchy, and are still doing same, using the SC People as exploited cash cows for the Aristocratic/Groomed Elite's own profits in their Legal Machine Criminal Enterprise they have created and serve for tax-free profits. See, "**ELECTION BY SELECTION HOEDOWN**").

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because after Petitioners filed the first Cert so that they Courts could not say Petitioners missed the fake moving goal post deadline, which is how the SC Courts roll, this Court felt it necessary to preach the rules to Petitioners, who were well versed on the rules, enough to know not to trust any law or rule in SC, and knew the stated Rules and the past behavior of SC Courts and the Appeals and Trail Courts, and knew it had to preserve its rights no matter what the cost and physical sacrifice.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because this Court notified Petitioners and Appeals Court in writing (and otherwise), on 4/24/26, that the Appeals Court needed to provide an alleged Order on the Rehearing/en banc, while keeping the $250 Petitioners paid to protect themselves against deceiving SC Government/Courts, who do not shy away from further exploitation and abuse of Elderly and Disabled litigants and others.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because on 5/8/26, the long awaited perhaps final communication from the Appeals Court to deny their ridiculous and non-complaint actions regarding the denial of the check the box, Rehearing in the alleged Order that is not for reasons already stated and more.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, the Appeals Court issued another Fraud on the Court by the Court alleged Order on the rehearing/en banc, that started the new countdown date, before Petitioners could file their 2nd Cert on the same matters, was handled by Petitioners the same way as the 1st so not to be tricked with the Courts further confusing the process and due dates, for the same reasons Petitioners

didn't wait for any alleged Order by the Appeals court before filing the 1st Cert. The deception is thick in SC. The Petitioners again knew not to wait on real, common sense countdowns but to use that partial and void alleged Order to measure the due date for this 2nd Cert. where otherwise, the Courts could again try the same confusing of the deadline and deny the Cert based on some made up due date.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because Petitioners are going off the alleged, feigned and vague and partial alleged Order by the Appeals Court, and treating it as constructively denying all claims, rather than to keep arguing with the Court that is not even ruling on what it must to begin with. Objections have been noted enough times and Constructive denial is the baseline for this 2nd Cert attempt. Petitioners are not waiting on other nonsense, just to keep this catch-22 going for infinity, while wasting more limited energy, money and minimal health abilities while the courts weaponize same.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because on May 29, 2026, a "letter" not an "order" signed by Clerk Kitchings stated that the en Banc was denied on 5/29/26. Again, more trickery and confusion. The letter is not an Order, and the Order is substantive, not administrative, so no Order is present, but is being treated by Petitioners as a constructive Order of denial of all matters that were not addressed or properly addressed and is Void Ab Initio anyway. The date creates more ambiguity and vagueness, however, Petitions are not going to follow that last date where this fake Order was sent, for the same reasons they are not following other specific dates to be tricked into defaults by the hostile Courts of SC with interests for predetermined outcome.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because the deceptions are indeed very thick in SC, and these dates mentioned herein, also relate to the Asbestos cases decision on May 27, 2026, and the Murdaugh feigned findings and release on May 13, 2026, which brings forth an entire different lawyer for the corruption and RACKETEERING present in this **Murdaugh 2.0 case as described many times in Trial, Appeals, and Supremes also.**

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because Petitioners understand that these are still all related SC Oligarchy corruption cases of the LMCE, and that the findings in those two cases affected and greatly complicated Petitioners case, as **MURDAUGH 2.0** facts showed the truth about Murdaugh and Asbestos cases that litigation is being feign, for the benefit of the Aristocrats, by MURDAUGH.2.0'S mere existence and Petitioners taking it forward over the physical brutality and punishments Petitioners received by the Judges, for doing so. The Truth is out here due to those sacrifices to make sure the record is set and independently preserved for future exposure. For now, Petitioners continue to box-check which is almost over and Federal focus and the Jury, and the Jury of Public Opinion and training will be Petitioners focus to get real justice and accountability in SC, necessary for The People to be more safe, through understanding what is really happening in this entrenched Oligarchic state, starting from at least 1669 with "**GRAND MODEL'S GHOST**," (and proceeding to the 1895 KKK Constitution, a continuation which spews the hatred of the Aristocrats against the People).

So, as to further answer the issue of Certification: Petitioners cannot clearly affirm or deny, because there was no real review by law, with the SAME JUDGES at issue refusing to recuse by law, and the Appeals Court provided a short alleged, partial Order stating the rehearing

was denied which is Void ab initio for many reasons. Basically they doubled down on the same facts and law they ignored openly, believing there is nothing Petitioners can do about it .. thinking the SC is the only legal option to expose and teach. The record courts denied the en banc on May 29th, 2026 in a letter not an Order, saying they refused the en banc, which is all we wanted to show it is all of the Judges, just like at the Trial and Supreme Court where the latter, the Judges made a point of all signing it as some sort of defiant unity to not follow the law in the Writ of Mandamus which is a gift for Petitioners to show complete unity in defiant Unconstitutional Acts taken, and treating the People as the enemy. So once again, Petitioner are ignoring the last letter as if it sets a deadline and entraps again if Petitioners allow it. Petitioners will not fall for the same tricks over and over again, by following a random letter in the record, that may or may not change the deadline, but Petitioners know to use the earlier date they see. may apply, even if this court sends the Cert back again with some haughty instruction like Petitioners don't know the law/rules, when we have to know them twice as well in order to get past the deceptions presented by entrenched Aristocrats in a LMCE.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because, Petitioners know the dark history of SC Courts before and since they have been involved in this nightmare to get justice on a case where Petitioners, have the very written admissions and recorded admissions for all Petitioners have stated, regarding the sick story and liable and guilt of Defendants, Judges at all levels, Lawyers, Allianz, David Wagner, Jony Mcurley, Reena Thompson, Justin Bamber, Jasim Smith, and so many more, and still can't get the case heard on the merits, which is Unconstitutional, and shows SMJ violations, Fraud on the Court, with some by the Court, Mandatory Recusal refusal, mandatory withdraw of lawyers refusal, Collusion among lawyers, RACKETERIG among all involved, Void ab initio findings

against Defense, Void findings against Defense, Default against Defendants entered and so forth, which means one can have the proof of everything claimed that meet the Cause of Action elements and still not get out of fake procedure set up through the Hegelian Dialectic by Judges and Lawyers who can then steal the proceeds, property, etc., and send it to their LMCE for tax-free profits for all State Actors and agents. . .just like Murdaugh did, and where the SC and SC Fed Courts are assisting fellow Aristocrats/Groomed Elite overturn the Jury through more fake procedure set up by the Groomed Elite Federal Judge and U.S. Aristocrat Attorney, protecting McMaster's family, ALL the Laffitte's, and the Aristocratic State Court Clerk Becky "Hier" Hill who is related to Murdaugh. With all related to or working with Groomed Elite like the Laffittes/Lay with Judge Kittredge, involved in the receivership of Murdaugh???

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, but now present the second attempt at a Cert., by dodging all the deception to check this box. Petitioners are filing, even though they could wait for about three more weeks due to a letter (not an order) signed by Clerk Kitchings, denying the rehearing en banc, with the trick being Petitioners could count from that last Letter (not an Order), or Petitioners could count from the Order, that did absolutely nothing by this Court sending it back down but stealing another $250 through this exploitation and abuse of elderly and disabled litigants, and again try to trip up Petitioners through the extremely biased and RACKETTERING judicial system in SC.

So below, to try to cut through more purposeful ambiguity as if the Appeals Court, Trial and Supreme Courts really consider(ed) anything, knowing that the Courts are acting totally outside Constitutional limits, Petitioners are again doing the box-checking exercise, before this case continues to go forward on the law AND THE FACTS in all other legal and nonviolent ways in and outside of court, where there will be some productivity and for a lot less money, as

Petitioners will be taking much more control of how this matter is heard, by whom, how, and make sure the meaning of this case is understood by all people who are becoming more vocal in demanding rights and accountability and no longer falling for the tricks.

If, by great surprise, this Court is finally ready to properly find in this case for Petitioners, because they choose the wisdom of a resolved matter, over other perceived possibilities (Petitioners only act legally and nonviolently and do not partake in anything other than plans within these parameters), through the Courts inherent authority TO DO RIGHT and/or other process, that is equitable for the victims of this Void Ab initio series of criminal frauds and RACKETEERING, and other such SMJ bundle challenges made, then although it is very late to do so, and this appears to be the last chance for reasonable minds to accept responsibility for these crimes against Petitioners before Petitioners go elsewhere inside and outside of the Courts where Petitioners have much more control of the message and process, much on their own turf, to get this resolved in all other legal, nonviolent ways.

Using technicalities the Court has created to help Aristocrat criminal Murdaugh, (and Laffitte too), while SC Judges and State Agents, are involved in attempted murder of two elderly cancer ladies and then physically abusing them so badly that one has lost about 7 inches of height from vertebrae fractures, in need of total hip replacement, and has seizures, and the other has such severe eye and limb issues, and other disabilities, most caused by the Courts creating and weaponizing these new disabilities to help get their own judges and lawyers and other agents off the hook, using Murdaugh schemes and personnel to control Petitioners case for more state tax-free profit, in the LMCE, does not show well to those wanting accountability in Government..

And in summary then, as further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because of all the absurd tricks being played by the SC Courts that do not come close to acceptable Jurisprudence. The video "**MURDAUGH THE MUSICAL**" was written months ago, with Dr. Kennedy knowing the outcome of all of this in advance, which SMJ was filed foretelling of the outcomes of Murdaugh, Asbestos cases, and **MURDAUGH 2.0,** and where the cases were going next, and other audios and videos have been created to teach the people the fiction of Constitutional Rights and Checks and Balances, to remove the scales of the deceivers and occupiers, as part of a new launch coming soon where our legal reform team will be setting up various community rallies and education centers across SC and America, to show the People, with these real life examples, the need for a newly educated public in the ways of the Aristocratic Oligarchy, and how to get justice in spite of these rogue findings occurring in this **MURDAUGH 2.0** CASE, and how to hold their government accountable, through exposure and rallying of people in mass, who have had enough of this nonsense, when cases like this show how unaccountable you all are operating like a secret society in an us against them environment you all have created.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, not surprisingly to Petitioners, and their legal reform teams, with these confiscations of evidence posted on the Occupiers records and preserved, will be useful to those being empowered to make positive change in SC finally outside the control of Aristocratic politics soon to be exposed with open government no matter what the tricks are for hiding and protecting each other. Once Petitioners go down that road to official launch, they will not return to this discussion.

As further answer to the issue of Certification: Petitioners cannot clearly affirm or deny, because Petitioners had already filed their Entries of Judgment Ex.____, in Trial Court

where they were ignored until Judge Taylor was sent in to obstruct justice and fix the case further, through the steering of Taylor by Lawyer Legislator Justin Bamber's obstruction, as you know. Petitioners still expect these entries of judgment to be entered by the Supremes herein, as P-Appellants won by fact and law, and the Courts shenanigans are not merely under any kind of abuse to hide the victories by void and void ab initio actions, are far worse than any abuse discretion determination. These types of crimes by the Courts, and State Actors obviously did not comply with SMJ Adjudication and the Oath of Office to uphold the Constitutions and is absolute FRAUD ON THE COURT BY THE COURT, corruption on the Court and on the People and Petitioners by the Courts. The SC **Oligarchy infested with Aristocrats and their Groomed Elite, with this entry as explained below then need to leave Petitioners alone, pay them what is owed, so Petitioners can go on their way with projects they had planned long before coming to SC for a much needed surgery. Petitioners projects had nothing to do with Legal Reform as they have clean hands in doing move than their part to teach and impower the public at their own detriment. Petitioners were heading to another state to assist families who were devastated by natures' fury, until this fight started in 2021, that your judges decided to try to have us killed in the Murdaugh-style LMCE scheme called Insurance Fraud/Insurance Reserve Fraud (IF/IRF). That song is on the LegalMachineCriminalEnterprise.com website under songs, called the Grand Model's Ghost. There are more songs than published as Dr. Kennedy is a song writer and musician as a hobby over since she was a teen.**

SOLUTION TO ALL THIS CONFUSION IN WHETHER CERT OCCURRED, AND CONTINUED EXPOSURE

As the SC Courts and Government know, Petitioners did not pick this fight, YOUR JUDGES AND STATE ACTORS DID, but Petitioners will continue to respond to this fight and this SC defiance to the law, as long as their awards and all else is stolen from them by this LMCE.

And as humanity and empathy are present in normal people who did not dehumanize those targeted for slavery or continue to exploit and abuse others for profit or enjoyment, Petitioners are also now obligated to assist the Murdaugh victims and the victims of the Asbestos case, in any such Inherent finding to end this finally, since P-A have filed SMJ Challenges within those cases also. There needs to be a mutual agreement that all those victims Petitioners have come across thus far, are not ignored by the state either. Petitioners know they cannot help everyone, and they don't represent anyone of them, but human conscience cannot be turned off in a civilized society, even if it does not include the Aristocratic/LMCE Oligarchy. **This LMCE must stop using people as if it is still 1669 under the Grand Model**[2] and thereafter.

Further, as is S**C and Federal precedence, due process, and equal protection, and in equity, the innocent parties of a void outcome not of their own doing, cannot be punished for the Defendants, Defense, State Actors, Allianz, and Judges constant RACKETEERING**

[2] See, Dr. Kennedy's song **"Grand Model's Ghost"** teaching on the VERY dark and shameful SC history of these SC Aristocrats/Groomed Elite, and the 10th Cir., up to and including the Supreme Court allowing and benefitting from these very warped acts. Something real must change now, so P-Appellants can go on their way, and the Public can have better protection for themselves and their families through these real changes that P-A can negotiate for themselves and other victims (without representing anyone by P-A), so P-A do not need to get more involved and can focus on other work that isn't in SC and not legal reform focused. **See, songs on the LegalMachineCriminalEnterprise.com website, still under construction made by the Petitioners Legal Reform Team A.**

and frauds in the case, and must be given what they won, with additionally damages that are joint and severally assigned, regardless of Allianz's claim to limits as this is way bigger than just the underlying case and involves Allianz itself. These entries of Judgment must be awarded, a neutral jury must be appointed by neutral Judges so the jury can determine additional damages, including, up to uncapped Punitive Damages, and including noneconomic damages, and fees and costs for P-A time, expertise and money spent that are all worth the same as these high priced lawyers time and expenses, expertise and money, obviously since none of these high priced lawyers could beat two old ladies with physical health issues, using a cell phone for legal research.

The award must be jointly and severally granted, and all amounts paid regardless of Allianz's alleged limits that they destroyed by illegal payouts and bad faith/fraud, and inserting them in Petitioners case to create a false narrative to try to dismiss this case on other fake grounds.. .not even procedural, but a feigned development Allianz, Dodd, MGC, GCC, and the lawyers and Mcintosh, Sprouse and William Blich concocted to try to get rid of the case not on the substantive claims. It is time for reasonable minds that may exist in the Judiciary to bring this to a proper conclusion following the Constitution, and Void ab initio the entire process, while protecting Petitioners and give them what they are owed no matter the objections of Allianz and others, who have openly perpetrated these voids and defaults. NOT PROOFREAD, NOR SEEN BUT MOSTLY DICTATED WITH DEMAND FOR ADA REASONSABLE ACCOMMODATIONS TO WRITE THIS BETTER IF NEEDED, AND FOR ANY OTHER PROCEEDING.

I. QUESTIONS PRESENTED (Rule 242(d)(1), SCACR)

1) Does Jurisdictional Power of a SC Court/Judge have to be determined **before** he/she/they can preside over or in any way affect any substantive matters in a case, including determining prerequisite, conditions precedent analysis as to whether the Court: **a)** has the power to make findings over the type and topic of case (for example whether it is civil, criminal, probate, family, and other types of cases etc.,), and also **b)** has power over the person(s) involved in the case, often known as Personal Jurisdiction, and also **c)** even if the judge has the other types of power to make findings (a, and b), that the judge also must still evaluate whether the Judge has authority to rule on that particular case and person for other reasons, such as is the Judge neutral or needing to recuse him/herself, does the Judge know a case is Feigned, if a judge knows there is collusion involved in the case, if a Judge is or should be a part of the underlying causes of action in the case, a material witness in the case, or have financial or other interests in the outcome of the case, if the Judge has relations involved in the case, is the judge planning or tempted to predetermine the case for his own or others interests rather than determining the case based on the law, and facts themselves, is the Judge not willing to uphold the oath of office taken to defend the Constitutions of the U.S. and SC, and so forth, sometimes called SMJ Adjudication power? (**YES**, SMJ Adjudication analysis as a prerequisite to having SMJ must be accessed before presiding over the case, in order to uphold the oath of office, and defend the Constitutions, through protecting the guaranteed Constitutional Rights of the People. If for any reason, SMJ Adjudiciation is not determined as a prerequisite and condition precedent, then this is Petitioners demand that any such law

otherwise is overturned, as the Courts have used this and other laws to remove its accountability by the people.

2) Is it improper and Unconstitutional for a SC Judge to dismiss any part of Petitioners case that affects in any way, Petitioners substantive rights and case by procedure or other unauthorized act, that affects the substantive issues. (**YES,** as per the Rules Enabling Act forbids procedural rules from eliminating substantive rights and Erie's confirmation that substantive rights survive any procedural reform. Petitioners challenge this law as unconstitutional and make demand that all SMJ Adjudication issues be determined before a Judge can exercise any power over a case, and the moment the People challenge that the Court is outside its SMJ, a review must come in from the outside, by a People's jury to hear that matter, and determine the proper process for the judge to continue, or the jury can remove the judge. This makes Judges accountable to the People, and do not allow them to ignore Constitutional Rights and create LMCE and Oligarchies, and the People can have the judges removed from the position if they are not following the Constitution).

3) Is it improper and Unconstitutional for a Judge to create a feigned proceeding for a predetermined outcome, that is not permitted by law or the SCRCP, like calling a Sua Sponte Evidentiary hearing, right after the litigant passes a 12(b)(6) challenge, and before Discovery is even turned over, before Depositions are taken, without allowance of Subpoenas and/or Subpoena Duces Tecums, with no witnesses, or authentication power, no examination, cross examination, or redirect, on approximately 162 unspecified issues, that the Defense never objected to nor called for sanctions on said issues, and the alleged evidentiary hearing could only be accomplished in writing, covering 3 years of litigation and addressed in only 20 pages permitted, including exhibits, and 10 effective days to

prepare for this trial-like evidentiary hearing with dismissal and sanctions over Petitioners head, for no reason, as they were defeating Defense and the Judges, while the jury was unlawfully taken away, and the Judge who is involved in the underlying Cause of Actions and crimes against Petitioners, is insisting on presiding over the case, and further, stealing Petitioners right to the default judgments they already proved and entered into the court, and moved for void and voidable judgments based on the lack of SMJ, and other matters that gave the Court no SMJ Adjudication over the case, and made various acts void or voidable, with some Defense filings making all this moot? (**YES,** in fact the defaults that were not close, but clear defaults must be entered by the Court, and awarded to Petitioners with a neutral jury to hearing additional damages. The Court must protect the innocent party who was not causing voids and not further protect the perpetrators. Attorney Jones, for MGC for example, filed a 12b6 and alleged Responsive Pleading for some Defendants who never met he or anyone from his firm, MGC, and stated they never heard of his firm either and did not want a 12b6 filed. This made Jones 4/15/22 filing void ab initio and created legal and criminal problems for Jones and MGC. The other attorneys who missed their own deadlines to respond, then tried to incorporate Jones' filing to pretend that they were all a part, in order to hide their defaults of up to 3 months late. However, because the Jones filing was void and could never be restored, all of them defaulted. All of them also did not answer Petitioners complaint but insisted they filed a Responsive Pleading to block Petitioners Amended Complaint. Therefore, because their filings were intentionally meant as a Responsive Pleading, they needed to file an answer, which they did not , thus defaults. Defense then failed to file anything to amended complaints that were approved to be filed. . .defaults,

and this went on like a Bad News Bears Movie where these high priced lawyers with judicial help, could not beat two old "tyranny grannies" who were fighting cancer, terribly physically abused by the judges, and using a cell phone to do their legal research).

4) Is it proper, necessary and Constitutional for a Court to protect Petitioners rights to a judgment well earned, when Voids are found, caused by the Defense/Courts, and Petitioners are not the party causing Void and Voidable filings and actions and have not defaulted but actually entered Judgments that are real and used in good faith even after the hostile Court was refusing to grant a Motion for Judgment on the Pleadings, or enter Judgment on defaults, where the Defense repeatedly defaulted and refused to answer the complaint while filing a Responsive Pleading, 3 months late, when the Defense was legally bound to answer timely or even file a Motion tolling the answer, none of which was done? (**YES**, if Voids caused by the Defense are equally applied to the Petitioner, then bad acts causing void judgments would be a Defense strategy to always make the Petitioner start over when the Petitioners is acting in good faith. This would then punish the innocent and reward the guilty. Any such act contrary to the Constitution and Power to the People, must be overturned as it is not Constitutional).

5). In SC, is it improper and Unconstitutional, for a Judge to take an Oath as a customary act? (YES, Oaths are not customary, but judicial commitments, with Due Process the jurisdictional floor. The Judges must defend the Constitutions, in order to hear a case. That means that guaranteed Constitutional Rights which includes the 9th Amendment, must not fall into a review status, where the case is continually narrowed by violating the Rules Enabling Act, to where there is nothing to appeal as the case moves up the review

ladder. The case must be a full as it was at trial, for appeals to be heard on merits, and substantive rights, as any other issue, and the Courts cannot limit responses or determine what the litigant can say or plead to protect itself, and with SMJ Adjudication, the People can remove any judge who says or tries otherwise to keep a Clean Constitutional Republic that is accountable to the people, which is the stated intent of the framers according to main stream history taught in government public schools. Any such act contrary to the Constitution and Power to the People, must be overturned as it is not Constitutional).

6) Is it improper and Unconstitutional for a SC Court/Judges having taken the oath to uphold the State and Federal Constitutional guaranteed rights of the People, to then act to nullify or take away the Petitioners jury demand? (**Yes**, the jury is one of the last bastions of protection of the People by the people. A judge is supposed to be a neutral arbiter and nothing more. If a judge is giving such power, that State/Federal Actor then controls the State/Fed and not the people controlling the state and protecting the People. Judges in SC who are exercising these "rights" when Courts and judges have no rights, only limitations, is a Court/Judge acting ultra virus and creating for himself arbitrary law while usurping the Constitution. Any such act must be overturned as it is not Constitutional).

7) Is it improper and Unconstitutional for a SC Court/Judges to interfere with the Jury to hear and decide the case, to hear and decide the facts and to hear and decide the law? (**YES**, history shows that juries were the ones to determine facts and law as protections for the people and against government overreach. Nothing has repealed or overturn that law. But, any such act contrary to the Constitution and Power to the People, must be

overturned as it is not Constitutional. Petitioner demands their jury trial with no further interferrance and they can ask the jury to find this case Void ab initio and present evidence of damages beyond what is already pled and accepted.).

8) Is it improper and Unconstitutional for the SC Court/Judge(s) to adopt the 1938 Federal Rules of Civil Procedure substantive divide, and even insert these Rules into their 1985 SCRCP, where the Rules Enabling Act applies to SC via the 1985 SCRCP, and forbids procedural rules from eliminating substantive rights by dismissal or otherwise, whether by pretext, using feigned procedure, and predetermined outcomes, using the Hegelian Dialectic to convert substantive rights as procedure, and other bad acts by the court and lawyers, as the substantive rights must survive any procedural reform or decision by the Courts, BUT THEN IGNORE AND DIFFERENTIATE THE RULES? (**YES**, as stated SC accepted the Federal Rules and its Rules Enabling Act and limitations. The act itself is Unconstitutional and leads to where the Courts are today, when they are running an Oligarchy and business out of the back of the State House. This cannot be so in a Constitutional Republic and power must be restored to the People and in this case also so Petitioners can present before their jury and get their findings from them, not from a Sua Sponte Judge being prosecutor and jury also just because he said so. This leads to state actors able to create illegal LMCE and exploit the people's awards and other assets no matter the facts or law, which his Unconstitutional. Further the case of Marbury v. Madison, Madison, 5 U.S. (1 Cranch) 137 (1803), through Article III, the non-waiver doctrine truly cannot be ignored EVER).

9) Is it improper and Unconstitutional for a SC Court/Judge to use its oath taking, as mere ceremonial exercise, rather than a jurisdictional commitment of office to defend the

U.S. and State Constitutions which includes defending the guarantees of the Peoples Rights including those not numbered. (**YES**, the State Actors must take an oath to uphold the Constitutions, and this is not a mere ceremonial act, but a commitment to the People. If broken, the Judge is committing crimes against the People and the People must determine the crime and the punishment, in order to oversee their government. People demand their own jury that the Government does not control and its findings rendered. If this cannot be agreed upon, then the People need to start their own parallel government for the People, and move the Oligarchy out and put the People in by all legal and nonviolent means).

10) Is it improper and Unconstitutional for a Court/Judge to ignore and close Petitioners case or their filings in a case, with a pending SMJ challenge and Bundle finding, still pending? (**YES**, Petitioners never got an independent review required when the Judges themselves are the issue. They never got an Order on the matters, after review with Opinion on such important and significant information therein, and need that process to proceed in all seriousness and respect due a Constitutional Challenge to SMJ Adjudication, Fraud on the Court by the Court and other, and mandatory recusal. That finding which must occur if the law and facts are being followed, must end in a Void ab initio finding, and Petitioners entry of judgment heard by a jury to add to it the damages already listed, as the state cannot punish the victim of the abuse, and thus reward the perpetrators, which his established law in SC and in the Fed Courts. This is the law. The same goes for the Murdaugh filing of a similar document with no proper filing, or ruling, and the Supremes heard the case anyway, and closed the case anyway. The Petitioners have copies of each days docket and record, showing there was never an Order submitted

so an Objection and other motions could be filed. Petitioners are using this as evidence of the Plan, Pattern and Practice of these judges breaking the law at will for their own personal gain in the LMCE with no accountability by the people).

11) Is it improper and Unconstitutional for a Court/Judges/Clerks to purposely disguise, hide, change, screen, or otherwise alter filings or refuse filings all together that expose the State's corruption in the case, of Petitioner in order for the Court to keep the truth from the record. (**YES**, the court is always on trial and cannot limit what is filed against it or control what it determines it will be liable for vs. what it won't, or keep public information away from the public. This happened when Mcintosh made Peitioners give him their filings and he would determine if it could be filed, which is totally Unconstitutional. Doing this made it appear that their filing to the fraudulent evidentiary hearing appeared late, and the appeals court jumped on that, whether there was a fact stated or not about tardiness, but Petitioners took pictures of them going into the courthouse on the due dates, with the documents, and gave them for filing with the Clerk which means they are filed at that moment, no matter what the clerk, or corrupt judges do with them. So the Appeals Court, among other lies and wrongs, refused to see the evidence and chose to side with the obvious perpetrating judge who cannot decide who gets to know about the LMCE and the entrenched Aristocratic Government in SC).

12) Is it improper and Unconstitutional for a Court/Judge to expand its own power beyond Constitutional limits? (**YES**, Government does not have rights. It has responsibilities and limitations. Rights, among other things, infer and us against them position. The Government is not to fight the People, but to serve the People. Asserting rights is anathema to service. Courts cannot use limited power granted to it when it is

following its oath, SMJ Adjudication and protecting other such protected guaranteed rights of the people. Giving itself more power, means infringing on the People's power and oversight and is not permitted in the constitution. This also fails the logical test where a limited power entity cannot exceed its power to give it more power. That power is a nullity).

13) In SC, is it improper and Unconstitutional for the Steele "Triology" creating some procedural presumptions, to ever override Constitutional SMJ obligations by the Court/Judge(s), or override other substantive claims/rights/merits of Petitioner's case by using procedure? (**YES**, this entire process is Unconstitutional in that judges cannot have any power granted unless they fulfill their SMJ Adjudicative analysis of taking the oath with a sincerely held belief and commitment to defending the Constitutions. Further, that means upholding and protecting all of the People's guaranteed rights, expressed or implied. A court being granted a "convenience" clause to perform certain innocuous duties without the full analysis of the power the Court/Judge can be granted only when they are in line with these pledges taken and under the review of the People with the power to remove or punish the judge for noncompliance, is not Constitutional and takes the People's right to hold the government accountable. Even still however, the Court/Judge still can't interfere with the People's claims and substantive rights through this convenience that they increased or ignored over time to just do as thou whilst, which they believe is the whole of the law. By allowing the slippery slope in the first place. Any such law or rule that allows Courts/Judges to just slide onto a thrown and start making decrees is not Constitutional and must be overturned).

14) Is it improper and Unconstitutional for the Judges/Courts to determine that SC Administrative Orders, allegedly from on high, can trump or override and subjugate the Constitutions of the U.S., and/or SC to it. How is Constitutional it even must be scrutinized? (YES, the Constitution of the U.S. is the Supreme Law of the land and all other laws must comply and not oppose it). This is the law of the People, not of a person deciding to make laws through the push of the print button.

15) Is it improper and Unconstitutional for a Court/Judge(s) to not issue an Order nor give an Opinion to each Motion filed so that the case can move forward, objections made, other legal actions taken if needed, and an appeal can be properly prepared if the litigant so desires? (**YES**, Judges are not Kings by Devine Right. . .yes there is a song. . . their findings must make sense and be logical. They have to justify that they are making a legally sound opinion and why so that the issue is clear and can be appealed. All these Judges in SC ignoring law, or manipulating a process so it looks like the law, but in fact is ERASURE where the law stays the same in word, but not in action, which is not Constitutional to manipulate the law for a Judges benefit).

16) Unconstitutional Dismissals: Is it improper and Unconstitutional for an Appeals court to dismiss an Appeal with important motions and challenges still open that must be heard by a neutral tribunal. (YES, a case is not over when the judge says it is. The Government is held to the Constitution and cannot just make his own rules just because he thinks he can. This is why the People being over government is so important. When entrenched Aristocrats and their Groomed Elite are running the show and have their kin in offices of accountability, then every court and every government office is just an all in

the family court. This is not proper nor Constitutional. Any such entrenchment acting in unison instead of for the People must be overturned as an Oligarchy.

17) Is it improper and Unconstitutional for a Court/Judge(s) to rule on an Appeal while still having recent filed and open Motions and Challenges, that are a very important SMJ Bundle just filed, that demand neutral judges to make findings, not the old judges trying to dismiss the Appeal anyway, due to the Appeals Judges and other Judges being the target of the filings, in order for the Neutral Judges to determine the merits of the filings, and make findings, Orders AND Opinions on these Motions and Challenges, so Petitioner can proceed on them accordingly? (**YES**, the Appeal Dismissal and the Footnoted simultaneous dismissal of the SMJ Bundle without independent Order and Opinion are Void ab initio, a nullity and repugnant to the Constitution. As per the Rules Enabling Act forbids procedural rules from eliminating substantive rights and Erie's confirmation that substantive rights survive any procedural reform. Erie Railroad Co. v. Tompkins, 304 U.S. 64 (1938). And an unruled upon SMJ challenge by footnote, is still pending, and must be heard by neutral judges not belonging to the LMCE or beholding to the Judges involved.

18) Is it improper and Unconstitutional for the Appeals Court/Judges, dealing with the Appeal and the SMJ Bundle just received, to still rule on the appeal and dismiss it, without first providing a stay of the Appeal proceedings, while neutral judges hear the open SMJ Challenge Bundle, and only then, after the Order and Opinion is released, to then reschedule the Appeals due date, that is still subject to other filings needing to be heard, to comply with Due Process and reasonable time provided with the ADA also in mind, to avoid an Appeal Judgment by Ambush. (**YES**, for the same reasons, regarding

the Rules Enabling Act, and Due Process, where each matter must be heard and in this matter by independent neutral judges, and the Appeal must be rescheduled to have meaningful Due Process at a reasonable time and place. The Rules Enabling Act, 28 U.S.C. § 2072.

19) Unconstitutional Denials and Immunity: Is it improper and Unconstitutional for Judges/Courts to deny Petitioners demand, by stealth, forth ADA reasonable accommodations that are supposed to be liberally granted to Petitioners, most favorably construed and taken into account Petitioners personal needs, while destroying Petitioners substantive claims, and the court instead blocking the filing or hearing of the Motions, by stealth so that facts and law and so Constitutional law cannot be rightfully included in the Appeal to be heard De Novo, through the court/judges blocking the block-time and pages needed to receive meaningful due process, through the Courts manipulation of Orders and ignoring the Motions filed, by not making findings on the Motion, making vague and inapplicable findings, twisting the name and meaning of the Motions and its findings, ignoring the Motion, using the wrong rules to wrongfully apply to the motion, giving ultimatums to dismiss without a finding on the motion, using fake clerk(s) who are actually Laffitte lawyer partners, to intimidate and deceive Petitioners into waiving their Constitutional rights and appeals through these deceptions, produce letters rather than Orders, refusing to make and Order or filing, and at the last minute create a selective enforcement finding to create a last minute Unconstitutional denial by not giving the litigant time to adjust and respond to the Unconstitutional ruling just made admitting they did not agree to provide the least restrictive Reasonable Accommodations using Petitioners special needs, nor at all, contradicting prior vague motions, of what it claimed

it already found, which it did not, to keep Petitioners from having block time and pages to plead a meaningful due process full Appeal presentation that allowed for facts, law and Constitutional violations to be argued and heard de novo, and where reviewable actions of the Trial Court lead to RACKETEERING of its judges including Appeals and Supremes, lawyers, State Actors, Allianz and other agents, and the exposure of the LMCE, Insurance Fraud and Insurance Reserve Fraud by Allianz (IF/IRF Murdaugh Scheme), the Unconstitutional use of the Hegelian Dialectic to dismiss substantive issues by converting them into feigned procedure to dismiss the troubling cases, denying flexible procedural limits (pages/block time) that are least restrictive and violate ADA Title II, Due Process, Equal Protection, and Access to Courts and also that these Unconstitutional violations intended to hide and protect the LMCE and its judges, also removed immunity from the Judges in addition to other ways immunity is removed? (**YES**. This is clearly not a neutral court following laws, and willing to hear Constitutional claims and other facts/law to allow a full Appeal presentation, that requires a De Novo review, but a court with financial and other interests trying to hide the LMCE, and clearly will do anything it takes to keep the whistle blower Petitioners from ever speaking or writing about the troubling cases, and documented criminal activity of the LMCE present in the 10th Cir, that is stealing awards ala Murdaugh-Style IF/IRF schemes, showing that the isolation used in the 14th Cir to limit the Defendants and broad net or corruption involving Murdaugh and the State, would not be discovered by the public through these show trials. Obviously, immunity is waived).

20) Is it improper and Unconstitutional for Judges and other State Actors and Agents to hire proxies to create and inflict catastrophic injury or death on Petitioners, for revenge as

Petitioners are Legal Reformers, and to create IF/IRF claims with cooperation of Allianz, to feed Aristocratic and Groomed Elite/LMCE insatiable thirst for tax-free money by exploiting and abusing elderly and disabled litigants and others by running Murdaugh-Schemes IF/IRF and other schemes in the 10th Cir., and then these same RACKETEERS insisting that they preside over and are involved in the Judicial functions and prosecution of the case through Sua Sponte Motions, ex parte communications, orchestration with other State Actors and agents, and so forth? (**YES**, Murder, Murder for Hire, and fraud schemes with lawyers, Allianz, and others, the Courts/Judges involved presiding over the case, and all that this entailed, make these facts, classic RICO and Civil Rights Deprivation cases and the Judges have no immunity under the facts provided in many motions and challenges. The findings at trial, appeals and the Supremes are meant to bury these troubling facts that expose them for running Murdaugh schemes through the state and crating the LMCE that holds the tax-free profits for disbursement to its predatory members. The case is Void ab initio, and evidence filed in related cases, like Murdaugh and the Asbestos cases, are evidence of same, with Murdaugh's SMJ filing still open, while the Supremes hid the filing and refused to make an Order and Opinion, because Petitioners case spells out the entire scheme and depth of these feigned show trials to favor the State and its Aristocratic/Groomed Elite Oligarchy).

21) Is it improper and Unconstitutional for cases that are "heard" by judges are compromised judges who preplanned and intend to feigned outcomes? (**YES**, the case is void ab initio, and these Judges do not have SMJ Adjudication Power to exercise over this **MURDAUGH 2.0** case, as they must follow their oath to defend the Constitutions, be neutral and provide Due Process and protect other guaranteed rights, and cannot

interfere with substantive rights of litigants, and protecting their guaranteed, Constitutional rights nor refuse to follow their Oaths. Immunity is waived).

22) SMJ Bundle: Is recusal mandatory when the Judges are the subject of motions regarding Fraud on the Court and SMJ targeting the Judges or complaint, or the judges are a part of the underlying facts as potential Defendants, material witnesses or for other good cause that would bring the findings into question without such recusal, but especially when the Judges are the perpetrators and also hired proxies in the underlying Causes of Action, to do harm or kill Petitioners which attempts were attempted by proxies. (**YES**, the Judges cannot hear and preside over their own issues or case. Thier Immunity is waived, and is the case is Void ab initio or Void, with the facts themselves, but also if the Court continues to rule over their own issues? On all Void matters, the Petitioners must be protected and their judgements entered as described herein).

23. Is it improper and Unconstitutional, for the Court of Appeals' handling of dismissal, remittitur, and unresolved rehearing issues to create a deliberately unclear date of finality, further subverting the Petitioners case, by playing with the timeline for Rule 242 certiorari and federal exhaustion, further punishing Petitioners disability issue it has weaponized repeatedly, to ring up the charges, and to trip Petitioners up on the deadline? (**YES**, the Court is supposed to be neutral and clear in its findings, and they must be logical and make sense. The appeals Court has regularly tried to be vague, during this entire process of Petitioners trying to get reasonable accommodation, because it did not want to give them, which would allow meaningful due process and a full Appeal presentation).

24) Is it improper and Unconstitutional for the Trial and Appeals Courts, to use, Problem–Reaction–Solution (Hegelian Dialectic) engineering, to progressively narrow a meritorious case into procedure by switching substantive issues into procedure issues, stripping the merits away, so the Court can dismiss on some procedure while ignoring the Substantive issues, that cannot be ignored or altered, and by time the case reaches the Appeals Court, the case is further erased, and limited so the review cannot be on the facts or Constitutional de novo review, but instead is limited to fake procedural and fraudulent acts of the lower court that the Appeals court mimics limiting and blocking block-time/pages, that are permitted to others who do not even claim ADA Reasonable Accommodations. (**YES**, the Courts cannot ignore Substantive issues through procedural dismissal, no matter how much they convert merits to procedure. The Appeals Court uses the same Hegelian Dialectic to narrow the review even more than the trial court, which is the Plan and Pattern used in SC Courts to hide their LMCE Murdaugh schemes. Immunity is waived, and the case is Void ab initio).

25) Is it improper and Unconstitutional, for the Courts, and the other branches of Government to be close Aristocratic kin and Groomed Elite with common goals that do not follow a Constitutional Republic, nor include public interests, and are working for their own interest, spanning trial, appeals, and supreme levels, and across the other two branches of SC who are supposed to be checks and balances for each other? (**YES**, and the Courts require mandatory recusal and independent review to rid itself of this Oligarchy, and remove those entrenched and a part of this LMCE, and their secret societies that swear oaths to protect each other rather than the Constitution, which many of the entrenched belong to. Petitioners identified overlapping networks and

relationships in the three comparative and very troubling cases to SC, (**MURDAUGH 2.0** Murdaugh/Laffitte, and Asbestos cases), where the same Murdaugh scams are being run for throughout the state, but all are being used by the LMCE, and all are feigned cases from the inception, which are void ab initio, nonjusticiable, and collusions of Judges, Lawyers, Insurance Carriers, State Actors, and others, where the innocent litigants must be protected and their entries of Judgement honored as earned or as sanctions to be paid in full by Defendants and Allianz, jointly and severely. The Judges waive their immunity).

26) Is it improper and Unconstitutional, for Whether judges and court actors have no judicial immunity for non-judicial acts (e.g., being involved in the underlying causes of action, Appeals and Supreme Courts assisting the Trial Court's lack of immunity, by acting as prosecutor/investigator/architect of procedural barriers and so forth to try to get a predetermined outcome) and where they proceed in the clear absence of all Subject Matter Jurisdiction Adjudication jurisdiction and refusal to mandatorily recuse.

27) Is it improper and Unconstitutional to go forward with any of these trial, appeal or supreme court findings and exercises, as the proper disposition is to declare the challenged proceedings void ab initio and a nullity as to wrongdoers on the part of the Judges, Lawyers, State Actors, Defendants, Allianz, and others, while also not being concerned about expressly saving and protecting the innocent Petitioners by ordering entry of Petitioners' last earned Entries of Judgment, requiring joint-and-several payment in full, and convening a neutral jury to determine additional damages including, but not limited to, uncapped punitive and noneconomic damages and more as defined herin. (**YES**, the fact that the Courts continue to act criminally to hide their LMCE, and their

Murdaugh-style scams across the state, for tax-free profit disbursed through their LMCE. The case is Void ab Initio, and the Petitioners must be protected and granted their rights as the innocent Petitioners, that were victimized by this entire LMCE operation).

28) Is it improper and Unconstitutional for the Trial Court Judges, and other State Actors, MGC law firm and lawyers, and proxy-Defendants and others, to have secret, unilateral meetings with 10th Circuit Judges in order to hire these former felon Defendants and other proxies (future defendants) to create catastrophic injury or wrongful death against Petitioners, as vengeance and to create a claim with fellow colluding Allianz carrier so they could steal, and money launder that and other State dark money through Allianz Insurance Reserve Accounts to redistribute after washing, referred to as Insurance Fraud/Insurance Reserve Fraud (IF/IRF). (**YES**, this is the scam Murdaugh was running and the scam the State is running against Petitioners, and the same structure of the Asbestos victims including the corporations being taken over by the state, in hostility without supporting law, using the same dismissal-sanction or dismissal-punishment that the courts used on Petitions as a plan and practice in this state to rid the case, and keep the funds. Obviously, this is not a Constitutional Republic, but a criminal enterprise through the legal system and political system all working as one unit against the people.

29) Is it improper and Unconstitutional for a Lawyer-Legislator like Jusin Bamberg, to steer a judge, Heath P. Taylor from another circuit to step in to hear matters in Petitioners case in a different circuit, and create predetermined outcomes in Petitioners case against Petitioners, no matter what the law and facts, and rules, that do not apply, and ignoring facts and law that clearly apply. (**YES**, and the ruling is void ab initio, and Bamber has obstructed justice and been a part of other criminal activity in Petitioners case, and is

RACKETEERING in Petitioners case and in the Murdaugh case, feigning representation of real victims that need real help from people who care. All Judges, Lawyers, Legislators, firms, and carriers, are RACKETEERING and Petitioners have the right to either demand and receive criminal prosecution of all, or Prosecute the case themselves as People's Grand Juries have not been abolished in SC and are a Connotational Guaranteed right under the 9th Amendment that helps hold government accountable. All have lost their immunity).

30) Is it proper and Constitutional for Petitioners to demand and receive a jury who decides the law and facts, and to demand a People's Grand Jury where Petitioners can bring forth this criminality both as a part of the People holding their servant government. (**YES**, history shows that Juries are to rule on facts and law, and People can call their own Grand Juries to bring forth their own criminal charges against Government. The Government, operating as an Oligarchy, must be challenged by the People, where Petitioners are demanding a neutral jury in their case, to hear damages that are not already pled and all other damages they see fit. Petitioners are demanding a GRAND JURY be called, with no interference by the Government, and that Petitioners are provided with the same funding that the Government gives itself to feign prosecuting itself. Petitioners demand ADA reasonable accommodations to present a full Cert and Supreme Brief and argument, as there is so much criminality in this case, that any block-time/page limit that would be given, is probably not enough).

31) Is it improper and Unconstitutional to have immunity between the State and the People? (**YES**. Immunity was never a historic precedent in the U.S. In fact, in Britian, the Royas of parliament insisted on gaining immunity because the Crown was retaliating

against it. The issue was never government versus the people. The entire leaning by the Court on this doctrine is the Court granting itself more power than it has and is Unconstitutional and another way to keep the government from the People's oversight and accountability to the people and must be overturned. The State Actors should never be positioned against the People in Connotational Republic. Immunity is not needed as long as the Courts start off by being accountable to the People and not protected from them.

32) Is it improper and Unconstitutional for the People not to be able to call and prosecute their own criminal case, especially against Government, where all avenues of government accountability have been block? (**YES**, like the jury deciding law and fact, the People were able to call their own grand juries and deal with their own alleged victimization by an alleged criminal, without begging the State to prosecute itself and find itself corrupt.

33) Is it improper and Unconstitutional for a People to be blocked from their Constitution, by being almost forced to hire an attorney, if one has the money, and if one can trust the attorney, because the law is too complex, and the LMCE made it illegal for people to help people with their legal needs, when the Constitution cannot be blocked by any rule or regulation that keeps the people from understanding their rights, and how to pursue their rights by whatever means they wish? (**YES**, the Bars of America have sufficiently bullied their Monopoly into every state of the U.S., forcing the People to be slaves to them and the legal system's complex and unaccountable LMCE. The constitution is the rule book as to how to proceed in the U.S. by right and obligation. To have to have a Pope-like mediator that costs money, to decipher latin or the law and procedure is Unconstitutional. People who are free may and shall pursue their rights in

whatever way they please, and the Government cannot dictate how the People understand or how much the People understand their own working documents. This is a violation of the 1st Amendment, Freedom of Speech, Freedom of association, Right to Access the Courts as one chooses, and Right to Redress grievances. Further, to make fees collectible for lawyers and not for the very hard working litigant who gets paid nothing, violates the Equal Protections Clause of the 5th And !4th Amendment. Part of the settlement pressure is knowing that one may have to pay the other's fees. The law that protects the Bar Monopoly does not protect, but destroys the litigant in many if not most cases. The Bar must be disbarred, and people free to choose whom they want to accompany and assist or speak for them in Court. The Bar violates the Sherman Act, as it has shown to be the enemy of the people, with very few complaints being dealt with properly, and highway robbery to pay for.

34) Fees and Costs of Litigation. Most everyone pays taxes. Taxes go to the running of the State/local government or the Federal Government. Forcing anyone to have to pay $25 or $50 dollars to file a motion that barely gets addressed, if at all (see this case), and paying even more for Certs like this at $250, creates a system that forces everything into motions and repeat motions. The Courts draw from taxes, That is sufficient to run the operation. This is not a country club, but a place where justice should be the focus. Charging fees for justice, is Unconstitutional and must be overturned.

II. INTRODUCTION

This case presents extremely troubling structural constitutional violations requiring review de novo, and void judgment with protection as the innocent parties not involved in

these void acts. An de novo hearing should not be narrowed in the record. The courts converted a meritorious case into a procedural moras; denied ADA accommodations required for meaningful participation; and then converted the procedures into procedural nonsense, that were not permitted to be administered by the Courts, Constitutionally, to dismiss the meritorious case, to dismiss the case on illegal procedural acts that were legally impossible to perform. . forcing a dismissal on procedure. On appeal, the procedural Hegelian Dialectic was further limited to not allow threshold Constitutional motions, and what Petitioners did file, were footnoted denied with no opinion or recusal as the motions and challenges were against these same judges, and all done simultaneously so the case was dismissed as well as punishment directed at Petitioners, because Petitioners could not comply without reasonable accommodations, that the court would not provide (with the case requiring a stay not an Ambush dismissal), creating the dismissal as a part of the plan and pattern in SC to rid itself of troubling cases while stealing the insurance funds, with Allianz cooperation, through more Hegelian Dialectic, and then used remittitur/finality devices to sabotage rehearing/certiorari timing.

Further the lack of a clear, reviewable order and the lack of a clear date of finality were used as a procedural weapon to further try to block the appeal rights and exhaustion ad infinitum.

The bottom line, is the trial courts met with further defendants to create IF/IRF claims by paying the proxies to greatly harm of kill Petitioners to work with Allianz, steal the Award (like Aristocratic Murdaugh-style schemes), and then use the Insurance Reserve Fraud accounts of Allianz, to allow the state to money launder other dark money

stolen by the state, through these accounts and disbursed to the LMCE and its perpetrators.

The judges would not recuse even though they were involved in the underlying causes of action through their hiring of proxies that became the Defendants. The Court and Attorneys goal was to keep the case open to money launder while never allowing Discovery or any other communications with Defendants.

Meanwhile, some Defendants provided Petitioners about 2,000 pages of Defendant Group Texts admissions, regarding this RACKETEERNG and murder for hire plot using the Murdaugh IF/IRF scam. Stamm stated that she and others received bribes to stop helping Petitioners.

The rest of the case, Petitioners fought their own attorney colluding with the other side, to help control the case until it was time to dispose of it. Defense was ghost writing Petitioners Amendments, and Petitioners attorney was hiding defaults and agreed with Defense to never go after the Discovery that Petitioners filed before hiring an attorney.

The entire time, the Courts and lawyers tried to dismiss Petitioners for things like Petitioners didn't comply with Virgin Island Customs and therefore the meritorious case should be dismissed and other such nonsense. Too much happened that is absolutely bizarre, but Petitioners were able to finally fire their attorney, where the Defense was contesting that because they stated they could not win without their colluding opposition attorney controlling Petitioners who were not going to allow this collusion to continue.

Shortly after more schemes that Allianz actually played a part in to try to get the case dismissed on issues outside procedure and the merits, because Petitioners were

seeing the IF/IRF, and the Murdaugh style scam being used in Murdaugh and **MURDAUGH 2.0. Petitioners were notifying the public and the Legislature and so forth.** Bamberg secretly sent in Judge Health Taylor to fix the case and dismiss Petitioners, but he was discovered and could not end the case, and ran away, once Petitioners were tipped off as to how he ended up on Petitioners case. In this hearing of 2/16/24, it was argued and clear that Defense had defaulted several times and lost the case repeatedly, but Petitioners attorney was telling them that they needed to drop these Defendants and Causes of Action because there was no case, like Petitioners didn't understand the law.

Once the attorneys and judges realized that Petitioners knew they were colluding and at some point later learned that Petitioners were legally recording their attorney because it was clear he was not trying to represent Petitioners best interest. Thereafter, the attorneys were all trying to move Petitioners hiring date months later than when he was hired (IN WRITING, and with full performance), to try to prove there was no collusion because the Petitioners attorney wasn't even hired yet, in spite of all the evidence that makes it a nonissue. The recordings the Petitioners made of their attorney show him trying to rewrite history to try to move these hiring dates, to the point that it is pathetic, all caught on recordings.

Eventually, due to Petitioners exposure of the LMCE in their case and all the attorneys and judges hiding and running away, Mcintosh, Sua Sponte called for a legal impossibility of an evidentiary hearing that could not happen right after Petitioners could not be dismissed by 12b6.

Petitioners described the hearing as a written presentation of no more than 20 pages, to include exhibits, on a 3 year old case, with about 20,000 pages of evidence all collected by Petitioners outside of discovery because the courts would not permit their co-RACKETEERS to be questioned, yet an evidentiary hearing was called when just a scintilla of evidence was needed to get past the 12b6. The court gave Petitioners 10 working days to prepare with no evidence, witness, subpoenas, subpoenas duces tecum and the Supremes made sure there was no evidence available with their smear, cancel culture order that included a threat that if Petitioneers were so concerned for their health than they should quit rather than order ADA compliance, a continuance, and stop the illegal evidentiary hearing. Petitioners were to somehow answer approximately 162 issues, in this limited amount of pages, that were not addressed as to why they were to be addressed, under penalty of sanctions and dismissal, in a made up attempt to use a total legal impossibility to try to dismiss based on the merits and right to be heard at a reasonable time and place, when there was no merits permitted in that limited number of pages, and no time to prepare, with no witnesses and so forth, and no legal reason for an evidentiary hearing at that time, as it was a disguised summary judgment without discovery for Defendants to win with Mcintosh being Judge, Prosecutor and jury.

The bottom line, is the Court/Attorneys/State Actors/Allianz and others could never allow Petitioners to have Discovery and depositions, because the proxy defendants were very ignorant and could never keep the judges secrets no matter how much they were bribed. For the protection of the LMCE and its predatoriness presiding over and participating in Petitioners case, the case had to end then. Petitioners were not permitted to contact Mcintosh.

Instead of dealing with legal impossibilities, Petitioners took the position that ADA would reverse such ridiculousness, and so would anyone following the law, which they knew was risky to assume. Petitioners addressed a common sense approach and went through every violation of the law the Courts and Attorneys engaged in, and asked the jury of pubic opinion, would a neutral court allow these acts, or perform these acts instead of doing the easiest action, which was to just following the law, if they had no interest in the case. Each part of the handing of the case, from attorneys to Judges, Bamberg, and all the others were addressed, and common sense showed that there was no smell test that could be passed to call this a fair and impartial hearing.

The Courts/lawyers told on themselves much like the Appeals and Supremes have done likewise, which shows the people the importance of making the Court respond when the law and facts do not matter, because the court is crooked and fixed, and void ab inito.

The Order by Mcintosh dismissing the case without any real reasons, but what was made up for the Sua Sponte fake evidentiary hearing, where no evidence could be provided under these terms given, showed all his hate and frustration that Petitioners didn't fall for the fake evidentiary hearing that could not happen, and could not happen under those conditions either. Mcintosh was rude, made fun of Petitioners disabilities he and his RACKETEERS created and weaponized, he was demeaning, trying to humiliate through misogynistic and silver-spooned attitudes that he could not nor did he want to hide, showing the Discrimination and hatred for people that he shows each day in the Courtroom, and arrogant to believe that Petitioners were going to allow him to act as a King of Devine Right when Petitioners had a winning case, that needed fair adjudication by Neutral Judges, not Defendants presiding over the case. His entire "schtick" was

against the rules, and created legal impossibility so he could get away with attempted murder and steal the award and so much more through the LMCE.

There are over 50 Void or Voidable incidences in this **MURDAUGH 2.0** with many not even mentioned due to space and Petitioners limiting disabilities and the cumulative affect. Petitioners provide those here now, with law because the Petitioners won't be able to see to separate them and place them elsewhere later.

THE MOTHER MOTION TABLE:

Ranked Record of 40 of the many Void and Voidable Defects

Under South Carolina and Federal Law -- In Order of Constitutional Severity;

Rule 60 Framework, Timing, and ADA Disability Tolling;

The Innocent Party Cannot Be Bound With the Wrongdoer;

Entry of Judgment by Neutral Authority; Jury Determination of All Damages;

Joint and Several Immediate Full Payment by All Defendants regardless of limits

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The Three Legal Categories -- Void, Voidable, and Fraud Upon the Court

A. Category Definitions Under South Carolina and Federal Law

VOID AB INITIO -- South Carolina Law: "A void judgment is one that, from its inception, is a complete nullity and is without legal effect and must be distinguished from one which is merely 'voidable.'" *Thomas & Howard Co. v. T.W. Graham & Co.*, 318 S.C. 286, 291, 457 S.E.2d 340, 343 (1995).[1] South Carolina courts confirm: "A judgment of a court without subject matter jurisdiction is void and constitutes grounds for the court to vacate the judgment under Rule 60(b)(4)." *Gainey v. Gainey*, 382 S.C. 414, 675 S.E.2d 792, 795 (Ct. App. 2009).[2] "A void order is one rendered in the absence of proper due process or jurisdiction." *Universal Benefits, Inc. v. McKinney*, 349 S.C. 179, 184, 561 S.E.2d 659, 662 (Ct. App. 2002).[3]

VOID AB INITIO -- Federal Law: "Courts are constituted by authority and they cannot go beyond that power delegated to them. If they act beyond that authority, and certainly in contravention of it, their judgements and orders are regarded as nullities; they are not voidable, but simply void, and this even prior to reversal." *Williamson v. Berry*, 49 U.S. (8 How.) 945, 540 (1850).[4] "Without jurisdiction the court cannot proceed at all in any cause; jurisdiction is power to declare the law, and when it ceases to exist, the only function remaining to the court is that of announcing the fact and dismissing the cause." *Steel Co. v. Citizens for a Better Environment*, 523 U.S. 83, 94 (1998).[5]

VOIDABLE -- South Carolina Law: A voidable judgment is issued by a facially competent court but contains material defects entitling a party to vacatur on timely motion. Relief under S.C. R. Civ. P. 60(b)(1)-(3) requires motion within one year. Relief under Rule 60(b)(4) (void) and (5) (satisfied judgment) requires motion within "a reasonable time." *Dunham v. Coffey*, 365 S.C. 90, 98, 615 S.E.2d 836, 840 (2005): "[M]otions for relief grounded in Rule 60(b)(4) and (5), SCRCP, are not subject to this absolute one-year limitation, but may be brought within a reasonable time after the order is entered."[6] Note critically: South Carolina deleted Federal Rule 60(b)(6) -- the catchall "any other reason justifying relief" ground -- so SC practitioners must fit motions within grounds (1)-(5) or proceed by independent action.

FRAUD UPON THE COURT -- South Carolina Law: The South Carolina Court of Appeals confirmed in *Chewning v. Ford Motor Co.* that fraud upon the court is NOT subject to the one-year limitation of Rule 60(b)(3) and that the independent action for fraud upon the court survives without time bar. "Relief for fraud upon the court is not subject to the one year limit placed on relief under Rule 60(b)(3)."[7] The SC Supreme Court confirmed in *Ray v. Ray*, 371 S.C. 226, 638 S.E.2d 50 (2006), that an independent equity action to set aside a judgment for fraud upon the court may be brought without time restriction.[8] Fraud upon the court is defined as "that species of fraud which does, or attempts to, subvert the integrity of the Court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery cannot perform in the usual manner its impartial task of adjudging cases." *Evans v. Gunter*, 294 S.C. 525, 529, 366 S.E.2d 44, 46 (1988).[9]

INDEPENDENT EQUITY ACTION -- SC Rule 60: South Carolina Rule 60 explicitly preserves the independent equity action: "This rule does not limit the power of a court to entertain an independent action to relieve a party from a judgment, order, or proceeding, or to set aside a judgment for fraud upon the court." S.C. R. Civ. P. 60(b). The SC Court of Appeals confirmed in *Mr. T v. Ms. T*, 378 S.C. 127, 662 S.E.2d 413, 417 (Ct. App. 2008), that an independent action may be brought for "such rare, special, exceptional or unusual circumstances that may warrant equitable relief."[10]

B. Rule 60 Timing -- What Is Still Available and What the ADA Disability Tolling Provides

The trial court judgment is over one year old. The appellate dismissal is NOT over one month old. Here is the precise timing analysis under both SC and federal law:

SCRCP 60(b)(1)-(3) -- One Year Hard Cap: These grounds (mistake, new evidence, fraud between parties) are time-barred at the trial court level since over one year has passed. At the appellate level, the one-month window remains technically open for grounds (1)-(3) but only upon obtaining leave of the appellate court while the appeal is pending. S.C. R. Civ. P. 60(b). However, the most powerful grounds -- void and fraud upon the court -- are not confined to this one-year limit.

SCRCP 60(b)(4) -- Void Judgment -- Reasonable Time: Both SC and federal law confirm this ground is NOT subject to the one-year cap. It requires motion "within a reasonable time." *Dunham v. Coffey*, 365 S.C. 90, 615 S.E.2d 836 (2005).[11] The Supreme Court's January 2026 decision in *Coney Island Auto Parts Unlimited, Inc. v. Burton* held that "reasonable time" applies even to void judgment challenges -- but critically, reasonable time is flexible and is tolled where the movant could not have acted earlier. Where the void was actively concealed by the opposing parties and the court itself -- as documented here -- the reasonable time period has not run.

SCRCP Independent Action and Fraud Upon the Court -- No Time Bar: As confirmed by *Chewning v. Ford Motor Co.* and *Ray v. Ray*, an independent action for fraud upon the court in South Carolina carries no time limitation. This is the most important vehicle here because the fraud upon the court -- including the Laffitte attorney posing as deputy clerk, the falsification of court records, and the collusion between judicial actors and adverse parties -- constitutes the precise type of fraud that subverts the judicial machinery itself.

ADA Disability Tolling -- The Court Cannot Benefit From the Obstacles It Created

The ADA disability tolling argument operates independently of and in addition to the void and fraud upon court grounds. Under federal equitable tolling doctrine: "(1) that he has been pursuing his rights diligently, and (2) that some extraordinary circumstance stood in his way and prevented timely filing." *Holland v. Florida*, 560 U.S. 631, 645 (2010).[12] "Nonjurisdictional limitations periods are presumptively subject to equitable tolling." *Boechler, P.C. v. Commissioner of Internal Revenue*, 596 U.S. 347, 355 (2022).[13] Given Petitioners constant record building demanded Reasonable Accommodations that were ignored and ridiculed, no deadlines herein apply to Petitioners.

Both conditions are overwhelmingly met. The plaintiff has diligently pursued rights throughout. The extraordinary circumstances preventing timely filing were created by the

court itself: the ADA accommodation denial prevented comprehensive filings; alteration of motion titles erased the record; refusal to issue written orders left no reviewable ruling; and page restrictions combined with ADA denial made timely constitutional preservation physically impossible. A party cannot benefit from the obstacle it created. *Menominee Indian Tribe of Wisconsin v. United States*, 577 U.S. 250, 257 (2016).[14] The ADA violation is also a continuing violation under *National Railroad Passenger Corp. v. Morgan*, 536 U.S. 101, 115 (2002) -- the limitations clock has not started because the violation continues.[15]

Furthermore: South Carolina courts have recognized that disability constitute grounds for equitable relief from time limitations. Under SC equitable principles, a party who is physically unable to file due to disability -- especially where that disability is compounded by the opposing party's and court's misconduct -- is entitled to tolling of any limitations period. The combination of pre-existing disability, court-caused inability to file comprehensively, and ADA violations by the court system means that no limitation period applicable to grounds (1)-(3) has run against the plaintiff.

C. The Complete Ranked Void and Voidable Defect Record of just 40 Defects in Order of Severity

Each defect is classified, assigned its South Carolina and federal Rule 60 ground, cited with primary authority, and quoted. Defects 1-12 are VOID AB INITIO or FRAUD UPON THE COURT with no time bar under the independent equity action. Defects 13-28 are VOID under Rule 60(b)(4) requiring reasonable time, ADA-tolled. Defects 29-40 are VOIDABLE under Rules 60(b)(1)-(3), time-limited but ADA-tolled and partially available through independent equity action.

1. *[VOID AB INITIO -- HIGHEST]* Subject Matter Jurisdiction Absent at Individual Case Level -- Every Proceeding Is a Constitutional Nullity

SC Ground: S.C. R. Civ. P. 60(b)(4); Independent Equity Action -- No Time Bar.

Federal Ground: Fed. R. Civ. P. 60(b)(4); Collateral Attack at Any Time.

Thomas & Howard, 318 S.C. at 291: "A judgment of a court without subject matter jurisdiction is void." [16] *Steel Co.*, 523 U.S. at 94: "[T]he only function remaining to the court is that of announcing the fact and dismissing the cause."[17] The presiding judge's oath under U.S. Const. art. VI, cl. 3 and S.C. Const. art. VI, sec. 5 to defend the Constitution is the individual jurisdictional prerequisite. A judge who participates in suppressing the constitutional rights the oath requires protection of lacks the individual jurisdictional predicate for the judicial power itself.

2. *[VOID AB INITIO]* Feigned and Colluded Case -- No Real Case or Controversy Under Article III or South Carolina Law

SC Ground: S.C. R. Civ. P. 60(b)(4); Independent Equity Action. SC courts require a justiciable controversy. A manufactured proceeding designed for a predetermined outcome is non-justiciable. *Muskrat v. United States*, 219 U.S. 346, 362 (1911): "To constitute a case within the meaning of the Constitution, there must be parties -- and a dispute which the court has the power to determine."[18] Virgin Islands customs applied to South Carolina parties proves the proceeding was feigned: no legitimate court would find that argument colorable.

3. *[VOID AB INITIO]* Presiding Judges as Parties to Underlying Conduct -- Mandatory Recusal Refused -- Nemo Iudex in Causa Sua

SC Ground: S.C. R. Civ. P. 60(b)(4); Independent Equity Action. SC Code Ann. sec. 62-1-107 and Canon 3E of the SC Code of Judicial Conduct require disqualification where the judge has a personal interest in the outcome.

Caperton v. A.T. Massey Coal Co., 556 U.S. 868, 872 (2009): Due process requires recusal when "the probability of actual bias . . . is too high to be constitutionally tolerable."[19] Where the judge is an actual party to the underlying conduct the bias is certain, not merely probable. Every act by that judge is void. *Dunham v. Coffey*, 365 S.C. at 98: "A void order is one rendered in the absence of proper due process or jurisdiction."[20]

4. *[VOID -- FRAUD UPON COURT -- NO TIME BAR]* Laffitte Firm Attorney Posing as Deputy Clerk -- Extrinsic Fraud Subverting the Judicial Machinery

SC Ground: Independent Equity Action for Fraud Upon the Court -- No Time Bar. S.C. R. Civ. P. 60(b).

Evans v. Gunter, 294 S.C. at 529: Fraud upon the court is "fraud perpetrated by officers of the court so that the judicial machinery cannot perform in the usual manner its impartial task."[21] *Chewning v. Ford Motor Co.*: "Relief for fraud upon the court is not subject to the one year limit."[22] A full partner of the Laffitte firm -- a firm implicated in the underlying litigation -- not a current court employee, issued letters falsely representing herself as a deputy clerk making legal rulings on ADA accommodations. This is textbook fraud upon the court. Also: potential 18 U.S.C. sec. 1001 violation (false statements); potential violation of Rule 8.4, SC Rules of Professional Conduct (fraud, deceit, misrepresentation).

5. *[VOID -- FRAUD UPON COURT -- NO TIME BAR]* ADA Record Falsification -- Motion Titles Altered in Official Court Record

SC Ground: Independent Equity Action for Fraud Upon the Court -- No Time Bar.

Altering the official titles of filed motions in the court record to remove ADA designations is falsification of official court records. This is not clerical error correctable under S.C. R. Civ. P. 60(a) -- it is a deliberate act changing the substance of what was filed, designed to prevent any reviewable record of ADA requests from existing. *Evans v. Gunter*, 294 S.C. at 529.[23] Also: potential violation of S.C. Code Ann. sec. 33-11-130 (falsification of records); S.C. Code Ann. sec. 16-9-10 (perjury by false entry in records).

6. *[VOID -- FRAUD UPON COURT -- NO TIME BAR]* Refusal to File Properly Submitted Motions -- Denial of Court Access

SC Ground: Independent Equity Action for Fraud Upon the Court; also S.C. R. Civ. P. 60(b)(4) as due process void.

Bounds v. Smith, 430 U.S. 817 (1977): The constitutional right of access to courts is violated when the court refuses to file properly submitted documents.[24] In South Carolina, the clerk of court is required by S.C. Code Ann. sec. 14-17-30 to accept and file all documents properly presented. Refusal to file ADA accommodation motions deprived the plaintiff of any record of those requests and made administrative review impossible -- a fraud upon the court record constituting extrinsic fraud that "deprives a person of the opportunity to be heard." *Gainey*, 382 S.C. at 798.[25]

7. *[VOID -- FRAUD UPON COURT -- NO TIME BAR]* Rulings Issued by Clerk Letter Rather Than Judicial Order -- No Valid Ruling Exists

SC Ground: Independent Equity Action; S.C. R. Civ. P. 60(b)(4).

"An order is not final until it is written and entered by the clerk of court." *Mr. T v. Ms. T*, 378 S.C. at 134.[26] A letter from a clerk is not a judicial order. It has no legal authority, creates no reviewable record, and cannot constitute a ruling on a statutory or constitutional right. Because no valid order denying ADA accommodations was ever entered, no valid denial exists -- meaning the accommodation must be granted by default, and any procedural consequence flowing from the non-existent denial is itself void.

8. *[VOID -- FRAUD UPON COURT -- NO TIME BAR]* Misrepresentation That Prior ADA Rulings Existed When They Did Not

SC Ground: Independent Equity Action for Fraud Upon the Court -- No Time Bar.

Representing to a litigant that the court has already ruled on an ADA accommodation request -- when no order referencing the ADA statute, no order applying accommodation analysis, and no written ruling exists -- is an affirmative misrepresentation of the court record. This deprived the plaintiff of the ability to seek clarification, mandamus, or appeal of a ruling that did not exist. It is precisely the type of fraud that "prevents a party

from fully exhibiting and trying his case" -- extrinsic fraud under *Gainey*, 382 S.C. at 798.[27]

9. *[VOID -- FRAUD UPON COURT -- NO TIME BAR]* Rule 221 Misapplied to Recharacterize Clarification as Reconsideration -- Manufactured Procedural Bar

SC Ground: Independent Equity Action; S.C. R. Civ. P. 60(b)(4).

A motion to clarify whether a court ever ruled on a pending ADA motion is not a motion for reconsideration of any ruling under Rule 221, SCACR. Mischaracterizing it as such -- and applying the reconsideration standard to trigger a procedural bar -- is a misapplication of the rule designed to prevent the plaintiff from obtaining a clear record. This constitutes extrinsic fraud preventing the plaintiff from having the ADA issue heard. *Chewning v. Ford Motor Co.*: fraud upon the court "is not subject to the one year limit."[28]

10. *[VOID -- FRAUD UPON COURT -- NO TIME BAR]* Simultaneous Dismissal of Appeal, SMJ Challenge, and Recusal Motion as Unexplained Footnotes -- Judges Deciding Their Own Misconduct

SC Ground: Independent Equity Action; S.C. R. Civ. P. 60(b)(4) -- due process void.

Dunham v. Coffey, 365 S.C. at 98: "A void order is one rendered in the absence of proper due process."[29] *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976): "The fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner." The SMJ challenge and mandatory recusal were dismissed as unexplained footnotes in the same order dismissing the appeal -- issued the day after filing, without stay, without hearing, by the judges whose own conduct was at issue. *Nemo iudex in causa sua*. Every act produced by this order is void.

11. *[VOID -- FRAUD UPON COURT -- NO TIME BAR]* Supreme Court Mandamus Threatening Health to Coerce Abandonment of Constitutional Claims

SC Ground: Independent Equity Action; ADA Retaliation under 42 U.S.C. sec. 12203.

Using a writ of mandamus to threaten a disabled litigant that if they were concerned about their health they should abandon constitutional claims is not a legitimate exercise of judicial power. It constitutes: (a) extrinsic fraud coercing non-participation; (b) ADA retaliation under 42 U.S.C. sec. 12203; (c) potential 18 U.S.C. secs. 241 and 242 violations; (d) 42 U.S.C. sec. 1983 claim. Judges have "no immunity whatsoever from criminal prosecutions."[30]

12. *[VOID -- FRAUD UPON COURT -- NO TIME BAR]* Virgin Islands Customs Applied to South Carolina Case -- Signal of Predetermined Outcome -- No Sanctions Granted

SC Ground: Independent Equity Action for Fraud Upon the Court; S.C. R. Civ. P. 60(b)(4).

No court with legitimate jurisdiction over a South Carolina case between South Carolina parties on South Carolina causes of action has a colorable legal theory under which Virgin Islands customs apply. The filing of this argument and the court's use of it as a dismissal vehicle -- without sanctioning the filing under S.C. R. Civ. P. 11 -- demonstrates a predetermined outcome. A neutral court would sanction a legally baseless filing. Failure to do so is evidence that the legal argument was not evaluated but selected as a vehicle. This is extrinsic fraud preventing adjudication of the merits. *Ray v. Ray*, 371 S.C. at 235.[31]

13. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Oath Violation as Jurisdictional Predicate Failure -- Judge's Duty to Defend Constitutional Rights

SC Ground: S.C. R. Civ. P. 60(b)(4) -- reasonable time, ADA-tolled.

U.S. Const. art. VI, cl. 3 and S.C. Const. art. VI, sec. 5 require all judges to be "bound by Oath or Affirmation, to support this Constitution." That oath is the individual jurisdictional predicate for adjudicating constitutional rights. A judge who participates in suppressing the rights the oath requires protection of has violated the predicate. Every resulting order is void under S.C. R. Civ. P. 60(b)(4). *Universal Benefits*, 349 S.C. at 184.[32]

14. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* SC Justiciability Misused to Avoid SMJ Void Analysis -- Non-Justiciability Finding to Prevent Constitutional Adjudication

SC Ground: S.C. R. Civ. P. 60(b)(4) -- reasonable time, ADA-tolled.

South Carolina distinguishes justiciability from SMJ, but uses non-justiciability to dispose of constitutional claims without merits adjudication. Where the non-justiciability finding was itself manufactured to avoid the SMJ void analysis -- as where the court feigned that no live controversy existed while actively suppressing one -- the non-justiciability order is void as a product of fraud upon the court. *Gainey*, 382 S.C. at 795: "A judgment of a court without subject matter jurisdiction is void."[33]

15. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Court-Authored Procedural Default Through ADA Denial -- Coleman Trap

SC Ground: S.C. R. Civ. P. 60(b)(4); Independent Equity Action.

Coleman v. Thompson, 501 U.S. 722, 750 (1991), bars review of unpresented claims -- but presupposes a legitimate opportunity to present. The court's ADA denial prevented preservation. A court cannot create a procedural default through its own wrongdoing and

then invoke it to bar the claim it suppressed. The resulting dismissal is void as a due process violation. S.C. R. Civ. P. 60(b)(4); *Universal Benefits*, 349 S.C. at 184.[34]

16. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Rules Enabling Act Violation -- Procedure Used to Permanently Extinguish Substantive Constitutional Rights

SC Ground: S.C. R. Civ. P. 60(b)(4); Independent Equity Action.

S.C. R. Civ. P. 1 provides that the SC Rules "shall be construed to secure the just, speedy, and inexpensive determination of every action." Federal Rules Enabling Act, 28 U.S.C. sec. 2072(b): "Such rules shall not abridge, enlarge or modify any substantive right." *Sibbach v. Wilson & Co.*, 312 U.S. 1, 10 (1941): "No court-made rule can enlarge or restrict jurisdiction or abrogate or modify the substantive law."[35] Every procedural dismissal that permanently extinguished a substantive constitutional claim violated this limit and is void as applied.

17. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Default Judgments Obtained and Erased Without Legal Process -- Plaintiff's Judgments Are Valid

SC Ground: S.C. R. Civ. P. 60(b)(4); also potential Rule 60(b)(3) within one year of each erasure, ADA-tolled.

S.C. R. Civ. P. 55 establishes the exclusive procedure for default judgment entry. S.C. R. Civ. P. 60(b) establishes the exclusive grounds for vacatur. Silent administrative erasure of valid default judgments without motion, findings, or cognizable legal basis is void under Rule 60(b)(4) as a due process deprivation. U.S. Const. amend. XIV; S.C. Const. art. I, sec. 3. The plaintiff who obtained those defaults in good faith retains their benefit. The wrongdoers cannot use the void they created to escape the judgments the innocent party legitimately won.

18. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Dismissal on Grounds With No Legal Basis in Applicable SC Law -- Twombly/Iqbal Plausibility Gatekeeping as REA Violation

SC Ground: S.C. R. Civ. P. 60(b)(4).

Bell Atlantic Corp. v. Twombly, 550 U.S. 544 (2007); *Ashcroft v. Iqbal*, 556 U.S. 662 (2009).[36] When plausibility assessment is used to dismiss constitutional claims before any factfinder evaluates them, the procedural rule functions as a substantive bar -- precisely what the Rules Enabling Act prohibits. The SC Rules similarly: S.C. R. Civ. P. 12(b)(6) dismissal is only appropriate where it is "certain that the plaintiff can prove no set of facts which would entitle him to relief." *Stiles v. Morse*, 280 S.C. 536, 313 S.E.2d 247 (1984).[37]

19. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Sanctions Imposed Against Plaintiff for Defending Against Manufactured Procedural Attacks

SC Ground: S.C. R. Civ. P. 60(b)(4); also 60(b)(3) if within one year of each sanction order, ADA-tolled.

S.C. R. Civ. P. 11 authorizes sanctions for frivolous filings. It does not authorize sanctions against a party defending a legitimate constitutional claim against procedurally manufactured attacks. When sanctions are imposed against the plaintiff for responding to baseless procedural arguments -- such as the Virgin Islands customs argument -- the sanction order is void: it was imposed not for frivolous filing but for resisting a predetermined dismissal. *Dunham v. Coffey*, 365 S.C. at 98.[38]

20. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Appeal Dismissed Day After SMJ and Recusal Filed -- No Stay -- No Hearing -- Judges Deciding Own Disqualification

SC Ground: S.C. R. Civ. P. 60(b)(4) -- due process void; Independent Equity Action.

"[A]n elementary and fundamental requirement of due process in any proceeding which is to be accorded finality is notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 314 (1950), cited in *Dunham v. Coffey*, 365 S.C. at 98.[39] Dismissing the entire appeal the day after an SMJ and recusal motion was filed -- without stay, hearing, or recusal -- violates this minimum. The dismissal order is void.

21. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Appellate Page and Time Restrictions That Prevented Constitutional Preservation -- Constructive Denial of Access

SC Ground: S.C. R. Civ. P. 60(b)(4); ADA statutory violation as independent ground.

Tennessee v. Lane, 541 U.S. 509, 533-34 (2004): Title II of the ADA applies to state court proceedings and denial of meaningful court access implicates the Fourteenth Amendment.[40] Artificially restricting page limits and time in a complex multi-issue constitutional appeal -- while denying ADA accommodations -- constructively denies court access. The resulting dismissal for failure to raise all constitutional issues is void as a manufactured default. EEOC Guidance: passive non-response to accommodation requests constitutes a denial that "violates the ADA."[41]

22. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* SC Supreme Court Refusing to Act on Extraordinary Writ While Threatening Litigant -- Abandonment of Neutral Role

SC Ground: S.C. R. Civ. P. 60(b)(4); ADA sec. 12203 independent cause.

A court that uses extraordinary writ proceedings to threaten a litigant's health rather than adjudicate a constitutional claim has abandoned the neutral judicial role required by due process. Every order issued in such a proceeding is tainted by the institutional bad faith it reflects. *Universal Benefits*, 349 S.C. at 184: "A void order is one rendered in the absence of proper due process."[42]

23. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* SC Legislative Judicial Appointment Network -- Structural Bias Requiring Recusal of All Network-Connected Judges

SC Ground: S.C. R. Civ. P. 60(b)(4); Canon 3E, SC Code of Judicial Conduct.

As documented by the Brennan Center: "One political science study found that judges facing legislative reappointment were more likely to rule in favor of the legislature in legal challenges."[43] Where lawyer-legislators appear as counsel before judges they appointed and who face reappointment votes, the structural conflict requires recusal of all judges connected to the appointment network. Proceedings before such judges without recusal are void. *Caperton*, 556 U.S. at 872.[44]

24. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Appellate Court Changing Substance of Motions Under Guise of Clerical Correction

SC Ground: S.C. R. Civ. P. 60(b)(4); S.C. R. Civ. P. 60(a) does not permit changing substance.

Dion v. Ravenel, Eiserhardt Associates, 316 S.C. 226, 449 S.E.2d 251, 253-54 (Ct. App. 1994): "[T]he trial court retains jurisdiction to correct clerical errors prior to the docketing of the appeal" but correction "cannot extend to changing the scope of the judgment."[45] Changing the title of a motion changes its substance for purposes of the record. It is not a clerical correction. It is an unauthorized alteration that voids any order purporting to rule on the altered document.

25. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Directed Verdict / Summary Judgment Entered Without Jury Determination -- Seventh Amendment Violation

SC Ground: S.C. R. Civ. P. 60(b)(4); U.S. Const. amend. VII.

The Seventh Amendment preserves the right to jury trial in civil cases. Summary judgment or directed verdict terminating constitutional claims before jury evaluation -- in a system where the jury was constitutionally authorized to evaluate both law and fact -- violates this guarantee and is void as applied. Constitution Center: "The substance of the English common law jury trial right in 1791 governs the meaning of the Seventh Amendment today" -- and that right included jury authority over law.[46]

26. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Sua Sponte Dismissal of Constitutional Claims Without Notice or Opportunity to Respond

SC Ground: S.C. R. Civ. P. 60(b)(4) -- due process void.

Due process requires that a party have notice and opportunity to respond before dismissal. *Mathews v. Eldridge*, 424 U.S. at 333.[47] A sua sponte dismissal of constitutional claims without prior notice or opportunity to address the grounds for dismissal violates this minimum requirement. The resulting dismissal is void as a due process deprivation under *Dunham v. Coffey*, 365 S.C. at 98.[48]

27. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Evidentiary Rulings Excluding Evidence of Constitutional Violations -- Evidence of Oligarchic Network Excluded

SC Ground: S.C. R. Civ. P. 60(b)(4).

Where a trial court excludes evidence that is directly probative of the constitutional claims at issue -- including evidence of the oligarchic network, Murdaugh-connected relationships, and judicial participation in the underlying conduct -- and does so to protect the network rather than based on legitimate evidentiary principles, the resulting record is void as a product of a proceeding that "cannot perform in the usual manner its impartial task." *Evans v. Gunter*, 294 S.C. at 529.[49]

28. *[VOID -- SCRCP 60(b)(4) / ADA-TOLLED]* Sidebars and Ex Parte Communications Excluding Plaintiff From Judicial Determinations

SC Ground: S.C. R. Civ. P. 60(b)(4) -- due process void; Canon 3B(7), SC Code of Judicial Conduct (prohibiting ex parte communications).

Ex parte communications between the court and adverse parties that result in judicial determinations adverse to the absent party violate due process and Canon 3B(7) of the SC Code of Judicial Conduct. They constitute the type of fraud that subverts the judicial machinery: *Evans v. Gunter*, 294 S.C. at 529.[50] Any order resulting from or influenced by undisclosed ex parte communication is void.

29. *[VOIDABLE -- SCRCP 60(b)(3) / ADA-TOLLED]* Extrinsic Fraud by Adverse Parties -- Manufactured Evidence and False Representations

SC Ground: S.C. R. Civ. P. 60(b)(3) -- one year, ADA-tolled; also Independent Equity Action if fraud upon court proven.

"Extrinsic fraud is fraud that induces a person not to present a case or deprives a person of the opportunity to be heard." *Gainey*, 382 S.C. at 798.[51] SC courts require extrinsic fraud for Rule 60(b)(3) relief: *Raby Construction v. Orr*, 358 S.C. 10, 594 S.E.2d 478 (2004).[52] The presentation of legally baseless arguments with no connection to the

governing law -- including the Virgin Islands customs argument -- constitutes extrinsic fraud that prevented the plaintiff from having the merits heard. Within the ADA-tolled window this ground remains available.

30. ***[VOIDABLE -- SCRCP 60(b)(3) / ADA-TOLLED]*** **False Claim That Prior ADA Ruling Existed -- Misrepresentation of Court Record to Adverse Party**

SC Ground: S.C. R. Civ. P. 60(b)(3) -- one year, ADA-tolled.

Affirmatively representing to a litigant that the court has already ruled on their ADA accommodation request -- when no such ruling exists -- is a misrepresentation of the court record. This constitutes misconduct by an adverse party under S.C. R. Civ. P. 60(b)(3) and, where the representation was made by judicial officers or their designees to prevent the plaintiff from exercising their legal rights, rises to fraud upon the court under the independent equity action.

31. ***[VOIDABLE -- SCRCP 60(b)(3) / ADA-TOLLED]*** **Rule 11 Failure -- Adverse Counsel Filed Baseless Motions Without Reasonable Legal Basis**

SC Ground: S.C. R. Civ. P. 60(b)(3) and S.C. R. Civ. P. 11 -- one year, ADA-tolled.

S.C. R. Civ. P. 11 requires that every motion be warranted by existing law or a non-frivolous argument for extension of law. Filing a motion based on Virgin Islands customs in a South Carolina case between South Carolina parties, with no colorable legal basis in any applicable choice of law principle, violates Rule 11. The failure to sanction this filing -- and the court's use of it as a dismissal vehicle -- demonstrates that the Rule 11 framework was not applied neutrally.

32. ***[VOIDABLE -- SCRCP 60(b)(3) / ADA-TOLLED]*** **Adverse Counsel Concealment of Conflicts of Interest -- Lawyers Connected to Oligarchic Network**

SC Ground: S.C. R. Civ. P. 60(b)(3) -- one year, ADA-tolled; also Rule 1.7, SC Rules of Professional Conduct.

Counsel who appear in a case while maintaining undisclosed relationships with the judicial officers presiding over it -- through the legislative appointment network, through the Laffitte firm connection, or through other entrenched oligarchic relationships -- have violated their duty of disclosure under Rule 1.7 of the SC Rules of Professional Conduct. This constitutes misconduct by an adverse party under S.C. R. Civ. P. 60(b)(3). The plaintiff could not have discovered these relationships through reasonable diligence because they are not publicly disclosed.

33. ***[VOIDABLE -- SCRCP 60(b)(3) / ADA-TOLLED]*** **ADA Accommodation Denial by Passive Non-Response -- Failure to Issue Written Order**

SC Ground: S.C. R. Civ. P. 60(b)(3) within one year of each denial, ADA-tolled; also Title II of ADA, 42 U.S.C. sec. 12132, as independent statutory cause of action.

Tennessee v. Lane, 541 U.S. at 533-34.[53] EEOC Guidance: "The lack of action under these circumstances amounts to a denial, and thus violates the ADA."[54] Each passive non-response to a properly filed ADA accommodation request constitutes a denial -- and each denial is both (a) misconduct by the court as an adverse party under Rule 60(b)(3), and (b) an independent violation of Title II actionable under 42 U.S.C. sec. 12132 without time limitation while the ongoing violation continues.

34. *[VOIDABLE -- SCRCP 60(b)(3) / ADA-TOLLED]* ADA Retaliation -- Threatening Health of Disabled Litigant for Pursuing ADA Rights

SC Ground: 42 U.S.C. sec. 12203 independent cause of action; S.C. R. Civ. P. 60(b)(3) within one year of the threat, ADA-tolled.

42 U.S.C. sec. 12203 prohibits retaliation and coercion against any individual who exercises rights under the ADA. Threatening a disabled litigant that if they were concerned about their health they should abandon constitutional claims constitutes coercion in violation of this provision. This is an independent cause of action separate from any Rule 60 motion and carries no limitation period while the coercive effect continues.

35. *[VOIDABLE -- SCRCP 60(b)(1) / ADA-TOLLED]* Twombly/Iqbal Standard Applied to Dismiss SC State Law Claims Under Federal Plausibility Test

SC Ground: S.C. R. Civ. P. 60(b)(1) -- one year, ADA-tolled; also Rule 60(b)(4) if REA violation renders dismissal void.

Stiles v. Morse, 280 S.C. at 539: In South Carolina, a complaint survives 12(b)(6) dismissal unless "certain that the plaintiff can prove no set of facts which would entitle him to relief."[55] Applying the more restrictive federal *Twombly/Iqbal* plausibility standard to South Carolina state law claims is a mistake of law -- a ground for relief under S.C. R. Civ. P. 60(b)(1) within one year, ADA-tolled.

36. *[VOIDABLE -- SCRCP 60(b)(1) / ADA-TOLLED]* Failure to Hold Evidentiary Hearing Required Before Dismissal of Constitutional Claims

SC Ground: S.C. R. Civ. P. 60(b)(1) and (4) -- ADA-tolled.

Where a constitutional claim requires factual development to adjudicate and the court dismisses without an evidentiary hearing, the dismissal constitutes both a mistake of law (Rule 60(b)(1)) and a due process violation (Rule 60(b)(4)). *Thomas & Howard*, 318 S.C. at 291: default judgment without required damages hearing is not void but is reversible

error.[56] Dismissal of constitutional claims without required evidentiary hearing is reversible error under Rule 60(b)(1) within one year, ADA-tolled.

37. ***[VOIDABLE -- SCRCP 60(b)(1) / ADA-TOLLED]*** **Procedural Default Doctrine Applied to Claims Preserved Under SC Law**

SC Ground: S.C. R. Civ. P. 60(b)(1) -- one year, ADA-tolled.

To the extent federal procedural default doctrine was applied to bar SC state law claims that were properly preserved under SC procedural rules, this constitutes a mistake of law reviewable under S.C. R. Civ. P. 60(b)(1). SC state law claims follow SC preservation rules, not federal habeas procedural default doctrine. The misapplication of federal default doctrine to state law claims is reversible error within one year of the order imposing default, ADA-tolled.

38. ***[VOIDABLE -- SCRCP 60(b)(2) / ADA-TOLLED]*** **Newly Discovered Evidence of Oligarchic Network Relationships and Murdaugh Connections**

SC Ground: S.C. R. Civ. P. 60(b)(2) -- one year from discovery, ADA-tolled.

Evidence of the entrenched oligarchic relationships -- including the Murdaugh-connected scheme, the Laffitte firm's role, and the judicial participation in the underlying conduct -- was not reasonably discoverable before the judgment through the exercise of due diligence because it was actively concealed. Each newly discovered item of such evidence reopens the one-year window under S.C. R. Civ. P. 60(b)(2), running from the date of discovery with ADA tolling. Evidence continues to emerge as the Murdaugh-connected corruption investigations proceed.

39. ***[VOIDABLE -- SCRCP 60(b)(5) / ADA-TOLLED]*** **Changed Circumstances Making Prospective Application of Judgment Inequitable**

SC Ground: S.C. R. Civ. P. 60(b)(5) -- reasonable time, ADA-tolled.

S.C. R. Civ. P. 60(b)(5) permits relief where "it is no longer equitable that the judgment should have prospective application." The subsequent public exposure of the Murdaugh network, the ongoing state investigations into judicial and prosecutorial misconduct in South Carolina, and the documented pattern of oligarchic case-fixing that has emerged since the judgments were entered constitute changed circumstances making the prospective application of any dismissal judgment against the plaintiff inequitable. This ground carries no one-year limitation -- only "reasonable time" -- ADA-tolled.

40. ***[VOIDABLE -- INDEPENDENT EQUITY ACTION]*** **General Equitable Relief -- Rare, Special, Exceptional Circumstances Warranting Independent Equity Action**

SC Ground: Independent Equity Action -- No time bar for exceptional circumstances. S.C. R. Civ. P. 60(b).

Mr. T v. Ms. T, 378 S.C. at 134: The independent equity action under Rule 60(b) is available for "such rare, special, exceptional or unusual circumstances that may warrant equitable relief, including accident or mistake."[57] The complete record documented in this motion -- feigned proceeding, judicial participants as parties, Laffitte firm attorney posing as clerk, ADA record falsification, Supreme Court health threats, defaults erased, all lawyers fleeing upon corruption exposure, Virgin Islands customs applied to South Carolina claims, SMJ and recusal dismissed as footnotes overnight -- constitutes precisely the "rare, special, exceptional or unusual circumstances" for which the independent equity action exists. This ground carries no time bar.

Part IX: The Innocent Party Cannot Be Bound With the Wrongdoer -- Judgments, Damages, and Full Payment

A. The Foundational Principle

"Fraud vitiates everything it touches." *Nudd v. Burrows*, 91 U.S. 426, 441 (1875).[58] The wrongdoers cannot use the void they created to escape judgment. "He who comes into equity must come with clean hands." *Keystone Driller Co. v. General Excavator Co.*, 290 U.S. 240, 245 (1933).[59] The innocent party retains the full benefit of every default and legal right obtained before the void was revealed. "A court cannot confer jurisdiction where none existed and cannot make a void proceeding valid." *Old Wayne Mut. L. Assoc. v. McDonough*, 204 U.S. 8 (1907).[60] The void works against the wrongdoers -- not the innocent party who obtained valid defaults before the fraud was discovered.

B. Entry of Judgments by Neutral SMJ-Authorized Authority

All judgments must be entered by a neutral authority with no connection to: the SC legislative appointment network; the Laffitte firm or any implicated firm; or any judge identified in this record as a participant in the underlying conduct. Options include: (a) special master drawn from outside SC; (b) federal judge by random selection outside the Fourth Circuit; or (c) neutral constitutional tribunal for the limited purpose of entering the defaults the plaintiff validly obtained. *Steel Co.*, 523 U.S. at 94: jurisdiction is the constitutional predicate for any valid judgment.[61]

C. Jury Determination of All Damages

The Seventh Amendment requires jury determination of all damages in common law actions. The damages here include: (1) all economic losses past and future; (2) non-economic damages including pain, suffering, emotional distress, loss of constitutional rights, and ADA violations -- no statutory cap where defendants acted intentionally; (3) punitive damages sufficient to deter documented intentional constitutional fraud by state actors -- not subject to ordinary commercial cap ratios under *BMW v. Gore*, 517 U.S. 559 (1996);[62] and (4) all attorneys' fees and costs under 42 U.S.C. sec. 1988 and applicable SC fee-shifting statutes. Caps that insulate state actors from accountability for intentional constitutional violations are subject to constitutional challenge under *United States v. Carolene Products Co.*, 304 U.S. 144 (1938).[63]

D. Joint and Several Immediate Full Payment

All defendants are jointly and severally liable. "[E]ach party is independently liable for the full extent of the injuries . . . the plaintiff may collect the full value of the judgment from any one of them."[64] Payment must be immediate upon judgment entry: cash, certified cashier's check, blockchain-based digital asset transfer at judgment-date rate, precious metal at market rate on judgment date, or same-day wire with confirmed receipt. No form subject to reversal, clawback, stop-payment, or institutional hold is acceptable. No installments. No stays. All defendants must pay in full before seeking contribution among themselves. The plaintiff shall not wait for any contribution proceeding.

III. STATEMENT OF THE CASE

A. Meritorious Case and Evidence (Troubling Facts)

The underlying case was very dangerous and deadly to the Petitioners. Where former felons and others went on the attack against two elderly ladies trying to recover from cancer (Petitioners) from June 29, 2021-September 15, 2021 and thereafter through March 31, 2026. After finally filing suit against he attacker Defendants (11), they obtained approximately 2,000 pages of Defendant group-text messages and other

evidence described as admissions and other after-acquired evidence on their own as discovery, depositions, subpoenas, and subpoenas duces tecum were not permitted by Trial or Supreme Court.

These admissions described secret and unilateral meetngs between10th Cir. Judges, State Actors, Lawyers, Allianz, proxies (future Defendants) and other where the Judges and these others were hiring these former felon proxies to create catastrophic injury or wrongful death against Petitioners, former Legal Reform Lawyers in Virginia who helped expose the same type of corruption there. The plan was to retaliate against these Legal Reformers with Virginia actors also joining, and to injury/death and file claims with Allianz insurance who would then money launder this hefty award, with other dark money in SC through their Insurance Reserve Account, creating a scam commonly used in SC among the Aristocratic/Groomed Elite of SC belonging to the LMCE.

To separate a litigant from his award, like Petitioners who escaped the violence, they convert merits adjudication with engineered procedure and Sua sponte mechanisms that created its own reasons to dismiss the case, not based on the merits, normal procedure, or any other legal way to do so, when the Defense could not get a 12b6 dismissal with the help of the Court and the Plaintiffs own attorney. This was an Ambushed, Sua Sponte evidentiary hearing right after the 12b6 attempts didn't work, when all that is needed is a scintilla of evidence. This was basically converting a meritorious case that past 12b6 into a summary judgment for Defense and themselves, without ever allowing discovery that would tell on the culprits.

After this dismissal of Petitioners, they appeals and the same strategies and bad faith tactics occurred there and in the Supreme Court also on some other matters, related to the case (SMJ, Fraud on the Court, Writ of Mandamus, etc.), where the unrecognizable procedural appeal on an unlawful Sua sponte evidentiary hearing on 162 issues, not properly identified or ever challenge were challenge by the judge, with all but one attorney having run away due ot exposure as a part of these crimes just like the Murdaugh mirror case, with some of the same Aristocratic family involved..

B. At trial, Defaults / Entries of Judgment Won but Not Entered

Petitioners fired their attorney for colluding with defense, and realized their attorney was hiding multiple defaults by defense he was helping to win while protecting the court also. Plaintiffs entered Default Judgments that the court would not hear or enter, until Lawyer-Legislator Bamberg got involved, a Murdaugh victim attorney not involved in this case or this circuit and steering another Judge, Taylor, involved in the Laffitte and Becky Hill portion of the Murdaugh case to "fix" this case to save the Judges and other State acctors and so forth. Taylor later attempted to eliminate those wins through engineered procedure called gaslighting where 3 months late was not a default, and a Motion and a Responsive Pleading are the same in spite of SCRCP Rule 7, 12, and 15 saying otherwise.

C. Entrenchment, Conflicts, and Named Networks (Recusal)

Petitioners thoroughly investigated their case to figure out what was really happening as no laws were being followed, in a mocking way, where the attorneys knew they cold do anything they want and the victory was secure. They found incredible Aristocratic and

Groomed Elite structural entrenchment in the Courts, and other two branches, where those involved in Petitioner's case, were also involved in the Murdaugh case, or trained with him, was a family member of his and so forth. Laffitte had similar results. These were way too many coincidences, and the Stage knew but was hiding these very severe conflicts. These and similar conflicts of interest were a part of Petitioners, trial, appeal, and supreme level dealings, including overlapping relationships and influence networks requiring mandatory recusal and independent review and a clean up of SC who had been so single minded within these networks/families that they created an unaccountable Oligarchy, where there was no law but what these Kings granted..

Named actors and entities (condensed list) as Entrenched Aristocratic LMCE working against Connotational Interests:: **Maddox; McIntosh; Sprouse; Wagner; Heath P. Taylor; Allianz; McAngus, Goudelock & Courie, LLC; Grier Cox & Cranshaw, LLC; attorney Deloach; attorney Neubauer; Michael Dodd; Lawyer-Legislator Justin Bamberg;** and public-case pattern references including **Murdaugh, Laffitte,** Becky Hill, **McMaster,** Limehouse, Toal, Mullen, and others listed as interconnected in Petitioners' record. Those in bold are directly linked to Petitioners case.

Named interconnections identified by Petitioners (as alleged) as Entrenched Aristocratic LMCE working against Connotational Interests: Judge **Maddox**/Dr. Maddox/Mullen; **McMaster/Laffitte**/Limehouse/ **Murdaugh/McDonald**/Boulware; **Mcintosh/Murdaugh/Maddox/Wagner/ Varn**/Hiers-Hill, **Deloach,** Calhoun/ Lay/**Bamberg**/ Tinsley/ Bland/Toal/**Kittredge; Kittredge/Murdaugh, Laffitte/** Lay/Buster Sr.; **Kittredge, Sprouse/Murdaugh/Maddox/ Wagner/ Cooley/Campbell/ Sosebee/Thomason/ McCurley/ Burdette**; **Kittredge**/Toal/Protopapas/

Rice/**MGC**/GWB/M. Smith/**Jasmin Smith, JMSC. Those in bold directly involved in Petitioners case. More listed in the Cert section.**

IV. ARGUMENT

A. Neutral Tribunal; Procedural Traps; Court-Created Impossibility

"A fair trial in a fair tribunal is a basic requirement of due process." In re Murchison, 349 U.S. 133, 136 (1955)

The tribunals, as the record shows for itself, (See Appeals ADA filings with P-Appellants Motions, and the finality, and look at almost any proceeding with the Judges in the Trial court and the finality of the Sua Sponte evidentiary hearing, the Writ of Mandamus, the response of Petitioners on time, and the reconsiderations and responses, and Mcintoshs most incredibly ignorant and hateful Order making fun of Petitioner disabilities, gloating about how he won, his punishing Petitioners for some sort of outside activity and so forth, and see all filings by Defendants making up claims, and ridiculous excuses for not winning even with help, Dodd on 11/28/23 choosing what he would argue to make sure he defaulted, and so forth) ceased to be neutral by acting as adversaries: creating procedural barriers, denying ADA accommodations, and then punishing Petitioners for court-created impossibility.

B. ADA Title II / Equal Protection / Access to Courts

"no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity."

— 42 U.S.C. § 12132, "A public entity shall take appropriate steps to ensure that communications with ... individuals with disabilities are as effective as communications with others."

— 28 C.F.R. § 35.160(a)(1), "...a public entity shall give primary consideration to the requests of individuals with disabilities."

— 28 C.F.R. § 35.160(b)(2)

The Trial and Appeals courts would not hear individual needs and denied by create confusion to not allow these reasonable accommodations of (90 days/200 pages to submit the 1st Appels brief in appeals court) . Both Courts denied or obscured necessary accommodations, aggravate the disabilities repeatedly, and then further weaponized them and used them resulting in impossibility, where they could then dismiss the case, violating ADA Title II, due process, access to the Courts, and equal protection.

C. Stay as Independent Due Process Violation

The stay by the appeals court on 3/24/26, was mandatory because threshold motions (subject matter jurisdiction, recusal/neutral tribunal, and ADA) controlled compliance and the ability to file; but the Appeals court were in a desperate situation for some reason, and dismissed all simultaneously without a stay while those issues were pending is a standalone due-process violation. There can also be no trials by Ambush, a plan and pattern of SC Courts.

D. Remittitur and Finality Sabotage (Rule 221)

Rule 221(b), SCACR: "Where a petition for rehearing has been denied, the Court of Appeals shall not send the remittitur ... until the time to petition for a writ of certiorari under Rule 242(c) has expired," Rule 221(b), SCACR

In Petitioners case, remittitur/finality handling was used by the Appeals Court in orchestrion with the Supreme Court, to obstruct rehearing and create uncertainty about when higher-review timelines begin. Petitioners are rushing to file and inferior product just to preserve their check the box exhaustion of opportunities.

E. No Judicial Immunity for Non-Judicial Acts / Clear Absence of Jurisdiction

"Judges acting as Prosecutors or investigators have no judicial immunity as neither are performing judicial acts."

Judges who are a part of the underlying case, have no judicial immunity as they are involved in the case/causes of action.

Petitioners' record citation to In re Murchison. "No man can be a judge in his own case. . ." In re Murchinson. *"The Immunity Doctrine is not absolute, and it does not apply when a judge act in the clear absence of all jurisdiction." Petitioners' record citation to Stump v. Sparkman. Adjudication SMJ is based on the Judges oath to defend the Constitution, which is filled with the People's guaranteed rights that cannot be abridge or infringed upon by government. . .therefore protecting those rights as a condition precedent as a part of that oath must be present before a Judges can take a case, and if rights are not protected, and still used as mere suggestions on review, then that case is void, unless the judge quickly corrected his own misstep. .*

Petitioners preserve all these issues in this document as federal questions because Petitioners allege the tribunals were running feigned cases like petitioners, Murdaugh/Laffitte and Asbestos cases, and were engineering barriers to create the very chaos they would then use to dismiss the Petitioner and others, and also proceeded while

subject matter jurisdiction and mandatory recusal were challenged, and that SC has created a complete entrenchment of the government, including the Courts who do not have to follow the law, and through this, they have built a huge LMCE where those entrenched, make tax-free, high volume profits by exploiting litigants as expendable cash cows. All these cases are void ab initio, and Petitioners must be protected as they did not create and hide the void, but exposed it, and must receive their award where they filed their entry of judgement son multiple Defense defaults, that the courts would not hear, until an unauthorized steered judge by Bamberg obstructed Petitioner's case further to try to save the colluders, and dispose of Petitioners case. Feigned and colluded cases are not justiciable in SC. . .allegedly. This case is void, and Petitioners rights must be protected.

V. VOID AB INITIO / NULLITY — SAVING AND PROTECTING THE INNOCENT PARTY

Petitioners request that the challenged dispositive proceedings and resulting orders be declared void ab initio and a nullity as to wrongdoers, because (as alleged) the tribunals proceeded without lawful authority and without neutrality and engineered dismissal through ADA-based impossibility and procedural traps.

Critically, Petitioners expressly request saving and protecting the innocent party: Petitioners must not be forced to start over. Petitioners request protective and sanction-based relief that (1) orders entry of Petitioners' last-filed Entries of Judgment; (2) requires Defendants to pay the judgment in full jointly and severally, leaving contribution disputes among Defendants; and (3) convenes a neutral jury to determine additional damages including uncapped punitive and noneconomic damages.

VI. REASONS FOR GRANTING THE WRIT (Rule 242(b))

Petitioners contend special and important reasons exist for review because the case raises constitutional and federal questions, presents procedural-integrity issues affecting appellate review (including date/finality manipulation), and involves alleged structural conflicts and entrenchment that threaten public confidence and the safety of citizens' rights, awards, property and declare voidness while protecting the innocent so they do not have to seek outside pressure points to force SC change its Oligarchy into a Constitution Republic by all legal and nonviolent ways, and demanding the Feds come back into SC to restore justice and presently rid itself of these same defiant Aristocrat/Groomed Elite that have haunted SC stating at least with the 1669, Grand Model design for classes/cast to rule under the Devine Right of Kings.

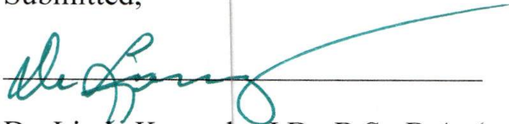
VII. CONCLUSION / RELIEF REQUESTED

For the foregoing reasons, Petitioners request that this Court grant certiorari; vacate dismissal; declare the challenged proceedings void ab initio and a nullity as to wrongdoers while saving and protecting Petitioners; order entry of Petitioners' last-filed Entries of Judgment paid by joint and several liability and other jury findings; impose joint-and-several payment in full; and convene a neutral jury to determine additional damages including uncapped punitive and noneconomic damages.

PETITIONERS HAVE STOPPED SHORT OF FINISHING, BECAUSE THEIR DISABILTIIES WITHOUT REASONABLE ACCOMDATIONS WITH SPEACIAL NEEDS INCLUDED ARE STOPPING THEM FROM DONG SO OR LOOKING AT THE RECORD. ALL IS DONE BY MEMORRY AND PETITIONERS

INCORPORATE THEIR ENTIRE RECORD IN THE APPEALS COURT, INCLUDING BUT NOT LIMITED TO THE SMJ CHALLENGE, RECUSAL, MOTION FOR A NEUTRAL TRIBULAN. .. , RECONSERATION, ORDERS, ALL ADA MOTIONS, LETTERS TO AND FROM, INCLUDNG, BUT NOT LIMITED TO JASMINE SMITH'S FAKE ORDER, AND THE STYLE OF THE CASE OBJECTION IGORNED BY THE COURT BECAUSE IT WS A FALSE PIECE OF EVIDENCE TO HELP THE OPPOSITION. Petitioners also INCORPORATE ALL THE TRIAL COURT RECORD, INDLUCIGN BUT NOT LIMITING TO THE LAST WEEKS OF DECEMBER 2025, AND THE BEGGING OF JANUARY THROUGH APRIL 2025, AS THAT RECORD HAS BEEN TERRIBLY ALTERED IN AMNY AREAS.

Submitted,



Dr. Linda Kennedy, J.D., B.S., B.A. (pro se), 6-6-26

Dr. Marsha Fink, J.D., B.A. (pro se), 6-7-26