

IN THE SUPREME COURT OF THE STATE OF SOUTH CAROLINA

Linda Kennedy, et al.,

Petitioners/Appellants,

v.

Lake Hartwell Resort and Cabins, LLC, et al.,

Respondents.

RECEIVED

Jul 16 2026

S.C. SUPREME COURT

Supreme Court No.: 2026-001282

Appellate Case No. 2025-000859

Lower Court Case No. 2022-CP-04-00592

**Motion for ADA Reasonable Accommodations
After ADA Notice Requirement Already Met**

Repeated ADA Reasonable Accommodations noticed and Motion, repeatedly, and before and during the filing of the Cert, the Appeals Court Reconsideration/en banc and now after also, at many other times all ignored by the Courts.

**MOTION FOR REASONABLE ACCOMMODATION UNDER TITLE II OF THE
AMERICANS WITH DISABILITIES ACT AND FOR RELATED RELIEF
ADDRESSING CUMULATIVE DUE PROCESS
AND RECORD INTEGRITY VIOLATIONS**

Applied to all Supreme Court filings as noticed on the Cert., which . is all that is required

I. INTRODUCTION AND RELIEF REQUESTED

COMES NOW, Petitioners Dr. Linda Kennedy and Dr. Marsha Fink, appearing pro se, filing jointly, making demand that this Court comply with the law and approve the mandated reasonable accommodation filed as notice with the original Cert and with the Rehearing/enbanc request, where both were already previously on notice also, with special needs requirements where **no** SC Court has followed the law. Further, to finally, review and approve the law under

Title II of the Americans with Disabilities Act, 42 U.S.C. § 12131 et seq., and for an order recognizing the cumulative effect of the disability, due process, and record-integrity violations described in the past and herein below and described in the Subject Matter Jurisdiction/Fraud on the Court by the Court and others and Mandatory Recusal filing in the Trial, Appeals and Supreme Court (one of which was refused by the court by refusing the certified mail filing, since the Clerks are not filing Motions timely, if at all, and to do the same for the Void ab initio Demand and Mandatory Recusal ("SMJ Bundle") in the Trial Court blocked by gatekeeping, Judge McIntosh without legal authority, Appeals court that was dismissed in footnotes without opinion, and the refused cert copy in the Supreme Court.

As stated these were filed with the Trial Court, where Judge McIntosh refused to allow any filings without his approval without cause, notice or right to be heard, making other filings appear late, or not filing them at all, to manipulate and obstruct the record and the Court and lawyers and their firms actions who are involved in this case, which is inappropriate and demands disqualification. The Trial, Appeals' and Supreme Court's private gatekeeper to protect the judges and lawyers/firms/Allianz/Legal Machine Criminal Enterprise and so forth from exposure of their own activities in the underlying causes of action and this subsequent cover up with the same tactics used in Trial Court used in the Appeal and Supreme Court interactions, and improper acts and fraud on the court by the court, with Allianz, our own colluding attorney fired, and others.

Petitioners also filed a SMJ Bundle against the Appeals Court on March 23, 2024, and it was dismissed with the actual Appeal and the SMJ Bundle, the day after the SMJ Bundle was received, on March 24, 2024. There was no stay on the Appeal for independent, neutral judges to review the SMJ Bundle, on its own fraud on the court by the court and reviewing a feigned

case challenge all that are void ab initio. The Court was to properly have reviewed by neutral judges its own fraud on the court, through the filing of the SMJ Bundle, and neutral tribunals are to provide an Order addressing the serious violations of the Trial and Appeals Court (and Supreme Court). Further, this Supreme Court also refused the filing of a SMJ Bundle certified mailing to it, as all three Courts have tampered with records filed by Petitioners through the internet option, in various matters affecting their case and causing it to be intentionally buried, in order for SC Courts to assist hiding the actions of its own courts, including the 10th Cir., and the Murdaugh case in the 14th Cir., and the Toal run Asbestos cases that are profit making for the undisclosed many using the same fraud on the court mechanisms used on Petitioners case, including the Insurance Fraud/Insurance Reserve Fraud structure, and also using the Discovery/Sanction strategy created by the court through its lawyers to gain control of the litigant case/business and so forth.

Petitioners' actual trial court case was exposing those cases because Petitioners did their own investigations in spite of being blocked by all Discovery avenues, to learn of the actual case, the additional defendants that should be on the style of the case, including Judges, lawyers, Allianz, Proxy/Defendants, State Actors and others, as this type of fraud on the Court by the Court and others were the same or similar in structure in all three cases that were feigned before they ever began. Becky Hill helped Murdaugh undue a projected guilty verdict on intentionally limited investigations to limit state exposure. . .eventually ending in an overturning of his case, which Petitioners described in their SMJ Bundle to the Supreme Court as reason to stop the hearing before it was heard, and to have independent judicial review by neutral judges, if any, which never happened through obstruction of justice by this court and its clerks taking illegal orders to hide and then disguise the filing later. This court later dismissed SMJ under another

name and then left the motion to strike and vacate a void ab initio based on the SMJ Bundle which was never ruled upon by Order and the Murdaugh file quickly closed with open motions that affected this case in obvious orchestrations as not all three courts are blocking filings, hiding filings, naming motions by the wrong name, dismissing motions that didn't exist, and so forth without each practiced by the Court that states it runs and oversees all of its employees, stating Judges are a part of those employees. See Exh. 1 Supreme Court Order regarding Petitioners' Writ of Mandamus.order.

Some of these are documented in the Petition herein, but it is too much to document without ADA Reasonable Accommodations. These Unconstitutional and fraudulent rulings and fraudulent actions by the above, at all three levels, in trying to fix a feigned case, and then bury this case in an unconstitutional funeral, to save the other cases mentioned (Murdaugh and Asbestos Case feigned scams by the state), to save the Judges involved and its LMCE are obviously not permitted by law and are Federal Questions, no matter what Rooker/Young Doctrines say, as the exceptions are certainly described in this case at all levels.

Further, not only was the Trial Court, Appeals Court and the Supreme Court all involved in the denial of Petitioners' due process under many of this case's individual narratives of weaponizing various tools not meant to be weaponized, but the Trial and Appeals Court used the ADA denials and ignoring of the Motions and requests to then weaponize them to dismiss the cases at trial and on appeal, using fraud and lies to prove that they needed to dismiss Petitioners Trial and Appeal no matter what the facts or procedure, by creating new procedures to do so anyway that are not the law. In the Appeals Court, the Court used an ADA vague series of rulings and orders to block Petitioners from getting a meaningful Due Process and full Appeal presentation by claiming they ruled on the ADA, but did not state the words, until March 2026,

just before dismissing the case on fraudulent grounds and findings they created themselves, using the weaponized ADA that is supposed to protect the disabled as a tool to protect the Courts through these lies and deceptions. And the Appeals Court claimed it had ruled, when it would not point to the vague orders that were not ADA rulings and did not state they were, and did not follow the law regarding ADA Reasonable Accommodations, and could not point to the Order that ruled on it, just so they could say at the predetermined dismissal that they did provide reasonable accommodations when they clearly did not and could not show where they did in repeated diversionary tactics to not show where the Order stated a Reasonable Accommodation Order. This is all seen in Exh 2, Motions list, which cannot be read, line by line, due to the very Disabilities needing Reasonable Accommodations that were noticed in the Cert and attempted to be noted in all other documents filed, including Appeal Rehearing/en banc., since Petitioners realized the Appeals Court did not want Petitioners to have a meaningful due process and full Appeal Presentation by giving them special needs listed, and the block time and pages estimated to be needed with right to adjust as the due date got closer and the estimate could be seen as accurate or needing adjusting. And Petitioners were reasonable using the least restrictive means especially with no opposition filing on any arguments, and letting the Court argue for them, which is not a Constitutional process as the Judges become a prosecutor also, especially when the state government is captured and entrenched aristocrats and their groomed elite are filling the seats that would otherwise be seats of accountability. See SMJ Argument with Appeals Court, never reviewed by biased or neutral judges See Exh 3 Order 3/24/26 dismissing SMJ in a footnote without opinion.

As this court should know, but many of its underlying courts clearly do not know, these ADA Reasonable Accommodations are mandates from the Department of Justice (DOJ), and

what Petitioners gave to all courts are least restrictive means with medical reports and now surgeries lined up to try to fix some of the serious physical damage intentionally and maliciously perpetrated against Petitioners, by these extremely compromised and captured Judges in the lower court where they were involved in the underlying causes of action themselves according to their own proxies and Petitioners' Defendants, where Petitioners did not yet know these facts that are in writing from Proxies in contemporaneous time, and not said months later.

Further weaponization and aggravations occurred in the Appeal court and through the Supreme Court's refusal to assist litigants under siege who were concerned with their health with all these judges and especially McIntosh did and were continuing to do to win the case himself by any fraudulent means available. Petitioners also reported these judges to the suspect Committee on Judicial Discipline and the very suspect Judicial Merits Selection Committee both turning a deaf ear to Petitioners' dire situation. In fact the JMSC selected them for another term. This Supreme Court stated that if Petitioners were concerned for our health, then Petitioners should not be issuing subpoenas, See Exh 1 when the alternative was the Trail Court being allowed to stealing Petitioners victory they had already accomplished, but for the Courts refusing to entertain timely, and the Appeals and Supreme Court's following suit. The Trial and Appeals Court have refused to address the matter in SMJ Bundles, and the Supremes refused their Cert mail on the SMJ Bundle matter.

When a new set of disabilities that qualify as ADA disabilities when Petitioners could not get a ruling on the first ones, that were more than enough to clearly qualify, the Appeals Court then did not Order anything, but had the clerk write a letter saying they would not address the new ones, either, See Exh 4 J Kitchings letter March 6, 2026, which letter, not an order, and about one motion, is what Defense has tried to cite as some sort of authority and basis for an

entire set of motions that it did not address anyway, as if it was the whole case, an open fraud on the court, and even still not compliant with mandated ADA protections of Petitioners (see, SC Judicial Branch's own ADA policy, reinforcing these mandates for all Judicial personnel including Judges, on their website: <https://www.sccourts.org/ada-compliance>).

A letter is not an Order. This trick has been used at all three levels of SC in this case, and worse. The prior judges, especially McIntosh caused disabilities by intentional and malicious acts meant to punish legal reform activists, coerce them to giving up, and for the pleasure of it, which is not being sarcastic, and was reported without consideration to the appropriate alleged accountability agents of the state's captured government. Petitioners know other abused litigants who have their own horror stories, and unfortunately, captured governments need these types of aristocrats who have long ago severed their consciences as seen in SC dark history.

The Appeals Court even had Attorney Jasmin Smith write a letter calling it an "Order" when she didn't work at the Court, proven by view source web and employment documents obtained. She worked for the Appeals court in 2014-2015, and also worked in some tech projects, and after the legal work with the Appeals Court, became a partner with Laffitte, with the Laffitte's name splashed all through the SMJ Bundle, and obviously one who Petitioners have serious conflicts with, with the Court just trying to intimidate and coerce Petitioners to not pursue their ADA Disability Reasonable Accommodations, when even complexity and volume alone would get a block and page extension, like in the Murdaugh case, where there was no disability, and they got repeated block 90 days and hundreds of pages with no hesitation from the Court.

When Petitioners are rushed beyond their ADA limit without reasonable accommodations for their disabilities, it is not only a violation of meaningful due process, which raises immunity

issues, but they can then not be held responsible for the type of notice to the court of the continued need for ADA reasonable accommodations, in whatever way they are able, including on the Appeal and/or the Cert. pages themselves in set apart language so it could be seen, that is delivered to the Court. That serves as notice. Once the court received that notice, they were obligated under Title II to provide such reasonable accommodations as requested, with their special needs in mind, sufficient to afford meaningful access to the judicial process rather than ignore the request or adjudicate the matter without addressing the accommodation's request. (See *Tennessee v. Lane*, 541, 531), and that the Court acknowledge that mistreatment of the disabled has a long judicial history, which Petitioners can affirm in still does in SC, based on its dark history that still exists in the entrenched aristocracy and groomed elite they have dealt with.

This same Court held that Title II validly protects the fundamental rights of access to the courts. *Id.* at 522-34.

This notice of ADA Reasonable Accommodations was added on the Rehearing/en banc and the Cert. by Petitioners and that was for those documents filed and all documents thereafter, with Petitioners consistently demanding their meaningful due process rights of the Reasonable Accommodations with special needs provided, that are liberally construed in favor of the disabled. Disabilities are considered in normal acts of life, and in the altering of these otherwise very normal activities, wherein Petitioners have suffered severe, intentional and malicious disabilities by your judges you made sure Petitioners knew that you, the Supreme Court, were supervising them. See Exh 1. Where were you? And where were you in the Writ allowing your brutal, own employees with more regard than the People's guaranteed Constitutional Rights, and claiming there is no evidence of any wrongdoing when Petitioners write provided what a Sua Sponte Judge was doing in demanding an evidentiary hearing called after the last

12b6 failed against Petitioners, and the show cause for not being able to do the legally impossible and the unlawful evidentiary hearing were “created without a rule of evidence to support it, by the attorneys that are now being copied as attorneys in this appeal, who are defendants and material witnesses in the Federal Case, to steal Petitioners jury, keep discovery/ depositions/ subpoenas/ duces tecum, from Petitioners, who would get the confessions and admissions needed to further show through authentication of evidence, and cross examination, that their written admissions were authentic and true. With more legal impossibility added, McIntosh gave 10 active days and 20 pages including exhibits to go through about 20,000 pages of evidence Petitioners collected and created for filings and other work product/attorney-client purposes, on their own, and were being forced to incorporate that and explain, approximately 162 documents filed to force the case forward in spite of all the collusion of the attorneys working together (Petitioners were finally able to fire their attorney), Racketeering between judges, lawyers, Allianz, Solicitor General, other State Actors, Proxies turned Defendants and others.

Petitioners were not allowed to get clarification on what was in question in each document that was at issue, since the documents were things like a Motion to Compel Discovery that the Judges and lawyers didn't want to allow due to the underlying collusion in the actual causes of action with proxy/Defendants, in Petitioners underlying case, long before Petitioners even knew there would be a case. (Case Filed 3/17/22, but collusion was happening from July of 2021 to at least September 20, 2021, and perhaps longer as this is from memory, since Petitioners cannot see the documents after a short time of staring at them and computer/phone screens, and Petitioners cannot search again through the voluminous case for a couple of pages, and are not going to be playing into more intentional and malicious disabling because the Courts do not want

to honor the ADA laws and MGC who is also being sued, wants to use a letter quote taken out of context, and ignore all the other matters to hide they were involved in a feigned case with the Judges, Allianz, colluded with Michael Dodd, Litigants' attorney until they could get "approval" to fire him, and so many other criminal acts that can be proven as Petitioners legally recorded Dodd trying to implement their collusion against Petitioners and their case.

The dark SC history wants to continue to take advantage, even of elderly disabled ladies fighting cancer, to cover up their own Murdaugh-style schemes they were attempting to pull off against Petitioners in the matters being described).

And, to top all this off, the Judges refused to recuse, and got to preside over their own liability and guilt, and be the judge, prosecution, investigator, jury, and so forth, in the Sua Sponte Evidentiary Ambush, allowing for no ADA, cross examination, authentication or time to prepare. This is not allowed in any court in the U.S., and is ludicrous that any Court would take the risk of acting in this fashion no matter how much cover they think they have or how much hate or money is at stake.

The same notice happened herein where Petitioners wrote right on the Cert, the need for ADA Disabilities in the only way they could do.

Bottom line, is the Trial, Appeals and Supreme Courts **cannot create an impossible procedural obstacle and then rule against a litigant for failing to overcome the obstacle the court itself created**, and the following authorities are among the strongest of many cases that state this in different ways.

1. **Boddie v. Connecticut**, *Boddie v. Connecticut*, 401 U.S. 371, 377–80 (1971):

"A State must afford to all individuals a meaningful opportunity to be heard if it is to fulfill the promise of the Due Process Clause." This case strongly supports the proposition that a court cannot impose procedures that make meaningful access impossible.

2. **Logan v. Zimmerman Brush Co.**, *Logan v. Zimmerman Brush Co.*, 455 U.S. 422, 433–37 (1982). "The Fourteenth Amendment requires 'an opportunity ... granted at a meaningful time and in a meaningful manner ...' The Court held that the government may not destroy a person's claim by operation of its own procedures.

These and other cases are frequently cited together for the proposition that government, including courts, cannot erect procedural barriers that deprive a litigant of any realistic opportunity to be heard. It must be meaningful to satisfy due process. That goes for all of the hearings of the lower court. . .ALL.

And, in regard to ADA, the reasonable accommodations mandated, must include Petitioners special needs (block time), and the court cannot ignore such, or ignore medical evidence and call Petitioners liars, and make other accommodations that do not satisfy the individual needs, and then make it appear the court complied by these other measures that specifically were explained away by Petitioners, due to the special needs described. See Exh 2. Defense claiming overall time given, not mentioning many had threats to dismiss if not met, meant that Petitioners were in a constant rush and stress to write anything, not what would help their case, with real evidence able to be found from 20,000 pieces of evidence (approximate). This Court must abide by ADA law, and the Supreme Court own Judicial website comply with this law, and again cites Murdaugh's block extensions, and 100's of pages of briefs, cited herein.

Also, in the unbelievable handling of the another case where this journalist was arrested by a probate judge (Mcintosh was the main common pleas judges, but all three: McIntosh,

Also, in the unbelievable handling of the another case where this journalist was arrested by a probate judge (Mcintosh was the main common pleas judges, but all three: McIntosh, Maddox, Sprouse were involved), when the litigant victim videoed his delivery of a document because he too, was having the same problems where clerks were not filing what they received, manipulating the record and abusing electronic filing to cause him to lose a case, due to the lack of or unconcerned with employee oversight by this Court, and he was arrested and thrown in jail without any paperwork or cause, and eventually released with no paperwork for a total of 50 days in jail, and as a part of double jeopardy with McIntosh. This all appeared to be due to an Administrative Order, not a law, that was not posted where it should have been, . . . which is not Constitutional to restrict access without due process, and to imprison as such. This was a punishment for the journalist to be snooping into the trust/inheritance fraud in SC. The watchdog victim's first amendment and so forth were being violated alone with 4th and 5th Amendment violations and so forth, and the journalist is actually still in this fight on straightforward facts (and did get a page extension on a simple case by this court). The fact that he has not won on a no-brainer, and could lose and even lost in Federal Court on an entirely illegal, Gestapo/KGB scenario where a person can apparently be arrested and thrown in jail with no charges and without paperwork, probably cause, and Due Process and where nobody knew where he was or what happened to him which is a part of his protections against abusive and tyrannical government. He spent the majority of the first stint in solitary confinement, as punishment for daring to report on the Court's criminal activity, which Petitioners have done for years and are doing repeatedly because these matters are of great public concern.

The journalist's wife was fighting in probate while the judges and lawyers had teamed up to remove her self-representation of the estate, which is usually one of the very first steps in the

state committing fraud to steal the estate, by placing their own people over the case to suck the trust dry. Eventually agreements were reached, but the Courts and lawyers stole enough from the amount due that they could consider it a victory. These are crimes that have been committed from long-ago and still be committed due to the LMCE in SC.

Trust/inheritance fraud is a major problem in the U.S. and a very bad situation in South Carolina when the judges are involved to defraud the victims with the attorneys and others, as this Court well knows. . .and McIntosh knows as well and is free to operate (See Tammy Bullock and how charges of her stealing from a dead person caught on camera with all the details of intent, and was released and not tried, while the AG's office and SLED continued to lie to the family of the deceased, and they fled to Florida). The journalist family has been chased out of the country just to keep themselves safe from the 10th Circuit judges and Appeal/Supreme Courts. Filing proper paperwork so the journalist does not have to film it to show he filed it, would be the proper action for employees of the Supreme Court, not to hide filings, lock up the reporter and make it legal to do so, which of course it is not legal, except there is no remedy to the guaranteed right in SC and in the 4th Circuit, because they ignore the law, which is a very tyrannical situation when aristocrats and Groom elite are entrenched in the SC/4th Circ governing bodies and selecting each other, making their own laws against the people, instead of being neutral, arms-length judges who are only referees with no interests other than to uphold their Oath/Constitution. Law in SC/4th Cir MUST be created because the journalist and his wife's case, unfortunately are not as bad as it gets here, as Petitioners have investigated far worse. . .worse than Murdaugh and Laffitte, Lay, Other Laffittes, Kittredge, Harpootlian, Wilson, Gergel, Limehouse, McMaster, Mullen, Bamberg, Taylor, and the 10th Circ. Judges, and more.

Therefore, this Court must start to follow the law, and accept the demand for ADA Reasonable Accommodations, and special needs with flexibility rather than further weaponizing them so MGC and other firms and lawyers and Judges and Allianz, and in other cases, are held responsible for their crimes and incredible circus environment that is created in SC to defeat the litigants who have something the LMCE wants, as the history of the abuse against Petitioners is enormous and long-standing, with the ADA ignorance being the key attack, by intentionally and maliciously physically harming Petitioners to such a degree that they could not continue strongly enough without reasonable accommodations demanded, and instead the Courts continued to weaponize the disabilities the courts created and aggravated in this matter so Petitioners could give notice at the front of the filings and not much more due to lack of physical ability.

And the Courts also gave victories to these same Defense/Judges who claim to represent Defendants, but already proved they did not represent all of them in Court, and against Petitioners. The Courts cannot even represent the Defendants or their attorneys and judges and are not acting as Judges when they are also prosecuting and then acting as juries as they have.

And suddenly after that argument, for the first time ever MGC reappears, by coincidence. But the damage is already done and this case for many reasons must be dismissed against Defendants as described in the Cert., as none of the judges have jurisdiction for many reasons, and the attorneys filed void motions and defaulted many times and entries of judgment were filed but not entered, as the Courts are not going to let Petitioners win, which is not their call, if the law matters. Any law that permits that is Unconstitutional as one blood-type is no better than the next as far as honesty and integrity and having entrenched blood-line(s) deciding alleged justice for everyone else, with extreme conflicts is by far not neutral, when the objective standard and probability of actual bias is too high to be constitutionally tolerable, *Caperton v. A.T. Massey*

Coal Co., 556 U.S. 868 (2009). The objective standard of the Due Process Clause has been implemented that “do not require proof of actual bias.” *Id.* at 883. Due Process requires neutral and detached judges.

Therefore all this aggressive denial of ADA, and claiming they ruled but would not give the ruling, point to the ruling, refer to the ruling but instead made up other reasons for the clear Motion to clarify the vague order, and to write the Order more clearly saying whether ADA Reasonable Accommodations are granted or denied and for what pages and times, would never be given, when it would be easy to just clarify as a Constitutional mandate. All of the tap dancing of both the Trial and Appeals Court to deny Motions for ADA, by refusing to rule, but claiming they did rule or just not ruling at all. . .but would not clarify the vagueness, and claimed Petitioners were asking for a rehearing, under the wrong Rule (221), to not have to give Reasonable Accommodations and still for time until they could say they gave plenty of time, which was actually used by Petitioners to try to clarify as they could not go forward without their Reasonable Accommodations creating this legal impossibility under Boddie, and Logan cases, where the court created its own dismissal by making the filing impossible for Petitioners to comply with and still get meaningful Due Process and a full Appeal Presentation, through their delays and outright lies of creating Orders that didn't exist and all the strong arm tactics some of which are briefly mentioned. It seems odd that a neutral court would ever take such a defensive and aggressive posture to deny documented and mandated disability for reasonable accommodations that would do a neutral court no harm if they were indeed neutral, and instead they are defending the Judges and the lawyers who have not participated until now with this surprise Return.

And the lawyers cannot do so as they are material witnesses and Defendants in the RICO and other Federal actions as this court and the state and MGC know, and also required self-disqualification in the underlying case via South Carolina law, filed in the Trial Court and of course never heard, because the judges chose not to which is another violation of Constitutional law. See Rule 2.5(A), Rule 501, SCACR and comment 4. Rule 2.7, Rule 501, SCACR, S.C. Const. art. I § 9, art.V, all about timely hearing of motions on all matters. This has been repeatedly violated by the Courts on all three levels.

To keep ADA reasonable accommodations away from Petitioners who are documented with many serious disabilities, but in particular the ones that the Judges at the trial and Appeals Court, caused and aggravated and then weaponized, and this court previously caused and/or aggravated these Disabilities continuously, to weaken and punish the Petitioners and to keep them from pursuing their Award from Allianz, which theft of same is part of the Murdaugh-style schemes being heard at the same time as much of this case, including appeals to this Supreme Court.

SMJ Bundles Filed and all ignored and ADA: The Supreme Court recognized in 2009 that “a judgment entered without subject matter jurisdiction is void ab initio.” *Judy v. Martin*, 391 S.C. 455, 706, S.E.2d 392 (2009). Petitioners has filed in all courts, this is a feigned case with proof, and that the Judges were involved in the underlying causes of action and insisted on presiding over this case and as was foreseeable, fixed the entire case, with the lawyers, including MGC lawyers who of their own volition should have disqualified in the Trial Court and certainly now as they are Defendants and witnesses in Federal litigation as are the judges in this matter, Trial, Appeals, Supremes and the case needs neutral decision makers from the very beginning of all of this, but should have been dismissed at the trial court level first.

As this Court knows, Petitioners filed SMJ Bundles against it and also against the Appeals Court. The Appeals Court SMJ Bundle was ignored, no neutral judges reviewed, and dismissed the day after it was filed along with the case, which cannot happen, and it was dismissed in two footnotes, without opinion. It was refused in the Supreme Court and not filed at all in this case.

In the Murdaugh case, which is related to this case and which this case proves what really happened in Murdaugh and many others involved in this State scam, by government, it was hidden from the public after reviewed by the Judges involved in the SMJ Bundle, the Murdaugh case went forward anyway, the SMJ Bundle was filed two days later, and labelled incorrectly, and dismissed under another name (NOT SMJ). Petitioners filed a Motion to Strike and Vacate for void ab initio findings, as the entire case was a feigned case, just like Petitioners case, and a letter was sent which is not an Order and an Order was demanded. Instead Murdaugh was overturned without SMJ and Fraud on the Court by the Court and ignoring mandatory recusal, and the case closed with an open motion on SMJ/Fraud on the Court by the Court and others, and the Recusal not ever heard or decided and Order given. . . and not by a neutral judge. And of course, already filed in the Trial Court and ignored in the Trial Court in January 2025, but McIntosh decided to be the gate keeper for the government and refused to allow numerous filings against the Judges and lawyers partaking in the Racketeering to fix the case through these ridiculous acts not permitted by law. These are void ab initio matters, with the Murdaugh filing part of the proof that Petitioners' case was going to be continuously buried to hide the crimes committed by state actors in this case, and to hide the true nature and scope of the Murdaugh-style crimes occurring in SC, that the 10th Circuit was involved in as well as the absurd Asbestos Case that this Court knows is not legal).

SC burying Petitioners' case through 40 plus mainly void and some voidable matters that cannot proceed except for the Petitioner and some cannot go forward at all, making Petitioners the victors per the protective laws under Rule 60(b)(4), SCRCP, and the Southern Trust Mortgage Corp. cases where equitable principles are applied, "where one of two innocent parties must suffer, the loss should fall on the party whose conduct made the loss possible." And *Hagy v. Pruitt*, 339 S.C. 425, 529 S.E.2d 714 (2000) (innocent party should not bear the loss and no real case was heard). Where courts have the inherent equitable power to set aside judgments procured by extrinsic fraud on the court, notwithstanding otherwise applicable time limitations they should do so. The Purpose is to prevent a party from benefiting from the fraud, that deprived the opposing party of a fair opportunity to be heard. . .and this would be all the Courts, lawyers, Bamberg, and Allianz, State Actors, Proxy Defendants. In, *Hilton Head Center of South Carolina Inc the Public Service Commission*, 294 S.C. 9, 362 S.E.2d 176 (1987), the court explained **"relief is granted for extrinsic fraud on the theory that because the fraud prevented a party from fully exhibiting prevented a party from fully exhibiting and trying his case there has never been a real contest before the court on the subject matter of the action."** *Bryan v. Bryan*, explains that **"equitable relief is available where extrinsic fraud prevented a fair adversarial proceeding."** *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238, 244-46, 64 S. Ct. 997, 1000-01, 88 L. Ed. 1250 (1944). **"Tampering with the administration of justice... is a wrong against the institutions [allegedly] set up to protect and safeguard the public."** See also *Co. v. Universal Oil Products Root Refining Co.* 2-23, 47 S. Ct. 437, 441, 71 L. Ed. 749 (1927), *Turney v. Ohio*, 273 U.S. 510, 52, *In re Murchinson*, 349, U.S. 133, 136, 75 S. Ct. 623, 625, 99 L. Ed. 942 (1955).

Petitioners' Murdaugh 2.0 (Petitioners underlying case), illustrated how the IF/IRF scheme of Murdaugh worked and that the 10th Circ was trying to pull it off against Petitioners as they 10th and 14th Circ., have family and otherwise entrenched aristocrats and groomed elite who trained together and some are family to each other. Petitioner's 2.0 case, showed the same Murdaugh-style fraud and theft occurring and the award was stolen (almost gone in the spring of 2023, according to Dodd) by the State Actors, Allianz, and others in Petitioners' case, just like these were stolen in the Murdaugh, Fleming, Laffitte and also others who were purposely not investigated, limiting and confining the damages to the state to a few spoiled Aristocrats alone, hiding the Judicial involvement, State involvement, and using State Actor AND KIN to Murdaugh, Becky Hill's to provide Murdaugh appealable issues in state court, and Judge Gergel to provide federal appealable issues to Laffitte like bookend strategies and so much more.

This led Petitioners to investigate more cases or incidents of the same pattern of Insurance Fraud and Insurance Reserve Fraud (IF/IRF), recognized by the FBI and Lawyer-Legislator Jusin Bamberg both as real crimes. Dr. Kennedy is familiar with these crimes because she trained carriers on claims handling and what to watch for. IF/IRF was one of those warnings she would give.

So Petitioners tracked where cases that had the signs of IF/IRF, were studied and Petitioners found that aristocratic or groomed elite lawyers and aristocratic and groomed elite judges were showing the classic signs of the fraud being executed on victims, and not being punished, and those cases will be brought to the public and elsewhere to show the plan/pattern/practice being exhibited in SC Courts/legal Community to where no case or litigant is safe from the Courts own Legal Machine Criminal Enterprise (LMCE), and this must be stopped to protect the people.

This is why the Court was so hostile to Petitioners outside of Dr. Kennedy being a leader in the legal reform community for many years and Dr. Fink supporting efforts to empower people. . . 1) because they spotted IF/IRF potential and requested an Evidentiary hearing that was ignored. 2) because Petitioners filed fraud complaints for Allianz adjuster, Barbara Robedee and SICU, Patricia Deamer of Allianz, all the attorneys, all the and later all the judges involved at the time they were discovered, State actors involved when they were discovered, and even the Virginia State Bar who Defendants stated in writing they were involved, and a extremely nasty Defendant texted Dr. Kennedy at 4:21 a.m. on May 30, 2022 shortly after receiving her suit in spite of dodging, that told Dr. Kennedy that the VSB was going to be at the Trial, which was true, b/c they were going to be sued with the others. Allianz had no interest in investigating, even after they got dinged for many billions in shareholder fraud with the company and its employees. 3) Further, because the Murdaugh case was not fully disclosed to the public in scope and criminals involved that led to the LMCE; 4) that the Asbestos Docket practices a variant of the IF/IRF scheme with money laundering through Delaware, and through alleged "gifts" to universities and so forth and Petitioners were making this connection to their case of IF/IRF and how Sua Sponte McIntosh got rid of their case, the same way that Asbestos cases are taken over. . . Discovery-Sanctions through Toal and Protopapas, and Evidentiary-Sanctions through Sua Sponte McIntosh with the disappearing lawyers taking the 6 months off to come up with the scheme and then not participate because they were discovered as part of the Murdaugh-style scheme in Petitioner's case (notice they are copied on this Return also), 5) because Petitioners own case was a Murdaugh-Style case using Allianz as the money-laundering arm for the stolen award, but more so for much of the State's dark money from all these and other state crimes investigated (i.e., Tomb Raiding, The Foreclosure Fraud/Ghost-Trustee Fraud (150 Page

Attorney manual forging documents) all with the assistance of the Judges and other state actors feeding the LMCE), Mortgage Fraud, Bail Bondsmen Fraud and drug trafficking, sheriff office crimes, and so much more. . . through Allianz and other Insurance Reserves (IF/IRF) accounts as part of the LMCE, with much more to document elsewhere with witnesses. (Asbestos fraud uses Delaware and steals from the carriers more than IF/IRF which needs cooperation with the carriers, but the scheme is structured the same way).

To hide all these matters, from Trial Court corruption performing Murdaugh-Style theft and money laundering through the carrier, to Murdaugh schemes where the scope and criminal totals were limited by state fraudulent investigations and feigned trial/supreme Court hearings, while hiding Petitioners SMJ bundle, then hearing and overturning the Murdaugh case as expected, and closing the case without ruling on any of the SMJ bundle that predicted Petitioners fate because their feigned Trial case had to be buried and killed to bring forth Murdaugh's feigned case and appeal where the verdict was etched in stone no matter what the jury determined. The Courts (all three levels) had to bury Petitioners case completely at Trial and then on Appeal, and assuming the same here with the Supreme Courts great hostility and illegal acts perpetrated against Petitioners already, including the stalling to attempt to avoid legal liability which is not going unnoticed but steps taken to prevent the trick.

So to get the burying finished at trial court, McIntosh finally had to hold the illegal alleged Sua Sponte evidentiary ambush to dismiss the case, which could not happen by rule and law, with all the exposed attorneys missing (but their fingerprints are all over this corrupt plan), and only the rookie lawyer, not capable of handling the case, occupying a spot making it look like there was an opposing attorney present, with Sua Sponte McIntosh being the judge, jury, prosecutor and investigator all at once.

All persons mentioned, are defendants and material witnesses and none should be judging, prosecuting, investigating, and being the jury on a proceeding that could not happen. .and no discovery was ever permitted, and with the many conflicts of interest. The evidence could have been acquired by the courts and lawyers simply turning over the discovery answers demanded on 4/12/22 just before Michael Dodd was hired and the case was ruined almost immediately due to the collusion proven by recordings and actions of Dodd and Defense. No evidentiary hearing was needed or warranted by rule, and all documents flagged were blocked by the scheduling clerk who eventually left under duress because she was caught with the clerk of courts hiding Orders and saying they were mailed, and got caught. The Judge must timely hear matters, and digging up old filings, like Petitioners motion to compel discovery are not sanctionable, but the Sua Sponte Judge (opposition) would not clarify the reason for the flagging and there was no possible way Petitioners could address this much material in 20 pages including exhibits and in 10 days and hold an evidentiary hearing with no Discovery, Depositions, Subpoenas/Decus Tecums, authentication, cross examination and so forth in front of those who involved in the underlying causes of action and would never judge fairly against their interests That would include the Supreme Court who helped McIntosh bring forth the Unconstitutional Hearing and provided no relief for the Petitioners, saying the Petitioners were just filing a writ because they lost, when in fact Petitioners filed before they lost based on the Sua Sponte demands which where on their face Unconstitutional and could not end a case, could not occur before mutual discovery, could not happen after a failed 12b6, where scintilla's of evidence is all that is needed, where Judges and lawyers involved in the underlying causes of action were setting up this Unconstitutional hearing because they could not beat two old ladies with physical health issues, even with the cheating they were already caught in, and so forth

So the Court had to limit the possibility of Petitioners ever defending, and made it legally impossible to do so with the 10 active days available, the 20 pages including all exhibits, no ADA Reasonable Accommodations, no continuance, no extensions of pages, no clarification on what was wrong with the flagged documents that needed addressing as they were legitimate motions to try to push the case forward from a 2 year stall by Dodd/Defense collusion, and answering reasons alleged Sua Sponte questions like why Petitioners filed documents like the Motion to Compel Discovery filing that was stalled by the Scheduling clerk but heard on 2/16/24 and agreements were made in court so Petitioners could get discovery, but only if they passed more hurdles that the court was throwing in front of them, that were lies and gaslighting on the law regarding a motion v. responsive pleading and that they are indeed different which addressed defaults and void filings by Defense, as if any of that is sanctionable. And the alternative if Petitioners didn't answer vague questions, their case would be dismissed, which cannot happen in an evidentiary hearing on 162 documents or issues not strictly identified as to the issue. Without telling Petitioners what specific part of the Motion was in question as a motion to compel Discovery that is years late with stonewalling is not a sanctionable offense. . . except when it can show further Judges, Lawyers, Allianz and state actor involvement and written admissions by Defendant group texts can be authenticated, and the Defendants naming others who were involved in the underlying causes of action according to the proxies/defendants own Group Texts (2,000 pages) in live time as they were meeting with the judges and so forth before there even was a case to file.

Further, for the first time, Petitioners could call witnesses who they had been keeping protected from inside the government who had narratives that shed new light on some of the other evidence involved, such as the Sheriff's Department being instructed to stand down and not

respond to distress calls from Petitioners, letting these dangerous Defendants have free shots at Petitioners without interference, where they tried to burn down Petitioners camper with them in it on September 15, 2021 evening. And other deadly acts without concern for being caught. . creating the catastrophic injury or death required to separate the claimants from the claimant with Allianz award, like Satterfield was killed or died after catastrophic injury where the story continually changed about how it happened, and how Satterfield died in the hospital, and then Murdaugh, Fleming, Westendorf and Mullen were able to get the large checks from the carriers through agreement without fighting over it, and Mullen signed the checks without proper case filings with her agreement. This is classic IF/IRF, no matter how much Bland and Tinsley tried to cover it up. The claim was separated from Satterfield sons. The catastrophic injury turned wrongful death raised the settlement check significantly that was not going to the children of Satterfield. Classic!

So, on Murdaugh 2.0, Petitioners' case, it then went to appeal on a totally sham and feigned trial court proceeding, where the judges at the trial court and others were involved in the causes of action according to written and released documents of the Group communications of Defendants, said contemporaneous to the time of the secret, unilateral meetings between these state actors and the proxies, turned Defendants, which is void ab initio. And shortly before the evidentiary hearing, Petitioners wrote a Subject Matter Jurisdiction Challenge based on Fraud on the Court by the Court and others, and mandatory recusal, (hereinafter, "SMJ Bundle") had been filed by giving to the clerk, and then she would have to call the clerk for McIntosh who would receive it and take it to McIntosh, where he could blocked the filing and it never made it to the record. This happened with many documents that the lawyers and Judges wanted sealed because it showed these schemes and they already knew what the Defendants gave Petitioners because

Dodd was turning over all our attorney-client and work-product to them secretly to help the Defense win the case and of course none of this is slightly Constitutional.

Mcintosh, Maddox, Sprouse and Taylor/Bamberg were making sure none of this was ever heard fairly or made it to a trial/jury, especially the group texts, and Petitioners recordings of Dodd, and other key witnesses that were not known yet as Petitioner was keeping them safe as they are government witnesses. So this was clearly a feigned trial that could never make it past square one. . .until the Court and Defense realized they were cornered and could not get a 12b6 no matter how much cheating they did, because Petitioners put the admissions from the group texts into the suit, and this would bring a Motion for Judgement on the Pleadings, and Petitioners were forcing Discovery and so forth in spite of the stonewalling. Thus, the 6-month break and the Sua Sponte Ambush Unconstitutional Evidentiary Hearing. From the beginning of the causes of action, the judges and others were involved in them, as they identified Dr. Kennedy as the legal reformer/attorney from Virginia who took down part of the Virginia legal system by not going along to get along. The Virginia State Bar (VSB) was involved in this SC case, because they apparently still had an ax to grind from about 23 years ago.

From the beginning the case was known to be feigned by Judges and others involved in these secret, unilateral meetings that happened much earlier with Proxies that turned into Defendants when Petitioners finally had enough and filed suit on March 17, 2022. The perpetrators insisted on presiding over the case with fellow aristocratic and groomed elite lawyers who knew their role. Once Dodd was hired right after Petitioners filed their discovery on April 12, 2022, the collusion almost immediately started between Dodd/Defense and Petitioners were recording conversations legally with Dodd because they already did not trust

him from work he was doing on another parallel case who was supposed to be mandatorily joined.

Shortly before Petitioners pried their case back from Dodd and found all so much more collusion including Defaults and void ab initio filings, that would have won this case by May 18, 2022, where instead, Dodd was telling us to drop defendants and causes of action because there was no case, when they were the biggest defendants and were cooperating with Petitioners, before attorneys got involved, and gave the 2,000 plus pages of Defendant Group Texts admissions confirming Petitioners suit was accurate and actionable, and allowing Petitioners to have Dodd write in the Defendants own quotes of what they said and did to petitioners instead of Petitions just claiming they did it. And further, it showed the first discussions about meeting secretly and unilaterally with Judges, Solicitor General and other State Actors and agents, where one of the Defendants' father (Detective Jody McCurley) worked with and then for the Solicitor General in the past and was involved in some of the Anderson County Sheriff Department corruption, that has never left Anderson and Oconee Counties (10th Cir).¹

¹ Anderson County Corruption runs deep and far back between the Sheriff's Office and the Court house and Clerk of Court and Solicitor. Petitioners dealt with this nepotism in this case from the Sheriff's office/and Solicitor David Wagner nepotism with the Defendant Jennifer Burdette (of the Burdettes), and the Judges and Clerk's office, with Clerk of Court Rena Thomason (Aristocrat Loureena Campbell, Cooley Sosobee), appointed by Aristocrat McMaster (related to the Aristocratic Laffitte line). Former Anderson Detective Jody McCurley, Defendant Jennifer Burdette's father, was influenced by Sheriff E.E. Duck Cooley's frauds and drug operations in the 80's using bail bondsmen, Jamie Hawkins and Hawk Bonding Co. as part of the criminal enterprise of the LMCE, and those jailed were used as traffickers in exchange for bond from Hawk Bonding, for the LMCE. Jody McCurley got his Defendant daughter and other Defendants before the Judges in Anderson County through their connections for secret unilateral meetings to create catastrophic injury or wrongful death in Petitioners according to Defendant interviews before lawyers were involved. Aristocrat McMaster appointed Clerk of Court Rena Thomason in the 10th Circuit, is the grand-daughter of this Campbell, Cooley and Sosebee group involving auto parts and auto theft from Michigan and transferred to Sosebee's Auto in Anderson for resale as a part of the illegal operations run through the Anderson Sheriff's Department. King Henry, "Bud" Campbell selected the Sheriffs of Anderson County in spite of the election claim, and did so with Cooley after the prior Sheriff was raided and arrested, and to be sheriff Cooley had to marry Sosebee's daughter June, in order to keep the Sosebee operation rolling

uncalled for physical abuse started with McIntosh, Sprouse and Maddox creating situations where Petitioners had to pull ever other night all-nighters and going into hearings, they were up for 3 and 4 day/nights in a row to try to save their case from dismissal, even though Dodd was still on the case, but abandoned for about 5-7 months. . .McIntosh was making Petitioners defend their own case with Dodd still assisting the Defense and on the case which is unconstitutional and Petitioners made him well aware of the fact, but neither he nor Dodd nor defense cared because the fix was in. This was the beginning of the seizures in Dr. Fink, the eyes and limbs nerve damages requiring surgery for Dr. Kennedy, that would no longer work from starting and typing at computers/screens day and night continuously with breaks for food and bathroom and back to the computer, something even the Geneva convention, the medical community, the international community all classifies as torture. And this continued for the life of the case, that intentionally and maliciously crippled both fairly healthy and older ladies able to manage their disabilities up to that time. Many of their managed disabilities' were then aggravated, along with the constant aggravation of the new Disabilities that they Court ignored the ADA Reasonable Accommodations and the piling on of excessive amounts of work, due to the scheduling being told not to schedule for so long, that the amount to hear by time there was a hearing was beyond what Petitioners could do without further ruining their health due to the courts not giving ADA Reasonable Accommodations, and continuing to pile on.

after the death of Pratt Sosebee. Clerk Rena Thomas has since inherited much of the property and assets from these crimes through property and trusts of the Campbell/Sosebee/Cooley line. Sosebee, Cooley and Campbell were close with Judge Maddox as he discussed when he was swearing in Rena Thomason, as Clerk of Courts, and stating that they were coming full circle with tears in his eyes. This is one example of the entrenchment people face when they have to deal with this very corrupt and oligarchical SC State government system that does not work as a Constitutional Republic and makes up rules and laws as they go to continue in these types of LMCE tax free profits at the expense of the public.

The use of sleep deprivation has been recognized by the International Human Rights framework as a method of torture or cruel, inhuman and degrading treatment or punishment, tidsskrift.dk. The U.S. has been condemned by the International Community for using such torture as cruel and inhuman punishment. Interestingly, the U.S. Courts, on several occasions characterize sleep deprivation as torture when inflicted by other countries, which is part of the reason so many want to avail themselves of the International Courts rather than the hypocritical and WEAPONIZED courts in the U.S., SC and other states Courts.² (Plead in several Trial Court

² Sleep Deprivation is recognized by the International Community/United Nations/Human Rights Commission, and in the Medical Industry as Cruel and Unusual Punishment, that even the Geneva Convention banned. The use of sleep deprivation has been recognized by the International Human Rights framework as a method of torture or cruel, inhuman and degrading treatment or punishment, tidsskrift.dk. The U.S. has been condemned by the International Community for using such torture as cruel and inhuman punishment. Interestingly, the U.S. Courts, on several occasions characterize sleep deprivation as torture when inflicted by other countries, which is part of the reason so many want to avail themselves of the International Courts rather than the hypocritical and WEAPONIZED courts in the U.S., SC and other states Courts. This has been noticed by the International Community and the U.S. has been called out for its hypocrisy as a member of the Human Rights Council.

When a person intentionally **WEAPONIZES** sleeplessness for it to be classified as sleep deprivation, through WEAPONIZED LEGAL INDUSTRY ABUSE, like in this situation where obviously bias and sadistic judges who were involved in trying to have Plaintiffs killed, are now sitting over the case regarding the Defendants they used to harm and try to kill Plaintiffs, these colluding Judges McIntosh and Sprouse were going to give a predetermined outcome to the Defense on November 28, 2023, in Unconstitutional hearings, and now again it is scheduled likewise for January 11, 2024, through procedural engineering and retaliation/financial interests. Experts say this forced sleep deprivation goes from is psychological abuse, which includes 'emotional abuse' and takes the form of threats of harm, or abandonment, deprivation of contact, humiliation, rejection, blaming, controlling, intimidation, coercion, indifference, harassment, verbal abuse (including shouting or swearing), and isolation or withdrawal from services or support, llradultsafeguarding.co.uk., See also Dr. Karin Huffir, Author of Legal Abuse Syndrome, where she describes the "injury caused when legal authorities fail to uphold their responsibilities to provide a fair venue for justice).

Mental torture, also known as Psychological torture, is torture that does not directly cause physical violence or injury to a person's body. Forms of mental torture include. . . sleep deprivation, Jul 12, 2023, freedomfromtorture.org., See also Kelly Bulkeley, PhD, Dreaming in the Digital Age. Mental Torture is used to break down the resistance of the target like Plaintiffs, so they cannot effectively go against Defendants who are receiving the predetermined outcome from McIntosh and Sprouse. These abusers want to demonstrate absolute control over the tortured and humiliate the target and Plaintiff find those who desire such inhuman cravings are sick and Plaintiffs need protection from them, whether at the Defendant level who exhibited these same sick and twisted characteristics, the lawyers, Allianz, and the Judges and other State Actors. How is this not sadistic when used against Citizens who are just trying to get fair and just redress of grievances? Plaintiffs wanted their case resolved fairly under the laws of the land, and to be left alone by the colluding abusers, from the present and going forward by all those targeting them. The range of psychological abuse to include sleep deprivation. Casts a wide net, but denial of access to legal services is one of the listed deprivations, along with sleep deprivation of course. The bizarre Orders of these Judges are a part of denying Plaintiffs legal services, as Dodd is colluding with the Defense, and Plaintiffs are being put in incredibly bad situations that are not even Constitutional in order to steal their victory. Encyclopedia.uia.org.

motions, and also to the SC Bar that cannot be retrieved due to ADA disabilities, and the records have been so tampered with by McIntosh/Judges, Clerks, Lawyers, other? That the record is not valuable overall and Petitioners cannot waste limited vision searching out a maybe still there scenario and lose sight for the other matters needing to be performed under a tight timeline).

The appeals court would also not allow ADA Reasonable Accommodations either, in spite of medical reports and now serious surgeries scheduled and/or occurring with Petitioners travelling to try to repair what the SC Courts have intentionally and maliciously caused and are now even allowing these lawyers who must be disqualified and should have been long ago, continue to break the law, misstate, twist and so forth to give this court reason they can dismiss or deny cert, again Weaponizing the CLEAR ADA DISABILITY LAW, THAT IS IN PLACE FOR THIS VERY REASON. “The unequal treatment of disabled persons in the administration

Psychological abuse, becomes a form of **PHYSICAL ABUSE AND TORTURE**, which often goes unnoticed to the outside world, Jul 9 2019. Most people will begin to experience the effects of sleep deprivation after just 24 hours. The CDC claims that at this point, staying awake for 24 hours is likened to a blood alcohol content of 0.10 percent, Mar 27, 2029, medialnewstoday.com. At this percentage, you may have a **reduced reaction time, slurred speech and slowed thinking**. A blood alcohol level of 0.08-0.10 is considered legally drunk. In SC that level is 0.08. People who suffer from

Sleep Deprivation, also have “microsleeps.” These are brief periods of sleep during waking time. This can be dangerous and cause a diminished function of the person trying to argue in court against a incredibly stacked deck, like Plaintiffs are facing and trying to oppose, just like BAC issues. Driving is an entirely different issue that could kill Plaintiffs or someone else, to the delight of those doing this.

“Torture; means the **INTENTIONAL INFLECTION OF SEVERE PAIN OR SUFFERING**, whether physical or mental, upon a person in the custody or **CONTROL** of the accused. Corteidh.or.cr The Court is the Control and Custody in this matter, since Plaintiffs lose if they do not fight, even knowing the case is already predetermined, which is additional IIED causing more pain and suffering. Add to this that the stalkers on the underlying case are now again stalking Plaintiffs right after Plaintiffs provided their new location to the Court. Additionally, Dodd is writing perversely, sexually explicit statements and threatening to kill Plaintiffs, and Plaintiffs can’t even get police to respond because they have been ordered to stand down by the sitting judges on this case. Plaintiffs have fired Dodd, but he remains on the case with the choice or what he will argue, how well he will argue it, and what he will default on. Thus, the gift that keeps on giving to the Defense is indeed Dodd. All a Coincidence? Nothing to see here?

For all these reasons, and more provided, this bar **MUST STEP IN** before irreparable harm to Plaintiffs case occurs, and even more so that Plaintiffs are in danger and if nothing else, it would look pretty bad on these Courts, lawyers, police. Allianz, and this BAR who let it all happen **WITH NOTICE**. Plaintiffs are way too well documented and have mirror the Court records, in case Defense/Judge gets those removed from public view. **STAND UP SC BAR/Committee! January 11, 2024, WILL BE TOO LATE.**

of judicial services has a long history.” *Tennessee v. Lane*, 541 U.S. 509, 531 (2004). The Court further held that Title II validly protects the fundamental right of access to the courts. *Id.* at 522-34. The conduct of these lawyers and MGC (and GCC and lawyers, and Dodd also is shameful and more than deserving of sanctions and severe bar discipline in an uncaptured legal system. And that is the problem, there is no place for honest citizens fo to hold their government accountable for things that create a LMCE under color of law with the people being the cash cow, up until and including getting proxies to create catastrophic injury and wrongful death so the State can run its IF/IRF Murdaugh-style scheme in the 10th Circuit. Petitioners have had to experience “bizarro world.” And this world is way too familiar with many proofs it exists and not just in SC.

Disabilities at the hands of the Trial Court Judges and agents: Dr. Fink is having a serious and much more complex hip surgery to replace much of her necrotic hip where much of the bone is missing. This is NOT a basic hip replacement. She is scheduled to have this surgery at her domicile location in Florida. Obviously, this will be an extremely painful operation, and the injury/disability all began in November 2023 with an intentionally abusive and Unconstitutional series of act by McIntosh to punish, and make it impossible for Petitioners to win a case he and his judicial colleagues and others were actually a part of . . . in the causes of action. . . that he began using such Unconstitutional hearings to give defense a predetermined outcome on 11/28/23 Sua Sponte notice (again) hearing, that ignored a June 9, 2023 Order, that was obviously orchestrated where Dodd who was still the attorney of record, but abandoned the case, would not argue anything but what he chose; two motions that helped him and Defense get the case dismissed by his testimony that was not the same as what was recorded on tape during the times in question, and would hurt Petitioners.

Petitioners were somehow supposed to defend an entire case of two years, with them cut out of any of the proceedings. . . none in court. . . where they had not been privy to the Dodd/Defense dealings because Dodd would not disclose the status, and where Dodd claimed he had no file on this case he had for almost 2 years, which should show how little he did in the case, other than to help stall with Defense and provide them with Petitioners record originals meant as attorney-client and work-product of some additional information on the investigations into all parties and what they were really doing that would hurt or help Petitioners case and so forth. Fortunately, because they didn't trust Dodd, they not only legally recorded his bogus legal advice, but did not give Dodd most all the evidence, because he could not even learn, nor wanted to learn the 1,000 plus pages he received. At the time of Dr. Fink's first seizure in the case,³

³ Full Disclosure: Dr. Fink had been free of seizures for many years, and had her only seizures after a slip off a ladder where her head hit cement in 2015, and free in 2016, and she had one during the under siege events of the underlying attacks by Court Proxies who became Defendants, who were poisoning Petitioners with H₂S, which is very toxic and deadly solution in tight and hot places like the camper. This liquid was poured into Petitioners camper vents by Defendant Jennefer Burdette who was the Defendant who first had direct contact with Solicitor General David Wagner through her father, ex Robbery and Vice Detective and PI for Wagner, Jody McCurley who set up appointments for she and the other main Defendants to meet with Wagner and the 10th Circ judges who devised the catastrophic injury/wrongful death scheme against Petitioners. Petitioner's dog also had seizures, and the other was sick and Petitioners were both very sick until they left and could clean out the camper of H₂S that leaked into the floorboards and was hard to cleanse and air out. These events are said regularly including in the amended complaints, with this exhibit attached. The Defendants thought it was funny and called it "Skunk Spray," and were prepared to do it more, Ex 5 if they didn't do so. This is who the Courts had to physically disable Petitioners, this is why they used these very low class and morally void Proxies to get rid of Petitioners and for they and Allianz to pull off the Murdaugh Style IF/IRF scheme, this is why the Courts/Attorneys could never allow Discovery, Depositions, and the SCT quashed the Subpoenas and witnesses in the Writ. to the absurd Sua Sponte Ambush of an Unconstitutional Evidentiary Hearing that the SCT felt there was no evidence given to them to grant the writ. . . when the fraud is on the court by the court and on its face with attachments sent so they saw the entire Show Cause, and list of items that needed to be addressed without specification in an impossible 20 pages that was obviously written by the lawyers who would no longer show up UNTIL NOW TO GIVE THIS COURT SOMETHING THEY COULD RULE ON. Ex. 6. Dr. Kennedy has a degree in Pre-med/and Tech and knows the smell and the test for H₂S and uses the BW-BWC2 Detector as H₂S in a closed camper is deadly. THIS IS VOID AB INITIO AS A FEIGNED CASE. All of you need to be mandatorily recused and neutral

she had been free for many years after a slip off a ladder and her head hit cement in 2015, and she had one during the siege by Defendants to try to poison Petitioners with H₂S, which is very toxic. Petitioner's dog also had seizures, and the other was sick and Petitioners were both very sick.

Dr. Fink's hip was fine and she was exercising at full capacity for her age and for many years until 11/23. Since November 2023, Dr. Fink went from 5'9" to 5'3" with at least 6 crushed vertebrae and a back hump from lifting many of the 20,000 documents in emergencies repeatedly due to short deadlines and massive amounts of presentations scheduled that were impossible to do without sacrificing health and sleep. Fink started the seizures on this 11/28/23 date due to the every other night all nighters and 3 going into 4 all nighters in a row to try to be prepared for the Unconstitutional hearing. For Dr. Fink these disabilities began with what was eventually diagnosed as extreme sleep deprivation seizures, and became also, at least 6 crushed vertebrae, and a major hip replacement for ½ of her hip bone not being seen on an x-ray. Dr. Fink also lost her hearing aids and her contacts, during the collapse at McIntosh's feet and taken from the courtroom to the ER by ambulance, and in spite of not being able to hear, and see very well, there were no reasonable accommodations made, and even the Evidentiary hearing that was first going to be live in person, and then changed to written form, Dr. Fink would have to present without hearing and barely seeing.

judges enter to rule Void ab initio the Feigned case and in equity grant Petitioners all they listed in their last Entry of Judgment and Petitioners need to go before a really neutral jury and tell their story and the jury can provide all extra punitive/uncapped, and noneconomic damages including any other award, and Allianz and all Defendants need to be held jointly and severally liable beyond the abuses spending and bribing Allianz did with the award money. . and pay in full, and the state then needs to contact and settle this against them before this gets to be more a case tried in public then in private due to the teachings of legal reform activists that already have this material and are waiting for the ending to tell the story as is a Biography as Justice must be served.

Even Dr. Kennedy's genetic kidney stones received no consideration, as three times severe attacks and hydronephrosis involving court dates and deadlines which the Court either refused to make accommodations or didn't classify the severe pain and hydronephrosis in these genetic attacks and kidney stones as an emergency that would change the scheduling in spite of the doctor clearing his schedule for surgery each time due to possibility of Dr. Kennedy losing one or both Kidneys. Dr. Kennedy ignored the feet dragging of the court and got her surgery as she is not going to have the judges decide if she keeps her kidneys or suffers great pain from what proved to be very large stones and total blockage.

Dr. Kennedy's upper limbs were and are so swollen and painful that she can barely type for long, and her vision has been ruined. Dr. Kennedy can look at screens and print for a short time and then sees double, and blurred with burning eyes. Both limbs (hands, wrists, thumbs, forearms, elbows) and eyes need surgery to correct which she cannot get until this settlement or victory is completely found in their favor as they will not let this LMCE win this way by bullying Petitioners into compliance. This is over when the Court decides that they must depart from normal LMCE operations and provide a full and whole settlement to Petitioners. Petitioners are working inside and outside the courts and ready to launch all legal, nonviolent actions that will expose and make changes to SC if it will not do so on its own to protect the public.

In regard to Dr. Kennedy's health, on one occasion where Kennedy was trying to work through two kidney stones attacking her, and not delaying or taking medicine for it, due to a court date coming up via Teleconference, Dr. Kennedy had spent two all nighters in a row to finish her part of the argument, and was driving to pick up Fink so they could be in the same room for the conference call.

Dr. Kennedy was stopped in her van, and saw a speeding car coming at her and could not even react to try to avoid a head on collision. Dr. Kennedy woke up briefly in an ambulance and then in the ER and found out that she was hit and her van spun around in a 360-degree spin, and she was hit out of her seatbelt and was hanging outside the passenger window as the van spun, with her head going through the glass side window. She had obviously experienced severe temporary memory loss, a concussion, a collapsed lung, and other severe bumps and bruises and pains. The notes for the hearing blew out the window and were never recovered by the rescue team of which she had no control being unconscious. The hit was so violent that an all metal cargo van was totaled (Ex 7).

When Dr. Fink found out and made her way to the ER, she called the Court and explained the situation and that Dr. Kennedy could not speak well yet and was not able to remember people's names and so forth and had no notes for the hearing. "The Court Clerks yelled, "if you can call, you can argue," and this hostility was approved also by Judge Maddox, in that this was a chance they planned to get the case dismissed and save themselves and they didn't care what condition Dr. Kennedy was in.

So, when Dr. Kennedy woke up, and was dazed and the Dr. already said you are not calling in as she was astounded by the ruthless words and delivery of these clerks, Petitioners called in anyway because they knew the Courts would dismiss the case no matter what happened, as this was just the way SC works. They called into the Web-X platform comm system and they could not reach anyone, and it turned out that the entire Comm System went down right when Petitioners were supposed to call in and all the hearings had to be cancelled. God works in mysterious ways, as Petitioners found out an ambush was ready to happen with fired MGC attorney. . .because he and Dodd's collusion. . .against Allianz. . .was going to be worked in

continuous collusion against Petitioners in spite of the real evidence. When Petitioners finally were able to listen to some of the legal recordings of Dodd, they could hear this endgame being plotted out by Dodd and Defense, although they had no way of knowing this at the time of the recordings. All of this needed to be heard to prove the collusion, RACKETEERING and predetermined outcome long before the case was conceived or ever filed by Petitioners as a Murdaugh-Style scheme where all were involved except the victims. . .same as Murdaugh cases with Mullen and so many others not disclosed involved in this statewide LMCE set of crimes protected by these courts who know these cases are feigned.

But the words of the clerks and support by Maddox are a very clear illustrative example of the ruthlessness that Petitioners have been under when the alleged neutral courts are a part of the underlying causes of action and there is money and covering their own guilt by presiding is involved. . .Petitioner could not even remember names or her own medical history, like 4 back surgeries that has changed her life and made her permanently disabled, for the doctor and had no notes to argue a case even if well. . .although with the ambush, the lawyers and judges and clerks were already prepared to frivolously and fraudulently change the facts into some distortion that never happened by the clear real, unfabricated evidence that didn't take wet ink to make.

And not as a petty issue, but as a show of hostility, not one person from the courthouse even was polite enough to say are you ok, or sorry that happened to you, or some sort of pleasantries that shows basic humanity and manners. This is not a sign of Petitioners expectations but of the hostility they showed for Petitioners. They would have been happy if Dr. Kennedy was tragically killed. They showed it. This is a level of hatred and self-absorbed thievery and reprobate agency working for the State and under this Court's supervision and this must be changed to go forward as the Courts have pitted themselves against the people they are supposed

to serve and be accountable to by any legality they choose since the accountability positions are seated with LMCE predators. And of course this entire scenario is against the ADA Disabilities Act and a Doctor giving a written note to be left alone.

All of these incidents with many intentionally and maliciously caused/aggravated/weaponized disabilities and the torture of going through it over and over again, by the Judges/lawyers in this matter, at all three levels violates ADA Reasonable Accommodations that only demands a notice not a full blown contested motion. This is the same practice that this MGC, involved in the underlying case with fraud, and collusion, and Racketeering and so much more. The same hatred because they were not getting their way in fixing the case without it being pointed out and caught by two old ladies with physical health issues using a cell phone for legal research. They even claimed that the Virgin Island Customs were violated by Petitioners and therefore their case must be dismissed. . . knowing there were no Virgin Islanders involved, the case was in Townville, SC, and these were alleged customs not law. The Court let that stand as a valid Defense to dismiss the case, in spite of Petitioners Motion for sanctions. The Court and lawyers were constantly signaling that they and the judges could and would do whatever they wanted and were going to win no matter what the law and facts. This was clear from motions and correspondence like this.

It was like the Buster Murdaugh, Sr. corruption case in 1956, where SC justice system as a whole was being called out for allowing such unbelievable chaotic and illegal behavior to go on in their state and to have this man as the Solicitor of the state. Nothing changed.

To SC Government and their Courts and Bar, Petitioners are resources with an award due, and this LMCE wanted it extracted along with the money laundering it could gain in its love of all money and the root of all evil, and wanted to inflict extra punishment for Dr. Kennedy's work

in Legal Reform to help those people are who mere cash cows to the Aristocrat/Groomed Elite entrenchment. All Murdaugh victims were just human resources with awards to be extracted also. Petitioners are not heart-broken over it, as they do not desire acknowledgement from this group, but they are stating the facts and what a litigant is going to face if he/she enters SC Courts. This is not a surprise as this is just like another colony, Virginia, with the same spirit.

During the November 2023 rushed preparation period, Petitioners were reviewing the beginning of the case as fast as they could and found the defaults and void filing of MGC occurring on 4/1 that would have ended 22, 3 days after Dodd was hired by written instrument, confirmed by email, texts and performance documented by all forms of media. The case would have been won by May 18, 2022, but for Dodd covering for Defense. This all started to be learned during this Unconstitutional Sua Sponte demand for winner to take all, with Dodd, who had long ago abandoned the case, seen and specifically talked about in the record, in mid June 2023 after he and Defense were caught via emails, and recordings to be in collusion to throw Petitioners case. That has never been heard by the Court of course who kept creating new drama to steer away from these troubling issues.

In fact, the lawyers including Dodd tried to later move the hiring date of Dodd to as late as June 27, 2022, to frivolously try to show there was no collusion because Dodd wasn't even hired knowing Petitioners have all the evidence showing definitively that he was, and that either way, an attorney-client relationship was without a doubt in existence even if the corrupt Judges working with the lawyers would find so ridiculously, which was always possible in this SC Court experience where there is an obvious LMCE occurring where the Judges and lawyers and Legislators and all their accountability arms are all working together in a "thiefdom" against the public.

Warnings to the Court and Committee on Judicial Discipline, the Bar, the Judicial Merit Selection Committee and Congress, and the Judges and lawyers went ignored, regarding the degrading conditions of Petitioners and the onslaught of abuse continued throughout the case, and into the Appeal also, with the Supreme Court adding salt to the wound with their Groomed Elite cold responses to the human suffering they were all causing, which was not surprising but is still very sad as Petitioners believe they are experiencing the old world Aristocratic view of human resources which has never changed in SC. It is hard to witness.

The Appeals Court denied all ADA demands on least restrictive means with special needs also disclosed and medical reports, because that would give Petitioner 90 block days (like Murdaugh who received several), and 200 pages with the understanding that more may be needed and that 30 days with surprise final notice of due date would not work and the explanation was given on why they needed the 90 block days given to others without disabilities, as a special need, to cover just some of the following: The underlying case, blocking of discovery, and other shenanigans by Judges, lawyers and clerks, the later discovery of lawyer collusion caught on recordings, the fake attempt for the colluding attorneys to help Michale Dodd (Plaintiff's colluding attorney, "Dodd") to withdraw in another secret meeting with judges that backfired, (when their attempt to get a private withdrawal to hide that Attorney Dodd, was caught colluding with Defense on recordings), the Racketeering and IRF of Allianz with the Judges and lawyers and others, Discovery stonewalling for the entire case, the Racketeering of the Judges with all the others, the Murdaugh discovery as this case became Murdaugh 2.0, the Bamberg steering of Judge Taylor to the case to further fix it when the Murdaugh truth was learned and the judges scattered, Taylor running when Petitioners found out about the Bamberg steering, the Clerk of Court and Scheduling clerk hiding Orders to try to get Petitioners to miss

deadlines and lose, the fake hearings on fake issues just to try to get Petitioners dismissed without hearing the merits at all and with the help of Dodd until we finally could get him fired, never hearing the Constitutional issues, the approximate 6 months off Judge McIntosh gave the opposition totally without any chance for Petitioners to oppose, in 2024 and elsewhere, and to give Maddox time to collect and retire early, and the few other attorneys who had run away, but were and now show their signatures improperly because they cannot be a part of the case, to write this fake evidentiary hearing on all documents they had been trying to seal since October 2023, and give it to McIntosh to claim it was a Sua Sponte Ambush because it serves as a summary judgment without discovery, when that can't happen either. The Defense/Judges wanted those documents filed sealed because they told and showed the Racketeers as colluders fixing the case on recordings and filings and writings, and showed the Judges involvement in same, and the refusals of ADA Accommodations, and even once saying Petitioners could not have any reasonable accommodations unless the other side agreed, while giving the opposition vacation time and other perks during the same time without Petitioners able to oppose, and Petitioners catching Maddox having an ex parte hearing with opposition that he could not erase, and then the Ambush of the fake Evidentiary hearing not even written by McIntosh but feigning like it was. So the Appeals Court could not allow 90 day block time for ADA Reasonable Accommodations with special needs listed, and continued to give 30 day continuances with threats to end the case at various times, so Petitions were always trying to rush through 20,000,000 documents and could never try to organize the documents or the arguments or have any time to stop using the disabled body parts that the Judges intentionally and maliciously injured and/or aggravated, to be able to receive any kind of meaningful due process, and would say they complied with the statutes, but would not show where they specifically ruled on ADA

over the course of many months. Further, they would not give any additional pages, because to do so, meant the scams and feigning were exposed as was the Murdaugh and Asbestos scams being run through the Courts own LMCE. To give the pages meant the merits, Constitutional and criminal acts would be documented and argued for a Void ab initio finding against Defendants and immediate investigations. . .not by SLED or any of the Murdaugh sham perpetrators, and Petitioners would demand grand juries and criminal prosecutions outside of SC and the Fed 4th Cir., because the guilty would not just settle the case for value and show some changes in how future Plaintiffs are protected.

Several of these RACKETEERS would have needed to retire as a part of the settlement, and perhaps become claims adjusters like MGC Alan Jones, and MGC Elizabeth Moore who were on this case, before they got caught filing Void ab initio filings. They were out of the case on 4/15/22, and GCC, James Cox, III, and G. Robert DeLoach, III, who were missing deadlines, and then adapting the Void ab initio filings of Jones to try to avoid the default after the fact, even though they were given 30 extra days from the date of service. So Cox and DeLoach adapted a Void ab initio filings and were out of the case anyway, by May 17, 2022.

In addition, Jones/Moore filed an Alleged Responsive Pleading they were calling a Motion to Dismiss. It was a motion to dismiss only. And this was not by mistake as they were trying to dismiss, keep their affirmative defenses by claiming nobody was served even when Petitioners had the services on video, and still block the Amended Complaints, by claiming this was a Dual Filing called a Motion to Dismiss. . .which there is no such thing per SCRCF, Rule 7, 12, 15. In their insistence that this was a Responsive Pleading they did not answer the complaint, file a cross, counter or 3rd party claim therefore defaulted by admitting all was true. All Defendants lost by May 17, 2022 (two months after the initial filing, but for Dodd and Defense

colluding together until Petitioners found out in November 2023, when McIntosh was doing another special Sua Sponte motion to dismiss where Petitioners had to defend their case while Dodd was still on the case, and he got to pick what he was going to argue and Petitioners were responsible for all else even though Dodd kept Petitioners in the dark no matter how much Petitioners asked for information. . .and now Petitioners know why.

To top that off, Defense and Dodd tried to move his hiring date from 4/12/22, right after Petitioners filed Discovery, to as late as June 27, 2022, to cover for the collusion. The fraudulent attempt was to claim that Dodd was not hired until June 27, 2022, so he could not have been colluding with the Defense.

Since Petitioners had the contract, email confirmation, texts from Dodd giving progress on his writing of the alleged 1st Amended Complaint, other discussions about the case and strategy, Petitioners continued to ask him to make the appearance and he kept promising the date and then didn't until sometime in May 25, 2022, and even engaging in legally recorded taped phone because Petitioners did not trust his work on a parallel case that was supposed to be necessarily joined with Petitioners case. So who does this but someone needed to move the hired date and why would that be important are the rhetorical questions.

Therefore, this Court must accept the filings of Petitioner as ADA reasonable accommodation filings, as Petitioners noted this need on all filings where they were relevant in the best and only way they could with their physical disabilities never granted in any court before, which is 100% in violation of the law and are Constitutional Due Process and Access to the Courts, equal protection and other violations that waive the immunity of those involved, even if this Cert is not granted and as this court knows this is not the end of anything unless it can finally be resolved here.

But, if the Defense is really going to argue that ADA accommodations should be denied in this case as their sole defense in a letter from the Clerk on a different set of ADA reasonable accommodations when they denied even the ones they caused for the entire time of this Appeal and the entire time of the underlying case once McIntosh first became involved, then the ADA that was requested in the initial filings is all that is needed to get an overturning of this case and entries of Judgement entered, and jury trial on the uncapped punitive and noneconomic damages and all other damages the JURY decides to honor already, because the Defense cannot put on a real case and those involved, including MGC itself are already disqualified as Defendants and material witnesses, as they well know and this all continues. Even the volume and complexity would have received such requests, but for the Courts protecting each other.

Further, the SC Judges who had any part in this case, are also Defendants and material witnesses as all have waived their immunity. It is best to now get this settled before it gets much worse in and out of court using all legal and nonviolent means to do so and that is a promise from Petitioners. Petitioners are known to many in the LMCE and do not act outside the law and rely on strategy and knowledge of the crimes of the state taken to the people to talk for the People not just Petitioners.

Petitioners state the grounds for this motion below, with reference to the record and to sworn affidavits filed herewith addressing facts not otherwise contained in the record on appeal.

II. THE APPLICABLE ADA STANDARD IS DELIBERATELY BROAD AND MUST BE LIBERALLY CONSTRUED

Congress amended the ADA in 2008 specifically to override restrictive judicial interpretations of the term "disability." See ADA Amendments Act of 2008, Pub. L. No. 110-325, 122 Stat. 3553. The statute now provides that "the definition of disability in this chapter

shall be construed in favor of broad coverage of individuals under this chapter, to the maximum extent permitted by the terms of this chapter." 42 U.S.C. § 12102(4)(A). Implementing regulations confirm that whether an individual meets the definition of disability "should not demand extensive analysis." 29 C.F.R. § 1630.1(c)(4).

This standard is not satisfied by a Court's mere acknowledgment on paper, as did the Appeals Court claiming they provide ADA Reasonable Accommodations and that they construed the liberally. This is shown from the record to be a 100% fabrication and lie. If a Court has to lie and block ADA, and make sure the Disabled doesn't get meaningful due process, or a full Appeal Presentation, with De Novo review, and then makes a dismissal on the courts own creation and dismisses the case and two SMJ Bundles in two footnotes on the same page of the dismissal of the case, one day after received. . .no stay, no neutral judges that were required always but in the SMJ Bundle for sure because the issue was the Judges. And this was done just before the Murdaugh overturning release with Petitioners SMJ Bundle filed there still open, wrongful filed, backdated, and never implemented by the Supreme Court. And then HOW IS THIS A NEUTRAL COURT WITH NO INTERESTS IN THE OUTCOME burying the TC and Appeal Case, and sure this alleged cert also, while until now, actually arguing for the Defense? And where the Defense and all the Judges are material witnesses and Defendants in a Federal Case.

With ADA, a court that requests medical documentation receives it, and Petitioners also requested to send. The Courts ignored them, so they sent them anyway. The Trial Court and Appeals Court received it without request, and then the Trial Court proceeded to accuse the Petitioners of lying regarding the very conditions documented, without any contrary medical finding in the record. The courts did not apply the statute's liberal-construction mandate or any

construction mandates. All the Courts and MGC have this entire argument inverted, and purposely not stating the law. These are the same lawyers that filed a Motion to Dismiss based on Petitioners not following Virgin Island Customs when the case doesn't involve the Virgin Islands or its people, the case took place in Townville, SC, and this is a custom not even the law. They threw everything onto the wall and wanted McIntosh, Sprouse and Maddox (and Taylor) to just pick what they liked to dismiss the case. These frivolous arguments are sanctionable under Rule 11.

III. FACTUAL AND PROCEDURAL BACKGROUND

A. Origin of ADA Accommodation Requests and the Court's Pattern of Non-Response

Petitioners requested disability accommodation from the earliest stages of this litigation in the Trial Court, once McIntosh got involved, not merely in connection with page or time extensions but as a general and continuing need arising from documented physical conditions caused by the Judges (and lawyers). Petitioners only mentioned the once's caused by the state, even though they have many ADA Qualifying Disabilities, including fighting through serious cancer (there are few exceptions like when Dr. Kennedy had two and then three genetic kidney stones causing Hydronephrosis and both times the Dr. cleared his calendar to get Dr. Kennedy in for emergency surgery because the stones could not be broken and major kidney damages could be occurring. The courts below refused to allow the surgery unless Dr. Kennedy got the other sides approval while handing out vacation to the other side without even allowing an opposition. Dr. Kennedy got her emergency surgery anyway as the hostility raised to the level of ruining Dr. Kennedy's kidneys and causing great pain also. The opposition actually contested before or after they went or came back from unilaterally gifted vacation, and Judge Maddox let it slip in June 2024, that they had a hearing without Petitioners. Then he announced his early retirement on or about June

24, 2024 for the end of the year, December 31, 2024. Sprouse had disappeared by then after the sham he was caught in. Taylor had already run away, leaving McIntosh to again be the loose canon Petitioners warned the Judicial Committee on Judicial Discipline and that Petitioners were in danger. This was ignored of course as were several other complaints of him trying to disable Petitioners. No other ADA demands were addressed, even by this supreme court who instead threatened us that if we were so concerned for our health we would not be subpoenaing to try to save our case from an Unconstitutional on its face Sua Sponte evidentiary Ambush to end the case unlawfully.

In the appeals Court, Petitioners demanded ADA Reasonable Accommodations, that were not given, because they could not let Petitioners argue these matters and force a Constitutional Crisis claim against SC, a revelation about the Murdaugh case/Asbestos, which was just like Petitioners case, and a waiver of immunity and a de novo hearing. The Court instead insisted it ruled, but would not point to the ruling as it did not rule on ADA issues, but wanted to claim so at the time of dismissal while stopping any real change at a real full Appeal presentation through meaningful due process, which is exactly what they are doing now. This went on for quite a time, but Petitioners knew without the block time and pages, they had no way to actually have anything real heard. . .it would be a box checking exercise and Petitioners would lose on something that looked nothing like a meritorious case dismissed. This type of erasure of the case through procedural frivolity and then blaming Petitioners for responding to the frivolity to try to save their case which is then used as the reason to dismiss the case which never was heard on the merits or by constitutional violations, is present in the Trial and Appeals Court as standard operating procedure in SC to steal awards, inheritances, mortgages, operation bail bondsmen fraud and so many other crimes too numerous to mention here, to feed the LMCE which feeds

the courts and the rest of the government back. The request could not be fulfilled through a 30 day repetition and the Court's insistence on not filing, changing the name of the filing, using a sarcastic example to show their behavior taken to its logical conclusion, misusing SCACR 221, and hiring Laffitte lawyers to trick, intimidate and coerce Petitioners to file without insisting on ADA Reasonable Accommodations, so the Appeals Court could dismiss the case and save the day for the LMCE and SC government. When Petitioners demanded the same for other disabilities that did affect them but they were not wanting to list them all, and still have not, with each qualifying under ADA Disabilities that need reasonable accommodations, the court outright refused saying they were not going to consider them. Exh 4_____.

But as called in advance, in their fake opinion on feigned proceedings from after the initial filings, where judges were already actually involved in the underlying causes of action without Petitioners knowledge at the time, that was shown to them by the proxy hires of the Judges to create catastrophic injury or wrongful death against Petitioners for vengeance as they are legal reformers, and to make claim with Allianz themselves and start the IF/IRF Murdaugh-type scheme. Once Petitioners were informed of this, they continually tried to amend, or file a separate suit but McIntosh blocked their right to do any such filings which he is not permitted to do.

At no point were actual ADA Reasonable Accommodations granted, and no special needs were considered in ignoring them, as substantive accommodation suited to Petitioners' actual limitations supported by medical documentation. On at least one occasion, the dismissal, the correspondence was characterized by the court as having granted accommodation when, in substance, it had not. It just repeated Petitioners' call to provide them in a way most favorably construed to the disabled. They just say words. They don't mean them. And those supervising

them are directly responsible as the Supreme Court penned in a totally biased and insensitive writ of mandamus Order putting employees above litigants constitutional rights.

And in spite of medical reports from Doctors Petitioners had no relationship with and ambulance rides right from the Court, McIntosh defamed Petitioners in open court, saying that Petitioners were lying, which was salt to the wound when he and the other Judges were the ones causing them through short dated due dates and massive amounts of information needing to be heard. This caused Petitioners to pull every other night all-nighters and 3 and 4 all-nighters in a row, walking into the court to try to save their case from the next procedural or other made up onslaught to dismiss without the merits being heard.

If the Supreme Court's position from that writ is to protect and train its employees, Petitioners can testify under oath that they are not tried in ADA law, or simply ignoring it like the Appeals court. In fact, McIntosh stated he was in full compliance because they have a cement ramp out front of the courthouse. He has zero training in the law and doesn't try to learn or follow it. This is what the SC Courts put Petitioners into to take otherwise well-functioning elder women who dealt with their disabilities and didn't let those stop them from an active life, and have both part time in wheel chairs, and having seizures, massive hip surgery beyond the routine requiring Dr. Fink to donate her own blood they have to cut and fix the hip so deeply into the deteriorated bone. Dr. Kennedy needs eyes and arm/wrists/hands surgeries and both have crushed vertebrae with Dr. Kennedy having 4 back surgeries before being sucked into the SC litigation vortex with these Judges trying to use them for IF/IRF Murdaugh-schemes, and Fink going from 5'9" to 5'3" from November 2023 to present. Petitioners also had to arrange their own hearing devices for Dr. Fink who lost her hearing aids and contacts in her first collapse in a seizure at McIntosh's feet in the courtroom and was taken out unconscious to the ER. Since that

time, she has been experimenting with new tech hearing devices including bone conduction and other such advances. When McIntosh called his Sua Sponte Evidentiary Ambush, he refused to allow her to pick up her final new pair that she had order after testing, and she was going to have to appear in court without the ability to hear. Petitioners had to reach out to Columbia and locally and get a building ADA coordinator who was not the type of coordinator needed, but she was kind enough to help anyway. There is not even a coordinator for ADA at the building, which the Columbia office insisted Petitioners had to go through.

It turned out that the rush by McIntosh, of course caused another seizure in Dr. Fink, which they know it will, and didn't care that people die from seizures. And then called us liars when the foreseeability was on the Judges not the victims trying to get reasonable accommodations or even a continuance at that point, and the Supremes didn't assist.

That is when Sua Sponte McIntosh decided to do a written evidentiary hearing which cannot happen. . . even if it was legal otherwise (which it was not), instead of just giving the reasonable accommodations to allow Dr. Fink to pick up and test and adjust the ear pieces due the next week. At the same time, McIntosh also got new hearing aids and was making everyone repeat their statements and almost yell in the courtroom so he could eventually hear them. Very hypocritical and obviously pushing the predetermined outcome to avoid that Discovery/Depos and Subpoenas that the SC Courts could not survive, thus the block and stonewalling with the attorneys to never allow Petitioners 4/12/22 filings of discovery, just before hiring Dodd, could never see the light of day.

B. The November 2023 Emergency and Its Medical Origin

On November 28, 2023, Petitioners appeared before the R. Lawton McIntosh following a Sua sponte hearing notice issued October 27, 2023, ignoring the June 9, 2023 Order by Sprouse,

to not resolve anything but the attorney collusion/withdraw issue before proceeding on any other issue. McIntosh used Sua Sponte notices to not overrule an Order because there were no grounds to overrule the order, but still went forward with his predetermined agenda anyway through his Sua sponte trick.

McIntosh's Order required Petitioners — then still represented by counsel, Michael B. Dodd — to defend the entirety of their case notwithstanding Dodd's ongoing representation. In the thirty days preceding that hearing, Petitioners worked through repeated overnight sessions, including a stretch of three, approaching four, consecutive nights without sleep, reviewing the record to identify defaults and void filings by Defendants that counsel had failed to pursue. During that hearing, Petitioner Marsha Fink collapsed with seizure-like symptoms at the feet of the presiding judge and was transported by ambulance. A treating neurologist subsequently attributed the episode to sleep deprivation, and Dr. Fink was thereafter placed on seizure medication and could no longer drive. This was all so abusive.

The good thing that came out of this abuse, was that since McIntosh Noticed Petitioners to defend their own case with Dodd still on the case, they had to rush to review the beginnings of this case, and found several defaults and void filings by Defense and others adopting the void filing making all of them adopt void filings which made their filings void, and defaulted. Petitioners were able to file the entry of judgment and the Courts and lawyers wanted nothing to do with it. McIntosh would not even let Petitioners file it, or get a continuance.

C. The January 11, 2025 Incident and Court's attempt to create a fake scenario to dismiss Petitioner on false narrative. With the same short dated hearing and ignoring the ADA, Dodd, the lawyers, Allianz and McIntosh devised a fact patter that did not exist, and used Dodd to testify (which he can't), to help this fake story that basically said that Dodd and Petitioners were

working in a Hybrid representation. This could not have happened since Dodd abandoned the case in mid-June 2023, and never spoke to Petitioners at all from that time until January 11, 2024, when he tried to make it look like he was the lawyer and was loudly corrected and shown the way far from Petitioners. Petitioners were under an Order of June 9, 2023 to present evidence to the Court regarding Dodd/Defense's frivolous claim that Dodd needed to withdraw, when all his statements were just the opposite, creating a record that he was making up this last document to help Defense further stall the case, when Dodd had to finally file real documents and didn't want to. Petitioners filed these documents and showed how Dodd's withdrawal was fraudulent and had voice recordings of Dodd showing this was all made up because Dodd/Defense got caught in collusion and Petitioners would no longer allow Dodd to stall and lie to Petitioners.

Judge Sprouse would not let the court be opened to the public even though the public and press were there, for this sham hearing, but Petitioners took them all by surprise and took them off their mark and fired Dodd in person, to where the Defense and Sprouse could no longer get away with Dodd being the Double agent. So, this hybrid case, where to be true, Dodd would have to have been active in the case for the last 7 months, AND he would have to be helping Petitioners to show he was colluding with Defense which is ridiculous.

D. Murdaugh Scheme discovered, February 16, 2024. After the Sprouse hearing, about the end of January 2024, Petitioners were noticed that a hearing was to occur on February 16, 2024 with Judge Heath P. Taylor, of the 1st Circuit. Nobody would tell Petitioners why the change and why Taylor. They appeared and argued some of their arguments and Taylor and the Defense totally tried to gas light Petitioners in the most basic ways. They were trying to convince Petitioners that a Motion and a Responsive Pleading were the same thing in spite of SCRPC,

Rule 7, 12, 15. This was to try to erase Defendants voids and defaults, when they knew they did and only two attorneys even showed up because they were embarrassed. They could not convince Petitioners and Petitioners to provide more evidence because an old phone was broken and had to be fixed and to reiterate the law and that these were defaults and void without ability to cure. This was a clear loss because Defense was trying to get cut and toy with Petitioners thinking they did not know the law, which have worked hard to know. They did get their amended complaint relating back which changed the style of the case where the Appeals court insisted on using the original complaint, which helps Defense and Judges and would not change it even after Petitioners provided the Order and the Amended Complaint style stamped. Taylor ran out of time and did not hear all arguments. He was having conversations with Defense that showed they had already talked.

E. Judge Heath Taylor makes an appearance steered by Lawyer Legislator Justin

Bamberg: Petitioners checked with some people as to how Taylor got to Petitioners' case, and it turned out that Lawyer-Legislator Jusin Bamberg sent Taylor. Why would a legislator who also represented Murdaugh victims want to have Taylor who is trying to tell us that motions and responsive pleadings are the same and other such ridiculous findings.

Petitioners started looking into Murdaugh shorting after Sprouse hearing as these two cases were looking more familiar to each other than at first blush. A reporter suggested we take a close look, having reviewed both cases. Dr. Kennedy had taught insurance carrier claims adjusters how to properly do their job and cautioned about different schemes. . .including IF/IRF. Once Petitioners saw the limited investigation, limiting Defendants, and Crimes, when both Bamber and the FBI already said they knew what IF/IRF was, but yet protected the Carriers and

the law firm PMPED, Mullen's clear complicity, and began further review, these two cases **Murdaugh**, and **Murdaugh 2.0**, were both IF/IRF cases.

F. The February 2025 Incident and the Court's "Lying" Accusation

On or about February 6, 2025, while retrieving documents from a storage facility located approximately fifteen to twenty minutes from Petitioners' residence, Ms. Fink again experienced a seizure-like collapse following another period of sleep deprivation. Petitioners transported Ms. Fink to the nearest appropriate emergency facility, approximately twenty minutes away by direct highway route, rather than a more distant facility located near the courthouse, a facility reachable only by unfamiliar rural roads at night and requiring substantially more travel time. Petitioner Linda Kennedy contacted the receiving emergency room while en route to ensure timely intervention given the seriousness of a possible seizure.

Judge McIntosh subsequently stated in open court, in the presence of a member of the press, that Petitioners were lying. On information and belief, this statement followed from an assumption that Petitioners would present at a specific hospital located near the courthouse, rather than the facility Petitioners in fact used. This accusation was made without any contrary medical finding, without confirmation of which facility Petitioners had attended, and without regard for the statutory mandate that disability-related conditions be construed liberally in the disabled party's favor. No physician's finding at any point in this litigation has contradicted or cast doubt upon Ms. Fink's seizure disorder or its medical origin; the record contains only corroborating medical evidence.

Following this foreseeable incident caused by the same lack of time and volume of work or lose the case, the previously scheduled Sua Sponte Evidentiary Ambush was converted to written-only briefing with limited days and pages as described above, making a proper response

impossible, on a compressed schedule, without any ADA or individualized ADA accommodation, notwithstanding Dr. Fink's and Dr. Kennedy's documented and ongoing medical fragility, which was now including serious back problems and hip pain and severe hunched back.

G. The Structural Impossibility of the Written-Only Evidentiary Process

The underlying evidentiary hearing itself, from which the current appeal and related proceedings arise, was procedurally improper on its face. It was convened following the denial of a motion under Rule 12(b)(6), SCRCF, without any period of discovery, without depositions, without subpoenas or subpoena duces tecum available to Petitioners (the sole subpoenas Petitioners obtained having been quashed by order of this Court dated January 30, 2025), without any means of authenticating documentary evidence, and without any opportunity for cross-examination — all while Petitioners were simultaneously subject to compressed page and time limitations. A proceeding conducted entirely in writing cannot, by its nature, accommodate authentication or cross-examination regardless of the accommodations otherwise extended to a disabled litigant; the format itself is incompatible with the due process rights at stake. See *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976) (due process requires a meaningful opportunity to be heard in a manner suited to the nature of the proceeding). See *infra*.

E. Attorney Collusion as the Origin of the Volume Now Characterized as Sanctionable

The Rule to Show Cause issued January 3, 2025, identifies approximately one hundred sixty-two items of correspondence and filings by Petitioners between March 2022 and December 2024 as grounds for potential Rule 11, SCRCF sanctions, without identifying any specific defect in any individual item and without attaching supporting exhibits. This volume did not arise from disorganization. It arose because Petitioners spent approximately one and one-half years attempting to overcome delay by successive counsel, followed by approximately six additional

months during which their retained attorney, Michael B. Dodd, is documented — by recorded telephone conversation and contemporaneous written correspondence — to have colluded with opposing counsel, including drafting a proposed second amended complaint that opposing counsel had effectively ghostwritten, and later attempting to secure a one-sided withdrawal order from the court without Petitioners' knowledge, before that attempt was discovered and contested. Petitioners' filings during the relevant period reflect real-time discovery of, and response to, this conduct — not gratuitous litigiousness.

F. Denial of Rulings Without Written Order

On multiple occasions, including the sequence of events on and immediately before November 28, 2023, adverse rulings affecting Petitioners' rights — including denial of a requested continuance and treatment of default entries — were communicated to Petitioners solely through the office of the Common Pleas Docket Clerk, rather than through any written order of the court. See Exhibit 8, email correspondence with Clerk S. Elizabeth Beasley, November 27, 2023. This practice leaves no order for Petitioners to challenge on appeal and forecloses meaningful review, compounding the due process defect described above.

IV. THE COURT'S REASONING FOR DENYING RELIEF CANNOT SUBORDINATE CONSTITUTIONAL RIGHTS TO ADMINISTRATIVE CONVENIENCE

This Court's order of January 30, 2025 quashing Petitioners' subpoenas expressed concern for ensuring that judicial employees are not "unnecessarily called away from their duties." Whatever validity that concern carries in the ordinary case, it cannot operate to subordinate a litigant's constitutional right to due process, to reasonable disability accommodation, or to a proceeding free of the appearance of bias. Employment and administrative considerations for government personnel are not superior to the constitutional rights of the litigants those personnel serve. See

Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009); *Tumey v. Ohio*, 273 U.S. 510 (1927); *In re Murchison*, 349 U.S. 133, 136 (1955) ("[N]o man can be a judge in his own case.").

Petitioners further note, for the record, that the subpoenas at issue arose from a writ of mandamus challenging the facial legitimacy of the evidentiary hearing process itself — a process conducted after a failed Rule 12(b)(6) motion, without discovery, and without any mechanism for authentication or cross-examination — and were not, as this Court's order may be read to suggest, a response to an adverse outcome that had not yet occurred at the time of filing.

ADDITIONAL ARGUMENTS

Additional Argument On Sua Sponte Evidentiary Ambush Using Programs Because Petitioners Cannot Continue with Reasonable Accommodations with Plenty of Time to Rest in Between, CAUSED BY JUDGES UNDER THE SUPERVISION OF THE SUPREME COURT.

A genuine evidentiary hearing includes: Live testimony under oath; Opportunity to cross-examine witnesses; Credibility determinations by the factfinder; Application of rules of evidence

This ties directly to due process principles from cases like *Goldberg v. Kelly*, 397 U.S. 254 (1979), where the Court emphasized that when facts are disputed, a party must have the chance to confront and cross-examine adverse witnesses.

The constitutional problem: WITHOUT allowing cross-examination or live testimony, that's where serious due process issues arise. Courts have repeatedly held: Paper submissions **cannot substitute** for cross-examination where credibility matters; Deciding disputed facts "on affidavits" can be improper. The Judge doing this on his alleged own motion to be Judge, Prosecutor, investigation, and jury denies basic due process, even if there was a neutral judge and not a presiding judge involved in the underlying causes of action according to State Proxies, meaningful Due Process, by taking away the jury, making Sua Sponte defending evidence before evidence was exchanged and without depositions and subpoenas and so forth, is not Due Process and a case/trial never occurred.

Authentication & examination problem: On paper alone, you cannot properly: **Authenticate evidence** (no witness foundation), **Challenge hearsay effectively**, **Probe inconsistencies**, **Test bias or credibility**, **call witnesses and hostile witnesses**. That's why the rules of evidence (e.g., authentication requirements, hearsay rules) assume **a live process** when anything can be contested

When courts try to blur the line: First and foremost, WHY? Why would a neutral judge blur the line like *Sua Sponte McIntosh*? That was the response Petitioners wrote, because there was no way possible to do as demanded. It was a legal impossibility for Petitioners to comply.

"A court also cannot resolve disputed issues of fact, weigh credibility, or reject evidence under the guise of a 'paper hearing.' Such a procedure deprives the party of the fundamental right to confront and cross-examine adverse evidence, rendering the proceeding constitutionally infirm."

If the court: Avoided a live hearing rather than give Reasonable Accommodations. There is a serious problem shown at all three levels. Winning based on procedural manipulation to make the task legally impossible for Petitioners to perform, then the Courts are not neutral and have improper interests, like in this case. Decided factual issues anyway, Dismissed and alone with all the others issues raised and evident in the filings, **Fraud on the court by the Court and others**, **Denial of due process**, **Ultra vires action** if tied to jurisdictional determinations and the SMJ Bundles filed in all three courts, **Structural bias** if done to avoid scrutiny, and a captured SC Court/Government that gives litigants NO POSSIBILITY Of winning or recovering what is rightfully theirs. . .no remedy means no Constitutional Right in spite of the guarantees of the Constitution that Judges swear to uphold.

In summary, then, an evidentiary hearing "on the papers" is legally insufficient, and unnecessary in this matter, as Plaintiff was just getting past 12b6 and the Courts and lawyers did not want Discovery and Depositions to ever occur. Cross-examination is required where facts are disputed and the Court (through the silent attorneys) where brining basic motions like a motion to compel Discovery as a reason to sanction Petitioners which means Petitioners would have to call witnesses to show why they had to do such because the Judges would disagree with anything said, as they needed to have this case dismissed. The court's twisted and pretextual procedure to take away Petitioners' case and jury voids its findings.

V. RELIEF REQUESTED

For the foregoing reasons, Petitioners Demand guaranteed Constitutional Rights including that this Court:

1. Grant reasonable accommodation requested and be flexible if more or additional Reasonable Accommodations needed, under Title II of the ADA, including acceptance of all motions, certs, reconsiderations/en banc as all were noticed, and to recognize that the Trial Court and Appeals Court gave NO Reasonable Accommodations to gain advantages that were Unconstitutional and ruthless in trying to destroy two older ladies with physical health issues, and including its accompanying affidavits;
2. Recognize the structural incompatibility between a written-only evidentiary process and the due process requirements of authentication and cross-examination as applied to the proceedings below;
3. Recognizing that there was no good faith purpose in holding a sua sponte evidentiary Ambush right after the 12b6, to hide the lawyers' fraudulent acts with his own.
4. Recognize that the volume of Petitioners' filings arose from documented attorney collusion and delay, attorney and judge Racketeering, and all the other bad acts, only some outlined herein, not from misconduct by Petitioners who were trying to take their case forward after Dodd/Defense stalled it for two years and that the Courts didn't want Discovery/Depositions/Subpoenas and witnesses to appear at any time in the case, which should have led to a settlement not trying to destroy two old ladies, including this Court;
5. Void ab initio this case, as it was feigned from the start as all of those reading this know, and filed with and enter judgment for Petitioners that was last filed in the Trial Court, plus the 40 plus voids, as equitable relief as petitioners were not involved in the voids, and make all jointly and severally liable no matter what the limit, and direct the

state to enter settlement talks with Petitioners as soon as possible to get this horror over with finally as this is the only right thing to do and all else will continue what the state and all others will not like, although all legal and nonviolent so Petitioners can get justice and protect the public.

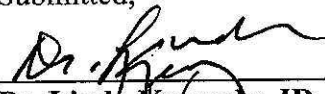
6. If the Defense's only argument is one that violates ADA Reasonable Accommodations on its face, then Petitioners have pled enough to win this case and if victorious, which should be, then Petitioners will not need additional time beyond what has been completed as they have filed more than enough to win.

7. Disqualify all Defense counsel and firms as they are voided, have contributed fraud on the Court, including in their arguments misstating a note from a clerk as an Order, and it only applied to one motion, and misstating ADA Law and not presenting it as counter argument.

8. If the Judges cannot find for Petitioners after all of this fraud on the court by the court and others, void ab initio feigned case, 40 plus voids in the case, where Petitioners already won and showed recorded collusions that were blocked by the court to save the attorneys, and lawyer-legislator Bamberg steered Judge Taylor to fix the case and the Supreme Court stated if Petitioners health was important they would not subpoena witnesses, meaning give up because Petitioners would and did lose without having any chance to submit anything other than what they did.

9. Grant such other and further relief as this Court deems just and proper.

Submitted,


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7/16/26

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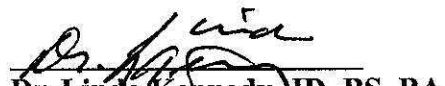
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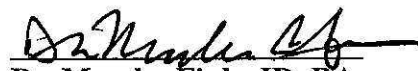
CERTIFICATE OF SERVICE

We certify that copies of this Motion and attachments have been sent to counsel of record by first class mail, postage prepaid and via email this 16th day of July 2026

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