

In the
SUPREME COURT
of the STATE OF SOUTH CAROLINA

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AUG 17 2026

S.C. SUPREME COURT

A.C. Benson, Essa Almasoud, Megan Wilson)

case no: 2026-001384

Living Sui Juris propria persona)

All Rights Reserved)

Plaintiffs)

vs.)

Clover School District Board et al.,and indiv.)

Sheila Quinn, Mary Gerber, Paige Howe,)

Lori Maczko, Elaine Miles, SCDOE through)

Ellen Weaver and Indv. Tina Ross, Barbara)

Drayton; Brian Murphy; York County)

Sheriff's Office through/indv Anthony)

Breeden, Brandon McCoy, Andy Boone,)

And Andrew Galant)

Defendants)

OBJECTION

CONFLICT OF INTEREST

MOTION FOR SUMMARY JUDGEMENT

CLARIFICATION/COMPEL

Plaintiffs waive any and all communication with the administrative court/ tribunal, including the Clerk of Court, and thus, under the SC and American Constitution, only recognize a Judge under his/her Judicial Authority and Under Oath, regarding this matter.

Request for Clarification and Compel:

1. The Case number is not accessible in Public Access Search under the SCCourts.gov website, under the appellant Court nor the Supreme Court. Why is this? Please Clarify and see **Exhibit A.**

All Plaintiffs exercise their Constitutional right to equal access to current due process systems; i.e., ALL E-filing Court systems immediately and without further delay.

2. Why has this case been given an Appellant case number and not a Supreme Court case number, as this is not an appeal, nor in the appellant court? Please Clarify
3. Clarify the statement made by the Clerk of Courts, "*All filing must comply with the requirements of Rule 267 of South Carolina Appellant court rules.*" I am unable to locate any law or caselaw or Rule within the Supreme Court Rules.
4. Requesting the Court to enforce /compel that the EACH INDIVIDUAL DEFENDANT and/or their attorneys, File a Notice of Appearance/ or PRO SE'. According to the SCRCF, this MUST BE FILED PRIOR to filing any response. It is PAST 30 days, a procedural violation.
5. Should the Court have received, as they indicated they had, any communication or documents from any of the defendants or their Licensed Counsel appearing for and representing them in this case, the Court MUST disclose it to the other party, as it would then be Ex Parte Communication.

We immediately request any and all communication and or documentation from defendants at this time and without delay in addition to being entered into the public docket/ record. This, again, is missing from public access. Please correct without further delay.

6. Plaintiffs have received **Exhibit B** from CSD Counsel, Meredith Seibert, on July 13th, 2026:
- a. UNFILED/ NOT TIMESTAMPED- Response from Clover School District claiming to also “represent” the individual defendants: Sheila Quinn, Mary Gerber, Paige Howe, Lori Maczko and Elaine Miles.
 - b. UNFILED/ NOT TIMESTAMPED- Certificate of Service
 - c. VAUGE letter to Plaintiffs indicating representation but not to WHO, in this matter.
7. On July 1, 2026, Plaintiff received a letter from Todd Atwater, Deputy Superintendent of Legal affairs for SCDOE, which stated they received the Summons and Complaint and **WOULD ACCEPT** service for Ellen Weaver, but would not accept service for Barbara Drayton or Tina Ross, **Exhibit C**. Despite accepting service, the SCDOE failed to file a response with the court in a timely manner and according to the SCRCF, nor did they file a Motion to Continue.

Mr. Atwater’s letter also contradicts Meredith Seibert's letter.

Plaintiffs Request the court to compel and enforce PROPER Notification to the Plaintiffs and to the Court as to who Meredith Seibert is Appearing For and Representing; who is Appearing and Representing the SCDOE; and who is appearing for and representing each defendant.

Conflict of Interest

SC Attorneys Conduct Rules for attorneys and the Code of Judicial Conduct, Rule 501, SCACR for judges.

1. Attorney conflicts — Rule 1.7

South Carolina Rule of Professional Conduct 1.7(a) prohibits representation where there is a concurrent conflict of interest. A conflict exists where: “the representation of one client will be directly adverse to another client”, or where there is a significant risk that representation will be materially limited by the lawyer's duties to another client, former client, third person, or the lawyer's own personal interests.

Meredith Seibert esq. nor any attorney with Duff Freeman Seibert Law Firm, has FILED a NOTICE OF Appearance or Representation for ANY of the Defendants, with the Court. Lawfully, she is only able to represent the Clover School District and not the individually liable defendants:

- a. Individual defendants are employed under a 1 year contract, by the school district. They CAN NOT be afforded Legal Representation by anyone USING tax payer monies. That would be continued FRAUD and EMBEZZELMENT of Tax Payer Monies. SC is a ‘WORK AT WILL’ and PUBLIC contracts do not include “Legal Insurance or Assurance” . Individual defendants can contact their professional associations for legal assistance.
- b. Paige Howe is no longer employed by the Clover School District.

2. Rule 1.9 — Former-client conflicts

The Attorney Firm has previously represented: another district, teachers and another governmental entities. A lawyer cannot switch sides in the same or a substantially related matter when the new client's interests are materially adverse to the former client's interests without the former client's informed written consent.

The Supreme Court's commentary makes an important distinction:

Merely having handled the same type of legal issue for a former client isn't necessarily enough. The inquiry is whether the matters are the same or substantially related and whether the attorney's earlier involvement created the relevant conflict/confidential-information problem, which is what the plaintiffs allege.

3. Conflicts Extend to the entire law firm — Rule 1.10

Under **Rule 1.10(a)**, since attorneys are associated in a firm, none may knowingly undertake representation when one of them individually would be prohibited by Rules 1.7, 1.8(c), or 1.9, subject to specified exceptions.

Law firms can not represent multiple governmental entities, approximately 50% of the SEPARATE GOVERNMENT ENTITIES, school districts in SC, which is an imputation of a conflict.

4. Government lawyers — Rule 1.11

"Special Conflicts of Interest for Former and Current Government Officers and Employees." A part of Rule 407's conflict-of-interest framework, one may pay particular

attention examining the relationships between government agencies, school districts, attorneys, and individuals who have moved between public and private roles, such as Meredith Seibert has done more than once, “Flip-flopping”.

Additionally, A former or current government lawyer cannot represent a private client in a matter in which that attorney participated "personally and substantially" while serving the government.

Motion for Summary Judgement- Rule 56(c)

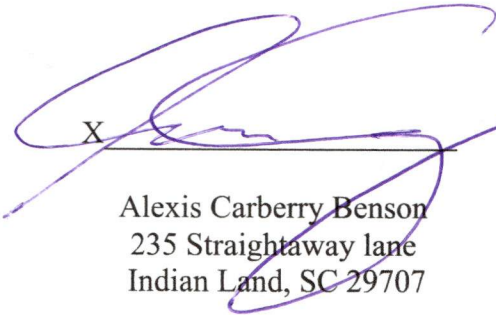
A court should grant summary judgment because:

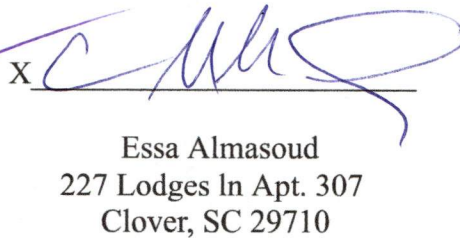
1. materials before it establish: “no genuine issue as to any material fact”
2. the moving party is entitled to judgment as a matter of law.
3. The court may consider the pleadings, administrative record, emails and or official recorded meetings that contradict the False documentation, with the SCDOE, SEA and the Clover School District LEA, and affidavits.
4. Under Rule 56(a), a plaintiff/claimant may move for summary judgment after 30 days have expired from commencement of the action

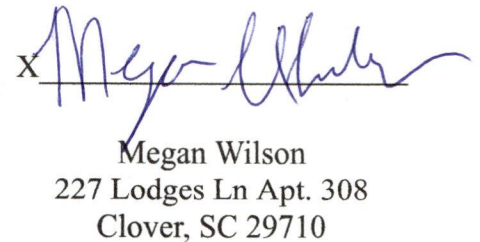
On June 22, 2026, a Writ of Mandamus, Summons for all Defendants, and Certificate of Service was filed with the Supreme Court of South Carolina. Communication has commenced with Counsel for Clover School District ONLY. The SCDOE nor the York County Sheriff's Office, nor any of the individual persons, have responded to the service of the summons and complaint. 30 days have passed.

Based on the **recorded video and audio evidence which contradicts the false**
documentation created in collusion by all defendants, coupled with the blatant disregard for the
American and South Carolina Constitution and Natural Law, Plaintiff Motion for summary
judgement in the amount of \$144,000 per plaintiff per defendant and any other relief the court
deems appropriate.

Autographed 22th day of June 2026,

X 
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