

THE STATE OF SOUTH CAROLINA
SOUTH CAROLINA COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS
JOCELYN NEWMAN, CIRCUIT COURT JUDGE

Appellate Case No: 2026-001144

Renee Wicks, Respondent,

v.

ER Construction, LLC; OJC LLC; Richard McDaniel, individually and d/b/a ER Construction
And Kenneth L. Edwards, individually, Defendants, of which Kenneth L. Edwards is the
Appellant.

FINAL BRIEF OF APPELLANT

Kenneth L. Edwards, PRO SE

P.O. Box 1563

Hollywood, S.C 29449

(843) 437-5798

S.C Bar 62877

klorenzoedwards@yahoo.com

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STATEMENT OF ISSUES ON APPEAL

- I. DID THE LOWER COURT ERR IN GRANTING AN ORDER OF DEFAULT, AFFECTING A SUBSTANTIAL RIGHT OF APPELLANT, MADE UPON A SUMMARY APPLICATION IN THIS ACTION AFTER JUDGMENT?

- II. DID THE LOWER COURT ERR IN DENYING APPELLANT RELIEF FROM JUDGMENT BASED ON RESPONDENT'S CERTIFICATE OF SERVICE ADDRESSED TO A NON-EXISTENT ADDRESS AND BASED ON THE ABSENCE OF PROVIDING APPELLANT NOTICE OF THE DATE, TIME AND PLACE OF THE OPPORTUNITY TO BE HEARD ON THE CLAIM FOR UNLIQUIDATED DAMAGES?

STATEMENT OF THE CASE

1. Respondent commenced this action on July 12, 2024 by the filing of a Summons and Complaint against ER Construction, LLC; OJC LLC; Richard McDaniel, individually and d/b/a ER Construction; and Kenneth L. Edwards, individually, Defendants, of which Kenneth L. Edwards is the Appellant.
2. Respondent alleged causes of action for Breach of Contract, Breach of Warranty for Workmanlike Service, Negligence/Gross Negligence/Negligence per se, Veil Piercing/Alter Ego/Amalgamation/Single Business Enterprise, and judgment against Defendants for an award for actual, consequential, resulting, and punitive damages in an amount to be determined by the trier of fact; for costs, and any further relief this Honorable Court may deem just and proper.
3. ON AUGUST 14, 2024, Respondent served Appellant, Kenneth L. Edwards, with filed Summons and Complaint.
4. ON SEPTEMBER 6, 2024, APPELLANT, KENNETH L. EDWARDS, individually and personally served Respondent's Attorney with ANSWER, Affirmative Defenses, and Third-Party Cross Complaint against Richard McDaniel, individually, d/b/a ER Construction, LLC, OJC, LLC.
5. Appellant, Kenneth L. Edwards, raised and pled, FOR A FIRST DEFENSE (General Objections Applicable to All Allegations); FOR A FIRST AND AFFIRMATIVE DEFENSE (Statute of Limitation); FOR A SECOND AND AFFIRMATIVE DEFENSE (Rule 12(b)(6)); FOR A THIRD AND AFFIRMATIVE DEFENSE (Statute of Limitation); FOR A FOURTH AND AFFIRMATIVE DEFENSE (Release); FOR A FIFTH AND AFFIRMATIVE DEFENSE (Estoppel); FOR A SIXTH AND

AFFIRMATIVE DEFENSE (Failure of Consideration); FOR A SEVENTH AND AFFIRMATIVE DEFENSE (Agreement is not fully Integrated); EIGHTH AFFIRMATIVE DEFENSE AND BY WAY OF CROSS-COMPLAINT AGAINST DEFENDANTS, RICHARD MCDANIEL, individually, ER CONSTRUCTION, LLC and OJC, LLC; and NINTH AFFIRMATIVE DEFENSE (Reservation of Additional Defenses), and Request for Dismissal of Complaint against Appellant, Kenneth L. Edwards.

6. ON SEPTEMBER 24, 2024, Respondent's Attorney e-filed ENTRY OF DEFAULT against APPELLANT, KENNETH L. EDWARDS, stating in his AFFIDAVIT OF DEFAULT: "It being made to appear that Defendant, Kenneth L. Edwards, Individually, was served with the Summons and Complaint in the above-captioned matter on August 14, 2024, has failed to file an answer or responsive pleading in this matter."
7. On February 26, 2025, Respondent's Attorney scheduled a Motion Hearing for Damages for March 26, 2025. NOTICE OF MOTION SCHEDULING, dated February 26, 2025, was never served on APPELLANT, KENNETH L. EDWARDS, by mail Notice to Kenneth L. Edwards, P.O. Box 1563, Hollywood, S.C. 29449.
8. ON AUGUST 11, 2025, APPELLANT, KENNETH L. EDWARDS, received from the Charleston County Sheriff's Office NOTICE OF JUDGMENT HAS BEEN FILED WITH THE CLERK OF COURT FOR CHARLESTON COUNTY. AN EXECUTION AGAINST PROPERTY HAS BEEN RECEIVED IN THIS OFFICE FOR SERVICE.
9. Subsequently, Appellant filed and served Notice of Motion to Set Aside Default and Memorandum of Law in Support of Motion to Set Aside Default.

10. On April 22, 2026, Defendant Kenneth Edwards' Motions for Relief/from Default (filed on 10/22/2025 and 12/2/2025) DENIED.
11. On May 14, 2026, Appellant, Kenneth L. Edwards, timely filed and served Respondent with NOTICE OF APPEAL.
12. On June 8, 2026, Appellant, Kenneth L. Edwards, timely filed and served Initial Brief.

STANDARD OF REVIEW

Both issues are governed by the same standard of appellate review.

The power to set aside a default lies solely within the sound discretion of the trial court and will not be disturbed on appeal absent a clear showing of an abuse of discretion. *Richardson v. P.V., Inc.*, 383 S.C. 610, 682 S.E.2d 263 (2009); *Roberson v. Fin. of S.C.*, 365 S.C. 6, 615 S.E.2d 112 (2005); *Frank Ulmer Lumber Co. v. Patterson*, 272 S.C. 208, 250 S.E.2d 121 (1978). An abuse of discretion in setting aside a default judgment occurs when the judge issuing the order was controlled by some error of law or when the order, based upon factual, as distinguished from legal, conclusions is without evidentiary support. *Hill v. Dotts*, 345 S.C. 304, 547 S.E.2d 894 (Ct. App. 2001); *In re Estate of Weeks*, 329 S.C. 251, 495 S.E.2d 454 (Ct. App. 1997).

Thus, an abuse of discretion is highly deferential to the trial court. See, e.g., *State v. Lyles*, 379 S.C. 328, 665 S.E.2d 201 (Ct. App. 2008) (“We review a trial court’s decision regarding Rule 403, SCRE, pursuant to the abuse of discretion standard and are obligated to give great deference to the trial court’s judgment.”). A lower court has abused its discretion when its ruling is either controlled by an error of law or based on factual conclusions lacking evidentiary support. See, e.g., *Wilson v. Dallas*, 403 S.C. 411, 743 S.E.2d 746 (2013).

More specifically, an abuse of discretion occurs when the trial court’s ruling is based upon an error of law, such as application of the wrong legal principle; or, when based upon factual conclusions, the ruling is without evidentiary support; or when the trial court is vested with discretion, but the ruling reveals no discretion was exercised; or when the ruling does not fall within the range of permissible decisions applicable in a particular case, such that it may be deemed arbitrary and capricious. *State v. Allen*, 370 S.C. 88, 634 S.E.2d 653 (2006).

It is not always easy to determine when and if a trial judge has abused his discretion. Overly simplified, abuse of discretion involves the extent of disagreement. When an appellate court is in agreement with a discretionary ruling or is only mildly in disagreement, it says that the trial judge did not abuse his discretion. On the other hand, when the appellate court is in substantial or violent disagreement, it says that there has been an abuse of discretion. *Rish v. Rish*, 296 S.C. 14, 370 S.E.2d 102 (Ct. App. 1988); see also *State v. Corey D.*, 339 S.C. 107, 529 S.E.2d 20 (2000) (stating an abuse of discretion may be found if the conclusions reached by the lower court are without reasonable factual support).

ARGUMENT I

ISSUE: DID THE LOWER COURT ERR IN GRANTING AN ORDER OF DEFAULT, AFFECTING THE SUBSTANTIAL RIGHTS OF LIFE, LIBERTY AND PROPERTY OF THE APPELLANT, MADE UPON A SUMMARY APPLICATION IN THIS ACTION AFTER JUDGMENT?

STATEMENT OF FACTS RELEVANT TO THE ISSUE FOR REVIEW;

Respondent's Attorney alleges that a construction contract by and between Respondent and Defendant Contractor was executed on March 16, 2021; that on March 21, 2021, a Project and Cost Breakdown was executed; and that on June 18, 2021, a construction permit was applied for from the City of Charleston under the name of Appellant, for work at the residence, located and situated at 56 Dunnemann Ave. Charleston, S.C. 29403. Further, in paragraph 12 of Plaintiff's Complaint, Respondent alleges on or about June 28, 2021, a Homeowner/Contractor Agreement was entered into by and between Respondent and Contractor listed as ER Construction, LLC. However, RECORDS FROM THE CITY OF CHARLESTON PERMIT CENTER, (ENCLOSED HEREIN RECORD ON APPEAL), REFLECTS PERMIT WAS NEVER ISSUED FOR 56 DUNNEMANN AVE. CHARLESTON, S.C 29403, under the name of APPELLANT. The record reflects Respondent filed her action for breach of contract on July 12, 2024, after expiration of the statute of limitation. Moreover, on page 2 line 9 of the investigation report, dated February 24, 2024, states: "I do not have any information concerning the working relationship between the contractor and Kenneth Edwards." (ENCLOSED HEREIN RECORD ON APPEAL)

Pursuant to the South Carolina Notice and Opportunity to Cure Construction Dwelling Defects, codified at section 40-59-810 et.seq. Respondent served Appellant on March 20, 2024, with the Notice and Opportunity to Cure. Appellant provided Respondent with Answer on March 28, 2024, corroborating line 9 on page 2 of Respondent Investigation Report, dated February 24, 2024, again, stating: "I do not have any information concerning the working relationship between the Contractor and Kenneth Edwards."

In addition, the lower court did not inquire, prior to Order of Default, whether or not, section 40-59-810 was complied with or whether or not Title 15-36-100, S.C. Code of Laws, 1976, as amended, was complied with before the ENTRY OF DEFAULT.

Moreover, neither the Appellant nor the Respondent, one to the other, never met, and never at any time made an oral or written agreement as a bargained exchange for some legally sufficient consideration. Further, neither the Appellant nor the Respondent, never met and never at any time, made an agreement, taking the form of an offer by one to the

other, or an acceptance of it, one to the other. Thus, there has never been a duty, one to the other, between Appellant and Respondent.

Respondent served Appellant with a Summons and Complaint on August 14, 2024.

Appellant hand-delivered the Answer, Affirmative Defenses, and Cross-Complaint to Respondent's Attorney at his Office, 1058 East Montague Ave, N. Charleston, S.C on September 6, 2024, having been totally frustrated, after numerous unsuccessful attempts, and efforts to upload the document through the S.C E-Filing System. Then and there, Respondent's Attorney refused to provide receipt and acknowledgement of the Answer, Affirmative Defenses and Cross-Complaint, stating that he would upload the document through his system. Appellant relied on the honesty, integrity, professional courtesy, and misrepresentations of the Respondent's Attorney, that Respondent's Attorney would upload the Answer in the SC E-Filing system. However, on 9/24/24, Respondent's Attorney filed ENTRY OF DEFAULT, telling the lower court, Appellant, Kenneth L. Edwards failed to Answer and file a responsive pleading. Thus, the frustrations of the S.C E-filing system, the absent Proof of Return, the late filing on August 20, 2025 of the Answer, Affirmative Defenses and Cross-Complaint, in the wrong Existing Case No: 2025CP1004653, and under all these consolidated crisis, they all triggered the entry of Order of Default. Respondent's attorney failed to advise the lower court of the hand-delivered Answer to his office on September 6, 2024 and proceeded with Entry of Default on September 24, 2024.

DISCUSSION/ CITING AUTHORITIES

Having considered the totality of the circumstances, and pursuant to Rule 55 (a) SCRCP, Appellant concedes to entry of default, without formal disposition of the salient issues before the court. Appellant hereby submits this Appeal without oral argument.

For the reasons stated, this court should affirm the entry of default of the lower court.

ARGUMENT II

ISSUE: DID THE LOWER COURT ERR IN DENYING APPELLANT RELIEF FROM JUDGMENT BASED ON RESPONDENT'S CERTIFICATE OF SERVICE ADDRESSED TO A NON-EXISTENT ADDRESS AND BASED ON THE ABSENCE OF PROVIDING APPELLANT NOTICE OF THE DATE, TIME, AND PLACE, OF THE OPPORTUNITY TO BE HEARD ON THE CLAIM FOR UNLIQUIDATED DAMAGES?

STATEMENT OF FACTS RELEVANT TO THE ISSUE FOR REVIEW

THE LOWER COURT STATES: "Edwards argues that the judgment was based on fraud, but he has not made the requisite showing, See *Sanders v. Smith*, 431 S.C 605, 613, 848 S.E. 2nd 604, 608 (Ct. App 2020) ("A claim of fraud upon the court requires proof by clear and convincing evidence.") He has shown only that his address has no mail receptacle (i.e. "NMR"), a problem of his own making. His claim of mistake similarly fails, as no explanation for the entry of default is offered. Finally, Edwards does not challenge the judgment amount, only the entry itself which happened on 9/24/24. Thus the motion is not timely as to the entry of default. "

DISCUSSION/ CITING AUTHORITIES

On Friday May 8, 2026, Sydney Elise Lyons, Charleston County GIS Technician, by clear and convincing evidence, provided undisputable evidentiary support that the "**NON-EXISTENT ADDRESS**" 4532 HWY 162, HOLLYWOOD, S.C 29449 WAS DELETED BACK IN APRIL OF 2015 AND NO OTHER ADDRESS HAS EXISTED ON THAT LOT EVER SINCE."(EXHIBIT ENCLOSED IN RECORD ON APPEAL) RESPONDENT'S ATTORNEY ON FEBRUARY 26, 2025, CERTIFIED IN HIS CERTIFICATE OF SERVICE THAT A COMPLETE COPY OF RESPONDENT'S MOTION FOR DAMAGES HEARING WAS SERVED ON APPELLANT, KENNETH L. EDWARDS, BY PLACING SAME WITH THE UNITED STATES POSTAL SERVICE, POSTAGE PREPAID AND MAILING TO ADDRESS: 4532 HWY 162 HOLLYWOOD, S.C 29449.

Rule 5 (a) SCRCPP: provides notice of any trial or hearing on unliquidated damages shall also be given to parties in default. Thus, the judgment amount is moot. Appellant, Kenneth L. Edwards, was never provided with Notice, date, time, place and opportunity to

heard on the entire matter before the lower court. The lower court made factual conclusions; that "he has shown only that his address has no mail receptacle ("NMR")", a problem of his own making, without the evidentiary support of that fact.

For these reasons, this court should reverse the judgment of the lower court.

Further, Respondent's Attorney continues to proceed with this matter against Appellant, Kenneth L. Edwards, when the City of Charleston **PERMIT**, shows no issue date for permit for construction work at address: **56 Dunnemann Ave. Charleston, S.C. 29403. [City of Charleston Permit in Record on Appeal]. Thus, Respondent has no basis for claim Against Appellant, Kenneth L. Edwards.**

Finally, Respondent on February 26, 2025, scheduled a Motion Hearing before the Court for Wednesday, March 26, 2025 at 2:40 P.M. NO NOTICE OF MOTION SCHEDULING, dated February 26, 2025 was provided to Appellant, Kenneth Edwards, P.O. Box 1563, Hollywood, S.C 29449.

Both the Designation of Matter and the Record on Appeal reflect NOTICES OF MOTION SCHEDULING, dated November 13, 2024; February 18, 2025; and January 20, 2026, were provided to APPELLANT, Kenneth Edwards, P.O. Box 1563, Hollywood, S.C 29449. {ENCLOSED IN RECORD ON APPEAL}. Yet the February 26, 2025, Notice of Hearing for The Damages hearing, the single Notice that matters, was certified as mailed to 4532 Hwy 162, Hollywood, S.C 29449. The inference to be drawn from Respondent's conduct is Respondent's counsel knew or should have known, Notice of Damages Hearing would not be provided to Appellant. Further, Respondent's counsel certified using 4532 Hwy 162, Hollywood, S.C 29449, as a matter of fact. One can deduce the truth or proposition that Respondent's counsel did not use the Attorney Information System (AIS) to seek, find and explore Appellant at P.O. Box 1563, Hollywood, S.C 29449. Moreover, the lower court had the discretion to corroborate the certification of 4532 Hwy 162, Hollywood, S.C 29449, by perhaps using the Attorney Information System (AIS), which by clear and convincing

evidence reveals Appellant at P.O. Box 1563, Hollywood, SC, 29449. Thus, the lower court made factual conclusions, that Notice was provided to Appellant, without evidentiary support. For these reasons, Appellant requests this court to reverse the judgment of the lower court denying the Appellant relief from the judgment. Clearly and convincingly, the Attorney Information System (AIS) corroborates Kenneth L. Edwards P.O. Box 1563, Hollywood, S.C. 29449, as the last known address, pursuant to Rule 5 (b)(1) SCRPC. Even when the lower court was proceeding in absence of Appellant, and on its own motion, and in its own discretion, and with no party request to take Judicial Notice of the last known address of Appellant (P.O. Box 1563, Hollywood, S.C. 29449, the lower court erred in failing and refusing to rely on the most reliable source of information publicly available and readily accessible to the lower court, for purposes of determining the last known address of the Appellant. The Appellant furnished this information to the lower court and this information is part of the record of the lower court. Thus, the lower court made factual conclusions, without evidentiary support. The Order denying the Appellant Relief from Judgment must be reversed and remanded to the lower court. In addition to the foregoing, the lower court had discretion on its own motion to take Permissive Judicial Notice on a simple matter of common knowledge locally that can not be reasonably disputed, such as the non-existence of 4532 Hwy 162, Hollywood, S.C. 29449. The AIS system is not a subject of dispute. The AIS system, by resort thereto, is capable of immediate and accurate determination to verify the truth (Kenneth L. Edwards P.O. Box 1563, Hollywood, S.C 29449, last known address)). Thus, the AIS system is a source of the lower court of reasonably indisputable accuracy. Finally, again for these reasons, the Order, denying Appellant Relief from the Judgment must be reversed and remanded to the lower court.

CONCLUSION OF ARGUMENT II

In conclusion, Both the 5th and 14th Amendments protect against the deprivation of "life,

liberty, and property” without due process of law.” Due process of Law requires the Respondent to provide Appellant proper Notice of Motion Scheduling.

Respondent has failed to comply with Rule 5 (a) SCRCP and due process of law of the U.S Constitution.

The landmark U.S. Supreme Court Case, *Pennoyer v. Neff*, 95 U.S. 733, 24 L. Ed. 565

“Due Process of Law” implies the right of persons affected thereby to present before the tribunal which pronounces judgment upon the question of life, liberty or property, in its most comprehensive sense, to be heard by testimony or otherwise, and to have the right of controverting, by proof of every material fact which bears on the question of right in the matter involved. If any question of fact or liability be conclusively presumed, against him, this is not due process of law.” Due Process of law is the Law of the Land. The lower court did not afford Appellant Due Process of Law. Pursuant to Rule 60 (b) (4) SCRCP, the S.C Court of Appeals may relieve Appellant from the Order of the lower court, because this judgment is “ void” , for failure of the lower court to provide Appellant proper due process of law. This judgment may be set aside more than one year after its entry.

For the reason stated, this court should reverse the judgment of the lower court, and remand the case to the lower court for hearing on damages.

Appellant hereby waives oral argument on this issue before the S.C Court of Appeals.

CONCLUSION IN CLOSING

On March 16, 2021, Respondent became the victim of a scam by a Defendant, proposing as a building contractor. Respondent relied on the misrepresentations of the Defendant "scam artist". Respondent entered into feigned agreements with the Defendant "scam artist." Respondent initially expended thousands of dollars to the "scam artist" in reliance on a promise to renovate and remodel Respondent's home, located and situated at 56 Dunnemann Ave. Charleston, S.C 29403.

Then and there, Defendant "scam artist" made application, in the name of Appellant, Kenneth Edwards, with the City of Charleston for a construction permit at 56 Dunnemann Ave. Charleston, S.C.29403. As heretofore stated, the City of Charleston PERMIT was never issued. {City of Charleston PERMIT enclosed in Record}.

However, the record subsequently reflects Defendant "scam artist" proceeded to further engage in construction negotiations and feigned agreements with Respondent on June 10 and June 18, 2021. Defendant "scam artist" continued to pilfer money from Respondent after engaging in construction services at the Respondent's home. Defendant scam artist discontinued work and abandoned the premises.

Respondent on March 20, 2024, served Appellant with Notice and Opportunity to Cure. Appellant responded on March 28, 2024.

On July 20, 2024, Respondent, after the expiration of the Statute of Limitations, filed in the Charleston County Court of Common Pleas, an action for breach of contract against Appellant. On September 6, 2024, Appellant hand-delivered to Respondent's Attorney, a copy of the Answer, Affirmative Defenses and Cross-Complaint, at 1058 East Montague Ave, N. Charleston, S.C. On September 24, 2024, Respondent's Attorney filed an Affidavit of Default against Appellant. Order of Default was granted on Motion to Set Aside the Default and Motion for relief from the Judgment were denied on April 22, 2026.

Notice of Appeal was filed on May 14, 2026. Today, Appellant is being pursued and sacrificed by the Respondent as the "SCAPEGOAT". For the reasons stated this Court should reverse the judgment of the circuit and remand the case for hearing on the merits.

RESPECTFULLY SUBMITTED

August 24, 2026

s/Kenneth L. Edwards, PRO SE APPELLANT

P.O. Box 1563,

Hollywood, S.C. 29449

(843)437-5798

klorenzoedwards@yahoo.com SC 62877

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CERTIFICATE OF COUNSEL

The undersigned certified that this Final Brief complies with Rule 211 (b), SCACR.

s/Kenneth L. Edwards, PRO SE

Kenneth L. Edwards

P.O. Box 1563

Hollywood, S.C 29449

(843) 437-5798

S.C Bar 62877

klorenzoedwards@yahoo.com

August 24, 2026