

STATE OF SOUTH CAROLINA

COUNTY OF BEAUFORT

Debra S. Hoffman, Trustee of The
Hoffman Family Trust

Plaintiff,

v.

Graham Barugh,
Defendant.

IN THE COURT OF COMMON PLEAS

CIVIL ACTION NO. 2021CP0701828

RECEIVED

Sep 02 2026

SC Court of Appeals

**NOTICE OF MOTION/MOTION TO
VACATE VOID JUDGMENT FOR
FRAUD ON THE COURT (RULE 60)**

LIVE HEARING REQUESTED

Plaintiff Debra Hoffman, Trustee will and hereby move, on a date and time to be set by the Court, not less than ten (10) days after service hereof, for an Order vacating the void 3/19/26 Judgment of Judge Jocelyn Newman awarding Defendant Barugh \$50,000+ in contract attorney fees and costs, as well as any and all void references in Judge Edgar Dickson's 8/8/23 and 7/11/24 Orders (or the entirety of both Orders) that Defendant was entitled to recover contract attorney fees and costs.

This Motion is **based on a continuing Fraud on the Court perpetrated by Defendant and his counsel, to wit, surreptitiously including in orders they drafted at trial Judge Edgar Dickson's request, findings and an order thereon, that Defendant was entitled, under a real estate sales contract, to recover his attorney fees and costs because Plaintiff had defaulted, a claim that, besides being untrue, Defendant had never made in his pleadings, in discovery, or at trial. Clearly the hope of Defendant and his counsel was that Judge Dickson would sign the orders they prepared AS IS, rubber stamp them, without noticing their manufactured false findings and orders thereon, they had buried within, and Judge Dickson did sign them as is, not noticing or realizing he had been defrauded by Defendant's counsel. And to this day, Defendant and his counsel continue to fraudulently represent Defendant is entitled to recover his attorney fees and costs, when both factually and legally, based on this Fraud on the Court, he is absolutely not so entitled.**