

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM JASPER COUNTY
COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT

Civil Action No.: 2025-CP-27-00385

(Subsuming Interlocutory & Cross-Docket Contempt Directives in Case No. 2023-CP-27-00428)

Appellate Case No.: _____

TONY WILLIAMS,
Plaintiff-Appellant,

v.

HEARTHSTONE LAKES HOA; JOHN T. BUDROW, Individually;
KEVAN SHEPPS, Individually;
McANGUS, GOUDELOCK & COURIE, LLC (MG&C); and
MUTTERER LAW FIRM, LLC,
Defendants-Respondents.

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SC Court of Appeals

APPELLANT'S FORMAL TRANSCRIPT REQUEST AND NOTICE PURSUANT TO RULE
207(a)(1) & RULE 607, SCACR
(ORDERING ALL PROCEEDINGS BEFORE JUDGE ROBERT J. BONDS AND JUDGE
MARVIN H. DUKES, III, INCLUDING WEBEX AUDIO/VIDEO RECORDINGS AND
RECORDED PRO SE PARTICIPATION)

TO: OFFICE OF SOUTH CAROLINA COURT ADMINISTRATION
(TRANSCRIPTS@SCCOURTS.ORG); OFFICIAL COURT REPORTERS
TRANSCRIPTIONISTS FOR THE FOURTEENTH JUDICIAL CIRCUIT THE CLERK OF THE
SOUTH CAROLINA COURT OF APPEALS; THE CLERK OF COURT FOR JASPER COUNTY;
THOMAS E. LYDON, III, ESQ., COUNSEL FOR RESPONDENTS HEARTHSTONE LAKES
HOA, BUDROW, SHEPPS, AND MG&C; AND ANDREW N. PLATTE, ESQ., COUNSEL FOR
RESPONDENT MUTTERER LAW FIRM, LLC:

PLEASE TAKE NOTICE that the Plaintiff-Appellant, Tony Williams Pro Se, pursuant to Rule
207(a)(1) and Rule 607 of the South Carolina Appellate Court Rules (SCACR), hereby formally
orders from the Official Court Reporter(s), Transcriptionist(s), and South Carolina Court
Administration the complete, certified, verbatim transcript of all proceedings conducted in the
above-captioned civil action.

I. SPECIFIC PROCEEDINGS AND DATES TO BE TRANSCRIBED

/

Appellant requests the transcription of the ENTIRE RECORD and verbatim transcripts for the following specific hearings:

1. Hearing Date: January 15, 2026

- Presiding Judge: Honorable Robert J. Bonds
- Court Agency / Location: Jasper County Court of Common Pleas / Fourteenth Judicial Circuit
- Nature of Proceeding: Hearing on Defendants' Motions to Dismiss; Plaintiff's Motions; and unadjudicated Motion for Mandatory Judicial Recusal filed January 14, 2026.
- Scope of Transcription: Entire proceeding, including opening calls of the docket, all colloquies between the Court and counsel, all arguments presented by Thomas E. Lydon, III and Andrew N. Platte, all oral remarks regarding party representation, all statements regarding Plaintiff's filings, and all oral rulings, instructions, or directions from the bench.
- Recording Method: Stenographic Court Reporter / Digital Court Recording (DCRP) / WebEx audio/video record.

2. Hearing Date: August 6, 2026

- Presiding Judge: Honorable Marvin H. Dukes, III
- Court Agency / Location: Jasper County Court of Common Pleas / Fourteenth Judicial Circuit (Conducted via Remote WebEx)
- Nature of Proceeding: Hearing on Plaintiff's Omnibus Motion for Entry of Default Judgment and Motion to Vacate Void Orders Pursuant to Rule 60(b)(4), SCRCP; Defendants' Oppositions; and threshold Motion for Mandatory Judicial Recusal filed August 4, 2026.
- Scope of Transcription: Entire proceeding, including all appearances, all colloquies regarding Plaintiff's remote WebEx attendance, all technical connectivity issues and interruptions experienced by Plaintiff, all oral admissions by the Court regarding Plaintiff's courthouse banishment and "mail-only" filing restrictions, all discussions regarding default status under Rule 55, and all bench remarks concerning recusal and the February 3, 2026 Contempt Order.
- Recording Method: Remote WebEx / Digital Court Recording / Official Transcription.

II. DESIGNATION OF RECORD AND FINANCIAL UNDERTAKING

1. Completeness of Record: Pursuant to Rule 207(a)(1), SCACR, Appellant designates the entirety of both hearings without omission. The transcripts are indispensable to demonstrate to the Court of Appeals:

a. That Appellant actively attended both hearings (via remote WebEx) and did not "fail to appear" or abandon prosecution;

b. That Defendants John T. Budrow, Kevan Shepps, and McAngus, Goudelock & Courie, LLC had no attorney of record announce an appearance or argue on their individual behalf under Rule 11(a), SCRCP;

c. That the Circuit Court acknowledged Appellant's physical banishment from the courthouse; and

d. That the Circuit Court made oral findings directly contradicting the subsequent written order of September 24, 2026.

2. Payment and Rule 607(h) Compliance: In accordance with Rule 207(a)(1) and Rule 607, SCACR, Appellant agrees to pay the statutory per-page rate or deposit required by the Court Reporter/Transcriptionist upon receipt of the official estimate (SCCA Form 800) from Court Administration or the assigned reporter.

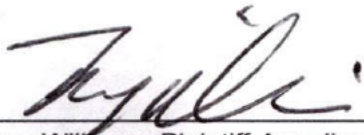
3. Electronic / WebEx Media Preservation: If the proceedings on January 15, 2026, or August 6, 2026, were captured via WebEx, DCRP, or courtroom electronic recording systems rather than a live stenographer, Appellant requests that South Carolina Court Administration immediately preserve and transcribe the raw digital audio/video recording files associated with Jasper County Civil Action No. 2025-CP-27-00385.

III. CONTEMPORANEOUS TRANSMITTAL NOTICE (RULE 207(a)(1), SCACR)

Pursuant to the mandatory provisions of Rule 207(a)(1), SCACR, a copy of this Transcript Request is being contemporaneously served upon:

1. South Carolina Court Administration (transcripts@sccourts.org);
2. The Clerk of the South Carolina Court of Appeals;
3. The Clerk of Court for Jasper County; and
4. All counsel of record for Defendants-Respondents.

Respectfully submitted,



Tony Williams, Plaintiff-Appellant Pro Se
145 Fort Sullivan Drive
Ridgeland, South Carolina 29936
Email: Twtony6371@gmail.com
Telephone: (843) 263-4488
Dated: September 28, 2026

TONY WILLIAMS
145 Fort Sullivan Drive
Ridgeland, South Carolina 29936
Telephone: (843) 263-4488
Email: Twtony6371@gmail.com

September 28, 2026

VIA CERTIFIED MAIL / RETURN RECEIPT REQUESTED
Tracking No.: _____

The Honorable Clerk of Court
South Carolina Court of Appeals
Supreme Court Building
1231 Gervais Street
Post Office Box 11629
Columbia, South Carolina 29211

Re: NOTICE OF APPEAL & INTAKE TRANSMITTAL PACKAGE

Tony Williams v. Hearthstone Lakes HOA, John T. Budrow, Kevan Shepps, McAngus,
Godelock & Courie, LLC, and Mutterer Law Firm, LLC

Jasper County Court of Common Pleas (Fourteenth Judicial Circuit)

Civil Action No.: 2025-CP-27-00385

(Cross-Referencing Contempt Directives in Case No. 2023-CP-27-00428)

Appealed Order Entered: September 24, 2026 (Judge Marvin H. Dukes, III)

Dear Clerk of Court:

Enclosed for formal filing with the South Carolina Court of Appeals pursuant to Rules 201, 203, 204, and 205 of the South Carolina Appellate Court Rules (SCACR), please find the original and duplicate copy of Plaintiff-Appellant Tony Williams's Appellate Intake Package, consisting of:

1. Appellant's Expedited Notice of Appeal, Statement of Issues on Appeal, and Designation of Jurisdictional, Procedural, Rule 54(b), and Party-Capacity Defects;
2. Appellate Certificate of Service confirming service upon the Jasper County Clerk of Court and all adverse counsel of record pursuant to Rule 203(b)(1) & Rule 204, SCACR;
3. Rule 207, SCACR Transcript Request Package / Court Reporter Notice; and

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SC Court of Appeals

4. Appellate filing fee OR Appellant's Verified Motion to Proceed In Forma Pauperis (IFP) accompanied by an executed Affidavit of Indigency.

JURISDICTIONAL & RECUSAL THRESHOLD NOTICE
(IMMEDIATE ATTENTION OF SENIOR STAFF ATTORNEYS REQUESTED)

Appellant respectfully requests that the intake department and Senior Staff Attorneys review this filing immediately upon docketing. The appealed final written Order—signed by the Honorable Marvin H. Dukes, III on September 21, 2026, and entered onto the public index on September 24, 2026—presents grave, irreconcilable jurisdictional, recusal, and structural due process defects apparent on the face of the public record:

1. Appearance of Impropriety & Direct Factual Contradiction on Recusal:

The Circuit Court denied Appellant's timely motion for mandatory judicial recusal under Canon 3(E) of the Code of Judicial Conduct by asserting under judicial signature on Page 2 of the appealed Order that a February 3, 2026 Contempt Order in Case No. 2023-CP-27-00428 "if such an Order exists, is not accessible through the public index." The official Judicial Branch CMSWeb 7.2 electronic ledger and clocked records confirm that Judge Marvin H. Dukes, III personally electronically signed that exact order at 12:12 PM on February 3, 2026, which was clocked onto the public index at 1:25 PM with an official electronic filing barcode.

2. Adjudicating Claims for "Ghost Defendants" (Rules 11(a) & 40(c), SCRCP): The official CMSWeb 7.2 Actions ledger establishes that Defendants John T. Budrow, Kevan Shepps, and McAngus, Goudelock & Courie, LLC (MG&C) never filed a Notice of Appearance under Rule 11(a), SCRCP, never filed an Answer, and were never published on any motions roster under Rule 40(c), SCRCP. Adverse counsel Thomas E. Lydon, III appeared exclusively for "Hearthstone Lakes HOA." The Circuit Court granted dismissals to ghost entities who never appeared, were never rostered, and never had a hearing conducted on their behalf.

3. Sua Sponte Excusal of an 8-Month Unbroken Default (*Stark Truss*, *Sundown*, & *Howard*):

Appellant's verified Affidavits of Default were clocked on January 29, 2026. For nearly eight (8) full months, Defendants Budrow, Shepps, MG&C, and MLF never filed a verified motion under Rule 55(c), SCRCP, to set aside default. On Page 3 of the appealed Order, the Circuit Court held that "[e]ven if a party or firm were in default, there is not a prohibition on allowing such a party to appear," and proceeded to excuse their defaults sua sponte, directly defying *Stark Truss Co. v. Superior Construction Corp.*, 360 S.C. 503 (Ct. App. 2004), *Sundown Operating Co. v. Intedge Industries, Inc.*, 383 S.C. 601 (2009), and *Howard v. Holiday Inns, Inc.*, 271 S.C. 238 (1978).

4. Judicial Admission of Physical Courthouse Banishment & "Mail-Only" Traps: The Circuit Court dismissed Appellant's claims for alleged "non-appearance" while explicitly admitting in Footnote 1 and Page 5 of its Order that Appellant was physically banished from entering the Jasper County Courthouse and restricted to "mail-only" filings under threat of police arrest. Banishment of an Eggshell, 100% disabled combat veteran from the public intake counter while penalizing him for non-appearance violates Logan v. Zimmerman Brush Co., 455 U.S. 422 (1982), and Huminski v. Corsones, 396 F.3d 53 (2d Cir. 2005).

5. Form 4 Judicial Admissions & Rule 54(b) Non-Finality: Judge Robert J. Bonds entered written judicial admissions on an official Form 4 Order (signed March 6, clocked March 9, 2026) certifying:

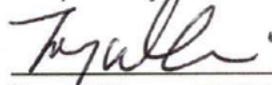
- (a) that the public index contained systemic errors conflating MGC filings with the HOA;
- (b) that Appellant's January 14, 2026 recusal motion was omitted from the hearing roster; and
- (c) that the order explicitly "does not end the case." Furthermore, the appealed September 24 Order confirms that Defendant HOA answered, was not dismissed, and that its \$5,494.75 Counterclaim was never tried, violating Rule 54(b), SCRCP.

FILING CONFIRMATION REQUEST

Please file-stamp the enclosed documents, assign an Appellate Case Number, and return the clock-stamped duplicate copy of the Notice of Appeal in the self-addressed, stamped envelope provided herewith.

Thank you in advance for your assistance and ministerial diligence in docketing this matter.

Respectfully submitted,

 9/28/26

Tony Williams, Plaintiff-Appellant Pro Se

145 Fort Sullivan Drive

Ridgeland, South Carolina 29936

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Telephone: (843) 263-4488

Enclosures:

1. Expedited Notice of Appeal, Statement of Issues, and Designation of Defects
2. Appellate Certificate of Service
3. Rule 207 Transcript Request Notice
4. Filing Fee / In Forma Pauperis Application
5. Self-Addressed Stamped Envelope (SASE)

cc:

Clerk of Court for Jasper County (Certified Mail)

Thomas E. Lydon, III, Esq., Counsel for Hearthstone Lakes HOA, Budrow, Shepps, and MG&C

Andrew N. Platte, Esq., Counsel for Mutterer Law Firm, LLC

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Supreme Court Building
1231 Gervais Street
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