

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF CHARLESTON )  
 )  
 CHURCHILL PARK )  
 )  
 Plaintiff, )  
 vs. )  
 )  
 ALAN G NIX, NORMA J NIX and ESTATE )  
 OF NORMA J NIX )  
 Defendant. )

IN THE COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT

CASE NO.: 2014-CP-10-05407

MOTION AND ORDER INFORMATION  
FORM AND COVERSHEET

RECEIVED

NOV 13 2018

SC Court of Appeals

Plaintiff's Attorney:  
 Todd Musheff, Bar No. \_\_\_\_\_  
 Address:  
 1121 Park West Blvd, St. B, #148, Mount Pleasant, SC 29466  
 Phone: 843.729.3187 Fax \_\_\_\_\_  
 E-mail: tmucheff@musheff-law.com Other: \_\_\_\_\_

Defendant's Attorney:  
 Alan Nix, Bar No. Pro Se  
 Address:  
 1401 Densmore Circle, Mt. Pleasant, SC 29466  
 Phone: 843.991.4170 Fax \_\_\_\_\_  
 E-mail: alan.g.nix@gmail.com Other: \_\_\_\_\_

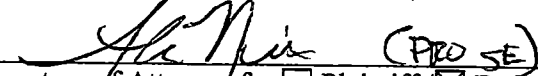
- MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
- FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
- PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

SECTION I: Hearing Information

Nature of Motion: Emergency Motion, Injunction of and clarification of Order dated 1 Dec 2017, court reporter needed if alternative judge determines hearing is required,  
 Estimated Time Needed: 0 Court Reporter Needed:  YES /  NO

SECTION II: Motion/Order Type

Written motion attached  
 Form Motion/Order  
 I hereby move for relief or action by the court as set forth in the attached proposed order.

 (PRO SE)  
 Signature of Attorney for  Plaintiff /  Defendant  
 Date submitted: 6 Nov 2018

SECTION III: Motion Fee

- PAID - AMOUNT: \$ 25.00 + FES
  - EXEMPT: (check reason)
    - Rule to Show Cause in Child or Spousal Support
    - Domestic Abuse or Abuse and Neglect
    - Indigent Status  State Agency v. Indigent Party
    - Sexually Violent Predator Act  Post-Conviction Relief
    - Motion for Stay in Bankruptcy
    - Motion for Publication  Motion for Execution (Rule 69, SCRPC)
    - Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions
- Name of Court Reporter: \_\_\_\_\_  
 Other: \_\_\_\_\_

JUDGE'S SECTION

Motion Fee to be paid upon filing of the attached order.  
 Other: \_\_\_\_\_  
 JUDGE CODE \_\_\_\_\_  
 Date: \_\_\_\_\_

CLERK'S VERIFICATION

Collected by: \_\_\_\_\_ Date Filed: \_\_\_\_\_  
 MOTION FEE COLLECTED: \$ \_\_\_\_\_  
 CONTESTED - AMOUNT DUE: \$ \_\_\_\_\_



- d. the Defendant's attorneys "is aware of at least two subpoenas Mr. Nix has served"
  - e. "that the Court last quashed 62 subpoenas served the day before trial"
  - f. plaintiff apparently worked with the Defendant's undersigned attorney to "In addition to Quashing all post-trial subpoenas, the Defendant's attorney somehow knew that the "plaintiff also requests Mr. Nix 1) be required to notify all subpoena recipients that the Court has quashed the subpoenas and no response is necessary and 2) require Mr. Nix to obtain prior Court approval before issuing any further subpoenas in this action"
2. In respect to the items raised in number one of this motion:
- a. in relation to 1 (c), it is the belief by defendant the "final hearing/trial in this action", the apparent Defendant's attorney is speaking of occurred on 26 September 2017.
  - b. the Case No. in the caption of this motion is 2017-CP-10-04031.
  - c. If defendant's assumption is correct, the "final hearing/trial" the Defendant's attorney must be speaking of was apparently scheduled by the Charleston County Master in Equity under case 2014-CP-10-05407 on or about 20 June 2017.
  - d. the roster meeting for the apparent "final hearing/trial" of 2014-CP-10-05407 was scheduled by the Charleston County Master in Equity on 21 June 2017.
  - e. case 2014-CP-10-05407 was dismissed by Judge Scarborough on 23 March 2016 for an alleged 40(j) agreement.
  - f. Judge Scarborough restored case 2014-CP-10-05407 on or about 9 May 2017 with a stated reason of "Reopen Case for Rule 40J – Original Case"
  - g. On 11 May 2017. Judge Scarborough scheduled a hearing for 7 August 2017 stating the purpose as being "Master/Pre-trial Hearing/ALL DISPOSITVE MOTIONS".
  - h. Judge Scarborough held the hearing on 7 August 2017, which was scheduled on 11 May 2017, despite the Charleston County Clerk of Court's note from 9 May 2017 which states: " Master's Order to Restore (didn't restore- filing fee not pd"
  - i. Case 2017-CP-10-04031 was not before Judge Scarborough as of the date of the roster meeting on 18 September 2017, the same roster hearing scheduled by Judge Scarborough for case 2014-CP-10-05407 on 21 June 2017.

j. Despite the hearing scheduled for 7 August 2017 specifically states it is for “ALL DISPOSITIVE MOTIONS”, Judge Scarborough heard several dispositive motions on 18 September 2018, but did not file any orders related to any of the orders until three days after the alleged final hearing or 2014-CP-10-05407, and maybe 2017-CP-10-04031, effectively, and apparently intentionally and improperly, making it impossible to challenge any of the apparent pre-trial orders prior to a “hearing/trial”.

k. Hence, clearly, “the final hearing/trial in this action”, if there was one, was for 2014-CP-10-05407 (not 2017-CP-10-04031), the same case Judge Scarborough clearly unilaterally dismissed on 23 March 2016 without a scintilla to support such a dismissal and entirely contrary to the basic requirements of Rule 40(j) of SCRCP.

3. With respect to 1 (e),

a. After Judge Scarborough clearly improperly scheduled, and actually held, the above detailed hearing of 7 August 2017, having known or should have known, it was not properly restored, Defendant Nix paid the \$150 to properly restore the case on 8 August 2017.

b. Despite court rules being very clear about the minimum amount of time required before calling a case to trial, Judge Scarborough apparently decided it was proper to completely ignore those rules and force the properly restored case to be held on the timeline he scheduled for the improperly restored case three and a half months earlier, hence 10-05407 to the properly restored case of 2017-CP-10-04031 and force the properly restored case into the improper schedule of the improperly restored case of 2014-CP-10-05407 with a “September term of court”. Specifically, there are only 49 days between 26 September 2017 and 8 August 2017, which is clearly less than the minimum of 120 or 180 days, depending on which version of the rules is applicable.

c. During this time frame, it was determined that if there was a scintilla of evidence to support the previously alleged fact that the 40(j) agreement occurred on the record on 21 March 2016, that was also not true given the discovery in early July 2017 that the court transcript from 21 March 2016 included apparent statements from a hearing held on 1 December 2015. When these improperly included statements are removed from the 21 March 2016 transcript, when the alleged 40(j) agreement allegedly occurred on the

record, all that is left is a single statement of Judge Scarborough apparently stating "I'll take it".

d. Clearly, "I'll take it" stated by a Judge does not remotely meet the standard stated in Rule 40(j) of an agreement "in writing" by "all parties".

e. Hence, ironically, the improperly restored case of 2014-CP-10-05407 is the correct case number since Judge Scarborough improperly dismissed case 2014-CP-10-05407 on 23 March 2016.

f. Given Judge Scarborough's improper scheduling of the roster meeting in relationship to the dates of the September term of Court in September 2017, it was fundamentally impossible to serve subpoenas in compliance with SCRCR Rule 45. To be specific, the maximum amount of time between the roster meeting and the last day of the scheduled court session was eleven days. Rule 45 allows for up to fifteen days for a party served to object to a subpoena, hence the scheduling of the roster meeting was clearly improperly scheduled which created an obvious and significant disadvantage for the defendant's ability to properly present their defense, with required testimony.

g. Given the motion by the plaintiff's / defendant's attorney chooses to raise the previously quashed 62 subpoenas by Judge Scarborough, defendant Nix will clarify that Mr. Musheff stated on the record on 25 September 2017 that he and/or McCabe Trotter also or \_\_\_ represented Southern Community Services, of which their motion to quash spent considerable time making the case as to why Southern Community Services officers, directors, owners, members, employees, contractors, subcontractors, customers, agents, associates etc., should not be required to attend a hearing that ironically, was directly related to a lien, a lis pendens, an "Assignment of Lien and Foreclosure Rights" and a foreclosure law suit that Southern Community Service, and / or its officers, directors, owners, members, employees, contractors, subcontractors, customers, agents, and / or other associates directly participated in their execution, filing and leveraging for future legal actions, including but not limited to, ones related to this motion.

4. The motion coversheet related to the motion represented in Exhibit A specifies that the motion is a Form motion, no hearing requested. Given it was filed and mailed on 13 November 2017, and no memorandum in opposition was filed, Judge Scarborough could have ruled on the

motion at any time on or after 28 November 2017 without a hearing. Instead, Judge Scarborough apparently decided on 17 November 2017 it was more proper to schedule hearing for the motion, hence one was scheduled for 29 November 2017.

5. Based on the Pro Se Defendant's increasing knowledge of what seemed to be an ongoing appearance of improper conduct by the Master in Equity and others, defendant Nix filed a motion for judicial recusal immediately before the start of the hearing on 29 November 2017. The motion was also served on Judge Scarborough, Mr. Musheff and Ms. Newman in person prior to the start of the hearing.

6. Judge Scarborough stated that since the motion for recusal had been filed less than ten days before the hearing, that he would not take up the motion on that day, but he did apparently decide it was proper to continue hearing other motion on that day with full knowledge that a motion for recusal was properly before him.

7.. Based on Charleston County's, Sandlapper Reporting LLC's, and Judge Scarborough's continued delay in producing hearing recordings and steno notes for hearings since 1 December 2015, the recent finding that the Charleston County Treasurer's office has records related to tax payments for the ten properties owned by Churchill Park Homeowners' Association, Inc. in Charleston County dating back to at least 2001, Charleston County and Judge Scarborough's continued delay in producing the names of the Persons who apparently swore in the potential witnesses at the subject hearing on 26 September 2017, bank account information related to a bank account that a check was deposited into in May 2018 made out to the real party in interest, Churchill Park Homeowners' Association, Inc., on 5 November 2018, defendant Nix requested Judge Scarborough to sign four subpoenas in compliance with the motion of 13 November 2017, to procure the new evidence in a timely manner. Judge Scarborough stated that for several reasons, including but not limited to, the fact that he was the judge in the matter, and if I understood correctly, the fact that he wasn't an attorney, he either could not or would not sign any subpoenas to collect new evidence that clearly refutes his apparent conclusions of fact from either 26 September 2017, 9 November 2017 or sometime in between. Consequently, defendant Nix is forced to file this motion.

## II.

### ARGUMENT

8. The motion filed 13 Nov 2017 specifically requests “*require Mr. Nix to obtain prior Court approval before issuing any further subpoenas in this action*”. The term “action” used in this statement can only be construed to mean case number 2017-CP-10-04031, as is cited in the caption of the motion. (See Exhibit B).

9. However, the Order dated two days later on 1 December 2017 reads in part “*Mr. Nix will further cease from undertaking any other post-trial discovery, including serving any more subpoenas, absent obtaining written approval from an attorney, acting as a gatekeeper, that such subpoenas or discovery are proper. This includes Case No. 2014-CP-10-05407, which is the identical cases to that captioned above, and includes any lis pendens pending that are associated with either case number.*”

10. Clearly, Judge Scarborough’s Order of 1 December is drastically different and substantially more encompassing than the motion it was based upon. Given the above cited pattern of conduct of Judge Scarborough prior to the date this Order was filed, in light of the recently filed motion seeking his recusal from the cases, and his apparently deciding it was proper to add numerous other limitations on defendant Nix from what was sought in the underlying motion, including the new and substantial requirement of having to find, hire and pay attorney fees so that an attorney will apparently provide “written approval from an attorney, acting as a gatekeeper, that such subpoenas or discovery are proper”, one can only construe Judge Scarborough’s intention was to intentionally interfere with and prevent defendant Nix from being able to file adequate post trial motions contesting the numerous issues with Judge Scarborough’s conduct of the proceedings as well as that of the plaintiff, plaintiff’s attorneys and plaintiff and plaintiff’s attorney’s associates.

11. While defendant has found instances where a court apparently required a Pro Se defendant to obtain leave of a court to take certain legal actions, defendant has yet to find instances of, or precedent for, a court to require a Pro Se defendant to hire an attorney to be “a gatekeeper”

12. Of specific note is the clearly improper concept of “*Mr. Nix will cease from undertaking further any other post-trial discovery... ..absent written approval from an attorney, acting as gatekeeper, that such....discovery is proper.*” Specifically, note the change from the motion that requested “*Mr. Nix to obtain prior Court approval before issuing any further*

*subpoenas in this action*". Given the numerous attorneys apparently directly, or indirectly, involved in either perpetuating the underlying improper conduct related to these cases, or have participated over an extended period of time by assisting in the concealment of the underlying conduct, this change of requirement from the motion can only be construed to place restrictions on defendant Nix to intentionally prevent him from discovering the breadth and depth of the issues with the case, and it's many possible co-plaintiff's or third party plaintiff's, many of which are apparently within the South Carolina legal and Government communities, as well as inappropriately insulating Judge Scarborough from further opportunity to incriminate himself.

13. Based on recent research by defendant Nix, it appears that such improper restrictions introduced by opposing attorneys, and approved by judges with potential liability for their conduct, is not as rare as typical citizen may believe, especially when the opposing party / target is a Pro Se litigant. This improper tactic is intended to protect attorneys, attorney's clients and involved judges from further scrutiny when the normal coercive strategies utilized against uncooperative attorneys are not available to dissuade a Pro Se litigant from actually zealously attempting to protect themselves, their families, and their property.

14. In these cases, and the subject motion and corresponding order, and specifically the significantly extended restrictions apparently unilaterally introduced by Judge Scarborough over and above what was sought in the motion, can only be construed as another example of the court's improper complicity with the Plaintiff / Plaintiff's attorneys / Plaintiff and Plaintiff's attorneys associates to conceal their ongoing pattern of improper conduct and extort the defendant into settling a case which clearly involves a pattern of improper, and potentially illegal conduct. Furthermore, when considered in the context of the long term similar pattern of improper conduct in these cases, defendant argues that this conduct essentially constitutes the intentional obstruction of justice, is obviously an abuse of judicial discretion, and has the underpinning of abuse of process, any of which on its own creates the appearance of impropriety, and when combined, can only be construed to actually be impropriety which required Judge Scarborough to recuse himself, whether or not a motion for recusal was filed by one or more of the parties to the cases.

WHEREFORE, Defendant, respectfully requests the Court to:

1. Immediately file an injunction related to this order preventing its enforceability.

2. Require Judge Scarborough to provide a written clarification of this order within ten days of this motion being filed and served, citing with specificity the facts, rules of civil procedure, and case law, he apparently relied upon to conclude this order was proper.
3. Grant equitable tolling of the statutes of limitations for all possible related causes of action, as well as the time counted toward rules of civil procedure for this motion and all subsequent motions, to equitably account for the improper restrictions this order imposed on defendants, thereby preventing further injury to defendants.
4. Allow defendant to immediately have the Charleston County Sheriff's Department serve subpoenas on all Charleston County Persons, including but not limited to employees, officers, directors, elected officials, contractors, subcontractors and agents who possess relevant information to these cases without being subject to contempt of court charges this improper order obviously threatens.
5. Require Judge Scarborough to recuse himself within one business day after he files his clarification of and justification for this order. In the event Judge Scarborough chooses not to recuse himself, schedule a recusal hearing for Judge Scarborough before a different, proven, impartial judge in as short of a timeframe as is provided by SCRPC.
6. Grant defendant the right to amend this motion to include a motion to set aside the order once the South Carolina Court of Appeals finally finds it is proper to grant defendant's motion for leave to file a Rule 60(b) motion, of which is expected no later than close of business on 7 November 2018.
7. Any and all other and further relief as the Court deems just, prudent, and proper.

The defendant reserves the right to supplement this motion with additional evidence and written and oral arguments at or before any scheduled hearings related to this matter. Additionally, defendant will serve a copy of this motion, the defendant's/ plaintiff's motion of 13 November 2017 and Judge Scarborough's order of 1 December 2017 as attachments to all subpoenas served until such time as a proper court hears any required arguments related to this matter and files an order related to the same.

**(signatures on next page)**

November 6, 2018

Respectfully submitted,



---

Alan G. Nix  
1401 Densmore Circle  
Mount Pleasant, SC 29466  
(843) 991-4170  
alan.g.nix@gmail.com

**Exhibit**

**A**

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF CHARLESTON )  
 )  
 Chruchill Park )  
 \_\_\_\_\_ )  
 Plaintiff, )  
 vs. )  
 )  
 Alan Nix and Estate of Norma Nix )  
 \_\_\_\_\_ )  
 Defendant. )

IN THE COURT OF COMMON PLEAS  
 NINTH JUDICIAL CIRCUIT  
 CASE NO.: 2017-CP-10-04031

**MOTION AND ORDER INFORMATION  
 FORM AND COVERSHEET**

Plaintiff's Attorney: Todd M. Musheff, Esq., Bar No. 69363 Address: 140 Stoneridge Dr., Suite 650 Columbia, SC 29221 Phone: 803-724-5000 Fax 803-724-5001 E-mail: tmusheff@mccabetrotter.com Other: _____	Defendant's Attorney: _____, Bar No. _____ Address: _____ Phone: _____ Fax _____ E-mail: _____ Other: _____
--	--

MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)  
 FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)  
 PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

**SECTION I: Hearing Information**

Nature of Motion: Receiver  
 Estimated Time Needed: 5 min      Court Reporter Needed:  YES /  NO

**SECTION II: Motion/Order Type**

Written motion attached  
 Form Motion/Order  
 I hereby move for relief or action by the court as set forth in the attached proposed order.

November 10, 2017

\_\_\_\_\_  
 Signature of Attorney for  Plaintiff /  Defendant      Date submitted

**SECTION III: Motion Fee**

PAID - AMOUNT: \$ 25  
 EXEMPT: (check reason)

Rule to Show Cause in Child or Spousal Support  
 Domestic Abuse or Abuse and Neglect  
 Indigent Status     State Agency v. Indigent Party  
 Sexually Violent Predator Act     Post-Conviction Relief  
 Motion for Stay in Bankruptcy  
 Motion for Publication     Motion for Execution (Rule 69, SCRCF)  
 Proposed order submitted at request of the court; or,  
 reduced to writing from motion made in open court per judge's instructions  
 Name of Court Reporter: \_\_\_\_\_  
 Other: \_\_\_\_\_

**JUDGE'S SECTION**

Motion Fee to be paid upon filing of the attached order.  
 Other: \_\_\_\_\_

JUDGE CODE \_\_\_\_\_  
 Date: \_\_\_\_\_

**CLERK'S VERIFICATION**

Collected by: \_\_\_\_\_ Date Filed: \_\_\_\_\_  
 MOTION FEE COLLECTED: \$ \_\_\_\_\_  
 CONTESTED - AMOUNT DUE: \$ \_\_\_\_\_

FILED  
2017 NOV 13 PM 3:23  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT  
Case No.: 2017-CP-10-04031

Churchill Park,

Plaintiff,

v.

Aland Nix and the Estate of Norma Nix,

Defendants

**MOTION TO QUASH  
POST-TRIAL SUBPOENAS OF  
DEFENDANT ALAN NIX**

17990.10 TMM

YOU WILL PLEASE TAKE NOTICE that the Defendants, by their undersigned attorney and after proper notice to defendants, will move before the Court for an Order quashing the subpoenas defendant Alan Nix has served seeking to gather documents and evidence despite the fact that it is approximately four (4) weeks *after* the final hearing/trial in this action. Because Mr. Nix repeatedly fails or refused to provide copies of his subpoenas to undersigned counsel, it is unclear how many subpoenas Mr. Nix has served, but counsel is aware of at least two subpoenas and given that the Court last quashed 62 subpoenas served the day before trial, the scope of Mr. Nix's subpoenas could be substantial. In addition to Quashing all post-trial subpoenas, plaintiff also requests that Mr. Nix 1) be required to notify all subpoena recipients that the Court has quashed the subpoenas and no response is necessary and 2) require Mr.

Nix to obtain prior Court approval before issuing any further subpoenas in this action.

Respectfully Submitted,

MCCABE, TROTTER & BEVERLY, P.C.



---

Todd M. Musheff  
McCabe, Trotter & Beverly, PC  
140 Stoneridge Drive, Suite 650  
P.O. Box 212069  
Columbia, SC 29221  
Phone: 803-724-5000  
Fax: 803-724-5001  
Email: [Todd.Musheff@mccabetrotter.com](mailto:Todd.Musheff@mccabetrotter.com)  
*Attorneys for Plaintiff*

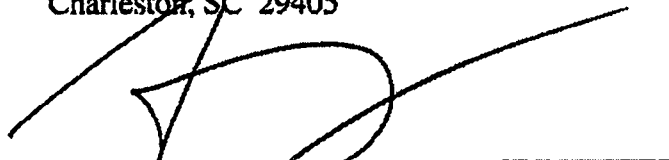
Charleston, South Carolina  
November 10, 2017

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been served upon the following counsel of record by placing the same in the United States mail, first class postage prepaid, addressed to the following as shown below this 10th day of November 2017.

Alan Nix  
Estate of Norma Nix  
1401 Densmore Circle  
Mt. Pleasant, SC 29466

Sally Newman  
Charleston Legal Access  
1630 Meeting Street, Suite 106  
Charleston, SC 29405



---

Todd M. Musheff

# **Exhibit**

# **B**

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON  
Churchill Park,

Plaintiff.

v.

Alan G. Nix and Estate of Norma J. Nix.

Defendants.

IN THE COURT OF COMMON PLEAS  
THE NINTH JUDICIAL CIRCUIT

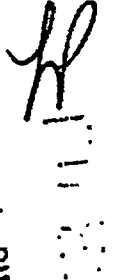
CASE NO.: 2017-CP-10-04031

ORDER

BY \_\_\_\_\_

J. L. NIX  
CLERK OF COURT

2017 DEC - 1 PM 3:48



This Matter came before the Court for hearing on November 29, 2017 on several pending motions. After carefully considering the filings and arguments of all parties, the Court determines as follows:

1. Plaintiff's Motion to Quash all post-trial subpoenas and discovery: The Motion to Quash is GRANTED. All post-trial subpoenas are quashed and defendant Alan Nix will immediately notify anyone served with such a subpoena of this Order and that no documents need to be produced. Mr. Nix will further cease from undertaking any other post-trial discovery, including serving any more subpoenas, absent obtaining written approval from an attorney, acting as a gatekeeper, that such subpoenas or discovery are proper. This includes Case No. 2014-CP-10-5407, which is the identical case to that captioned above, and includes any *lis pendens* pending that are associated with either case number.

2. Defendant Alan Nix's Motion for Directed Verdict: This Motion, filed November 14, 2017, is untimely, as the Defendant did not make any motion at either the close of Plaintiff's case-in-chief or the close of all evidence at the trial. Therefore, the Motion is DENIED.

3. Defendant Alan Nix's Motion for Reconsideration: Orders Dated September 29, 2017 and October 31, 2017: This Motion, filed November 15, 2017, seeks a reconsideration of

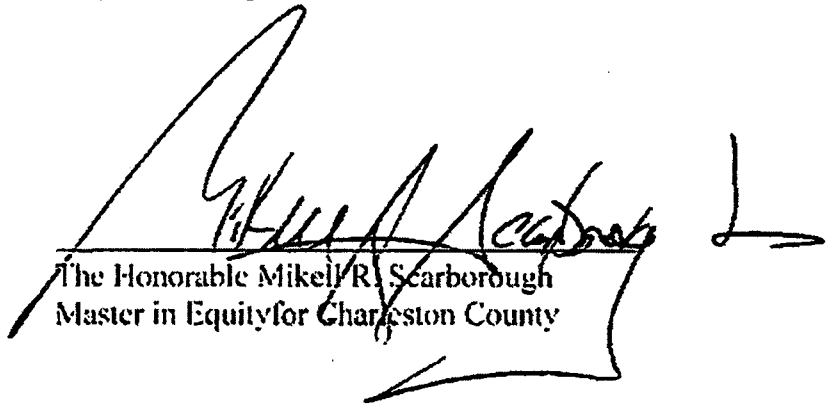


the Court's prior denial of a prior reconsideration motion concerning rulings on pretrial motions. The issues having already been the subject of one Motion for Reconsideration, the Motion is improper and is hereby DENIED.

4. Defendant Alan Nix's Motion to Alter or Amend November 9, 2017 Order or for New Trial: This Motion, filed November 22, 2017, was heard while all parties were otherwise present and after Plaintiff's waiver of the ten-day notice period for hearings. The Court finds nothing in the Motion or argument to justify any change to the November 9, 2017 Order. The Motion is DENIED.

**SO ORDERED.**

12/1, 2017  
Charleston, South Carolina

  
The Honorable Mikel R. Scarborough  
Master in Equity for Charleston County

STATE OF SOUTH CAROLINA )  
COUNTY OF CHARLESTON )

IN THE COURT OF COMMON PLEAS )  
THE NINTH JUDICIAL CIRCUIT )

CHURCHILL PARK, )  
Plaintiff, )

CASE NUMBER: 2017-CP-10-04031 )

vs. )

**CERTIFICATE OF SERVICE**

ALAN G NIX and the )  
ESTATE of NORMA J NIX, )  
Defendants. )

FILED  
2017 DEC -1 PM 3:13  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

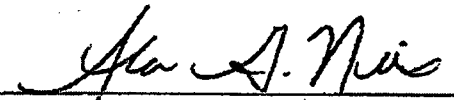
The undersigned hereby certifies that on the 21<sup>th</sup> day of November 2017, a true and correct copy of the Motion for Judicial Recusal Justice Mikell Scarborough was served upon all parties and/or their respective counsel of record In Person as follows:

Stephanie C. Trotter, Esq.  
McCabe, Trotter & Beverly, PC  
PO Box 212069  
Columbia, SC 29221  
In Person (Master Court 2A)

Todd M. Musheff, Esq.  
McCabe, Trotter & Beverly, PC  
PO Box 212069  
Columbia, SC 29221  
In Person (Master Court 2A)

Sally Newman  
Charleston Legal Access  
1630 Meeting St.  
Charleston, SC 29405  
In Person (Master Court 2A)

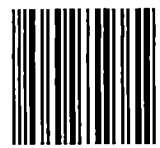
Judge Scarborough  
Master in Equity  
100 Broad Street, Suite 266  
Charleston, SC 29401  
In Person (Master's Office at 0930)

By:   
Alan G Nix  
1401 Densmore Circle  
Mount Pleasant, SC 29466  
(843) 729-2400 Phone  
alan.g.nix@gmail.com

20 DENSMORE CIRCLE  
M. B. ...



1000



29201

U.S. POSTAGE PAID  
FCM LG ENV  
CHARLESTON, SC  
29403  
NOV 07, 18  
AMOUNT

**\$1.63**

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SC COIT ...

SC COIT OF APPLS  
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COURT ...