

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF AIKEN

IN THE SECOND JUDICIAL CIRCUIT

Brian T. Michael)

Plaintiff,)

vs.)

William H. Ellwood,

aka)

Elk of the Wood)

_____)

Case No. 2018-CP-02005

RECEIVED

MAR 26 2019

SC Court of Appeals

AFFIDAVIT OF BIAS AND PREJUDICE

AFFIDAVIT

I, William Harry-Ellwood affiant herein, being of sound mind, over the age of 21 hereby state the following facts to be true, correct, complete and not misleading, made under penalty of perjury, pursuant to the law of the united States of America, to the best of my knowledge and belief :

1. Affiant herein states Common Pleas Court Judge WILLIAM P. KEESLEY, SECOND JUDICIAL CIRCUIT did show Bias and Prejudice toward the defendants when he allowed JAMES D. MOSTELLER III, Esquire to continually interrupt defendants statements in the hearing on defendants MOTION FOR EXTENSION OF TIME TO ANSWER, denied requested extension of time to Answer, to travel to Ohio to retrieve evidence from files and time to seek Counsel, for the action.

2. Affiant herein states Common Pleas Court Judge WILLIAM P. KEESLEY, SECOND JUDICIAL CIRCUIT and JAMES D. MOSTELLER III did show Bias and Prejudice toward the defendants when there was held an ex-parte hearing without exparte application Rule 6(d) Plaintiff Counsel JAMES D. MOSTELLER iii, Esquire on August 2 ,2018 consequent filing of MOTION OF REFERENCE TO MASTERS IN EQUITY August 2,2018 at 12:34PM and ORDER OF REFERENCE TO MASTER IN EQUITY, to M. Anderson Griffith by Judge WILLIAM P. KEESLEY on the record August 2,2018 at 12:35PM. Defendants were not served until September 19, 2018 out of time for defendants to respond. Violating Rule 5 SCRCP service of Notice.

3. Affiant herein states Common Pleas Court Judge WILLIAM P. KEESLEY, SECOND JUDICIAL CIRCUIT did show Bias and Prejudice toward defendants when he issued the ORDER OF REFERENCE TO MASTERS IN EQUITY without scheduling a hearing on the MOTION OF REFERENCE TO MASTERS IN EQUITY. Violating Rule 5 and Rule 6(d)SCRCP.

4. Affiant herein states, Plaintiff Counsel JAMES D. MOSTELLER iii, Esquire and Common Pleas Court Judge WILLIAM P. KEESLEY, SECOND JUDICIAL CIRCUIT did show Bias and Prejudice toward the defendants when he canceled, without service /notice to defendants , a scheduled Hearing on defendants MOTION FOR JUDGMENT ON THE PLEADINGS scheduled for September 24,2018 @ 9:30AM Court Room 5. Violation of Rule 5 SCRPC.

5. Affiant herein states Common Pleas Court, MASTER IN EQUITY Judge M. Anderson Griffith did show Bias and Prejudice toward the defendants when he MASTER IN EQUITY Judge, M. Anderson Griffith did accept the ORDER OF REFERENCE TO MASTERS IN EQUITY, from Judge WILLIAM P. KEESLEY either knowing or should have known there was a HEARING scheduled for the defendants MOTION FOR JUDGMENT ON THE PLEADINGS, in the Law Court, scheduled for September 24,2018 @ 9:30 AM Court Room 5.

6. Affiant herein states Common Pleas Court Judge WILLIAM P. KEESLEY, SECOND JUDICIAL CIRCUIT and MASTER IN EQUITY Judge M. Anderson Griffith did show Bias and Prejudice and collusion to deny defendants JUDGMENT ON THE PLEADINGS before the Court and did violate their Oaths, did Violate Rule 5 SCRPC and others, did deny DUE PROCESS OF LAW toward the defendants.

7. Affiant herein states Master in Equity Judge M. Anderson Griffith did show bias and prejudice when he continued to trial the issue before his court knowing the defendants had been seeking counsel in the action without asking if defendants wanted time to find competent counsel before proceeding to trial.

Affiant herein states Common Pleas Court Judge WILLIAM P. KEESLEY, SECOND JUDICIAL CIRCUIT and MASTER IN EQUITY Judge M. Anderson Griffith did show Bias and Prejudice toward defendants and have created TRESPASS and TORT on the defendants Rights as joint TORT-FEASORS.(Blacks Law 4th pgs 1660-1661)

" without prejudice"

William H. Ellwood

William H. Ellwood

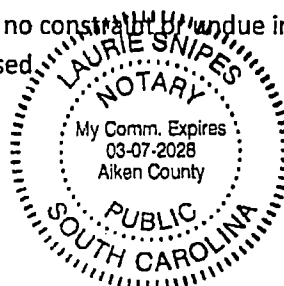
1792 South Lake Dr Ste 90 #112

Lexington, SC, 29073

614-208-6196- cell

Notary Verification

Before me, Laurie Snipes A Notary Public in and for the State of South Carolina, County of Aiken proven to be (s)he by presentment of State ID, certify that William Ellwood did appear personally and (s)he did sign and execute this document " Affidavit Of Bias and Prejudice" Case No. 2018-CP-02-00510 Akin County, S.C." and state that (s)he is of sound mind; eighteen (18) years of age or older, that (s)he signed it willingly and under no constraint or undue influence and as his own free and voluntary act for the purpose therein expressed.




Laurie Snipes

CERTIFICATE OF SERVICE

I, William Ellwood, certify that a copy of the NOTICE OF BIAS & PREJUDICE on case # 2018CP0200510 was served by proof of mailing U.S.P.S. delivered to James D. Mosteller, III, Esquire, P.O.Box 328, Aiken, SC 29802 on 03/20 /2019.

"without prejudice"



William Ellwood

c/o 1792 South Lake Drive

Ste 90 # 112

Lexington, S.C. 29073