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**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas**

Mikell R. Scarborough, Master in Equity

**Case No. 2014-CP-10-05407
2017-CP-10-04031**

RECEIVED
MAR 20 2020
SC Court of Appeals

Churchill Park, Respondent

v.

Alan G. Nix, Norma J. Nix and the Estate of Norma J. Nix, Defendants,

Of which Alan G. Nix is the Appellant

**Appellate Case Number 2018-000056 &
2018-000174**

**APPELLANT’S MOTION TO COMPEL RESPONDENT TO RESPOND PROPERLY
TO APPELLANT’S RETURN TO MOTION FOR COSTS**

Appellant Alan Nix filed a return to “Churchill Park”’s (the company, not the Subdivision, Community, Association nor Neighborhood) and McCabe Trotter’s Motion for Costs over thirty days ago. As of the date of this motion, Appellant has not received any of the documents requested of “Churchill Park”, McCabe Trotter, “Churchill Park”’s apparently professional management company, nor any of these three’s numerous coconspirators.

Thus, Appellant submits this motion to request the Court to enter an Order no later than close of business 23 March 2020 requiring these parties to file the required documents with this

Court and mail the same to Appellant and Charleston Legal Access no later than 1600 on 30 March 2020.

The following documents were requested to be filed / mailed to be utilized in determining an appropriate legal fee:

1. A fully documented, current version of Ex. G, from May 2013 through the end of February 2020. (of course without any of the redactions which Judge Scarborough apparently thought were ok for them to utilize to be granted excessive and improper attorney fees in 2017)
2. A copy of the contract McCabe Trotter alleges is instrumental to this calculation. See paragraph six, page 1 of Ex. G.
3. Actual copies of payment from "Churchill Park" (the company, not the Subdivision, Association, Neighborhood or Community), for payment of attorney fees and payment for the transcript.
 - a. See Ex, H, page 5, paragraph c. specifically "costs, including without limitation, reasonable attorney's fees actually incurred"
4. "Churchill Park" (the company, not the Subdivision, Association, Community or Neighborhood) provides proof they have incurred the transcript cost no later than 4 September 2018. Sufficient proof would be considered a transacted check in this amount, in the name of "Churchill Park" and signed by one or more Officers and/or Directors of "Churchill Park"
5. McCabe Trotter produces an invoice where they invoiced "Churchill Park" for the transcript amount, which resulted in "Churchill Park"'s Officers / Directors signing the check described in number one above.
6. McCabe Trotter returns the original copy of the transcript to Ms. Smith of Sandlapper Reporting, LLC and Sandlapper Reporting, LLC provides Alan Nix, the Appellant, the original copy of the transcript for \$10.00. This seems equitable to Sandlapper Reporting, LLC since Sandlapper Reporting, LLC surely received \$428.44 from "Churchill Park" (the company, not the Subdivision) at least a year and a half ago. Obviously, Sandlapper Reporting, LLC should reassert in writing, as an oath, that the original returned by McCabe Trotter is accurate and complete. (Sandlapper Reporting, LLC has had problems with this at least twice previously. The transcript

of 2014-CP-10-05407 of the hearing of 21 March 2016 and the transcript of 2017-CP-10-04031 and 2014-CP-10-05407 of the hearing on 26 September 2017. The Court is aware of this relate to several of the motions to remand they consistently denied.) (and this will officially be a Federal problem very soon, so please get this Order to Compel done no later than close of business 23 March 2020)

II – COMPEL JUDGE JEFFERSON TO ENTER HER EXPLANATION FOR ASSERTING THIS COURT “... affirmed the lower Court’s ruling “

As cited in the Return from over a month ago, Judge Jefferson asserted in her ruling in case 2019-CP-10-00067, filed 17 October 2019, that the “*The Court of Appeals affirmed the lower Court’s ruling, and Mr. Nix has since filed a pending petition for a writ of certiorari with the Supreme Court*”. Also as stated previously, Judge Jefferson further clarified her assertion as fact by specifying in footnote number two on page nine of that order that decision was filed on November 13, 2018 in case 2018-000056. Since Judge Jefferson has had well over a month to try to work all of this out, it seems more than just a little proper for Judge Jefferson to file her response with this Court clarifying all of this a bit further. That should help with the appeal of 2019-CP-10-00067, as well as several related matters. So, Appellant is trying real hard this one time to help the Court of Appeals out with that judicial economy thing, which it appears very very few circuit judges do for the Court.

WHEREFORE, Appellant Alan Nix respectfully requests this Court:

1. Enter an Order no later than close of business 23 March 2020 compelling “Churchill Park” (the company, not the Subdivision, Community, Neighborhood or Association), McCabe Trotter and their numerous coconspirators to file with the Court, as well as mail to Appellant and CoRespondent Charleston Legal Access, the various documents cited in the Return, and reiterated in this motion, no later than 1600 on 23 March 2020.
2. Delay judgement on Respondent’s motion for costs until Respondent complies with the associated Order which corresponds to this motion and Appellant has at least five business days to review and respond.
3. Enter an Order compelling Judge Jefferson to respond by close of business 27 March 2020 clarifying the factual and legal basis which she relied upon to assert in her order

of 17 October 2019, case 2019-CP-10-00067 that this “*Court of Appeals affirmed the lower Court’s ruling*” via an order filed on November 13, 2018 in case 2018-000056.

4. In the alternative to timely granting the above requests, just return this motion (and of course the \$50 check) and then just put this and everything else on hold pending a whole lot of Federal litigation and other apparent slanderous stuff that I’m working real hard on to finally seriously put a big dent in Public Corruption / Judicial Corruption in our apparently Great State.
5. Any other and further relief as the Court deems just, prudent and proper.

Dated: March 18, 2020

Respectfully submitted,



Alan G. Nix
1401 Densmore Circle
Mount Pleasant, SC 29466
(843) 991.4170

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas**

The Honorable Mikell R. Scarborough, Master in Equity

**Case No. 2014-CP-10-05407
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Churchill Park, Respondent

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Of which Alan G. Nix is the Appellant

**Appellate Case Number 2018-000056 &
2018-000174**

PROOF OF SERVICE

The undersigned certifies that a copy of the Appellant's Motion to Compel Respondent to respond to Appellant's Return for Costs has been served on the rest of all of "Churchill Park"'s (the company, not the Subdivision) attorneys / third party attorneys, etc. has been served on the Persons listed below by mailing a copy of the same, postage prepaid, in the United States Mail, or hand delivery, addressed as shown below this 18th day of March 2020 to:

Ryan McCabe
McCabe Trotter and Beverly
4500 Fort Jackson Blvd.

Charleston Legal Access
Attn: Schrieber
1630 Meeting St.

Columbia, SC 29209

Judge Scarborough
Master in Equity, Charleston County
100 Broad St., Ste. 266
Charleston, SC 29401

Chief Justice Beatty
SC Supreme Court
1231 Gervais St. .
Columbia, SC 29201

Joel Deason
Lexington County Sherriff's Dept..
521 Gibson Rd.
Lexington, SC 29072

Jaime McSweeney
Law offices of Nick Mermiges
1720 Main St., Ste. 202
Columbia, SC 29201

Judge Jefferson
100 Broad St.
Charleston, SC 29401

Dated: March 18, 2020

Charleston, SC 29405

Julie Armstrong
Clerk of Court, Charleston County.
100 Broad Street
Charleston, SC 29401

John Nichols
Office of Disciplinary Counsel
1220 Senate St.
Columbia, SC 29201

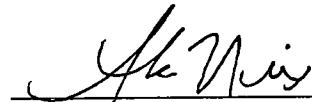
Stephanie Trotter
McCabe Trotter & Beverly
4500 Fort Jackson Blvd.
Columbia, SC 29201

Todd Musheff
Law Offices of Todd Musheff
1121 Park West Blvd. 148 B
Mt. Pleasant, SC 29466

Alan Wilson
SC Attorney General
1000 Assembly St.
Columbia, SC 29201

Respectfully submitted,

By:



Alan G. Nix
1401 Densmore Circle
Mount Pleasant, SC 29466
(843) 991.4170

18 March 2020

Alan Nix
1401 Densmore Circle
Mount Pleasant, SC 29466

Ms. Jennie Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201

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SC Court of Appeals

RE: Churchill Park v Alan G. Nix, et al
S.C. Appellate Case Number 2018-000056 / 000174
Response to two letters dated 11 February 2020

Ms. Abbott Kitchings,

Please find enclosed an motion to compel "Churchill Park" (the company, not the Subdivision, Association, Neighborhood, or Community) and their attorneys / apparently professional property managers, Officers, Directors, and other coconspirators to properly respond to the Appellant's Return to Respondent's Motion for Costs which was served over 30 days ago. Check number 934 is enclosed in the amount of \$50.00 as well as a self addressed postage paid envelope to return my copy in.

Since well over half of the persons and Persons copied will be involved in a Federal lawsuit in literally just several days from the date of this motion, it seems as if it would be a really good idea for one of y'all's judges to draft a simple order granting this motion, and of course sign it, date it and file it, no later than close of business 23 March 2020.

I'm sure you are as perplexed as I am that all of those Persons zeal seems to have ran out so quickly after their original motion. Anyways, please just make sure that at least of your judges finds 15 minutes this Friday or next Monday to just grant this motion and get it all in process. Since all of those Persons have had over a month to get all of that information together, which I'm sure they already had together, making them file it and mail it by next Thursday doesn't seem like too big of a request, unless of course they are running a 103 degree fever for the last few weeks with the Coronavirus.

If y'all won't act on this quickly next week, please just return everything. I don't have much money left after being subjected to more than five years of fraud and public corruption and I'm pretty sure after the lawsuit if filed and word gets out, nobody is gonna want to do anything else related to this mess.

Two other quick notes. Based on what Mr. Deason appears to have alluded to, he can't seem to remember much about any of this, including being involved with this appeal. I'm sure he has already

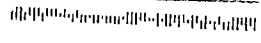
told y'all or someone of his issues. Also, very weird, I had a letter to you from February returned to me recently and I have ZERO idea why, because the address was 100% correct. Please let me know if the Court of Appeals are having the same problems with the USPS that Charleston County has apparently been experiencing for almost a year now.

Best regards,

A handwritten signature in black ink, appearing to read "Alan Nix". The signature is fluid and cursive, with the first name "Alan" being more prominent than the last name "Nix".

Alan Nix
(c) 843.991.4170

1401
M. P.



CHARLESTON SC 294
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SC Court of Appeals

Clerk Of Court
SC Court Of Appeals
1220 STATE ST.
COLUMBIA, SC 29201