

93304

**RECEIVED**  
SEP 24 2020  
SC Court of Appeals

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

-----

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

**The Honorable? Mikell Scarborough and  
The Honorable? Maite Murphy**

-----

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

-----

**Churchill Park**

**Respondent,**

**v.**

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

**Of which Alan G. Nix and the Estate of Norma J. Nix are the Appellants,**

-----

**NOTICE OF APPEAL**

-----

Kevin Mims  
Chase McNair  
Lurizaga Mims  
50 Immigration St., Ste. 200  
Charleston, SC 29403

**ATTORNEYS FOR RESPONDENTS**  
Churchill Park at Parkwest, Inc.

Troy Thames  
Wilson, Jones, Carter & Baxley  
421 Wando Park Blvd., Ste. 100  
Mount Pleasant, SC 29464  
Charleston, SC 29401

**ATTORNEY FOR RESPONDENTS**  
(no contract with either David

(NOT "Churchill Park" 2003 in this one)  
Churchill Park at Park West Association, Inc.  
(NOT Churchill Park Homeowners' Association, Inc.  
in this case)  
Maybe some other Churchill's too, like Churchill at  
Park West Association, Inc.

Brown and/or Catherine Brown  
nor paid by David Brown or  
Catherine Brown, but it is his /  
Wilson Jones's position that they  
are the Brown's attorney/s

Robert Wood  
Rogers, Townsend and Thomas  
1221 Main St., 14<sup>th</sup> floor  
Columbia, SC 29201  
ATTORNEYS FOR ATTORNEYS OF RESPONDENTS  
McCabe, Trotter & Beverly, PC.  
Ryan McCabe  
Stephanie Trotter  
Jaimie McSweeney  
Todd Musheff  
Joel Deason

Alan Nix and the Estate of Norma J. Nix appeals two Orders of the Honorable? Mikell Scarborough filed 21 August 2020 in the above cited cases, which are the first two Orders included in **Exhibit A** to this Notice of Appeal. Appellants received written notice of the entry of the two orders on 31 August 2020 and 27 August 2020 respectively.

On the date of this Notice of Appeal, the Appellant Alan Nix's motions related to these two Orders, one mailed on 3 September 2020 (dated 2 September 2020) and the second hand delivered to the Charleston County Clerk of Court on 9 September 2020, (dated 5 September 2020) have been received back from the Charleston County Clerk of Court with a pink page that states the reason it was returned as "Other: *Unable to file these documents pursuant to Judge Murphy's order dated 9/27/19*". The pink page is included as **Exhibit B** and the two motions of Appellant Alan Nix, dated 2 September 2020 and 5 September 2020, which were returned instead of being filed as responsive to the two Orders filed 21 August 2020, are included as **Exhibit D** and **Exhibit E**. Appellant Alan Nix received this envelope via the US Postal Service on 21 September 2020, the date of this Notice of Appeal. Also included in the large envelope from the Charleston County Clerk of Court is the two documents that Charleston County included when returning the two motions of Exhibit **D** and **E**, which is included in this Notice of

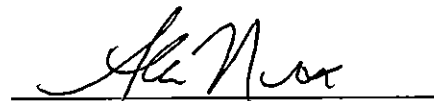
Appeal as **Exhibit C**. Appellant Alan Nix has modified these two documents by adding brackets around the portions of the two documents that someone with Charleston County and/or the S.C. Circuit Court highlighted in pink, since the pink highlighter did not show through when copied.

Consequently, the third Order included in this appeal, by virtue of Charleston County's and /or the S.C Circuit Court's own knowing and willful incorporation of the same into cases 2014-CP-105407 and 2017-CP-10-04031, is Judge Murphy's Order dated 27 September 2019, for case 2018-CP-10-03315, entitled ORDER ENJOINING THE PLAINTIFF FROM RE-FILING THIS MATTER AND IMPOSING SANCTIONS UPON THE PLAINTIFF, hereafter referred to as the ENJOIN ORDER.

This Notice of Appeal is being filed on 21 September 2020 since it is apparent that Scarborough, Charleston County, McCabe and Trotter, "Churchill Park" (the corporation incorporated by Southern Community Services, LLC, now known as Chuckleover LLC, on 31 July 2003, by and through deceptive business practices and with the intent to use, and did use, for fraudulent business practices) and many other Persons and Public Officials intend to utilize Murphy's ENJOIN ORDER to the maximum extent possible to Obstruct Justice, even though the very basis for the Order has already been proven highly flawed and almost certainly meant for an improper purpose, which the continued improper use of Murphy's ENJOIN ORDER essentially proves.

September 21, 2020

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Alan Nix", is written over a horizontal line.

Alan G. Nix (individually)  
1401 Densmore Circle  
Mount Pleasant, SC 29466  
(843) 991-4170

(signatures continued on next page)

Alan Nix

Alan G. Nix (as co-PR for Estate of Norma J. Nix)  
1401 Densmore Circle  
Mount Pleasant, SC 29466  
(843) 991-4170

Alan Nix (WITH PERMISSION  
FROM ETHAN NIX)

Ethan Nix, co-PR for Estate of Norma J. Nix  
211 Posey Hill Rd.  
Mount Pleasant, SC 29466  
(864) 419-8654

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

SEP 24 2020

SC 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  
2017-CP-10-04031

-----  
Churchill Park, Respondent

v.

Alan G. Nix, Norma J. Nix and the Estate of Norma J. Nix, Defendants,  
Of which Alan G. Nix and the Estate of Norma J. Nix are the Appellants

-----  
PROOF OF SERVICE

-----  
The undersigned certifies that a copy of the Appellant's Notice of Appeal for the Order filed 21 August 2020 has been served upon the individuals listed below by mailing or hand delivering a copy of the same, postage prepaid, in the United States Mail, addressed as shown, this 21<sup>st</sup> day of September 2020 to:

Plaintiff Attorneys:  
Ryan McCabe & Stephanie Trotter  
McCabe, Trotter & Beverly, P.C.  
4500 Fort Jackson Blvd.  
Columbia, SC 29209

Todd M. Musheff, Esq.  
Law Offices of Todd M. Musheff  
1121 Park West Blvd., Ste. B 148.  
Mount Pleasant, SC 29466

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

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

Sarah Schreiber  
Charleston Legal Access  
3775 Spruill Ave., Ste. B  
North Charleston, SC 29405

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

David Thomas / Gregory Galvin  
Crum & Foster / US Fire Insurance  
305 Madison Ave.  
Morristown, NJ 07960

Judge Murphy  
5200 East Jim Bilton Blvd.  
St. George, SC 29477

Troy Thames  
Wilson, Jones, Carter and Baxley  
421 Wando Park Blvd.  
Mt. Pleasant, SC 29464

Kevin Mims  
Luzuriaga Mims  
50 Immigration St.  
Charleston, SC 29403

Troy Thames  
Wilson, Jones, Carter and Baxley  
421 Wando Park Blvd.  
Mt. Pleasant, SC 29464

Robert Wood  
Rogers, Townsend & Thomas  
1221 Main St., 14<sup>th</sup> Floor  
Columbia, SC 29201

Nici Comer  
General Counsel, Center State Bank  
700 Gervais St., Ste. 400  
Columbia, SC 29201

Dated: September 21, 2020

Respectfully submitted,

By:



---

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

21 September 2020

**RECEIVED**

SEP 24 2020

**SC Court of Appeals**

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

RE: Churchill Park v. Alan G. Nix, Norma J. Nix and the Estate of Norma J. Nix  
Notice of Appeal – Case Number: 2017-CP-10-04031 and 2014-CP-10-05407

Ms. Abbott Kitchings,

Please find enclosed:

1. Notice of Appeal for Order filed 21 August 2020 for case numbers 2014-CP-10-05407 and 2017-CP-10-04031
2. Proof of Service.
3. Check number 1247 drawn on Navy Federal Credit Union in the amount of \$250.00
4. Copies of the Notice of Appeal and Proof of Service to be returned with your clock stamp
5. Self-addressed and postage prepaid envelope to return the enclosed copies of the Motion and Proof of Service

Thank you very much for your assistance and please let me know if you require anything else related to this filing.

Best regards,



Alan Nix

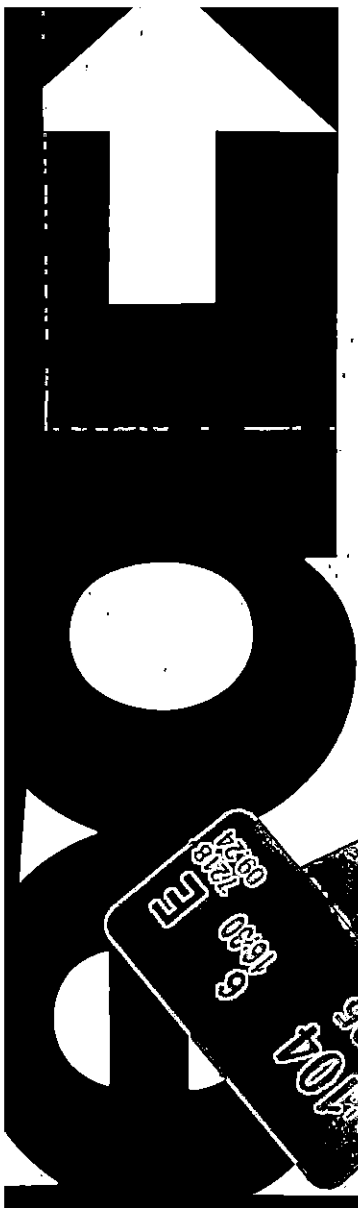
cc.

Todd Musheff  
Robert Wood  
Kevin Mims

Troy Thames  
Alan Wilson  
Mikell Scarborough

Maite Murphy  
Stephanie Trotter  
Ryan McCabe

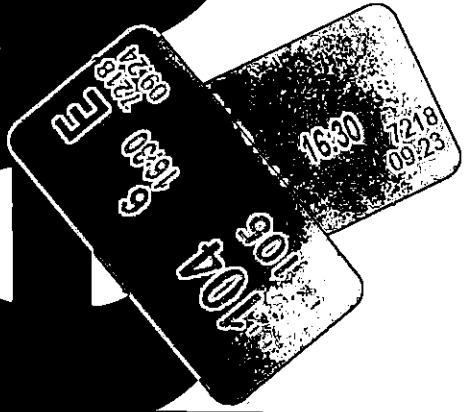
Julie Armstrong  
Sarah Schreiber  
David Thomas/ US Fire



**Express**  
**RECEIVED**

SEP 24 2020

SC Court of Appeals



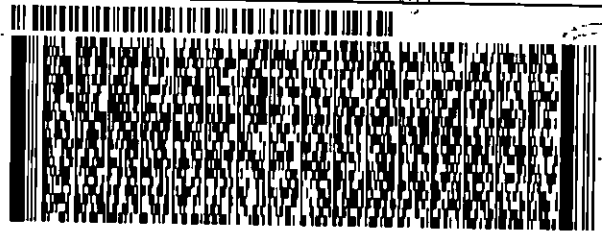
ORIGIN ID:CHSA (843) 891-4170  
ALAN NIX  
1401 DENSMORE CIR  
MOUNT PLEASANT, SC 29466  
UNITED STATES US

SHIP DATE: 21SEP20  
ACTGNT: 1 30 18  
CAD: 6993999/SSFE2110  
BILL THIRD PARTY

TO **SC COURT OF APPEALS**  
**CLERK OF COURT**  
**1220 SENATE ST**

**COLUMBIA SC 29201**

(803) 734-1890 REF:  
TRK# PS1 DEPT:

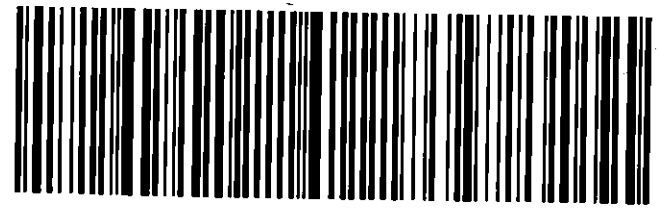


**THU - 24 SEP 4:30P**  
**EXPRESS SAVER**

TRK# 3970 5105 7218  
0201

**SH USCA**

29201  
SC--US CAE



Part 8 (8520) 9/18/18 5/18/18 04/21