

2 October 2019

Alan Nix
1401 Densmore Circle
Mount Pleasant, SC 29466

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

RE: Response to Thames proposed order 2019-CP-10-00067

Mr. Thames.

Despite Andy's and Mr. Wood's assertion that this is all very simple, and perhaps it certainly would be if any of this were even remotely within the bounds of normality, I think it may be prudent for you to consider a few items relative to your very succinct proposed motion.

1. Your proposed order doesn't specify which of the cited causes of action you think your client(s) should be excused from with prejudice. If you truly believe it is appropriate to ask for a dismissal with prejudice, it would probably also be appropriate for you to name with specificity which causes of action named you and your clients believe is properly applicable.
2. Similar to point number one above, please specify the effective time period you are seeking each of the causes of action you cite to be dismissed with prejudice.
3. And, for each cause of action you cite that you want to have dismissed with prejudice, you should probably specify which violations of law you want to have each cause of action dismissed with prejudice for
4. For instance, and admittedly for some reason no one has ever verified Dave's exact status during April and May 2013 (primarily because he was sitting in his garage talking with Stephen Sumner on the morning of 26 Sept 2017 instead of coming to Scarborough's office downtown), but let's consider the lien that Andy's and Mr. Wood's clients (and previous employees) Ryan McCabe and Stephanie Trotter filed against my family's home on 23 May 2013. Now we know that less than a month earlier McCabe Trotter conspired with Larry Riddlehoover to improperly assign the rights of lien and foreclosure away from Churchill Park Homeowners Association, Inc to Park West Master Association, Inc. And it seems to be well above a general preponderance of the evidence that Dave was an officer or director or something with apparently real power and fiduciary responsibilities to one or more of the "Churchill's during April and May 2013, so, clearly Dave has some civil and/or criminal liability

related to going along with Ryan McCabe, Stephanie Trotter and Larry Ridlehoover in filing a lien in the name of "Churchill Park", and not Park West Master Association, Inc or Churchill Park Homeowners Association, Inc. So, with this as an example, if you also choose to cite conspiracy as one of the causes of action you think should be dismissed with prejudice, please also cite in addition to the violation of law that is applicable, Dave's and 'or Catherine's coconspirators. (and this may be a bit tricky for you since Dave nominated Catherine to replace him on the board of one or more of the "Churchill" entities in June 2014 and then went around and lobbied everyone in the room to vote for her)

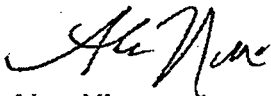
5. Since cases 2014-CP-10-05407 and 2017-CP-10-04031 are cited in this complaint, specifically related to needing to be properly restored due to numerous acts of misconduct by many many many Persons, you should probably state your rationale for seeking a dismissal with prejudice within the context of the 60(b) motions filed on 9 Nov 2018 for case 2017-CP-10-04031 and 13 Nov 2018 for case 2014-CP-10-05407. Think the language goes something like *"Properly restore case number 2014-CP-10-05047 and 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.* See, if you seek a dismissal with prejudice in this case, which was filed after those two 60(b) motions, which were filed almost two months earlier, that appears to create some weird conflicts with all of that equitable tolling stuff.
6. Also, I'm copying my previous attorney's attorney on this because he may very well want to chime in or submit a motion to intervene or something. See, on 4 Jan 2019, once Andy's and Mr. Wood's clients associates and associates associates left my Lot, and once I finished sending the pictures of Andy's and Mr. Wood's clients associates and associates associates to Chief Ritchie, Mr. Demoura, Deputy Chief Gragg, Pagliarini, etc., which cost me like almost 4 hours that day between 0930 and 1330, I got back to trying to get this thing kind of sorted out so it could be filed before 1700 on 4 Jan 2019, because, obviously that would have been exactly three years since I had gave Bill all of the information of Andy's and Mr. Wood's clients associates and associates associates fraud, etc on 4 Jan 2016, which of course Bill didn't do anything with for the next 2.5 months. BUT, if he had, like at least a kinda zealous second year law school student level would have done, I suspect his amended complaint would have added a bunch of new third party plaintiffs and lots of new counter claims which would have looked a bit like this filing, except of course with all of the details of their crimes. So, depending on everyone's potential need to show Bill a little gratitude and sympathy related to this big ole jamb he is in, maybe y'all want to see if Mr. Umbarger wants to try to minimize his client's predicament just a little by taking a look at this case kind of quickly so that whole case in a case thing is a bit more clear.
7. Also, don't you want me to pay your attorney fees???? I didn't see anything about that in your proposed order? This is your chance to ask for all of the fees you think is fair that insurance isn't paying you. I'm probably just going to turn around and get it from Bill or his associates or associates associates, etc. Another reason Mr.

Umbarger, Mr Dawson, etc. probably should be given a quick chance to consider this situation.

8. And I'm just raising this as a potential issue, but I'm like 95% sure you may have some problems in that other case you are representing Dave and Catherine in related to Judge Young's and Mr. Kaiser's and yours improper conduct for that order last Sept 2018. Granted, you didn't sign it, but you have clearly went along with it since November of 2018. Since it is the same clients in highly related matters, whatever happens here may come back around again sometime in the next year or so.....
9. And, perhaps it would be as Mr. McNair stated last week, in pursuit of judicial economy, to go ahead and insert the requirement in your order to file an explanation for your apparent confusion over if I had thirteen pending in Charleston County. I'm guessing you have the letter now which you can use to pretty accurately capture the concept / requirement.
10. I also noted that you said something about the complaint being frivolous on its face. Don't you want to ask for all kinds of big sanctions and stuff?
11. Lastly, you know I have been trying to get someone, like actually any Person at all, whether breathing or not, to file the attached "Assignment of Foreclosure Rights" from over two years ago. If you or your client's or any of your clients coconspirators have that document (like the original of course), could you try to make sure that gets filed at the Charleston County ROD like, literally, in the next two or three business days?

I hope you don't mind too much in considering / accommodating the above requests / issues. As I'm sure you must know by now, I'm literally right on the edge of bankruptcy due to six plus years of fraud and public corruption and malicious prosecution, etc. So, I really don't have enough money to keep paying \$25 per motion to get things ultimately sorted out mostly correctly.

Best regards,



Alan Nix

cc.

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321 Wingo Way
Mt. Pleasant, SC 29464

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100 Broad St.
Charleston, SC 29401

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

Josh Umbarger
Earhart Overstreet
PO Box 22528
Charleston, SC 29413

Property to collect Assessments from those Lot Owners and the right to enforce and foreclose upon such liens for the collection of delinquent Assessments; and

WHEREAS, that certain ASSIGNMENT OF LIEN AND FORECLOSURE RIGHTS dated April 16, 2013 and recorded April 28, 2013 in the Charleston County RMC Office in Book 0326 at Page 993 (the "*Subordinate Assignment*") sought to grant to the Master Association rights to enforce and foreclose upon the Subordinate Assignment Assessment liens for the collection of delinquent Assessments (to include all associated fines, interest, costs and attorneys fees as authorized by the Subordinate Declaration); and,

WHEREAS, by the execution of this Assignment, Assignor elects to assign back to Assignee a coextensive individual right of Assignee to enforce and to the extent the Subordinate Assignment is construed as having assigned all of the Subordinate Association's rights to foreclose upon Assessment liens for the collection of delinquent Assessments as defined herein above, foreclose upon its respective Assessment liens for the collection of delinquent Assessments (to include all associated fines, interest, costs and attorneys fees as authorized by the applicable Subordinate Declaration) such that the Subordinate Association and the Master Association each have the coextensive, equal and separate right and authority to enforce and foreclose upon such Subordinate Association's Assessment liens for the collection of delinquent Assessments (to include all associated fines, interest, costs and attorneys fees as authorized by the respective applicable Subordinate Declarations);

NOW, THEREFORE, for value received, the Assignor hereby sells, transfers and assigns unto Assignee, its successors and assigns, the respective rights, as described herein, to enforce and foreclose upon Assignee's Assessment liens for the collection of delinquent Assessments, including any and all associated fines, interest, costs, and attorney's fees as authorized by the applicable Subordinate Declaration, while Assignor retains for itself the coextensive right to enforce and foreclose upon Subordinate Association's Assessment liens for the collection of delinquent Assessments, including any and all associated fines, interest, costs, and attorney's fees as authorized by the applicable Subordinate Declaration. The collection and enforcement rights contemplated by this Assignment shall include all legal and equitable remedies granted to Subordinate Association as set forth in the applicable Subordinate Declaration.

This Assignment applies to all existing and future Assessment liens held by the Subordinate Association. It is the intent of the parties for Subordinate Association to continue filing its own Notice of Liens for delinquent Assessments, however by operation of this Assignment Subordinate Association possess the rights to enforce and foreclose upon such Subordinate Association's Assessment liens and the Master Association holds a coextensive right to enforce and foreclose on any such Subordinate Association's Assessment liens.

The rights and benefits herein conferred upon the Assignee shall inure to the benefit of each of their successors and assigns.

Any capitalized terms used, but not defined, herein shall have the meaning set forth in the Master Declaration or the applicable Subordinate Declaration.

IN WITNESS WHEREOF, the undersigned have caused these presents to be duly executed on the date(s) of signature below (the "Execution Date"). If the signature dates differ, the later of the signature dates shall constitute the Execution Date.

WITNESSES:

ASSIGNOR:

[Signature]
(Witness #1)
[Signature]
(Witness #2)

Park West Master Association, Inc.

By: [Signature]
Print Name: Kevin Steelman
Its: President
Date: 9-14-17

STATE OF SOUTH CAROLINA)
COUNTY OF Richland)

ACKNOWLEDGMENT
S.C. §30-5-30
(EFFECTIVE MARCH 14, 2016)

I, Jarrie Cross, a Notary Public for South Carolina, do hereby certify that Park West Master Association, Inc., by its authorized officer, Kevin Steelman, personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and seal this 14th day of Sept 2017.

[Signature]
Notary Public for South Carolina
My Commission Expires: 02-26-24

WITNESSES:

[Signature]
(witness #1)
[Signature]
(witness #2)

ASSIGNEE:

Churchill Park
By: [Signature]
Print Name: Zane Perry
Its: President
Date: 9/14/17

STATE OF SOUTH CAROLINA)
COUNTY OF Charleston)

ACKNOWLEDGMENT
S.C. §30-5-30
(EFFECTIVE MARCH 14, 2016)

I, Shaunda Cothens, a Notary Public for South Carolina, do hereby certify that Churchill Park, by its authorized officer, Zane Perry, personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and seal this 14th day of September, 2017.

[Signature]
Notary Public for South Carolina
My Commission Expires: July 16, 2025
~~MY COMMISSION EXPIRES JULY 16, 2021~~

3 October 2019

Alan Nix
1401 Densmore Circle
Mount Pleasant, SC 29466

Robert Wood
Rogers Townsend & Thomas
PO Box 100200
Columbia, SC 29202

Andy Countryman
Countryman Law Firm
321 Wingo Way
Mt. Pleasant, SC 29466

RE: Response to Woods / Countryman proposed order 2019-CP-10-00067

Mr. Robert and Andy.

Just in case your proposed order is considered timely, I am responding with a good bit of the feedback I gave to Troy yesterday and attempting to speak to as much of your stuff as possible as well. Given, thanks to your Rogers Townsend Thomas's relationship with your clients, as well as being their previous employers and apparent master minds of the various schemes of your clients and your clients apparent clients and actual clients, as well as of course their many many associates, clearly, none of this is remotely normal, and consequently, I'm confident it would be very prudent for you to consider providing some additional details relative to your proposed order.

1. Your proposed order appears to be citing attorney legal malpractice, negligence and negligent supervision in the negligence categories, but doesn't really provide any details to help ascertain the situation. For instance, when Ryan McCabe and Stephanie Trotter, as attorneys for Park West Master Association, Inc and apparently, "Churchill Park" filed liens against my family's home in May 2013 with fraudulent acknowledgments, who was responsible for that? Trotter and McCabe equally? McCabe principally since he was by far the majority shareholder? McCabe principally plus Trotter since clearly she knew there wasn't a notary in her presence when she signed the liens? Further, you seem to suggest that breach of fiduciary duty, aiding and abetting breach of fiduciary duty and negligent misrepresentation are within the gambit of professional malpractice. Certainly you could argue that point I suppose, but those causes of action aren't in the same spectrum as making a typo and not correcting it.... Consequently, please cite with specificity which causes of action for which actions on which dates you and Mr. Robert desire to have each of your clients dismissed with prejudice. Also, unless you are representing Rogers, Townsend and Thomas and/or Dodds & Hennessy LLP, please remove their names from your proposed order.

2. For instance, lets assume that your clients were hired by Southern Community Services, LLC as a third party contractor to Park West Master Association, Inc., which was controlled by the “developer” or “developers”. Then lets assume, as a third party contractor to Southern Community Services, LLC, your client(s) conspired with Southern Community Services, LLC, and their Principals Larry Ridlehover and Chuck Munn, to craft, and fraudulently execute and file the “Assignment of Lien and Foreclosure Rights” filed 29 April 2013, very similar to what Rogers Townsend and Thomas did at Lake Carolina in Dec 2011 (that was one off the exhibits you didn’t want to take last Thursday). In that example, then it would appear that your clients wouldn’t be a third party contractor to Churchill Park Homeowners Association, Inc. to file liens and foreclosure actions because that would now all be under Park West Master Association, Inc. which SCS was the Managing Agent and your clients would be the third party contractor to Park West Master Association, Inc., via SCS, of course assuming that your clients were not involved in multiple sorts of fraud in devising and executing that scheme, including but not limited to fraudulently notarizing and witnessing multiple signatures of Larry Ridlehoover in the April 2013 “Assignment of Lien and Foreclosure Rights”. But with that example to work with, please state which causes of action, against which of your clients, for which of those acts you wish to have dismissed with prejudice and which, if any of their coconspirators you are attempting to assist by having those claims dismissed with prejudice. Then do the same for any other fraudulent and/or criminal acts you wish to request a dismissal for prejudice for. And here’s another interesting example, your client(s) client(s) send a bill in Dec 2012 asking us to pay Mr. Mims client Churchill Park at Park West Association our annual “assessments”, then your clients client(s) conspire with your clients clients cleints to craft, execute and file the April 2013 “Assignment of Lien and Foreclosure Rights” purporting to assign the rights of lien and foreclosure rights away from, not Churchill Park at Park West Association, Inc, but Churchill Park Homeowners Association, Inc, to Park West Master Association, Inc. and then less than a month later, file not one, but two liens in the name of Park West Master Association, Inc. and “Churchill Park”, which isn’t Churchill Park Homeowners Association, Inc. nor Churchill Park at Park West Association, which apparently I didn’t pay my annual “assessments” to three months earlier.....
3. Since cases 2014-CP-10-05407 and 2017-CP-10-04031 are cited in this complaint, specifically related to needing to be properly restored due to numerous acts of misconduct by many many many Persons, you should probably state your rationale for seeking a dismissal with prejudice within the context of the 60(b) motions filed on 9 Nov 2018 for case 2017-CP-10-04031 and 13 Nov 2018 for case 2014-CP-10-05407. Think the language goes something like *“Properly restore case number 2014-CP-10-05047, and 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.* See, if you seek a dismissal with prejudice in this case, which was filed after those two 60(b) motions, which were filed almost two months earlier, that appears to create some weird conflicts with all of that equitable tolling stuff.

4. Also, I'm copying my previous attorney's attorney on this because he may very well want to chime in or submit a motion to intervene or something. See, on 4 Jan 2019, once Andy's and Mr. Wood's clients associates and associates associates left my Lot, and once I finished sending the pictures of Andy's and Mr. Wood's clients associates and associates associates to Chief Ritchie, Mr. Demoura, Deputy Chief Gragg, Pagliarini, etc., which cost me like almost 4 hours that day between 0930 and 1330, I got back to trying to get this thing kind of sorted out so it could be filed before 1700 on 4 Jan 2019, because, obviously that would have been exactly three years since I had gave Bill all of the information of Andy's and Mr. Wood's clients associates and associates associates fraud, etc on 4 Jan 2016, which of course Bill didn't do anything with for the next 2.5 months. BUT, if he had, like at least a kinda zealous second year law school student level would have done, I suspect his amended complaint would have added a bunch of new third party plaintiffs and lots of new counter claims which would have looked a bit like this filing, except of course with all of the details of their crimes. So, depending on everyone's potential need to show Bill a little gratitude and sympathy related to this big ole jamb he is in, maybe y'all want to see if Mr. Umbarger wants to try to minimize his client's predicament just a little by taking a look at this case kind of quickly so that whole case in a case thing is a bit more clear.
5. You filed an affidavit last Thursday wanting a bunch of money for all of your efforts to defend your clients and your cocounsel / cocounsel law firm. I think Judge Jefferson said for you to file a detailed listing of your billing supporting all of that but, unless I'm missing something, I don't see that. Don't you want to include that in your proposed order? Make sure you include Mr. Robert's charges too..... Now of course, if someone else is paying your fees now, please make sure you provide copies of all of the bills you sent to them and payments you have received from them. And just in case there are some cutouts in the middle, make sure you provide the exact name of the Person(s) actually paying the bills. For instance, lets assume that relationship layout in number 2 is pretty close to being accurate, and lets assume that Southern Community Services purchase director and officer insurance on behalf of Park West Master Association, Inc., and lets assume that Southern Community Services is filing insurance claims with some CAI insurance company to pay McCabe Trotter's legal defense which is paid to you. If something like that is going on, make sure you lay that out in detail too.
6. And just to make sure you and Mr. Robert are totally aware of y'all's potential situation, once I finally gave in and paid like \$30 to the State of South Carolina to get access to Richland County's ROD records for a month, and found the Dec 2011 "Assignment of Lien and Foreclosure Rights" related to Lake Carolina Master Association, also apparently professionally managed by Larry Ridlehoover and SCS, compounded with the liens filed in 2011 by Ryan McCabe and Stephanie Trotter, as employees of Rogers, Townsend and Thomas PC, which were filed in the name of Park West Master Association, Inc. and "Churchill Park", on the same lien document, it appears that Mr. Wood's employer and Mr. Wood's, as Mr. McCabe's and Ms. Trotter's previous supervisor, are at the center of this scheme. Consequently, what I was attempting to clarify for you the other day, is you representing McCabe and Trotter, etc., when you are clearly on notice of their and your cocounsel's illegal

activity for a number of years, is an obvious conflict of interest for you and Mr. Wood's / Rogers Townsend and Thomas, since it seems rather clear you are either directly involved in their illegal conduct, or have unwisely continued to represent them when you knew or should have known about their continued ongoing pattern of illegal conduct. And yes, that should be construed to be fair warning.

7. Now under number one, I'm confused. You call out the SC Frivolous Proceedings Sanctions Act but then don't ask for any sanctions? Like having a corrupt attorney appointed to baby sit me so y'all have a friend in the business to help y'all stave off the inevitable issues coming your way or maybe asking for tens of thousands of dollars in penalties to try to complete what your clients and your clients clients and your clients clients associates etc. have been trying to do since at least Sept 2014...bankrupt me...
8. And as to legal malpractice toward your clients, I don't think Churchill Park Homeowners Association, Inc's real statute of limitations against your clients can be legally construed to start until sometime in Dec 2017, hence, there is at least another 14 months or so of liability there. BUT, and just asking, are you really sure that is what you should be worried about here? Last I heard, no one goes to jail for legal malpractice....
9. Under Procedure on page two, and in other places, you get really caught up in the service of process thing. BUT, didn't your and Mr. Robert filing a motion to dismiss essentially serve as you accepting service of process for your clients? And of course, I attempted to serve you and you didn't want it. Could that maybe be considered bad faith? I will try to find that stuff from you pretty quickly too, just so you have a chance to correct anything you may have apparently put in there that could be construed as in bad faith. Same issue on page eight under number "5".
10. NOW, under number 5, you interestingly chose to introduce the topic of Scarborough's fraudulent 40(j) order of 23 March 2016, and for that I truly appreciate your choice. HOWEVER, perhaps you should include a lot more information about that other than just trying to make it seem like it was under good faith by using the concept "cursory review". Please lay out all of the facts there. It shouldn't take but a couple of extra sentences. Something about form 4 with 40j box checked and ends case box checked. NO agreement in writing as specified by rule 40(j), only supported by a fraudulent transcript and your clients refused to document a 40(j) agreement in May 2017 when asked. Pretty simple fact set for common law obstruction of justice and misconduct in office, etc.
11. And in the category of clearly BAD FAITH, you state, obviously incorrectly, that "The Court of Appeals affirmed the lower court's ruling" BUT, just in case my assessment is incorrect about your intentions, please attach the Court of Appeals order to your proposed order which you refer to to make the apparently clear assertion that the Court of Appeals affirmed the lower court's ruling.
12. Page eight, bottom of second paragraph. It's my opinion that an attorney is liable for their own conduct and their law firm is also liable for their employee's conduct. Hence, if an attorney like McSweeney, does something like redacting all kinds of information in an accounting document, with the clear intent to conceal that SCS only maintained one account for the Nix Lot 22, in the Churchill Park Subdivision of the Park West Development in Mount Pleasant, SC, clearly McSweeney is liable for her

- conduct as well as McCabe Trotter and her direct supervisor at McCabe Trotter. If you disagree, please clarify with sufficient facts, case law citations etc.
13. Your statements relative to Norma are under consideration.
 14. Page 6, second paragraph, "The firm, through those lawyers, represented Plaintiff's homeowners' association in a lien foreclosure action reference in the Complaint". Mr. Robert and Andy, assuming both of y'all aren't suffering from some mental illness or both have some chemical dependency or both aren't suffering from early onset of Alzheimer's, this is clearly a bad faith statement. Didn't you bring up both in your Affidavit wanting all of that money last week and in your in your comments at the hearing last week the two case you removed to federal court last year? Unless all of the (di)stress your clients and your clients clients and your clients clients associates have induced on me in the last six plus years as created mental illness for me, I seem to remember Judge Gergel clarifying Magistrate Barstow's use of "Churchill" to mean Churchill Park Homeowners Association, Inc..... Y'all did win those two cases, at least from the battle perspective. Be proud, but you should definitely clear that up so you don't engage any further in "bad faith" conduct.
 15. Lastly, you know I have been trying to get someone, like actually any Person at all, whether breathing or not, to file the attached "Assignment of Foreclosure Rights" fo4 over two years. If you or your client's or any of your clients coconspirators have that document (like the original of course), could you try to make sure that gets filed at the Charleston County ROD like, literally, in the next day For a reminder, your apparent client Todd Musheff emailed that document to me on the evening of 17 Sept 2017, I got a copy out of my mail box on the morning of 18 Sept 2017, your apparent client Todd Musheff had it in Scarborough's office on the morning of 18 Sept 2017, someone filed it with the Clerk of Court in Charleston County on 20 Sept 2017 and then brought a copy of it to Scarborough's office again on the morning of 26 Sept 2017. So someone was within just a few hundred feet of the Charleston County ROD's office at least three times between 18 Sept 2017 and 26 Sept 2017 and still, 106 weeks later it still isn't filed with the Charleston County ROD. And to be transparent, I'm pretty sure your client or your client's clients or client's clients associates had it then and has it now. But, as you know, an attorney who knows their client is engaged in ongoing criminal activity has ethical responsibilities related to that situation. SO, please make sure the original document of the enclosed exhibit your apparent client Todd Musheff used on 26 Sept 2017 finally gets filed with the Charleston County ROD ASAP.... Sorry, I meant to mention, that your apparent client Todd Musheff also stated in Scarborough's office on 25 Sept 2017 that he also represented Southern Community Services.....

I hope you don't mind too much in considering / accommodating the above requests / issues. As I'm sure you must know by now, I'm literally right on the edge of bankruptcy due to six plus years of fraud and public corruption and malicious prosecution, etc. So, I really don't have enough money to keep paying \$25 per motion to get things ultimately sorted out mostly correctly.

Best regards,



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Property to collect Assessments from those Lot Owners and the right to enforce and foreclose upon such liens for the collection of delinquent Assessments; and

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WHEREAS, by the execution of this Assignment, Assignor elects to assign back to Assignee a coextensive individual right of Assignee to enforce and to the extent the Subordinate Assignment is construed as having assigned all of the Subordinate Association's rights to foreclose upon Assessment liens for the collection of delinquent Assessments as defined herein above, foreclose upon its respective Assessment liens for the collection of delinquent Assessments (to include all associated fines, interest, costs and attorneys fees as authorized by the applicable Subordinate Declaration) such that the Subordinate Association and the Master Association each have the coextensive, equal and separate right and authority to enforce and foreclose upon such Subordinate Association's Assessment liens for the collection of delinquent Assessments (to include all associated fines, interest, costs and attorneys fees as authorized by the respective applicable Subordinate Declarations);

NOW, THEREFORE, for value received, the Assignor hereby sells, transfers and assigns unto Assignee, its successors and assigns, the respective rights, as described herein, to enforce and foreclose upon Assignee's Assessment liens for the collection of delinquent Assessments, including any and all associated fines, interest, costs, and attorney's fees as authorized by the applicable Subordinate Declaration, while Assignor retains for itself the coextensive right to enforce and foreclose upon Subordinate Association's Assessment liens for the collection of delinquent Assessments, including any and all associated fines, interest, costs, and attorney's fees as authorized by the applicable Subordinate Declaration. The collection and enforcement rights contemplated by this Assignment shall include all legal and equitable remedies granted to Subordinate Association as set forth in the applicable Subordinate Declaration.

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The rights and benefits herein conferred upon the Assignee shall inure to the benefit of each of their successors and assigns.

Any capitalized terms used, but not defined, herein shall have the meaning set forth in the Master Declaration or the applicable Subordinate Declaration.

IN WITNESS WHEREOF, the undersigned have caused these presents to be duly executed on the date(s) of signature below (the "Execution Date"). If the signature dates differ, the later of the signature dates shall constitute the Execution Date.

WITNESSES:

ASSIGNOR:

[Signature]
(Witness #1)
[Signature]
(Witness #2)

Park West Master Association, Inc.

By: [Signature]
Print Name: Karin Steelman
Its: President
Date: 9-14-17

STATE OF SOUTH CAROLINA)
COUNTY OF Richland)

ACKNOWLEDGMENT
S.C. §30-5-30
(EFFECTIVE MARCH 14, 2016)

I, Jerrie Cross, a Notary Public for South Carolina, do hereby certify that Park West Master Association, Inc., by its authorized officer, Karin Steelman, personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and seal this 14th day of Sept 2017.

[Signature]
Notary Public for South Carolina
My Commission Expires: 02-26-24

WITNESSES:

[Signature]
 (witness #1)

[Signature]
 (witness #2)

ASSIGNEE:

Churchill Park

By: [Signature]
 Print Name: Zane Perry
 Its: President
 Date: 9/14/17

STATE OF SOUTH CAROLINA)
 COUNTY OF Charleston)

ACKNOWLEDGMENT
 S.C. §30-5-30
 (EFFECTIVE MARCH 14, 2016)

I, Shaunda Cothran, a Notary Public for South Carolina, do hereby certify that Churchill Park, by its authorized officer, Zane Perry, personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and seal this 14th day of September, 2017.

[Signature]
 Notary Public for South Carolina
 My Commission Expires: July 16, 2025
 MY COMMISSION EXPIRES JULY 16, 2021

22 October 2019

Alan Nix
1401 Densmore Circle
Mt. Pleasant, SC 29466

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

RE: Charleston County / Charleston County Clerk of Court use of your already problematic order
ORDER ENJOINING PLAINTIFF FROM RE-FILING THIS MATTER AND IMPOSING SANCTIONS UPON THE
PLAINTIFF; case 2018-CP-10-03315

Judge Murphy,

Based on the letter you should have received 14 October 2019 related to the subject order, asking you and Mr. Wilson to timely fix that situation prior to it causing improper issues for me to respond to your orders stamped by the Charleston County Clerk of Court on 27 September 2019, along with the copy of the Rule 59 motion that you should have received either 18 or 21 October related to this order, as well as the others of yours for case 2018-CP-10-03315, I feel relatively confident you are aware of the many issues related to this situation, including but not limited to, more than a few inaccurate and/or misrepresentative apparent facts including in those orders.

However, this letter is meant to ensure you are aware of how Charleston County / the Charleston County Clerk of Court is leveraging your order as of at least yesterday, 21 October 2019. I went to the Charleston County Courthouse yesterday afternoon to file a motion in case 2019-CP-10-00067, the same case the I filed a motion to set aside your order related to the Kevin Mims motion to quash on 7 October 2019, and was told by Mr. Robert Duncan, apparently acting on behalf of and with full knowledge of Ms. Armstrong, that the Charleston County Clerk of Court would not file anything related to anything that might be apparently related to anything at all as potentially referenced in case 2018-CP-10-03315. Despite me asking him like three different times to just write down, date and sign his / Ms. Armstrong's policy and logic for that extremely broad usage, he completely refused to do so. I'm fairly sure based on his comments, Charleston County, Ms. Armstrong, etc. are totally enthralled with leveraging your (or Mr. Wilson's) portion of the last sentence that reads in part "related to the matters set fourth in Civil Action No. 18-CP-10-03315". I did manage to get Mr. Duncan to state that essentially any that loosely references the word "Churchill", (I'm now thinking either directly or indirectly) would be DENIED! He also stated to that end, that other than for a medical thing that I filed, everything else was persona non grada. (The power of big money and shared risk of prosecution right!)

Now, to be honest, if I were in Ms. Armstrong or Charleston County or William Sloan or "Churchill Park" or Churchill Park at Park West Association, Inc. or Churchill Park at Parkwest or Park West Master Association Inc. or the Tomlin brothers or Landtech or Park West Amenity Association Inc., or McCabe Trotter & Beverly or Roger, Townsend & Thomas or Kevin Mims or Randall Stoney or Todd Musheff or Southern Community Services or Judge Turner or Judge Scarborough or Judge Young or Charleston Legal Access or the Town of Mt. Pleasant or the Charleston County Sherriff's office or etc. (I could go on for a very long time, but I bet you get the picture) that is exactly how I would want the Charleston County Clerk of Court to interpret it too. And, to be honest one more time, I'm pretty darn sure that is exactly how Mr. Wilson wanted it worded and interpreted, since it is obviously much easier to defend a corrupt judge in a case that doesn't exist because of such language than defend a corrupt judge in a case that does exist. BUT, since you signed it Judge Murphy, it is YOUR order.

With that as some background, please respond to all and confirm the way Ms. Armstrong and Charleston County are leveraging your order is the way you actually intended it to be used, OR, if not, clarify how you did intend for it to be used.

And while you are thinking about this before you finally decide again, you should know a few things. (not meant to be an inclusive list, just some of the important things right off the top of my head)

1. I'm essentially bankrupt from fighting this fraud for more than six years, which has obviously now turned into a very large public corruption case to keep the Tomlin brothers and all of their companies and associates and associate's companies, etc out of major civil and criminal legal problems.
2. Mr. Tomlin appears to be a pretty staunch financial supporter of Mr. Wilson.
3. Governor McMaster just appointed him to another commission overseeing lots of taxpayer funds..
4. Governor McMaster's brother used to be Mr. Tomlin's attorney.
5. There are a number of Federal crimes involved in these matters.
6. Given all of the issues with your orders and conduct of the hearing, it is possible this order could be construed to be another act of obstruction of justice, etc.
7. Given I'm essentially bankrupt from fighting this fraud for more than six years, my house is likely to get foreclosed on by First Federal of Charleston Savings and Loan Association, nka this, previously dba as that, etc., in the near future. If this order is continued to be leveraged like it currently is, then bringing that foreclosure case in Charleston County is going to be extremely weird.
8. And the same goes for Navy Federal Credit Union as is stated in number 7 above.
9. And McCabe Trotter & Beverly is over two years late from filing more liens and foreclosure cases against my family's home in the names of Park West Master Association, Inc and Park West Amenity Association, Inc.
10. And, the case I'm trying to intervene in on behalf of the taxpayers of Mount Pleasant, Park West Development v. the Town of Mt. Pleasant, is in the Public Interest.
11. And, Judge Scarborough has clearly broken a number of laws related to these cases, starting with the obviously fraudulent 40(j) order of 23 March 2016 in case 2014-CP-10-05407.
12. And, if I appeal your orders, that is going to get even more crazy because I'm certain the SC Court of Appeals has committed crimes because of their conduct in covering up Judge Scarborough's crimes during 2018 and most of 2019.
13. And, Mr. Duncan, once again pretty sure acting on behalf of Ms. Armstrong and with her knowledge, has previously utilized similar broad language inappropriately. For instance, in December 2017, he used similar broad language out of an Order of Reference Ms.

Armstrong signed November 2014 for case 2014-CP-10-05407, (a Rogers, Townsend and Thomas form Order of Reference), to apparently justify also referring case 2017-CP-10-04031 to Judge Scarborough without needing another order of reference, even though that case was clearly not in default nor did the parties consent to the transfer.

So, I guess what I'm getting to is that signing an order like this is like giving crack cocaine to the SC BAR association, Charleston County, Landtech, the SC Attorney General, the Town of Mt. Pleasant, etc. They desperately needed a "fix" like this.... but I doubt a remotely responsible doctor (trying to continue the analogy) would have ever considered this type of "solution" to their problem as appropriate and ethical.

I just wanted to make sure you were totally aware of the dark waters you are swimming in with this order and stuff. Hopefully you and Mr. Wilson can figure this out real quick. Please lets us know soonest.

Best regards,



Alan Nix

Ps. About footnote 1, I'm pretty sure you have a transcript filed in your courthouse from January of this year that pretty much confirms the allegations I made about Trotter and crew. I'm surprised you didn't remember that tidbit when you were drafting or signing or whatever this questionable order. Hopefully you have reported that illegal conduct to the appropriate authorities already.

cc.

Luke Rankin
Chairman, SC Senate Judiciary Committee
101 Gressette Bldg.
Columbia, SC 29201

Peter McCoy
Chairman, SC House Judiciary Committee
512 Blatt Bldg
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Joe Dawson
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Julie Armstrong
Charleston County Clerk of Court
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Tonnya Kohn
SC Court Administration
1220 Senate St.
Columbia, SC 29201

4 November 2019

Alan Nix
1401 Densmore Circle
Mount Pleasant, SC 29466

Julie Armstrong
Clerk of Court, Charleston County
100 Broad St.
Charleston, SC 29201

RE: 2019-CP-10-00067 motion for Orders filed 17 October 2019

Ms. Armstrong.

Enclosed is:

1. check number 899 in the amount of \$25.00
2. motion related to the three orders with a file date of 17 October 2019
3. certificate of service for the motion

I received the letter from your office on 29 October 2019.

I was going to come down there and file it in person today, but, since I have yet to receive a response from you or Mr. Wilson or Judge Murphy or anyone else related to her infamous order titled "ORDER ENJOINING THE PLAINTIFF FROM RE-FILING THIS MATTER AND IMPOSING SANCTIONS UPON THE PLAINTIFF", and the fact that I was hassled by the Charleston County Sherriff's office on 29 August 2018 at Judge Scarborough's, and Mr. Duncan threatened me with the same on 21 October 2019 when he declared that because of Judge Murphy's "ORDER ENJOINING THE PLAINTIFF FROM RE-FILING THIS MATTER AND IMPOSING SANCTIONS UPON THE PLAINTIFF" I couldn't file anything with your office, I'm just mailing this motion so I don't get arrested or something. Since I'm now largely destitute, I almost certainly couldn't afford bail or an attorney, and once again, I couldn't represent myself either because of Judge Murphy's infamous "ORDER ENJOINING THE PLAINTIFF FROM RE-FILING THIS MATTER AND IMPOSING SANCTIONS UPON THE PLAINTIFF". So, I'm fairly confident you won't properly file this motion either but you should definitely retain all of it properly because who knows what will happen next with this big ole cauldron of public corruption.

Additionally, I wanted to make sure you know that:

1. I still haven't received the five or six notices for a motion hearing Trotter emailed about on 25 April 2019. Could you please send those to me?
2. I still haven't received a notice for motion hearings for the 60(b) motions filed for 2017-CP-10-04031 on 9 November 2018 and 2014-CP-10-05407 on 13 November 2018. (almost a one year anniversary)
3. Also, these motions incorporate the letters sent on 2 Oct 2019 and 3 Oct 2019 related to Mr. Robert's / Andy's and Thames proposed orders. Please ensure they are posted to the file and website so they are properly in the record for appeal. A copy was sent to you too.
4. Since it looks like this case ended on 17 Oct 2019, how was it possible to have a hearing scheduled for 29 Oct 2019? And since that is like 12 days between those two dates, shouldn't you have sent some type of notification out about that hearing?
5. Please respond and state how you received Judge Murphy's order related to Mim's motion to quash. Eg. Was it mailed to you? If so, what was the date mailed, date received, mailed from where, etc.

Best regards,



Alan Nix

cc.

Robert Wood
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Andy Countryman
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Judge Jefferson
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08 November 2019

Alan Nix
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Mt. Pleasant, SC 29466

Judge Murphy
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St. George, SC 29477

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

RE: Notification to preserve evidence

Judge Murphy / Mr. Wilson

First, by the time you receive this letter you should have received notification of the appeal filed in case 2018-CP-10-03315. Second, you will note that one of the orders appealed is your order titled "ORDER ENJOINING THE PLAINTIFF FROM RE-FILE THIS MATTER AND IMPOSING SANCTIONS UPON THE PLAINTIFF". As you were aware at the time that order was drafted, at the time that order was signed and at the time that order was filed, that order / proposed order contained several easily determined inaccurate statements that you clearly improperly utilized to make your case why sanctions, and a very specific type of sanctions, against me were apparently warranted.

This letter is intended to put all copied on notice that due to that action, counter action(s) will be taken against all parties involved with that case and order, as well as any other related case. Hence, all relevant evidence, including all relevant documents, should obviously be properly retained in anticipation of those actions. Likewise, given several violations of Federal law are involved, any evidence that is tampered with or not properly retained, would obviously constitute other violations of Federal law. Since there have already been actions of this nature taken, it seems like I should remind everyone of that, even though most of you are attorneys and should know better.

Judge Murphy, in your order titled "ORDER ENJOINING THE PLAINTIFF FROM RE-FILE THIS MATTER AND IMPOSING SANCTIONS UPON THE PLAINTIFF", you comment several times about my "numerous complaints about Defendant Churchill Park's business practices". For instance, "*In response to instituting foreclosure proceedings against him, Plaintiff filed numerous complaints with city, county and state offices complaining of Defendant Churchill Park's business practices. Further, Plaintiff sent numerous requests to state agencies for the registration and financial information of Defendant Churchill Park*". You will note in my Rule 59 motion, I asked you to clarify with specificity those numerous state agencies, city, county and state offices. Given the overall situation involved here, it would be most appreciated, and dare we say proper, if you could go ahead and provide the complete list of state agencies, city, county and state offices you cited, as well as a comprehensive list of the numerous complaints you cited. A simple date, clarification of the complaint or request and name of the state

agency or city, county and state office will be sufficient for the time being. Maybe just file that with the Charleston County Clerk of Court to keep it simple.

Also, related to footnote number one on page two of your order, have you:

1. Reviewed again the "Assignment of Lien and Foreclosure Rights" document filed with the Charleston County ROD on 29 April 2013 at book 0326, page 993?
 - a. If so, do you believe that 16 April 2013 is the same date as 24 April 2013?
 - b. If you don't believe that 16 April 2013 is the same date as 24 April 2013, have you reported any potential criminal conduct to one or more law enforcement authorities?
 - c. If you have, could you please provide the law enforcement authority name(s) and police report number(s)?
2. Have you reviewed the transcript dated 15 January 2019 for case 2016-CP-18-01001 filed in your own courthouse yet?
 - a. If so, did you find any possible evidence of criminal conduct included in that transcript?
 - b. If so, did you inquire of Mr. Wood and Mr. Countryman what actions they have taken in the last almost ten months to appropriately report and deal with those situations?
 - c. If you did inquire of Mr. Wood and Mr. Countryman, and they didn't report they had reported the potential criminal conduct, did you take any action to report the potential criminal conduct and/or any other potential ethical issues?
 - d. If so, could you reply with whatever information you believe you can reply with, at least the name of the law enforcement authorities and police report number(s).

Thank you for everyone's time and attention to these situations. Hopefully 2020 will be a lot more ethical, just, proper and productive for the other 97% of South Carolina citizens.

Best regards,



Alan Nix

PS.

Mr. Lesemann. Can you please get your client Mr. Steelman to finally file that "Assignment of Foreclosure Rights" dated 14 Sept 2017? Surely he or one of his associates could have found the time in the last 782 days to get that thing filed? Like for instance, 7 January 2019 at the latest?

Mr. Dawson, since I still haven't received a notification for a 60(b) hearing for case 2014-CP-10-05407 or 2017-CP-10-04031, now a year since filing, is it safe to construe that as an admission of guilt by Scarborough, Charleston County, Duke-Beck, etc.? If not, please make sure y'all readvertise my family's home for the December 2019 auction

cc.

Luke Rankin
Chairman, SC Senate Judiciary Committee
101 Gressette Bldg.
Columbia, SC 29201

Peter McCoy
Chairman, SC House Judiciary Committee
512 Blatt Bldg
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Kevin Mims
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Ryan McCabe
McCabe Trotter & Beverly
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Nicole Comer
South State Bank
PO Box 1030
Columbia, SC 29202

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

SEP 16 2020

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Deadra Jefferson
And
The Honorable Maite Murphy

Case No. 2018-CP-10-00067

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

Appellants,

v.

Churchill Park, Churchill Park HOA, Churchill Park Homeowners' Association, Inc., Churchill at Park West Association Inc., Churchill Property Owners Association, Churchill Park Property Owners Association, Churchill Park at Parkwest, Inc., Churchill Park at Park West Association Inc., Churchill Park @ Park West Association, Inc., Southern Community Services, LLC, Park West Development Corp., LPPM, Inc., McCabe, Trotter & Beverly, PC, Dobson Builders, Stephanie Trotter, Ryan McCabe, Jamie McSweeney, Larry Ridlehoover, Mike Hurd, Sheri Cothran, David Brown, Catherine Brown, Stephen Sumner, Richard Riccoboni, Rick Cumberland, Park West Master Association, Inc., Park West Amenity Association, Inc., C. Richard Dobson Builders, Inc., D.R. Horton, Inc., Brian Gardner, Venture Management of South Carolina, Inc., Dodds & Hennessey LLP, Kim Atkeson, Jennifer Williamson, Jessica Turner, Kevin Steelman, Landtech Development LLC., Landtech Incorporated of South Carolina, Land Tech Charleston LLC., Rogers Townsend & Thomas PC, Henry Munn, Charleston County (Christine Smith), Judge Mikell Scarborough, Sandlapper Reporting, LLC, William H. Sloan, Sloan Law Firm, Individual Agents, Assigns, Attorneys, Accountants, Employees, Officers, Directors, Independent Contractors, Investors, Successors Predecessors, Insurers, Representatives, Parents, Sister and Affiliated entities, Partners, Members of all Persona who might be liable

Respondents.

Appellate Case Number 2019-001951

PROOF OF SERVICE

The undersigned certifies that a copy of the Initial Brief and Designation of Matter has been served upon the individuals listed below by mailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown below this 14th day of September 2020 to:

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

Kevin Mims
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Charleston, SC 29403

Judge Jefferson
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Charleston, SC 29401

Julie Armstrong
Clerk of Court, Charleston County.
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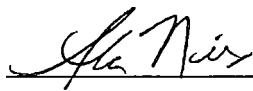
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Dated: September 13, 2020

Respectfully submitted,

By:  _____

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