

13 December 2020

Alan Nix
1401 Densmore Circle
Mount Pleasant, SC 29466

RECEIVED
DEC 29 2020
SC Court of Appeals

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
Appellate Case Number: 2020-001304

Ms. Abbott Kitchings and Ms. Claire Allen, etc.

In reference to the motion submitted last Tuesday in this case, I found two documents tonight that need to be added to that motion as additional exhibits given they address even more fully the issues Ms. Allen cited in her order dated 24 November 2020.

Please find attached two more exhibits that should be included with that motion. The first is a three page letter dated 31 August 2020 with a title line of "*transcript request forms for cases 2014-CP-10-05407 and 2017-CP-10-04031*". The next two pages are two transcript request forms also dated 31 August 2020.

The second exhibit is a one page transcript request form that is dated 2 September 2020 from Ms. Christine Smith.

Hence, the second issue Ms. Allen laid out in her order attempting to dismiss the appeal, that I had not ordered a transcript, is also not accurate based on these two documents. In this case however, Ms. Allen (Court of Appeals Ms. Allen) potentially didn't know if Ms. Allen (Court of Administration Ms. Allen) or Ms. Kohn hasn't informed y'all yet.

I feel confident at least one of the four people copied on the 31 August 2020 letter has already made the Court of Appeals aware of this situation, but in the remote possibility that none of the four material witnesses has done so by now, I'm sending these two documents to be appended to the motion from last Tuesday.

To be transparent though, and for multiple reasons, some of which are now quite obvious based on the motion from last week and this letter motion, I have not paid Ms. Christine Smith yet. One reason which may or may not be so obvious I will clarify now though. In the spirit of "*Fool me once, shame on you. Fool me twice, shame on me*", since Ms. Christine Smith has already produced more than one false transcript in these matters, I will be suing her personally, her employer Charleston County, and her employer's business partner, Sandlapper Reporting, LLC as well as hopefully managing to get Capt. Prodan of the SC Law Enforcement Division, the person they cite as their Public Corruption Expert; to do the proper thing related to these false transcripts.

Please let me know if I need to pay y'all another \$50 to have these two exhibits included with the motion from last week. If so, I will put a check in the mail tomorrow, 14 December 2020 when I hear from you. I will also be mailing this information to all the same parties I mailed the motion to last week. I will even go ahead and fill out a Certificate of Service to submit with this letter and the two exhibits.

Best regards,

A handwritten signature in black ink, appearing to read "Alan Nix", written in a cursive style.

Alan Nix

Exhibit

D

31 August 2020

Alan Nix
1401 Densmore Circle
Mount Pleasant, SC 29466

Desiree Allen
Court Reporter Program Manager
SC Court Administration
1220 Senate St., Ste. 200
Columbia, SC 29201

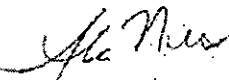
RE: transcript request forms for cases 2014-CP-10-05407 and 2017-CP-10-04031

Ms. Allen,

Please find enclosed two transcript request forms for transcripts for cases 2014-CP-10-05407 and 2017-CP-10-04031 for 20 August 2020 in Charleston County. I need the transcripts expedited to see exactly what happened to whom by whom in these two cases week before last. I just got home today from being out of town since the 24th and found a notice from Ms. Armstrong.

Also, I still haven't received anything from you or anyone else about the transcript for case 2019-CP-10-01496 from 28 January 2020. If there is some type of a problem with that, please let me know soonest.

Best regards,



Alan Nix

cc.
McCabe Trotter and Beverly
4500 Fort Jackson Blvd.
Columbia, SC 29209

Scarborough
100 Broad St., Ste. 266
Charleston, SC 29401

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

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

Transcript Request Form

Pursuant to Rule 207 and 607 of the South Carolina Appellate Court Rules, the transcribed paper copy is the official record of court proceedings. You may request a transcript by completing this form and emailing it to the Court Reporter and to South Carolina Court Administration at transcripts@scacourts.org. Click [here](#) for instructions on how to find the court reporter's email and mailing addresses. Once the court reporter receives your request, it will be processed pursuant to Rule 207 and 607 of the SCACR. Rule 607(h) governs the fees for transcripts, which are not provided for free or at reduced rates to any party. Please send by mail a money order or certified bank check to the court reporter in order to obtain the transcript. Some court reporters may accept personal checks. Please check with the court reporter to see if this option is available. Once your request is received, you will receive a copy of this form with the bottom portion completed. Please promptly submit your payment in order for the transcript to be provided. If you need to cancel the transcript request for any reason, you are responsible for paying for the pages of the transcript that have already been completed at the time of the cancellation.

Requestor's Information			
Full Name <u>ALAN NIX</u>	Phone Number <u>843.991.4170</u>	Email Address <u>RENIXI@HOTMAIL.COM</u>	
Mailing Address <u>1401 DENSMORE CIRCLE</u>	City <u>MT. PLEASANT</u>	State <u>SC</u>	Zip Code <u>29466</u>
Transcript Information			
Docket Number <u>2014-CP-D-05407</u>	Case Caption (i.e. State v. John Doe or Smith v. Smith) <u>CHURCHILL PARK V ALAN G NIX AND NORMA J. NIX</u>		
Date(s) of Proceeding <u>20 AUGUST 2020</u>	Circuit ☒ Family ☐	County <u>CHARLESTON</u>	
Presiding Judge <u>SCARBOROUGH</u>	Expedited Yes ☒ No ☐		
Court Reporter(s) <u>DO NOT KNOW</u>	Opposing Counsel <u>MC CABE TROTTER</u> <u>SARAH SCHNEIDER</u>		

Requestor's Signature: Alan Nix
(Typed name will serve as signature)

Date: 31 AUG 2020

Note: If you are ordering a transcript pursuant to Rule 207(a)(1), SCACR, you must contemporaneously furnish all parties, the Office of Court Administration, and the clerk of the appellate court with copies of all correspondence with the court reporter.

For Court Reporter Use Only			
Full Name _____	Date Received _____	Email Address _____	
Notice of Estimate to Requestor-Party Date: _____ Number of Pages: _____ Estimated Amount: _____			
Mailing Address for Payment _____	City _____	State _____	Zip Code _____

Transcript Request Form

Pursuant to Rule 207 and 607 of the South Carolina Appellate Court Rules, the transcribed paper copy is the official record of court proceedings. You may request a transcript by completing this form and emailing it to the Court Reporter and to South Carolina Court Administration at transcripts@sccourts.org. Click [here](#) for instructions on how to find the court reporter's email and mailing addresses. Once the court reporter receives your request, it will be processed pursuant to Rule 207 and 607 of the SCACR. Rule 607(h) governs the fees for transcripts, which are not provided for free or at reduced rates to any party. Please send by mail a money order or certified bank check to the court reporter in order to obtain the transcript. Some court reporters may accept personal checks. Please check with the court reporter to see if this option is available. Once your request is received, you will receive a copy of this form with the bottom portion completed. Please promptly submit your payment in order for the transcript to be provided. If you need to cancel the transcript request for any reason, you are responsible for paying for the pages of the transcript that have already been completed at the time of the cancellation.

Requestor's Information			
Full Name <u>ALAN NIX</u>	Phone Number <u>843-991-4770</u>	Email Address <u>AGNIX1@HOTMAIL.COM</u>	
Mailing Address <u>1401 DENMORE CIRCLE</u>	City <u>MT. PLEASANT</u>	State <u>SC</u>	Zip Code <u>29466</u>
Transcript Information			
Docket Number <u>2017 CP-10-04031</u>	Case Caption (i.e. State v. John Doe or Smith v. Smith) <u>CHURCHILL PARK V ALAN G NIX, NORMAN J. NIX & ESTATE OF NORMAN NIX</u>		
Date(s) of Proceeding <u>20 AUG 2020</u>	Circuit ☒ Family ☐	County <u>CHARLESTON</u>	
Presiding Judge <u>SCARBOROUGH</u>	Expedited Yes ☒ No ☐		
Court Reporter(s) <u>DO NOT KNOW</u>	Opposing Counsel <u>MCCABE TROTTER</u> <u>SARAH SCHREIBER</u>		

Requestor's Signature: AL NIX
(Typed name will serve as signature)

Date: 31 Aug 2020

Note: If you are ordering a transcript pursuant to Rule 207(a)(1), SCACR, you must contemporaneously furnish all parties, the Office of Court Administration, and the clerk of the appellate court with copies of all correspondence with the court reporter.

For Court Reporter Use Only			
Full Name	Date Received	Email Address	
Notice of Estimate to Requestor Party Date: _____ Number of Pages: _____ Estimated Amount: _____			
Mailing Address for Payment	City	State	Zip Code

Exhibit E

Transcript Request Form

Pursuant to Rule 207 and 607 of the South Carolina Appellate Court Rules, the transcribed paper copy is the official record of court proceedings. You may request a transcript by completing this form and emailing it to the Court Reporter and to South Carolina Court Administration at transcript@scacourt.org. Click [here](#) for instructions on how to find the court reporter's email and mailing addresses. Once the court reporter receives your request, it will be processed pursuant to Rule 207 and 607 of the SCACR. Rule 607(h) governs the fees for transcripts, which are not provided for free or at reduced rates to any party. Please send by mail a money order or certified bank check to the court reporter in order to obtain the transcript. Some court reporters may accept personal checks. Please check with the court reporter to see if this option is available. Once your request is received, you will receive a copy of this form with the bottom portion completed. Please promptly submit your payment in order for the transcript to be provided. If you need to cancel the transcript request for any reason, you are responsible for paying for the pages of the transcript that have already been completed at the time of the cancellation.

Requestor's Information			
Full Name <u>ALAN NIX</u>	Phone Number <u>843-991-4170</u>	Email Address <u>AGNIX1@NOTMAIL.COM</u>	
Mailing Address <u>1401 DENMORE CIRCLE</u>	City <u>MT. PLEASANT</u>	State <u>SC</u>	Zip Code <u>29462</u>
Transcript Information			
Docket Number <u>2017 CP-10-04031</u>	Case Caption (i.e. State v. John Doe or Smith v. Smith) <u>SHERRILL PATE v ALAN G NIX, NORMAN J NIX + ESTATE OF NORMAN NIX</u>		
Date(s) of Proceeding <u>20 Aug 2020</u>	Circuit ☒ Family ☐	County <u>CHARLESTON</u>	
Presiding Judge <u>SCARBOROUGH</u>	Expedited Yes ☒ No ☐		
Court Reporter(s) <u>DO NOT KNOW</u>	Opposing Counsel <u>MCCABE TROTTER</u> <u>SARAH SCHREIBER</u>		

Requestor's Signature: AL NIX
(Typed name will serve as signature)

Date: 31 Aug 2020

Note: If you are ordering a transcript pursuant to Rule 207(a)(1), SCACR, you must contemporaneously furnish all parties, the Office of Court Administration, and the clerk of the appellate court with copies of all correspondence with the court reporter.

For Court Reporter Use Only			
Full Name <u>CHRISTINE A. SMITH</u>	Date Received <u>9-2-20</u>	Email Address <u>CASMITH@CHARLESTONCOUNTY.ORG</u>	
Notice of Estimate to Requestor Party Date: <u>9/2/20</u> , Number of Pages: <u>23</u>		Estimated Amount: <u>\$104.65 (Regular delivery)</u>	
Mailing Address for Payment <u>P.O. Box 30276</u>	City <u>Charleston</u>	State <u>SC</u>	Zip Code <u>29417</u>

SCCA 800 (1/2019)

Reg. Delivery 2 weeks to 30 days.
Expedited - under 10 days.
\$120.75.
must be paid up front via money order or certified bank check.
Time does not start until payment is received.
C.A. Smith,

agnix1@hotmail.com

From: agnix1@hotmail.com
Sent: Monday, December 14, 2020 3:13 PM
To: ctappfilings@sccourts.org
Cc: callen@sccourts.org; jkitchings@sccourts.org; tkohn@sccourts.org; jsnichols@sccourts.org; 'Ryan McCabe'; 'Stephanie Trotter'; todd.musheff@mccabetrotter.com; tmusheff@musheff-law.com; 'Mikell Scarborough'; jarmstrong@charlestoncounty.org; 'Sarah Schreiber'; awilson@scag.gov; Nici.Comer@southstatebank.com; michael.morris@mpmorrislawfirm.com; peter.mccoy@usdoj.gov; mmurphyj@sccourts.org; tthames@wjlaw.net; 'Joe Dawson'; mkeel@sled.sc.gov; 'Kevin Mims'; dallen@sccourts.org
Subject: RE: motion filing today - 2020-1304
Importance: High

Good afternoon Court of Appeals folks.

Im getting ready to take a break and run to the post office to mail this stuff. Can you let me know in the next few mins if I need to pay you another \$50 for this too? If so, and you don't respond soon, perhaps you can just use the \$50 check I sent along with the \$250 check on 1 Dec 2020? Just let me know in the next 15 mins or so if at all possible so I can write you another check if necessary.

Best regards,

Alan Nix

"Injustice anywhere is a threat to justice everywhere. We are caught in an inescapable network of mutuality, tied in a single garment of destiny. Whatever affects one directly, affects all indirectly." Martin Luther King Jr.

From: agnix1@hotmail.com <agnix1@hotmail.com>
Sent: Monday, December 14, 2020 8:54 AM
To: ctappfilings@sccourts.org
Cc: callen@sccourts.org; jkitchings@sccourts.org; tkohn@sccourts.org; jsnichols@sccourts.org; 'Ryan McCabe' <Ryan.McCabe@mccabetrotter.com>; 'Stephanie Trotter' <Stephanie.Trotter@mccabetrotter.com>; todd.musheff@mccabetrotter.com; tmusheff@musheff-law.com; 'Mikell Scarborough' <master@charlestoncounty.org>; jarmstrong@charlestoncounty.org; 'Sarah Schreiber' <sarah@charlestonlegalaccess.org>; awilson@scag.gov; Nici.Comer@southstatebank.com; michael.morris@mpmorrislawfirm.com; peter.mccoy@usdoj.gov; mmurphyj@sccourts.org; tthames@wjlaw.net; 'Joe Dawson' <JDawson@charlestoncounty.org>; mkeel@sled.sc.gov; 'Kevin Mims' <kmims@lmlawllp.com>
Subject: RE: motion filing today - 2020-1304
Importance: High

Ms Kitchings and Ms. Allen.

Please see the attached to include with the motion filed last Tuesday, 8 Dec 2020.

I've copied everyone from the motion from last Tuesday and will be putting all of this in the mail to you today too. Please let me know soonest if I need to include another \$50 to y'all

Best regards,

Alan Nix

"Facts are stubborn things, and whatever may be our wishes, our inclinations, or the dictates or our passion, they cannot alter the state of facts and evidence." John Adams

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
DEC 29 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

Appellate Case No. 2020-001304

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

Appellants,

v.

Churchill Park,

Respondent,

PROOF OF SERVICE

The undersigned certifies that a copy of the Appellants' letter and/or motion to include two additional exhibits with the motion filed 8 December 2020 related to Ms. Allen's Order to Dismiss filed 24 November 2020 has been served upon the individuals listed below by mailing and emailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown, this 14th day of December 2020 to:

Plaintiff Attorneys:
Ryan McCabe & Stephanie Trotter

Todd M. Musheff, Esq.

McCabe, Trotter & Beverly, P.C.
4500 Fort Jackson Blvd.
Columbia, SC 29209

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

First Federal Savings & Loan Association
of Charleston dba CenterState Bank, N.A.
c/o Nicole Comer
700 Gervais St.
Columbia, SC 29202

State Street Holdings, LLC
c/o MP Morris Law Firm
336 Old Chapin Rd.
Lexington, SC 29072

CenterState Bank, N.A.
Office of General Counsel
1951 8th Street NW
Winter Haven, FL 33881

Peter McCoy
U.S. Attorney, South Carolina
1441 Main St., Ste. 500
Columbia, SC 29201

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

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

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

Joe Dawson
Charleston County Attorneys
4045 Bridge View Dr.
Charleston, SC 29405

Tonnya Kohn
Court Administration
1220 Senate St.
Columbia, SC 29201

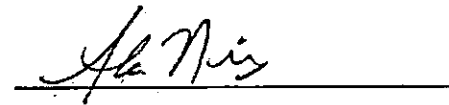
Chief Keel
SC Law Enforcement Div
4400 Broad River Rd.
Columbia, SC 29210

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

Dated: December ¹⁴~~8~~, 2020

Respectfully submitted,

By:

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

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

Nix
1401 Bonshore Cir
Mt. Pleasant, SC 29466

CHARLESTON

23 DEC 20



RECEIVED

DEC 29 2020

SC Court of Appeals

Appeals

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK
1220 SEVENTH ST.
COLUMBIA, SC 29201

25201-376555

