

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF Florence )  
 )  
Michael Anderson )  
 ) Plaintiff, )  
 vs. )  
Five Oak Mobile Home Park, William B. Gooddy )  
Alexia Brown aka Gloria Brown Marshall )  
 ) Defendant. )

IN THE COURT OF COMMON PLEAS  
12th JUDICIAL CIRCUIT  
 CASE NO.: 2025-CP-21 of 381

**MOTION AND ORDER INFORMATION  
 FORM AND COVERSHEET**

*Please re-attached sheet, please*

Plaintiff's Attorney: _____, Bar No. _____ Address: _____ Phone: _____ Fax _____ E-mail: _____ Other: _____	Defendant's Attorney: _____, Bar No. _____ Address: _____ Phone: _____ Fax _____ E-mail: _____ Other: _____
--	--

- MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)  
 FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)  
 PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

**SECTION I: Hearing Information**  
 Nature of Motion: Motion to Strike Jan 21, 2026 Hearing  
 Estimated Time Needed: \_\_\_\_\_ Court Reporter Needed:  YES /  NO

**SECTION II: Motion/Order Type**  
 Written motion attached  
 Form Motion/Order  
 I hereby move for relief or action by the court as set forth in the attached proposed order.  
Michael Anderson 12/31/2025  
 Signature of Attorney for  Plaintiff /  Defendant Date submitted

**SECTION III: Motion Fee**  
 PAID - AMOUNT: \$ \_\_\_\_\_  
 EXEMPT: (check reason)  Rule to Show Cause in Child or Spousal Support  
 Domestic Abuse or Abuse and Neglect  
 Indigent Status  State Agency v. Indigent Party  
 Sexually Violent Predator Act  Post-Conviction Relief  
 Motion for Stay in Bankruptcy  
 Motion for Publication  Motion for Execution (Rule 69, SCRPC)  
 Proposed order submitted at request of the court; or,  
 reduced to writing from motion made in open court per judge's instructions  
 Name of Court Reporter: \_\_\_\_\_  
 Other: \_\_\_\_\_

**JUDGE'S SECTION**  
 Motion Fee to be paid upon filing of the attached order.  
 Other: \_\_\_\_\_

JUDGE CODE \_\_\_\_\_  
 Date: \_\_\_\_\_

**CLERK'S VERIFICATION**

Collected by: AG Date Filed: 12/31/25  
 MOTION FEE COLLECTED: \$ 25.00  
 CONTESTED - AMOUNT DUE: \$ \_\_\_\_\_

FILED  
 2025 DEC 31 P 2:14  
 DORIS PCULOS O'HARA  
 CLERK & GS  
 FLORENCE COUNTY, SC

State of South Carolina  
County of Florence In The Court  
of Common Pleas  
MICHAEL ANDERSON Plaintiff  
vs  
Five Ask Mobile Home Park

William D. Eaddy  
Gloria Brown aka Gloria Brown Gandy

Case # 2025-CP-21381

5. **500 Empty Docket Spaces:** The presence of 500 empty spaces in the docket numbering constitutes a "reservation of space" used to facilitate the backdating of documents.

**RELIEF REQUESTED:** Strike the Jan 21 hearing and Stay all proceedings pending SC Supreme Court Case No. 2025-002290.

## NOTICE OF OBJECTION AND PRE-HEARING CLARIFICATION

To: Clerk of Court / Circuit Manager Dawn Pappas / Chief Deputy Clerk Melissa McCutcheon

I am formally objecting to the participation of **Eugene Nettles III** and **Parker Brown** on the following grounds:

1. **Default Status & Fraudulent Backdating:** Defendants are in Legal Default. The Clerk's office engaged in record tampering by backdating a Notice of Appearance for Eugene Nettles III to May 31st.
2. **Clerk Acting as Counsel:** I object to the Clerk's office scheduling <sup>(57)</sup> 20 motions without a moving party of record, effectively litigating on behalf of legal strangers.
3. **Stacking of 57 Motions:** I object to the scheduling of 57 substantive motions for a single day as a denial of meaningful access to the court.
4. **Irregularities:** I note the hearing on Gloria Brown (sequence 11:04) held without my presence and the 500 empty docket spaces.
5. **ADA Request:** I request a neutral ADA coordinator for all future proceedings.

## MOTION AND ORDER FOR PROTECTION (SCCA-233 CUSTOMIZED)

### MOTION FOR PROTECTIVE ORDER (Rule 26(c), SCRCP)

Plaintiff moves for a Protective Order regarding the Jan 21, 2026 hearing:

1. **Undue Burden:** Stacking <sup>57</sup> 20 motions is oppressive and prevents a meaningful opportunity to be heard.
2. **Protection of Record:** A protective order is needed to prevent further "scrubbing" of the 242 empty entries until the ODC investigation is complete.
3. **Supreme Court Pendency:** Protective relief is required while SC Supreme Court Case No. 2025-002290 is pending.

500  
entries

FILED  
2025 DEC 31 P 2:14  
DORIS FOULOS O'HARA  
CCCP & GS  
FLORENCE COUNTY, SC

STATE OF SOUTH CAROLINA

COUNTY OF FLORENCE

IN THE COURT OF COMMON PLEAS

Michael Anderson, Plaintiff, Pro Se

v.

Live Oak Mobile Home Park, Defendant, 1, 1.

William B. Eaddy, Defendant, 2.

Gloria Brown a.k.a Gloria Brown Gamble Defendant, 3.

LOWER COURT CASE NO: 2025-CP-21-01381

SC SUPREME COURT CASE NO: 2025-002290

(PENDING WRIT OF MANDAMUS & WRIT OF PROHIBITION)

**MOTION TO STRIKE JANUARY 21, 2026 HEARING, TO STAY PROCEEDINGS, TO PRESERVE AND CORRECT THE DOCKET, TO VACATE THE NOVEMBER 4, 2025 RULING, AND NOTICE OF PENDING SUPREME COURT WRITS**

Plaintiff, appearing *pro se*, respectfully moves this Court for an Order (1) striking the hearing currently scheduled for January 21, 2026, (2) staying all further proceedings pending resolution of SC Supreme Court Case No. 2025-002290, and (3) preserving, correcting, and "freezing" the docket to protect the integrity of the record.

## **I. GROUNDS FOR MOTION**

**1. Vacated prior pleadings and resulting default:** The only purported responsive pleadings filed for Defendants were vacated by this Court. Defendants remain in a state of **Total Legal Default**.

**2. Lack of standing and oppressive scheduling:** Parties in default lack standing to prosecute the **fifty-seven (57) motions** "stacked" for January 21, 2026. This mass-scheduling against a medically fragile *pro se* litigant is inherently oppressive.

**3. Pattern of backdating and Rule 79 violations:** The Clerk's Office has created approximately 500 "blank" docket entry positions, facilitating retroactive insertion and backdating of filings to "cure" default status.

**4. Parallel dockets:** The maintenance of dual dockets (Common Pleas vs. Master-in-Equity) creates a fragmented and manipulated record, depriving Plaintiff of meaningful appellate review.

**5. Unauthorized Filings:** Eugene LeRoy Nettles III (October 7th, 2025) and Parker Brown (June 25, 2025) made filings prior to being recognized as attorneys of record. These are legal nullities.

**6. Fraudulent "Shadow Filings" and Mail Tracking:** Counsel mailed documents to Plaintiff that were **never recorded with the Clerk**. Plaintiff incorporates by reference the exhibits in **Supplemental Addendum**, **July 7th, 2025**, **July 3rd, 2025**, **November 6th, 2025** which contain USPS tracking numbers originating from the Nettles firm, proving Plaintiff responded to every "shadow filing."

**7. Proof of Timely Response:** The tracking numbers prove Plaintiff was consistently ahead of the Defense in procedural diligence. The Defense's claim of "non-response" is a fraud upon the Court.

**8. Administrative Conflict:** The notices were processed by staff with a professional nexus to Judge Michael G. Nettles, creating a structural conflict of interest.

**9. Motion to Vacate November 4, 2025 Ruling:** This hearing was held while Plaintiff was recovering from a stroke and while the unrepresented co-defendant, Gloria Brown, was absent. This violates Due Process.

**10. Pending Writs:** The SC Supreme Court is currently reviewing these jurisdictional and procedural irregularities under a **Writ of Mandamus** and **Writ of Prohibition**.

## II. RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests an Order:

1. **STRIKING** the January 21, 2026 hearing;
2. **STAYING** all further proceedings pending resolution of SC Supreme Court Case No. 2025-002290;
3. **FREEZING** the docket to prevent additional backdated filings;
4. **UNIFYING** the record into a single chronological docket;
5. **VACATING** any orders resulting from the November 4, 2025 hearing;
6. **STRIKING** all "shadow filings" that lack an official docket entry and SCCA-233;
7. **TAKING JUDICIAL NOTICE** of Supplemental Addendum July 14th, 2025, July 3rd, 2025, and November 6th, 2025 numbers contained therein.

## VERIFICATION

I, Michael Anderson, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this motion is filed in good faith to prevent a fraud upon the Court.

Respectfully submitted, 

Michael Anderson, Pro Se Plaintiff

P.O.BOX 156 SCRANTON S.C 29591

Dated: December 31st, 2025

## **TABLE OF EVIDENCE: PROOF OF TIMELY RESPONSES & TRACKING DATA**

### **Refuting Claims of Non-Response through Self-Authenticating Receipts**

The following exhibits, already on file with this Court, contain physical receipts and tracking numbers from the United States Postal Service (USPS) that match the correspondence sent by the Nettles firm. This evidence proves the Plaintiff provided timely responses to all "shadow filings" and correspondence.

**1. Supplemental Addendum 714 (Filed July 14, 2025):** This filing contains the original envelopes and USPS Tracking Numbers originating from Defense Counsel. This evidence directly matches the Plaintiff's recorded **Answer and Counterclaim**, proving that a timely response was made to the unauthorized "Shadow Filings" received.

**2. Exhibit B-1 (Filed July 3, 2025):** This recorded response and proof of service addresses the July 2nd unauthorized motion. It proves the Plaintiff responded to the Defense's claims even before the Defense had filed their own defective motion with the Clerk.

**3. Exhibit C-1 (Filed November 6, 2025):** This filing formally addresses the October 27th medical event and the subsequent unauthorized filings made in the Plaintiff's absence. It serves as proof of the Plaintiff's continued diligence and responsiveness despite a documented medical emergency (stroke).

### **NOTICE TO THE COURT:**

The tracking numbers contained within these exhibits are **self-authenticating**. A comparison of the tracking numbers on the envelopes mailed by Eugene Nettles III to the filing dates of Plaintiff's responses (Supplemental Addendum July 14th, 2025) reveals that the Plaintiff was consistently ahead of the Defense in procedural diligence. The Defense's claim that "Plaintiff failed to respond" is mathematically and physically refuted by these existing court records. The discrepancy between the Defense's narrative and these tracking numbers constitutes a fraud upon the Court.

STATE OF SOUTH CAROLINA

COUNTY OF [Your County Name]

IN THE COURT OF COMMON PLEAS

Michael Anderson, Plaintiff,

vs.

Live Oak Mobile Home Park, Defendant, 1.

William B. Eaddy, Defendant, 2.

Gloria Brown a.k.a Gloria Brown Gamble

CASE NO: 2025-CP-21-01381

SC SUPREME COURT CASE NO: 2025-002290

**CERTIFICATE OF SERVICE**

I hereby certify that on this \_\_\_\_\_ day of \_\_\_\_\_, 2025/2026, I served a true and correct copy of the **MOTION TO STRIKE AND STAY** and the **NOTICE OF OBJECTION** upon the Clerk in this action:

as there is currently no Attorney of Record:

**RECIPIENTS (Defendants):**

Live Oaks Mobile Home Park

William B. "Eddie"

Gloria Brown Gamble Refused Certified Mail Service.

**Note on Non-Service:** Service was **not** effected upon Eugene Nettles III or Parker Brown. Their "Notice of Appearance" filed in October 2024 was fraudulently backdated to May 2024 to hide a June 2024 default. They remain legal strangers to this case.

Signature: Michael Anderson

Date: 12/31/2025

Michael Anderson P.O.BOX 156

Scranton S.C 29591

Include Tracking  
# 70 21-0330001 6599-  
4330

EXhibits Table of  
Evidence: Proof of timely  
Response & Tracking Data  
EXhibit B1 EXhibit C-1

Michael Anderson, Pro Se  
P.O. Box 156  
Scranton, SC 29591  
July 14, 2025

Florence County Clerk of Court  
Attn: Doris Paula O'Hara, Chief Clerk  
Florence County Judicial Center  
180 N. Irby Street  
Florence, SC 29501

FILED  
2025 JUL 14 A 10: 06  
DORIS PAULOS O'HARA  
CCLC & GS  
FLORENCE COUNTY, SC

RE: Case No. 2025-CP-21-01381 – Filing of Exhibit MM-25 (Supplemental Addendum to MM-24)

Dear Clerk O'Hara:

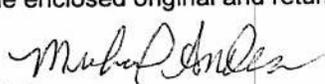
Please accept the enclosed **\*\*Supplemental Addendum to Plaintiff's Filing MM-24\*\***, now designated as **\*\*Exhibit MM-25\*\***, in further support of Plaintiff's pending **\*\*Motion for Entry of Default Judgment (MM-22)\*\***.

This Addendum includes:

- A clarification of total relief requested (\$3,978,000),
- A reaffirmation of Plaintiff's Jury Demand under Rule 38(b), SCRPC,
- A reminder to the Court of the operative Omnibus Complaint.

Also included are **\*\*Exhibits NN-7 and NN-8\*\***, consisting of certified mail envelopes and letters dated June 25 and July 2, 2025, from counsel for Defendants. These demonstrate improper service, absence of Clerk filing, and violations of the Rules of Civil Procedure and ethical standards.

Please file-stamp the enclosed original and return a copy for my records. A Certificate of Service is attached.

  
Respectfully submitted,  
/s/ Michael Anderson  
Michael Anderson, Pro Se  
P.O. Box 156  
Scranton, SC 29591

—  
**\*\*EXHIBIT MM-25\*\***  
**\*\*SUPPLEMENTAL ADDENDUM TO MM-24\*\***  
**\*\*IN SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT (MM-22)\*\***

**\*\*AND REAFFIRMATION OF PLAINTIFF'S JURY DEMAND\*\***

IN THE COURT OF COMMON PLEAS  
TWELFTH JUDICIAL CIRCUIT – FLORENCE COUNTY

CASE NO. 2025-CP-21-01381

Michael Anderson, Plaintiff, Pro Se  
v.  
Live Oak Mobile Home Park, Defendant 1  
William B. Eaddy, Defendant 2  
Gloria Brown a/k/a Gloria Brown Gamble, Defendant 3

FILED  
2025 JUL 14 A 10:06  
DORIS POULOS O'HARA  
COOP & GS  
FLORENCE COUNTY, SC

**\*\*SUPPLEMENTAL ADDENDUM TO MM-24\*\***

Plaintiff, appearing pro se, respectfully files this supplemental addendum to reinforce and clarify issues presented in MM-24, and states:

1. Plaintiff reaffirms that the operative **\*\*Omnibus Complaint\*\***, filed and amended pursuant to Rule 15, SCRCP, remains the active pleading in this matter, and that Defendants failed to respond within the required timeframe under Rule 12.
2. Plaintiff hereby clarifies that the full amount of relief sought in this action totals **\*\*Three Million Nine Hundred Seventy-Eight Thousand Dollars (\$3,978,000)\*\***. This includes compensatory damages, treble damages for fraudulent conveyance, Pro se/litigation costs, and punitive damages based on willful misconduct, mail fraud, and fraud upon the court.
3. To the extent a lesser amount (e.g., \$1,978,000) was referenced in earlier filings, Plaintiff clarifies that such amount represents a **\*\*subset\*\*** of the total damages now requested.
4. Plaintiff **\*\*reasserts a demand for trial by jury\*\*** on all issues so triable pursuant to Rule 38(b), SCRCP and Article I, Section 14 of the South Carolina Constitution.

Respectfully submitted,  
/s/ Michael Anderson  
Michael Anderson, Pro Se  
P.O. Box 156  
Scranton, SC 29591  
Dated: July 14, 2025



**\*\*CERTIFICATE OF SERVICE\*\***

I certify that I have this day served a true and correct copy of the foregoing **\*\*Cover Letter, Exhibit MM-25, and Exhibits NN-7 and NN-8\*\*** by placing a copy in the U.S. Mail, with proper postage affixed, addressed to:

Joseph Cantey Heath  
Nettles, Turbeville & Reddeck  
P.O. Box 699  
Lake City, SC 29560

Date: July 14, 2025  
/s/ Michael Anderson  
Michael Anderson, Pro Se



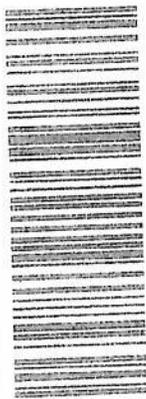
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**\*\*EXHIBIT INDEX – MM-25\*\***

- **\*\*Exhibit NN-7\*\***: July 2, 2025 letter from Joseph Cantey Heath, and certified mailing envelope (postmarked July 2, received July 5, 2025) purporting to serve an "Amended Answer" not filed with the Clerk of Court.
- **\*\*Exhibit NN-8\*\***: June 25, 2025 letter and certified envelope (postmarked June 25, received June 30) with no clerk timestamp, also referencing pleadings not docketed.

Exhibit - MM-7

2nd

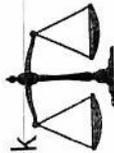


7021 0350 0001 6599 4071

07/09/25

LAW OFFICES

Nettles, Turbeville & Reddeck



P.O. BOX 699

LAKE CITY, SC 29560

To:

MICHAEL ANDERSON

P.O. BOX 156

SCRANTON, SC 29591

EX-100 07/11/13



7021 0350 0001 6599 4330

*Handwritten scribble*

LAW OFFICES  
 Nettles, Turbeville & Reddeck  
 P.O. BOX 699  
 LAKE CITY, SC 29560




---

To: Michael Anderson  
 P.O. Box 156  
 Scranton, SC 29591

*Exhibit 11-7*

LAW OFFICES  
**NETTLES, TURBEVILLE & REDDECK**

P.O. BOX 699  
261 KELLEY STREET  
LAKE CITY, SOUTH CAROLINA 29560

E. LEROY NETTLES, SR. (1929-2020)  
ELBERT K. TURBEVILLE  
LARRY G. REDDECK (1950-2022)  
MARIAN D. NETTLES  
E. LEROY (LEE) NETTLES, III  
JOSEPH CANTEY (J.C.) HEATH

(PHONE) 843-374-8511  
(FAX) 843-374-3211

July 2, 2025

Michael Anderson  
P.O. Box 156  
Scranton, SC 29591

RE: Case No. 2025-CP-21-01381

Dear Mr. Anderson,

Please find enclosed with this letter a copy of the Amended Answer and Counterclaims along with a copy of Exhibit A-Exhibit E (Exhibit E amended) filed in the above referenced case on behalf of our clients William B. Eaddy and Live Oak Mobile Home Park.

With my best regards, I am

Yours very truly,

NETTLES, TURBEVILLE & REDDECK

*Joseph Cantey Heath*

Joseph Cantey (J.C.) Heath

JCH  
Enclosures

EXHIBIT A-8

LAW OFFICES  
**NETTLES, TURBEVILLE & REDDECK**

P.O. BOX 699  
261 KELLEY STREET  
LAKE CITY, SOUTH CAROLINA 29560

E. LEROY NETTLES, SR. (1929-2020)  
ELBERT K. TURBEVILLE  
LARRY G. REDDECK (1950-2022)  
MARIAN D. NETTLES  
E. LEROY (LEE) NETTLES, III  
JOSEPH CANTEY (J.C.) HEATH

(PHONE)843-374-8511  
(FAX)843-374-3211

June 25, 2025

Michael Anderson  
P.O. Box 156  
Scranton, SC 29591

RE: Case No. 2025-CP-21-01381

Dear Mr. Anderson,

Please find enclosed with this letter a copy of the answer and counterclaims along with a copy of Exhibit A-Exhibit E filed in the above referenced case on behalf of our clients William B. Eaddy and Live Oak Mobile Home Park.

With my best regards, I am

Yours very truly,

NETTLES, TURBEVILLE & REDDECK

*Joseph Cantey Heath*

Joseph Cantey (J.C.) Heath

JCH  
Enclosures

EXHIBIT 117-7

STATE OF SOUTH CAROLINA )  
COUNTY OF FLORENCE )

Michael Anderson, )  
Plaintiff, )

vs. )

Live Oak Mobile Home Park, )  
William B. Eaddy, )  
and Gloria Brown a/k/a )  
Gloria Brown Gamble, )

Defendant(s). )

IN THE COURT OF COMMON PLEAS  
FOR THE TWELFTH JUDICIAL CIRCUIT  
Case Number: 2025-CP-21-01381

**Certificate of Service**

The undersigned hereby certifies that on July 2, 2025, a filed copy of the Amended Answer and Counterclaims to Plaintiff's Amended Complaint and a filed copy of Exhibit A-Exhibit E was served by certified mail return receipt requested on the Plaintiff, Michael Anderson, at the addresses listed below by depositing the same in the United States Post Office with the proper postage affixed thereto and/or electronically serving at the address below:

Michael Anderson  
P.O. Box 156  
Scranton, SC 29591

  
Malorie G. Spring  
Nettles, Turbeville & Reddeck



4. Plaintiff received two letters by certified mail on June 25, 2025: one from the Clerk of Court (Exhibit MM-1) and one from opposing counsel, Attorney Joseph Heath (Exhibit MM-2). Both letters contained identical claims that a hearing had occurred on June 2, 2025, and both were mailed only after Plaintiff had already filed multiple objections regarding docket manipulation and due process violations.

5. The certified mail receipt (Exhibit MM-3), USPS Form 3849 (Exhibit MM-4), and postmarked envelopes from both the Clerk and Attorney Heath (Exhibit MM-5) prove that neither document was delivered or even attempted until weeks after the supposed hearing.

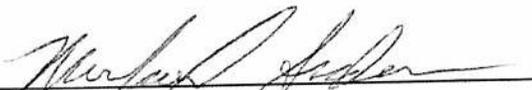
6. These actions collectively constitute fraud upon the court by introducing a fabricated judicial event into the record and depriving the Plaintiff of notice and an opportunity to be heard. A court order based on a falsehood is void ab initio and must be stricken.

7. Pursuant to Rule 60(b)(4), SCRPC, a judgment or order entered without due process is void and subject to mandatory vacatur.

WHEREFORE, Plaintiff respectfully requests that this Court:

- STRIKE the Order of Reference filed June 16, 2025;
- Restore full jurisdiction to the Circuit Court;
- Schedule a hearing before a Circuit Court Judge on all pending motions, including Plaintiff's Motion for Summary Judgment and Motion for Fraud Upon the Court;
- Grant such other and further relief as this Court deems just and proper.

Respectfully submitted this 25th day of June, 2025.



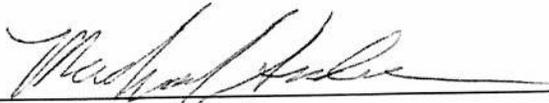
Michael Anderson, Pro Se  
P.O. Box 156  
Scranton, SC 29591  
Phone: (954) 290-1356  
Email: [Andersso95@gmail.com](mailto:Andersso95@gmail.com)

#### CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing Motion to Strike Order of Reference as Void upon the following parties by depositing a copy in the U.S. Mail, first-class postage prepaid, properly addressed as follows:

Joseph Cantey Heath  
Nettles, Turbeville & Reddeck  
P.O. Box 699  
Lake City, SC 29560

This the 25th day of June, 2025.



Michael Anderson, Pro Se

EXHIBITS ATTACHED:

- Exhibit MM-1 – Copy of "Order of Reference" dated June 16, 2025
- Exhibit MM-2 – Cover letter from Attorney Heath dated June 17, 2025
- Exhibit MM-3 – USPS Certified Mail Receipt showing pickup on June 25, 2025
- Exhibit MM-4 – USPS Delivery Notice (Form 3849) showing June 20, 2025 attempt
- Exhibit MM-5 – Photo of both envelopes postmarked June 25, 2025

EXhibit MME  
 EXhibit MME  
 SCRANTON, SC 29591  
 JUN 25 2025  
 USA

ELECTRONICALLY FILED - 2025 Jun 16 12:14 PM - FLORENCE - COMMON PLEAS - CASE#2025CP2101381

STATE OF SOUTH CAROLINA )  
 COUNTY OF FLORENCE )  
 )  
 Michael Anderson, )  
 ) Plaintiff, )  
 vs. )  
 )  
 Live Oak Mobile Home Park, )  
 William B. Eaddy, )  
 and Gloria Brown a/k/a )  
 Gloria Brown Gamble, )  
 )  
 Defendant(s). )

IN THE COURT OF COMMON PLEAS  
 FOR THE TWELFTH JUDICIAL CIRCUIT  
 Case Number: 2025-CP-21-01381

EXhibit  
 MME

**ORDER OF REFERENCE**

This matter is before the Court pursuant to a Motion for a Temporary Restraining Order and a Preliminary Injunction filed in the Court of Common Pleas for Florence County on May 12, 2025, and a Motion to Stay Eviction and a Motion to Cancel Hearing in Magistrate Court filed in the Court of Common Pleas for Florence County on May 16, 2025.

A hearing on the motions was held on June 2, 2025, attended by Defendant, William Eaddy, accompanied by his attorney, Joseph Cantey Heath, and Defendant, Gloria Brown, who appeared *pro se*. The Plaintiff did not appear at the hearing. Upon consideration of the argument for Defendant, William Eaddy, and a review of the pleadings on file with the court, the court denies Plaintiff's Motions and finds this case should be referred to the Florence County Master-in-equity pursuant to Rule 53 of the *South Carolina Rules of Civil Procedure*.

Rule 53(b), SCRCP, provides that "in an action where the parties consent, in a default case, or an action for foreclosure, some or all of the causes of action in a case may be referred to a master or special referee by order of a circuit judge or the clerk of court. In all other actions, the circuit court may, upon application of any party or upon its own motion, direct a reference of some or all of the causes of action in a case."

Therefore, IT IS ORDERED, ADJUDGED AND DECREED that this case is referred to W. Haigh Porter, the Florence County Master-in-Equity, to make findings of fact and conclusions of law; dispose of any and all issues and direct entry of final judgment in this action under Rule 53, SCRCP. An appeal from the final judgment entered by the Master-in-Equity shall be directed to the Court of Appeals as provided by the South Carolina Appellate Court Rules.

AND IT IS SO ORDERED.

Date: June \_\_, 2025

William H. Seals, Jr.  
 Presiding Circuit Court Judge  
 12<sup>th</sup> Judicial Circuit

RECEIVED: A TRUE COPY  
 Clerk of Court  
 FLORENCE COUNTY, SC

EXhibit M-M-I

LAW OFFICES  
**NETTLES, TURBEVILLE & REDDECK**

P.O. BOX 699  
261 KELLEY STREET  
LAKE CITY, SOUTH CAROLINA 29560

E. LEROY NETTLES, SR. (1929-2020)  
ELBERT K. TURBEVILLE  
LARRY G. REDDECK (1950-2022)  
MARIAN D. NETTLES  
E. LEROY (LEE) NETTLES, III  
JOSEPH CANTEY (J.C.) HEATH

(PHONE)843-374-8511  
(FAX)843-374-3211

June 17, 2025

Michael Anderson  
P.O. Box 156  
Scranton, SC 29591

RE: Order of Reference- Case No. 2025-CP-21-01381

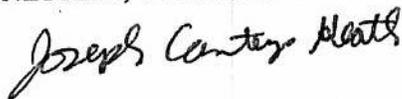
Dear Mr. Anderson,

Please find enclosed with this letter a filed copy of the Order of Reference referring this case to the Master in Equity for Florence County signed by Judge Seals.

With my best regards, I am

Yours very truly,

NETTLES, TURBEVILLE & REDDECK



Joseph Cantey (J.C.) Heath

JCH

Exhibit 9A-M-4  
Exhibit M-3



**Sorry we missed you while you were out.**

Date: 06/20/2025  
 The item was sent by Heather Yarberville  
 It was sent to: Michael Anderson  
 At this address: P.O. Box 156

**About the missed delivery:**

It was a:  Package  Letter  Large envelope  
 USPS® Smart Parcel Locker Eligible  
 (Smaller than 17Hx13Wx23D)

Available for pickup date: \_\_\_\_\_

This is the:

First attempt  Final notice

**To schedule a redelivery:**

Scan the QR code or go to [usps.com/redelivery](https://usps.com/redelivery)

Article number:

5293 0650 1995 8059



We have item/s for you which we could not deliver because:

- It requires a payment of \$ \_\_\_\_\_ for: \_\_\_\_\_ Postage due \_\_\_\_\_ Customs
- Receptacle full/item oversized
- No secure location available
- No authorized recipient available
- Signature required
- \_\_\_\_\_ must be 18+ years old \_\_\_\_\_ must be 21+ years old
- Other: \_\_\_\_\_

**Please see reverse to schedule redelivery or pickup.**

PS Form 3849, September 2022

UNITED STATES POSTAL SERVICES  
**Sorry We Missed You! We Redeliver for You**

Sender's Name: Heather Yarberville  
 Today's Date: Wed 06/25/2025  
 Available for Pick-up After: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

**For Redelivery**  
 Go to [usps.com/redelivery](https://usps.com/redelivery) or see reverse

If checked, you or your agent must be present at time of delivery to sign for item.  
 USPS Tracking # or Article Number(s)  
70210350000165994286

**Notice Left Section**  
 Customer Name and Address  
PO BOX 156  
SCRANTON, SC 29591-0156  
 Delivered By and Date

**Final Notice:** Article will be returned to sender on \_\_\_\_\_

**usps.com**

**Delivery Notice/Reminder/Receipt**

We will redeliver OR you or your agent can pick up your mail at the Post Office. (Bring this form and proper ID, your agent will pick up, sign below in item 2, and enter agent's name here):

a. Section 3:  
 b. Sign in section 2 below;  
 c. Leave this notice where the carrier can see it.

Sign Here to authorize redelivery or to authorize an agent to sign for you:

Redeliver (Enter day of week):  
 (Allow at least two delivery days for redelivery, or go to [usps.com/redelivery](https://usps.com/redelivery) or call 800-275-6777 to arrange redelivery.)

Leave item at my address (not available if you or your agent must be present)

(Specify where to leave. Example: "porch", "side door". The option is not available if box is checked on the front requiring your signature at time of delivery.)

Refused  Forward  Return

Signature: X  
 Printed Name: \_\_\_\_\_  
 Delivery Address: \_\_\_\_\_

**USPS**

**Delivery Section**

SCRANTON  
 1810 US 52 HWY  
 SCRANTON, SC 29591

**usps.com**

**PS Form 3849, July 2013 (Reverse)**



SCRANTON  
 1810 US 52 HWY  
 SCRANTON, SC 29591-9998  
 www.usps.com

06/25/2025 09:43 AM

Duplicate

Product	Qty	Unit Price	Price
Mail Pickup	1		\$0.00
Tracking #: 70210350000165994286			
Grand Total:			\$0.00

TO REPORT AN ISSUE  
 Visit <https://email.usps.com>

PREVIEW YOUR MAIL AND PACKAGES  
 Sign up for FREE at  
<https://informedelivery.usps.com>

All sales final on stamps and postage.  
 Refunds for guaranteed services only.  
 Thank you for your business.

Customer Service  
 1-800-ASK-USPS  
 Agents do not have any additional  
 information other than what is provided on  
 USPS.com.

Tell us about your experience.  
 Go to: <https://postalexperience.com/Pos>  
 or scan this code with your mobile device,



or call 1-800-410-7420.

*EX Subst MM 4*

SCRANTON  
 Unit #: 4579600591 ZIP Code: 29591

Date: 06/25/2025 10:06 AM

Tracking Status  
 Business Date: 06/25/2025

Tracking Number  
 70210350000165994286

Destination and Origin  
 Destination  
 ZIP Code: 29591  
 City: SCRANTON  
 State: SC  
 Origin  
 ZIP Code:  
 City:  
 State:

Tracking Number Classification  
 Class/Service: Certified Mail  
 Class of Mail Code/Description: -1

Origin/Return/Pickup Address Info  
 Address:  
 City:  
 State: ZIP Code:

Payment  
 Payment Type:  
 Payment Account Number:  
 Postage:  
 Weight: lb (s) oz (s)  
 Rate Indicator:

Extra Services Details

Description: Certified Mail  
 Amount:

Event Details

Event: 2ND NOTICE GENERATED  
 Date: 06/25/2025  
 Time: 03:32  
 Location: SCRANTON, SC 29591

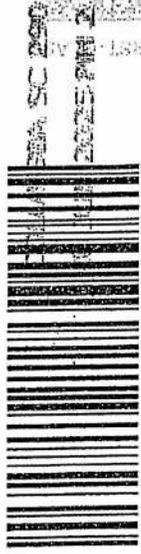
For Further Information,  
 go to USPS.com

UFN: 457960-0591  
 Receipt #: 840-52900233-1-1402574-1  
 Clerk: 07

LAW OFFICES

Nettles, Turbeville and Reddeck  
P. O. BOX 699  
261 KELLEY STREET  
LAKE CITY, SOUTH CAROLINA 29560

EXhibit MM-5



7021 0350 0001 6599 4286

06/20

Michael Anderson  
P.O. Box 156  
Scranton, SC 29591

29591-015656

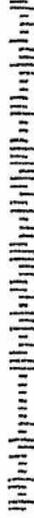


EXhibit MM-5

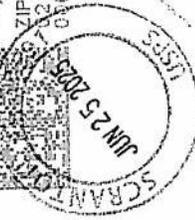
405-0001-A

DORIS POULOS O'HARA  
CLERK OF COURT  
COUNTY COMPLEX  
181 N. IRBY STREET, SUITE 1100  
FLORENCE, SC 29501

FIRST-CLASS

US POSTAGE PERMITS NO. 5216

ZIP 29501 \$000.69<sup>00</sup>  
0606027855 JUN 15 2025



Michael Anderson  
P.O. Box 156  
Scranton SC, 29591

