

SCCA-233 MOTION AND ORDER INFORMATION FORM (COVERSHEET)

STATE OF SOUTH CAROLINA

COUNTY OF: Florence County

IN THE COURT OF COMMON PLEAS

TWELFTH JUDICIAL CIRCUIT

CASE NO.: 2025-CP-21-01381

Plaintiff: Michael Anderson, Pro Se

P.O. Box 156, Scranton, SC 29591

954-290-1356 andersso95@gmail.com

Defendants:

Live Oak Mobile Home Park,

William B. Eaddy,

Gloria Brown a/k/a Gloria Brown Gamble

Nature of Motion:

Motion to Strike Unauthorized Counsel and Law Firms, Fraud Upon Court/Public Corruption  
Under Color of Office, Supplemental Motion for Release of Hearing Audio, and ADA/Section 88  
Accommodations

*Supplemental motion for Release of Hearing Audio and ADA/Section 88*

Estimated time needed: 15 minutes (ADA and complex record issues)

Court Reporter Needed: ☒ YES

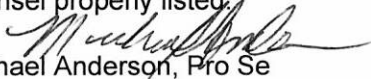
Written motion attached: ☒

Other motion/exhibits attached: ☒ Payment receipt, contested SCCA-233, denied filings  
evidence

Fee status: ☒ PAID (\$75—see attached receipt Exhibit A11); ☒ CONTESTED (SCCA-233,  
Exhibit A12, reflects \$25)

FILED  
2025 NOV -3 P 1:03  
DORIS POULOS O'HARA  
CCOP & GS  
FLORENCE COUNTY, SC

**Other/comments:** "Clerk irregularities and record discrepancies detailed in attached motion, all parties and counsel properly listed."

  
**Signature:** Michael Anderson, Pro Se

**Date:** Nov 3, 2025

**MOTION AND SUPPLEMENT: STRIKE UNAUTHORIZED COUNSEL, REMEDY FRAUD/CORRUPTION, RELEASE HEARING RECORDING, AND ADA ENFORCEMENT**

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

TWELFTH JUDICIAL CIRCUIT

FLORENCE COUNTY

**CASE NO.: 2025-CP-21-01381**

Michael Anderson, Pro Se, Plaintiff

v.

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

**I. MOTION TO STRIKE, SANCTION, AND REMEDY FRAUD**

Plaintiff moves this Court for an order:

- **Striking** all filings, appearances, and advocacy by any law firm or attorney not properly of record or covered by a timely SCCA-233 appearance or withdrawal, including but not limited to **Parker Brown, Eugene Nettles, and Joseph Heath**. The electronic filing notice confirms that Eugene Nettles, III, was filing documents, yet the associated Certificate of Service, dated October 28, 2025, references a "Notice of **Transfer within Firm**" from Nettles, Turbeville & Reddeck. Further, despite Joseph Heath no longer being affiliated with Nettles, Turbeville & Reddeck and having joined Murphy & Grantland, **no record of a formal withdrawal or substitution of counsel exists on the docket**. This procedural irregularity is compounded by the fact that the Certificate of Service was executed and filed on **October 28, 2025**, the day **after** the October 27, 2025, hearing, demonstrating the defense's attempt to retroactively legitimize unauthorized actions during the hearing.

- **Declaring** that all benefits, pleadings, and orders derived from unauthorized appearances or backdated filings are void and subject to vacatur.
- **Sanctioning** clerical/judicial misconduct for permitting and enabling unauthorized law firm participation and direct sabotage of Plaintiff's court access rights.

## II. PUBLIC CORRUPTION, COLOR OF OFFICE, AND CONSTITUTIONAL VIOLATIONS

The Clerk manager, who is responsible for the office's operations and finances, accepted \$75 in payment for a motion filing (Exhibit A11), but the docket and SCCA-233 reflect a \$25 fee (Exhibit A12), directly demonstrating **financial and record manipulation**—deliberately misleading both parties and the reviewing court. This discrepancy is especially critical because the Plaintiff has historically been charged a fee between \$50 and \$100 for motions raising the issue of fraud upon the court, suggesting the \$25 entry is a deliberate attempt to conceal the payment and nature of this filing, a tactic used to discourage Plaintiff's necessary court access, thereby violating his **First Amendment Right to Petition the Government for a Redress of Grievances**.

This same office blocked or "redirected" critical filings (including ADA/Section 88 requests), managed all dockets, and then acted as hearing stenographer—controlling the transcript and appellate record during periods of known procedural fraud. Such acts, under "**color of office,**" are actionable under 42 U.S.C. § 1983 as violations of the **First Amendment Right to Petition**, the **Fifth Amendment Due Process Clause**, and the **Fourteenth Amendment Due Process and Equal Protection Clauses**. These actions constitute fraud upon the court, conspiracy, and public corruption (see *Hazel-Atlas Glass*, *Rozier v. Ford Motor*, etc.).

Plaintiff, a stroke survivor with visual/mobility impairment, suffered direct **ADA and constitutional Due Process violations** as denied filings and accommodations impeded access to justice, retaliatory conduct by the Clerk, and ongoing transcript/docket tampering. **During a period of medical distress, prior to requiring emergency medical transport by ambulance, Plaintiff personally alerted the presiding Judge, William H. Seals Jr., that he was experiencing severe hand trembling and feeling unwell due to his stroke.**

The Judge proceeded to prioritize the court's docket over Plaintiff's health, turning to the unauthorized attorney, Eugene Nettles, and asking if the matter should be postponed. Mr. Nettles, an attorney Plaintiff is moving to strike, replied that he would prefer to continue and "get it over with," despite the known health emergency and Plaintiff's pro se status and disability. The impropriety of this decision is exacerbated by the fact that Eugene Nettles is a relative of Circuit Court Judge Michael G. Nettles, a known colleague of the presiding Judge, William H. Seals Jr. This relationship suggests a strong appearance of bias and improper influence, further supporting the motion's claim of fraud and public corruption and demonstrating a denial of Equal Protection under the Fourteenth Amendment.

### III. SUPPLEMENTAL MOTION—RELEASE COURT HEARING AUDIO

Given the documented pattern of docket tampering, denied filings, and certification of "official" transcripts by individuals not present at all court proceedings, Plaintiff requests immediate release of the October 27, 2025 hearing digital recording, to be certified and transcribed by a completely neutral party. Failure to allow neutral, transparent transcription further destroys the integrity of the court record and creates risk of factual/financial cover-up. Plaintiff's right to due process, meaningful ADA accommodations (including accessible record creation, audio access), and open judicial review requires full release of all materials.

### IV. RELIEF REQUESTED

- Strike all unauthorized counsel/law firm filings and void all tainted orders.
- Enter findings as to clerk misconduct and record/document irregularity.
- Order release of original October 27, 2025 hearing recording for independent transcription.
- Require all court payments/fees and dockets for Plaintiff to be reconciled and publicly documented.
- Sanction all further retaliation or ADA/88 denials.
- Grant any additional or further relief in law or equity.

Respectfully submitted,

Michael Anderson, Pro Se



P.O. Box 156, Scranton, SC 29591

954-290-1356 | andersso95@gmail.com

Date: Nov 3, 2025

### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion and all exhibits (including A11, A12) was served on:

- Parker Wayne Lee Brown, Aiken Bridges Attorneys at Law, P.O. Drawer 1931 Florence, SC 29503
- Nettles, Turbeville & Reddeck, P.A. (Eugene Nettles), P.O. Box 698, Lake City, SC 29560
- Joseph Cantey Heath, Murphy & Grantland, P.A., P.O. Box 6648, Columbia, SC 29260
- Gloria Brown a/k/a Gloria Brown Gamble, William B. Eaddy, and all appearing/defaulted parties per the court docket.

*Gloria Brown, aka Gloria Brown Gamble*  
*Refused of certified mail*

Date served: 11/3/2025

A handwritten signature in black ink, appearing to read "Michael Anderson".

Michael Anderson, Pro Se

11/3/2025

Common Pleas Court  
Clerk : Doris Poulos O'Hara  
181 North Irby Street, Suite 1100  
Florence, SC 29501  
Phone:(843) 665-3031 Fax:(843) 676-1212

*Exhibit A11*

Received From: Anderson, Michael

Date: 10/31/2025

Receipt #: 99650

Clerk: c21vsimon

Paying for: Self

Transaction Type: Payment

Payment Type: Cash

Total Paid:

\$75.00

\$75.00

Reference #:

Comment:  
Non-Refundable

You may check the status of your Florence case at:

<http://www.sccourts.org/caseSearch/>

| Case #        | Caption                                                 | Previous Balance | Amount Paid | Balance Due |
|---------------|---------------------------------------------------------|------------------|-------------|-------------|
| 2025CP2101381 | Michael Anderson VS William Eaddy ,<br>defendant, et al | \$75.00          | \$75.00     | \$0.00      |

*Please See Charges  
Discrepancy & irregularity  
Michael Anderson  
11/1/2025*

Total Cases: 1

\$75.00

\$75.00

\$0.00

Exhibit A12  
Charge discrepancy & irregularity  
Michael Anderson Prose

STATE OF SOUTH CAROLINA )

IN THE COURT OF COMMON PLEAS  
12<sup>th</sup> JUDICIAL CIRCUIT

11/01/2025

COUNTY OF Florence County )

CASE NO.: 2025-CP-21-01381

Michael Anderson Prose )

**MOTION AND ORDER INFORMATION  
FORM AND COVERSHEET**

Plaintiff, )

vs. )

Time out mobile Home Park, William B. Eckles )

Colina Brown, aka Felicia Brown )

Defendant. )

Plaintiff's Attorney:

Michael Anderson Prose, 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: ADHA Accommodations / motion to take remittance essential Requested Motion

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 Prose

Signature of Attorney for ☐ Plaintiff / ☐ Defendant

Date submitted: \_\_\_\_\_, 20\_\_\_\_

**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: \_\_\_\_\_, 20\_\_\_\_

**CLERK'S VERIFICATION**

Collected by: VS Date Filed: \_\_\_\_\_, 20\_\_\_\_

☐ MOTION FEE COLLECTED: \$ 25

☐ CONTESTED - AMOUNT DUE: \$ \_\_\_\_\_

See attached Supplemental  
SCCA-233 Form

STATE OF SOUTH CAROLINA )

IN THE COURT OF COMMON PLEAS

COUNTY OF )

12<sup>th</sup> JUDICIAL CIRCUIT

12<sup>th</sup> Circuit  
Florence

CASE NO.: 2025-CP-21-01381

Michael Anderson Prose

FILED

MOTION AND ORDER INFORMATION  
FORM AND COVERSHEET

Plaintiff, )

In re: order by Home Park  
William B. Eschley, Gloria Brown  
aka, Gloria Brown Eschley

2025 NOV -3 P 1:02  
DORIS POULOS O'HARA  
Defendant  
SCCP & GS  
FLORENCE COUNTY, SC

Plaintiff's Attorney:

Michael Anderson Prose, Bar No. \_\_\_\_\_

Address:

(954) 290-1356

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: unauthorized counsel & your firm, proceed upon the court, Public Corruption

Estimated Time Needed: 15 mins

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 Prose

Signature of Attorney for ☐ Plaintiff / ☐ Defendant

11/3/2025, 20\_\_\_\_  
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:

, 20\_\_\_\_

CLERK'S VERIFICATION

Collected by: VS

Date Filed: \_\_\_\_\_, 20\_\_\_\_

☐ MOTION FEE COLLECTED: \$ 75

☐ CONTESTED - AMOUNT DUE: \$ \_\_\_\_\_