

IN THE SUPREME COURT OF SOUTH CAROLINA

Case No. 2025-001601

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;
Gloria Brown a/k/a Gloria Brown Gamble,
Defendants.

FILED
2025 SEP -4 A 10:15
DORIS POULOS O'HARA
CCCP & GS
FLORENCE COUNTY, SC

NOTICE OF FILING

PLEASE TAKE NOTICE that Plaintiff, Michael Anderson, Pro Se, hereby files the following exhibits in the above-captioned matters:

1. **Exhibit Index** – Listing all exhibits previously filed, including EE, GG, HH, KK, NN-series, MM-12, MM-22, and others, all incorporated herein by reference.
2. **Exhibit MM-30 – Docket Backdating to Defeat Plaintiff Filing** – Demonstrating suppression and backdating of Plaintiff's June 16, 2025 filings into May docket slots, and the retroactive insertion of Attorney Parker Wayne Lee Brown as counsel of record "as of" June 24, 2025, when in fact he did not appear until June 25, 2025.

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Defendants.

MOTION

Plaintiff, Michael Anderson, Pro Se, respectfully moves this Court for emergency relief. This motion is grounded upon the record evidence of **DOCKET BACKDATING, DOCKET MANIPULATION**, the preservation of Plaintiff's constitutional **JURY TRIAL DEMAND**, and Plaintiff's damages claim of **\$3,974,000**.

Mini-Chart – Backdating Pattern

Original May Entry	Fraudulently Nested June 16 Entry
May 12, 2025 – Complaint	June 16, 2025 – Defense Proposed Order
May 16, 2025 – Motion (Injunction)	June 16, 2025 – Plaintiff Affidavit (Ex. EE)
May 16, 2025 – Motion (Stay)	June 16, 2025 – Plaintiff Motion to Decline

Note: Plaintiff's June 24, 2025 filing was suppressed and backdated. The docket falsely shows Parker Brown as attorney of record on June 24, though NEFs (Exhibits QQ & RR) prove he did not appear until June 25.

Corrected Chart of Backdated Entries (Expanded)

Original Entry / Filing	False / Manipulated Entry	Who Filed / Acted	Effect
May 12, 2025 – Complaint & Summons	June 16, 2025 – Defense Proposed Order Referring Case to Master	Defense	Created false link undermining Plaintiff's \$3,974,000 CLAIM and JURY TRIAL DEMAND ; concealed DOCKET BACKDATING .
May 16, 2025 – Motion/Injunction	June 16, 2025 – Plaintiff Affidavit (Ex. EE)	Plaintiff	Erased affidavit showing clerk corruption; obstructed \$3,974,000 CLAIM and JURY TRIAL DEMAND .
May 16, 2025 – Motion/Stay Eviction	June 16, 2025 – Plaintiff Motion to Decline Referral	Plaintiff	Erased opposition to fraudulent referral; delayed adjudication; continued DOCKET BACKDATING .
June 24, 2025 – Plaintiff Motion	Suppressed/backdated; docket falsely shows Parker Brown as attorney of record on June 24	Clerk / Parker	Misled record to show Parker as attorney before Plaintiff's filing, though NEFs (QQ, RR) prove June 25.
July 31, 2025 – Clerk solicitation	August 26, 2025 hearing scheduled; Parker participated despite not being attorney of record	Clerk / Parker	Judge vacated referral to Master-in-Equity; hearing adjourned. Shows continued DOCKET MANIPULATION .

*Note: July 31 solicitation and Parker's improper participation at the August 26 hearing confirm that **DOCKET MANIPULATION** and **DOCKET BACKDATING** extended beyond June.*

Attorney Backdating & DOCKET MANIPULATION

The docket falsely shows Parker Brown as **attorney of record** as of **June 24, 2025**. In truth, Plaintiff filed a motion that day which was **suppressed and backdated**, and Parker did not appear until **June 25**, as proven by **NEFs (Exhibits QQ, RR)**.

On **July 31, 2025**, the Clerk solicited Parker again for the **August 26 hearing**, where the judge ultimately **vacated the Master-in-Equity referral**. Although adjourned, Parker nevertheless **participated despite not being attorney of record**, further confirming deliberate **DOCKET MANIPULATION**.

Importantly, Plaintiff has preserved a **voicemail from Senior Clerk Doris O'Hara (Exhibit EE)**, together with Plaintiff's follow-up call, confirming that she and her staff had **double-checked and triple-checked Plaintiff's file**. This independent evidence proves the irregularities are not conjecture but are admitted at the highest level of the Clerk's office.

Ongoing Fraud and Grounds for Prohibition

These manipulated entries — the June 24/25 backdating, the Parker false appearance, the Master-in-Equity referral, the July 31 solicitation, and the August 26 hearing — all obstruct Plaintiff's rights, delay his **JURY TRIAL DEMAND**, and undermine his **\$3,974,000 CLAIM**.

Applicable Law

- **Ex parte Knox, 3 S.C. 338 (1872)** – **FRAUD UPON THE COURT** vitiates all proceedings.
 - **Chewning v. Ford Motor Co., 354 S.C. 72, 579 S.E.2d 605 (2003)** – Clerks cannot exercise judicial power.
 - **State ex rel. Ritter v. Bailey, 232 S.C. 192, 101 S.E.2d 503 (1957)** – Writs of **MANDAMUS** and **PROHIBITION** restrain unlawful judicial/clerical acts.
 - **Rule 79(a), SCRPC** – Clerk's duty to keep docket is ministerial; any **DOCKET MANIPULATION** is ultra vires and constitutes **FRAUD UPON THE COURT**.
 - **Rule 38, SCRPC** – **JURY TRIAL DEMAND** must be preserved.
 - **Rule 60(b)(3), SCRPC** – Relief for fraud or misconduct.
 - **S.C. Const. Art. I, § 22** – **JURY TRIAL** guaranteed.
 - **18 U.S.C. § 1506** – Falsification of records; persuasive authority against **DOCKET BACKDATING**.
-

RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully prays that this Court:

1. Recognize Defendants' default;
2. Grant summary judgment in Plaintiff's favor;
3. Enter judgment for damages of **\$3,974,000**;
4. Preserve Plaintiff's constitutional **JURY TRIAL DEMAND**;
5. Issue writs of **MANDAMUS** and **PROHIBITION** to prevent further **DOCKET MANIPULATION, DOCKET BACKDATING, and FRAUD UPON THE COURT**, as documented in Plaintiff's filings and confirmed by **voicemail evidence from Senior Clerk Doris O'Hara (Exhibit EE)**.

Respectfully submitted,

Dated: Sept 7th, 2025

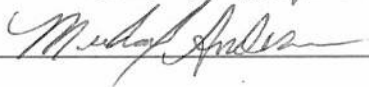


Michael Anderson, Pro Se
P.O. Box 156
Scranton, SC 29591
(954) 290-1356
andersso95@gmail.com

DECLARATION

I, Michael Anderson, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 7th day of Sept, 2025.



Michael Anderson, Pro Se



NOTE TO THE COURT – EXHIBIT EE (VOICEMAIL EVIDENCE)

Exhibit EE consists of (1) an audio voicemail left by **Senior Clerk Doris O'Hara** and (2) a transcript excerpt with Plaintiff's follow-up summary. It is offered as **direct evidence** of docket handling and manipulation.

Exhibit EE Cover Sheet

EXHIBIT EE — VOICEMAIL FROM SENIOR CLERK DORIS O'HARA

Description: Voicemail + transcript excerpt confirming docket handling review.

Transcript of Voicemail (Exhibit EE)

"Hello, this is Doris O'Hara from the Clerk's office. I'm just calling to see what would be a good time for us to set up a meeting for tomorrow. Please call me back."

Follow-Up Summary: When Plaintiff returned the call, Clerk O'Hara stated that she and her staff had **double-checked and triple-checked Plaintiff's entire file** to ensure filings were placed on the docket as they should have been.

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing **Emergency Motion on Backdating of Plaintiff Filings (Exhibit MM-30)**, together with attached Exhibit EE (Senior Clerk Doris O'Hara voicemail), upon the following parties by U.S. Mail, postage prepaid, on this 27 day of Sept, 2025:

- Joseph Cantey Heath, Esq., Nettles, Turbeville & Reddick, P.O. Box 699, Lake City, SC 29560
- William B. Eaddy, Defendant, P.O. Box 699, Lake City, SC 29560
- Gloria Brown a/k/a Gloria Brown Gamble, Defendant, 311 East Main Street, Scranton, SC 29591 (Refused Certified Mail)

Michael Anderson, Pro Se





Florence County
Twelfth Judicial Circuit
Public Index

Attorney Brown 6/25/2025

Backdated to
6/25/2025

Attorney Brown Parker



Florence County Home Page South Carolina Judicial Department Home Page SC.GOV Home Page

Backdated 6/24/2025

Switch View

Michael Anderson VS William Eaddy , defendant, et al

Case Number:	2025CP2101381	Court Agency:	Common Pleas Court	Filed Date:	05/12/2025
Case Type:	Common Pleas	Case Sub Type:	Breach of Cont 140	File Type:	Mediator - Jury
Status:	Referred To Master	Assigned Judge:	Clerk Of Court C P, G S, And Family Court		
Disposition:		Disposition Date:		Disposition Judge:	
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties

Click the  icon to show associated parties.



Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
 Anderson, Michael	1840 Bozy Rd Lot 60 Scranton SC 29591				Plaintiff Pro Se		05/12/2025
 Anderson, Michael					Plaintiff		08/15/2025
 Anderson, Michael	P O Box 156 Scranton SC 29591				Plaintiff Pro Se		06/16/2025
Brown, Glori(Inactive)					Defendant		06/10/2025
Brown, Gloria					Defendant		06/10/2025
 Brown, Parker Wayne Lee	P.O. Drawer 1931 Florence SC 29503				Defendant Attorney		06/24/2025
 Eaddy, William B					Defendant		06/16/2025
 Eaddy, William(Inactive)					Defendant		06/09/2025
Gamble, Gloria Brown					Defendant		06/09/2025
 Heath, Joseph Cantey	PO Box 699 261 Kelley Street Lake City SC 29560				Defendant Attorney		05/22/2025
 Live Oak Mobile Home Park					Defendant		06/09/2025

Actions

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Anderson, Michael	ADR/Alternative Dispute Resolution (Workflow)	Action		12/08/2025-16:16		
Anderson, Michael	Motion to Preserve Record and to Recognize Breach of Ministe	Motion		08/15/2025-10:13		
Anderson, Michael	Motion and Supplemental Evidence/Emergency Supplemental Filing	Motion		08/14/2025-16:33		
Anderson, Michael	Motion Request For Docket Correction	Motion		08/13/2025-12:04		
Anderson, Michael	Motion For Correction of Defective Electronic Record and Doc	Motion		08/13/2025-11:58		
Anderson, Michael	Motion For Correction Of Docket Entry and Preservation of Co	Motion		08/13/2025-11:36		
Anderson, Michael	Filing/Emergency Petition To The Supreme Court	Filing		08/12/2025-11:16		
Anderson, Michael	Motion/Emergency Stay Proceedings Pending Supreme Court Revi	Motion		08/11/2025-16:56		
Anderson, Michael	Supplemental Filing in Support of Motion to Decline Referral	Motion		08/06/2025-14:28		

Eaddy, William	NEF(05-29-2025 01:39:31 PM) Memo/Memo in Opposition	Filing		05/29/2025-	
Eaddy, William	Memo/Memo in Opposition	Filing		05/29/2025-13:39	
Eaddy, William	Response to Motion to Stay Eviction	Filing		05/29/2025-13:39	
Eaddy, William	Response to Motion to Cancel Hearing in Magistrate Court	Filing		05/29/2025-13:39	
Eaddy, William	Notice/Notice of Appearance	Filing		05/22/2025-07:00	
Anderson, Michael	Motion/Omnibus Motion/Preliminary Statement	Motion		05/21/2025-17:01	
Anderson, Michael	Affidavit/Affidavit With Exhibts	Filing		05/21/2025-16:58	
Anderson, Michael	Affidavit/Affidavit With Exhibits	Filing		05/21/2025-16:57	
Anderson, Michael	6/2/2025_MOTION_Notice of Motions Roster Publication Sent	Action		05/19/2025-11:36	
Anderson, Michael	6/2/2025_MOTION_Notice of Motions Roster Publication Sent	Action		05/19/2025-11:36	
Anderson, Michael	6/2/2025_MOTION_Notice of Motions Roster Publication Sent	Action		05/19/2025-11:32	
Anderson, Michael	Motion/Stay Eviction	Motion		05/16/2025-15:01	06/16/2025-15:01
Anderson, Michael	Motion/Cancel Hearing in Magistrate Court	Motion		05/16/2025-15:00	06/16/2025-15:00
Anderson, Michael	Filing/Exhibits	Filing		05/16/2025-13:40	
Anderson, Michael	Motion/Temporary	Motion		05/16/2025-	06/16/2025-

June 16th Backdate TO may 12th & may 16th

Not Referred To The Difference.

Name	Party Type	Case Number	Filed Date	Case Status	Disposition Date	Type	Subtype	Judgment #	Court Agency
Anderson, Michael	Plaintiff	<u>2025CP2101381</u>	05/12/2025	Pending/ADR		Common Pleas	Breach of Cont 140		Common Pleas Court
Brown, Giori	Defendant	<u>2025CP2101381</u>	05/12/2025	Pending/ADR		Common Pleas	Breach of Cont 140		Common Pleas Court
Brown, Gloria	Defendant	<u>2025CP2101381</u>	05/12/2025	Pending/ADR		Common Pleas	Breach of Cont 140		Common Pleas Court
Eaddy, William	Defendant	<u>2025CP2101381</u>	05/12/2025	Pending/ADR		Common Pleas	Breach of Cont 140		Common Pleas Court
Eaddy, William B	Defendant	<u>2025CP2101381</u>	05/12/2025	Pending/ADR		Common Pleas	Breach of Cont 140		Common Pleas Court
Gamble, Gloria Brown	Defendant	<u>2025CP2101381</u>	05/12/2025	Pending/ADR		Common Pleas	Breach of Cont 140		Common Pleas Court
Live Oak Mobile Home Park	Defendant	<u>2025CP2101381</u>	05/12/2025	Pending/ADR		Common Pleas	Breach of Cont 140		Common Pleas Court

Begins With ☐ Contains

See the D appearance in Docket

Name	Party Type	Case Number	Filed Date	Case Status	Disposition Date	Type	Subtype	Judgment #	Court Agency
Anderson, Michael	Plaintiff	<u>2025CP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court
Brown, Glori	Defendant	<u>2025CP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court
Brown, Gloria	Defendant	<u>2025CP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court
Eaddy, William	Defendant	<u>2025CP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court
Eaddy, William B	Defendant	<u>2025CP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court
Gamble, Gloria Brown	Defendant	<u>2025CP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court
Live Oak Mobile Home Park	Defendant	<u>2025CP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court

Back dated

EXhibits QQ,
RR

Certificate of Electronic Notification

Recipients

~~#~~ **Parker Brown** - Notification transmitted on 06-24-2025 05:02:59 PM.

Joseph Heath - Notification transmitted on 06-24-2025 05:02:59 PM.

ELECTRONICALLY FILED - 2025 Jun 25 8:14 AM - FLORENCE - COMMON PLEAS - CASE#2025CP2101381

Back dated
Exhibit QQ, RR

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2025CP2101381

Official File Stamp:

4

06-24-2025 05:02:37 PM

Court:

CIRCUIT COURT

Common Pleas

Florence

Case Caption:

Michael Anderson VS William Eaddy , defendant,
et al

Document(s) Submitted:

Answer/Answer & Counterclaim

- Exhibit/Filing of Exhibits

Filed by or on behalf of:

*

Parker Wayne Lee Brown

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Joseph Cantey Heath for William B Eaddy

Parker Wayne Lee Brown for Live Oak Mobile
Home Park, William B Eaddy

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Gloria Brown Gamble

Gloria Brown

Michael Anderson for Michael Anderson

Michael Anderson for Michael Anderson, Michael
Anderson

Michael Anderson for Michael Anderson

ELECTRONICALLY FILED - 2025 Jun 25 8:14 AM - FLORENCE - COMMON PLEAS - CASE#2025CP2101381