

SUPREME COURT COVER LETTER

Michael Anderson P.O. BOX 156

Scranton, S.C.

(954) 290-1356

January 5, 2026

CERTIFIED MAIL

The Honorable Clerk of Court South Carolina Supreme Court 1231 Gervais Street

Columbia, S.C. 29201

RE: Michael Anderson

v.

Live Oak Mobile Home Park, Defendant, 1.

William B. Eaddy, Defendant, 2.

Gloria Brown aka Gloria Brown Gamble

Supreme Court Case No.: 2025-002290

Circuit Court Case No.: 2025-CP-21-01381

TO THE HONORABLE CLERK OF THE SUPREME COURT:

Please find enclosed a copy of the **Notice Preserving Challenge to Judicial Immunity for Administrative and Ministerial Misconduct** and the accompanying **Index of Exhibits**, which I have filed today in the Florence County Court of Common Pleas.

I am providing this to the Supreme Court as a supplemental notification regarding the ongoing administrative irregularities in the lower court. This filing establishes for the record that:

1. **Default Status was Ignored:** Defendants have been in default since **June 26, 2025**, yet the lower court continued to entertain their motions.
2. **Fraudulent Orders:** A "Ghost Order" dated **June 2, 2025**, was manufactured without a hearing and was subsequently vacated by the Judge on **August 26, 2025**, upon the discovery of the fraud.
3. **Ministerial Failures:** The Clerk's office continues to maintain a "Dual Docket" and has deleted records regarding a medical emergency that occurred on October 27, 2025.

FILED
 2026 JAN -5 A 11: 59
 DORIS FOULOS O'HARA
 OCCP & GS
 FLORENCE COUNTY, SC

STATE OF SOUTH CAROLINA COUNTY OF FLORENCE
IN THE COURT OF COMMON PLEAS TWELFTH JUDICIAL CIRCUIT
LOWER COURT CASE NO.: 2025-CP-21-01381
SC SUPREME COURT CASE NO:2025-002290

Michael Anderson, Pro Se,

Plaintiff,

v.

Live Oak Mobile Home Park,

William B. Eaddy, and

Gloria Brown, aka Gloria Brown Gamble,

Defendants.

NOTICE PRESERVING CHALLENGE TO JUDICIAL IMMUNITY FOR ADMINISTRATIVE AND MINISTERIAL MISCONDUCT

TO: THE HONORABLE WILLIAM H. SEALS, JR., AND THE FLORENCE COUNTY CLERK OF COURT:

Plaintiff, appearing *pro se*, respectfully gives notice that the following conduct is ministerial and administrative in nature and is not protected by absolute judicial immunity. This Notice is filed to preserve these issues for any future review in state or federal court.

1. Administrative versus Judicial Acts Absolute judicial immunity does not apply to ministerial or administrative tasks. The creation of orders for hearings that did not occur and the unauthorized management of the case roster are administrative functions. (*Forrester v. White*, 484 U.S. 219 (1988)).

2. Fraudulent June 2nd Order and August 26th Vacation Plaintiff gives notice that the Clerk of Court and Defense Counsel manufactured a "Proposed Order" claiming a ruling on **June 2, 2025**, despite no hearing occurring and no parties being present. On **August 26, 2025**, the Court acknowledged this fraudulent irregularity and **vacated that order**. This confirms the existence of fraud upon the record and ministerial mismanagement.

STATE OF SOUTH CAROLINA

COUNTY OF FLORENCE

IN THE COURT OF COMMON PLEAS

CASE NO.: 2025-CP-21-01381

SC SUPREME COURT CASE NO.: 2025-002290

DECLARATION DOCUMENTING JUDICIAL KNOWLEDGE OF MEDICAL EMERGENCY AND SUBSEQUENT CRIMINAL RECORD SPOILIATION

I, **Michael Anderson**, appearing *pro se*, hereby testify under penalty of perjury to the events of October 27, 2025, which prove a terminal breach of Judicial Ethics and a coordinated criminal cover-up:

I. ACTUAL KNOWLEDGE OF MEDICAL DISTRESS

1. During the video hearing on October 27, 2025, I explicitly notified **Judge William H. Seals Jr.** that I was experiencing a severe medical episode. I was visibly trembling and incapacitated.
2. Judge Seals Jr. acknowledged my distress by instructing Managing Clerk **Melissa McCutchen** to provide me with soda and napkins.
3. Despite this physical evidence of a medical emergency, Judge Seals Jr. did not immediately stay the proceedings. Instead, he asked Defense Counsel **Eugene Nettles III** if he "wanted to keep going."
4. Under the direction of Nettles III, the hearing continued for approximately two minutes until I collapsed and was removed by emergency medical services (Ambulance).

II. THE COORDINATED COVER-UP (STAGE 3 SCRUBBING)

5. Following this event, Managing Clerks **Melissa McCutchen** and **Dawn Pappas**—who report directly to Judges Seals Jr. and Nettles—manually deleted the October 27th hearing from the public docket.

6. This "scrubbing" included the removal of hyperlinks to the video record of the collapse, intended to shield Judge Seals Jr. from liability for his failure to halt the proceedings and to hide the "Nettles Lineage" influence over the medical crisis.

7. The Clerk's Office then deleted **47 hyper links**, **HOWEVER**, the **274 blank entries** are **currently** on the docket directory to the October 27th hearing is still available on the docket dated October 6th, 274 time.

The removal of the Oct 27th hearing date timeline, making it appear that no such hearing or medical emergency ever occurred.

III. CRIMINAL PREDICATE ACTS

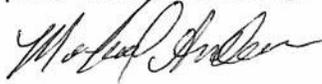
8. The decision to defer a medical emergency to the discretion of an opposing counsel (Nettles III) is a violation of the **14th Amendment (Due Process)** and the **8th Amendment (Cruel and Unusual Punishment)**.

9. The subsequent use of the Court's computer system to "erase" this event constitutes **Falsification of Public Records (S.C. Code § 16-13-10)** and **Federal Wire Fraud**.

DEMAND:

Plaintiff demands the immediate recusal of Judge William H. Seals Jr. and Judge Michael G. Nettles, a forensic preservation of the October 27th video, and an investigation into the "Soda and Napkins" incident as proof of actual knowledge of the emergency.

Respectfully submitted,



Michael Anderson, Pro Se Plaintiff

[Date: January 5, 2026]

3. Violation of Standing Default Status Defendants fell into **Default Status on June 16, 2025**. Plaintiff formally filed a **Motion for Default Judgment on June 26, 2025**. The Court's continued recognition of Defense motions while Defendants remain in default is a ministerial failure to enforce the Rules of Civil Procedure.

4. Ministerial Record Management and Supreme Court Oversight The deletion of the October 27, 2025, medical crisis record and the maintenance of a "Dual Docket" are currently under appellate review by the **South Carolina Supreme Court** under **Case No. 2025-002290**.

Respectfully submitted,

January 5, 2026

Michael Anderson, *Pro Se* P.O. BOX 156, Scranton, S.C.

954-290-1356

INDEX OF EXHIBITS

- **EXHIBIT 012:** Copy of the Clerk's Case Summary showing Defendants as "Inactive/Default" as of June 16, 2025.
- **EXHIBIT 013:** Plaintiff's **Motion for Default Judgment** filed June 26, 2025.
- **EXHIBIT 014:** Copy of the fraudulent **June 2, 2025 Order** (which was vacated on Aug 26). *EXHIBIT 014*
- **EXHIBIT 015:** Filed SCCA forms/receipts from **Nov 18, Dec 2, Dec 5, and Dec 31, 2025**, containing substantive evidence of fraud. *Refer electronic Docket*
- **EXHIBIT 016:** Screenshot of the "**Dual Docket**" showing conflicting case statuses.
- **EXHIBIT 017:** Notice of Case Assignment from the S.C. Supreme Court for **Case No. 2025-002290**.

Certificate of Service

I, Michael Anderson, certify that on January 5, 2026, I served this Notice and the attached Index of Exhibits upon:

- **Florence County Clerk of Court & The Hon. William H. Seals, Jr.** (By: Hand Delivery)
- **Live Oak Mobile Home Park, Attorney Joseph Cantey Heath, abandoned his Client.**
- **William B. Eaddy** (By: Listed as Inactive)
- **Gloria Brown aka Gloria Brown Gamble** (Note: Service Refused/Returned) and Listed as inactive.

Michael Anderson, *Pro Se*

Michael Anderson 1/6/2026

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
<input checked="" type="checkbox"/> Anderson, Michael	1840 Bozy Rd Lot 60 Scranton SC 29591				Plaintiff Pro Se <i>EXhibit</i>	<i>EX-7</i> <i>013</i>	<i>05/12/2025</i> <i>013</i>
<input checked="" type="checkbox"/> Anderson, Michael					Plaintiff		06/26/2025
<input checked="" type="checkbox"/> 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
<input checked="" type="checkbox"/> Brown, Parker Wayne Lee	P.O. Drawer 1931 Florence SC 29503				Defendant Attorney		06/24/2025
<input checked="" type="checkbox"/> Eaddy, William B					Defendant		06/16/2025
<input checked="" type="checkbox"/> Eaddy, William(Inactive)					Defendant		06/09/2025
Gamble, Gloria Brown					Defendant		06/09/2025
<input checked="" type="checkbox"/> Heath, Joseph Cantey	PO Box 699 261 Kelley Street Lake				Defendant Attorney		05/22/2025

EXHIBIT 013

STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
COUNTY OF FLORENCE

Case No. 2025-CP-21-01381

Michael Anderson, Plaintiff,

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 JUN 26 A 9 14
DORIS PAUL OS O'HARA
CCCP & GS
FLORENCE COUNTY, SC

MOTION FOR ENTRY OF DEFAULT JUDGMENT (MM-22)

TO: The Honorable Court and All Parties of Record:

Plaintiff Michael Anderson, appearing pro se, respectfully moves pursuant to Rule 55, South Carolina Rules of Civil Procedure ("SCRCP"), for entry of default and default judgment against the above-named Defendants. In support of this motion, Plaintiff states as follows:

1. **Service of Process.**

- o Summons and Complaint were personally served on each Defendant by the Florence County Sheriff's Office on **May 19th, 2025**. Proofs of service are on file with the Clerk of Court as Exhibits A-1 through A-3.

2. **Applicable Deadline.**

- o Under Rule 12(a), SCRCP, each Defendant had thirty (30) days—**until June 15, 2025**—to file an answer or other responsive pleading.

3. **Defendants' Failure to Respond.**

- o As of today, **June 26, 2025**, no Defendant has filed an answer, motion, or other pleading responsive to the Complaint.
- o Defendant Gloria Brown additionally **refused certified mail** containing three separate motions mailed on June 10 and June 11, 2025; the U.S. Postal Service returned those items marked "Refused." (See Exhibits MM-7, MM-8, MM-9.)

4. **Late Notice of Appearance—No Cure of Default.**

- o On or about **June 24, 2025** the electronic docket reflects that Attorney _____ filed a "Notice of Appearance" purporting to represent all three Defendants.
- o Plaintiff has **not been served** with that Notice or any other communication from said attorney.

- Under Rule 5(a), SCRCP, mere docket entry without service on Plaintiff does **not** make counsel attorney of record as to Plaintiff, nor does it extend or reopen the time to plead.
- A belated appearance **does not cure default** unless the Court sets aside default pursuant to Rule 55(c). See *Juba v. Harpers Ferry Ltd.*, 201 S.C. 8, 47 S.E.2d 134 (S.C. Ct. App. 2009).

5. Entry of Default Proper.

- Because each Defendant failed to plead or otherwise defend within the required time, entry of default is mandatory under Rule 55(a).
- Plaintiff's supporting Affidavit of Default (Exhibit C) verifies the amount of damages and establishes Defendants' liability.

6. Relief Requested.

Plaintiff respectfully requests that the Court:

- Enter default against all Defendants for failure to answer;
- Enter judgment in Plaintiff's favor for damages as set forth in the Affidavit of Default and supporting exhibits;
- Grant such other and further relief as the Court deems just and proper.

Respectfully submitted this 26 day of June 2025.

Michael Anderson

Michael Anderson, Plaintiff pro se

Mailing Address PO BOX 156, Scranton SC 29591

Phone: 954-290-1356

Email: andersso95@gmail.com

Michael Anderson

CERTIFICATE OF SERVICE

I, Michael Anderson, certify that on June 26 2025 I served a true and correct copy of the foregoing **Motion for Entry of Default Judgment (MM-22)** and all supporting exhibits upon the following by depositing same in the U.S. Mail, first-class postage prepaid, addressed as follows:

Attorney Joseph C. Heath

NEttles, Turbeville and Reddeck

PO BOX 699 291 Kelley Street Lake City, SC 29560

Michael Anderson

FIRMLY TO SEAL



7022 2410 0001 6494 0608

RDC 03

PHOTO
\$2324F500735-07

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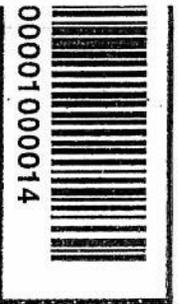
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P.O. Box 156
Spartanburg S.C. 29591

Refused
TO:
Walter Brown aka Walter
Brown Esquire
311 E. Main Street
Spartanburg S.C. 29591

Label 228, March 2016

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International Mail Manual at <http://pe.usps.com> for availability and limitations of coverage.

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29591

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Brown Handle
311 E. main Street
Spartanburg S.C. 29591

Label 228, March 2016

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International insurance.**

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International Mail Manual at <http://pe.usps.com>.

International Mail Manual at <http://pe.usps.com> for availability and limitations of coverage.

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scan the QR code.

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EP14F October 2023
OD: 12 1/2 x 9 1/2



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Michael Anderson
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Swanton, Se. 29591

TO:

Christie Beard, aka
Levia Beard Beamble
311 East Main Street
Swanton, Se. 29591

Label 229, March 2016

FOR DOMESTIC AND INTERNATIONAL USE

EXHIBIT MMS
EXHIBIT MMS



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
MMS

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
12th Judicial Circuit

FILED
JUN 16 2025
CLERK OF COURT
12th JUDICIAL CIRCUIT
FLORENCE, SC

EXHIBIT MMS
 EXHIBIT MMS
 JUN 25 2025
 JMN

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

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AND IT IS SO ORDERED.

Date: June __, 2025

 William H. Seals, Jr.
 Presiding Circuit Court Judge
 12th Judicial Circuit

RECEIVED / FILED
 JUN 16 2025
 JMN

Begins With Contains

*See The 11th Appellate in L-1000
EX-016*

Name	Party Type	Case Number	Filed Date	Case Status	Disposition Date	Type	Subtype	Judgment #	Court Agency
Anderson, Michael	Plaintiff	<u>2025SCP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140	<i>EX-016</i>	Common Pleas Court
Brown, Glori	Defendant	<u>2025SCP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court
Brown, Gloria	Defendant	<u>2025SCP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court
Eaddy, William	Defendant	<u>2025SCP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court
Eaddy, William B	Defendant	<u>2025SCP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court
Gamble, Gloria	Defendant	<u>2025SCP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court
Live Oak Mobile Home Park	Defendant	<u>2025SCP2101381</u>	05/12/2025	Referred To Master		Common Pleas	Breach of Cont 140		Common Pleas Court

7
Dual Packet

West signature 1 per signature

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, Glori	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
ive Oak Mobile Home Park	Defendant	<u>2025CP2101381</u>	05/12/2025	Pending/ADR		Common Pleas	Breach of Cont 140		Common Pleas Court

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David Docket



Court Rosters



[Summary Court Docket](#) [South Carolina Judicial Department Home Page](#) [Return To Roster Selection](#) [Jury Roster News](#) [Non-Jury Roster News](#) [Motion Roster News](#)

Court Agency	21002	Judge	Seals	Roster Description	CP Jury Trial Roster/December 1@ 9:30 A.M./Judge Seals/Courtroom 3B
Roster Type	Jury Roster	Roster Begin Date	12/01/2025	Roster End Date	12/05/2025
Roster Id	480				

Attorney Bar Number Case # Filed From

Filed Thru

Exhibit E

No records found with selected search criteria

OK

Original Source Doc:		Original Case #:		
Judgment Number:		Court Roster:		

Case Parties

Judgments

Tax Map Information

Associated Cases

Actions

Financials

Name	Description	Type	Motion Roster	Begin Date
Anderson, Michael	ADR/Alternative Dispute Resolution (Workflow)	Action		12/08/2025-16:16
Live Oak Mobile Home Park	NEF(10-28-2025 04:58:50 PM) Service/Certificate Of Servi...	Filing		10/29/2025-08:42
Live Oak Mobile Home Park	Service/Certificate Of Service	Filing		10/28/2025-16:58
Live Oak Mobile Home Park	NEF(10-28-2025 03:33:41 PM) Notice/Other	Filing		10/28/2025-15:40
Live Oak Mobile Home Park	Notice/Notice of Transfer Within Firm	Filing		10/28/2025-15:33
Anderson, Michael	Motion/Strike	Motion		10/13/2025-13:05
Live Oak Mobile	NEF(10-07-2025 09:56:08 AM) Notice/Notice of	Filing		10/07/2025-09:56

These documents are submitted to ensure the Supreme Court has a complete picture of the ministerial misconduct being challenged under **Case No. 2025-002290**.

Respectfully submitted, 

Michael Anderson, Pro Se

1/5/2026