

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
CLERK & 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
COCP & 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, SCRCPC, 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), SCRCPC 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



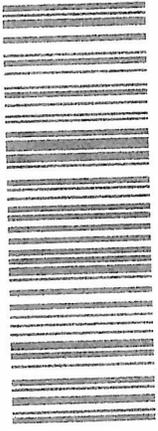
****EXHIBIT INDEX – MM-25****

- ****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 - 777-7

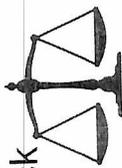
2nd

07/08/23



7021 0350 0001 6599 4071

LAW OFFICES
Nettles, Turbeville & Reddeck



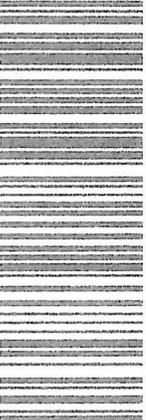
P.O. BOX 699
LAKE CITY, SC 29560

To:

MICHAEL ANDERSON
P.O. BOX 156
SCRANTON, SC 29591

EXHIBIT 7171-8

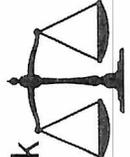
REGISTERED MAIL



7021 0350 0001 6599 4330

5/2/00

LAW OFFICES
Nettles, Turbeville & Reddeck



P.O. BOX 699
LAKE CITY, SC 29560

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

Exhibit 111-7

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 11-7

STATE OF SOUTH CAROLINA)
COUNTY OF FLORENCE)

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

Michael Anderson,)
Plaintiff,)

vs.)

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

Defendant(s).)

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