

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

RECEIVED
Feb 06 2023
SC Court of Appeals

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**APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas**

Honorable Edgar W. Dickson, Circuit Court Judge

~ ~ ~

Circuit Court Case No. 2018-CP-10-01622
Appellate Case No.: 2022-011 162

~ ~ ~

Chris C. Khamnei, Appellant,

v.

Cobb, Dill & Hammett, et al., Respondents.

~ ~ ~

APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER

NOW COMES Plaintiff Chris C. Khamnei, *pro se*, and hereby submits Appellant's Initial Brief And Designation Of Matter. In support of this brief, Appellant provides a Brief History, Transcript of Circuit Court Case No. 2018-CP-10-1622, and Conclusion.

BRIEF HISTORY

The Plaintiff and Appellant Chris C. Khamnei wanted decided to sell a house in Charleston. Two Charleston attorneys, Roy Willey & Eric Poulin offered to purchase the house. Khamnei accepted the offer. There were minor legal complications with the title of the house which was comprised of a bogus Lis Pendens filed by a tenant occupying the house. Khamnei offered to buyers a \$50,000 escrow until which time the tenant was evicted and the Lis Pendens was cancelled. Khamnei hired a closing attorney, Cobb, Dill and Hammett upon the recommendation of the

realtor. Khamnei did not know that Willey & Poulin had recommended the closing attorney to his Realtor and that all the attorneys involved worked together. Khamnei signed only a sales agreement, and addendum and power of attorney with Cobb, Dill and Hammett to consummate the sale. The power of attorney signed for Khamnei all of his money to be taken by the attorneys. Khamnei's money has been stolen through the attorneys.

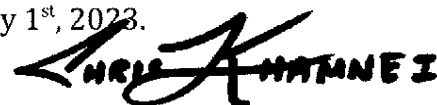
TRANSCRIPT OF CIRCUIT COURT CASE NO. 2018-CP-10-1622

Please see attached transcript.

CONCLUSION

Please make a judgment to return my money and criminally prosecute these theifs.

Respectfully Submitted and Dated at Burlington, Vermont on February 1st, 2023.



Chris C. Khamnei, *pro se*
82 Overlake Park
Burlington, VT 05401
Telephone: (802) 222-6090
Email: chris@rentinv.com

Pro Se Appellant

Parties of Record:

<p>Stefan B. Feidler Anastopoulo Law Firm, LLC 32 Ann Street Charleston, SC 29403</p>	<p>Thomas A. Pendarvis Pendarvis Law Offices, P.C. 710 Boundary St., Unit A-1 Beaufort, SC 29902-4188</p>
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Attorneys for Respondent

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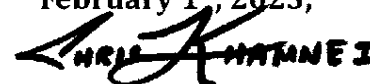
PROOF OF SERVICE

~ ~ ~

I certify that I have served the **Appellant's Intitial Brief** on Respondent by depositing a copy of it in the United States Mail, postage prepaid, on February 1st, 2023, addressed to Attorneys for Respondents at:

Stefan B. Feidler Anastopoulo Law Firm, LLC 32 Ann Street Charleston, SC 29403	Thomas A. Pendarvis Pendarvis Law Offices, P.C. 710 Boundary St., Unit A-1 Beaufort, SC 29902-4188
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February 1st, 2023,



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Pro Se Appellant

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February 1st, 2023

Jenny Abbot Kitchings
Clerk of the South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29201

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RE: Cobb, Dill & Hammett, LLC v Khamnei et al.
Circuit Court Case No. 2018-CP-10-1622
Appellate Case No. 2022-011 162

Dear Ms. Kitchings:

Please find enclosed for filing in the above-referenced case the following:

1. Proof of Service;
2. Appellant's Initial Brief; and
3. Court of Common Pleas Transcripts.

I have copied attorney Thomas Pandarvis, Esq. and Stephan Fiedler, Esq. with copies of this letter and its enclosures for service of the same upon Respondents.

If you have any questions or require further information, please contact me at 802-777-6007 or at chris@rentinvt.com.

Thank you for your assistance.

Sincerely,



Chris Khamnei
Plaintiff, *pro se*

Enclosures

cc: Thomas Pandarvis (Counsel of Record for Cobb, Dill & Hammett) and
Stefan Fiedler (Counsel of Record for Columbus Street Holdings)

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SC Court of Appeals

Fax

TO:	Attention Court Clerk	FROM:	Chris Khamnei
COMPANY:	The South Carolina Court of Appeals	COMPANY:	
FAX:	8037341839	FAX:	8022226080
SUBJECT:	Appellate Case No. 2022-011 162	DATE:	Sunday, February 5, 2023