

NOTICE OF APPEAL IN A CIVIL CASE

APPEAL FROM SUMTER COUNTY COURT OF COMMON PLEAS 03 (THIRD

JUDICIAL CIRCUIT), SUMTER, SC

THE STATE OF SOUTH CAROLINA

IN THE SOUTH CAROLINA COURT OF APPEALS

APPEAL FROM THE SUMTER COURT

Kristi F. Curtis, Circuit Court Judge

&

George M. McFaddin, Jr, Circuit Court Judge

RECEIVED
APR 20 2023
SC Court of Appeals

Case No. 2020-CP-43-1819

Gersh Zavodnik & Tatiana Zavodnik,

Appellants,

v.

Tony Morales (aka Anthony Morales),

Respondent.

NOTICE OF APPEAL

Gersh Zavodnik & Tatiana Zavodnik appeal the orders of the Honorable Kristi F. Curtis, Circuit Court Judge dated May 12, 2021, July 1st, 2021, August 29th or 30th, 2022 and the order of the Honorable George M. McFaddin, Jr, Circuit Court Judge dated

March 21st or March 22nd of 2023. Appellants have never received written notices of entries of these orders issued (if any) by the Court(s) as upon today.

April 14th, 2023.

Respectfully submitted,

Tatiana Zavodnik and Gersh Zavodnik

7365 Shadeland Station Way,
Apt. # 174
Indianapolis, In 46256
(812) 617-9994

Other counsel(s) of record:
SMITH ROBINSON
Smith Robinson Holler DuBose and Morgan, LLC
G. Murrell Smith, Jr.,
126 N. Main St.,
Sumter, SC 29151

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SC Court of Appeals

AND

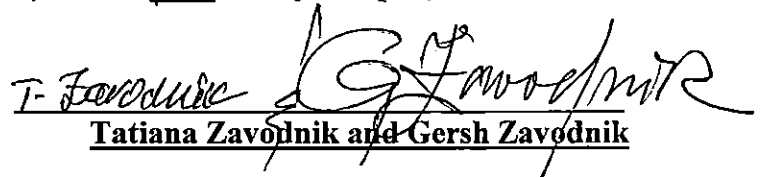
Frederick N. Hanna, Jr.,
2530 Devine St., Third Floor
Columbia, SC 29205
Counsel(s) for Respondent

CERTIFICATE OF FILING AND SERVICE

We hereby certify that on this 15 th day of April, 2023, the foregoing (Notice of Appeal and all of the accompanying it orders/documents/records attached to it) was filed with the Clerk of the South Carolina Court of Appeals, at 1220 Senate Street, Columbia, SC 29201 by sending this Notice of Appeal and these documents attached to it, by USPS, correct postage prepaid to the Clerk of the South Carolina Court of Appeals, at 1220 Senate Street, Columbia, SC 29201, sent on this 15 th day of April, 2023, as well as we also hereby certify that on this 15 th day of April, 2023, the foregoing (Notice of Appeal and all of the accompanying it orders/documents/records attached to it) was filed with the lower Court(s) – Sumter County Court of Common Pleas 03 (Third Judicial Circuit), Sumter, SC by sending this Notice of Appeal and these documents attached to it, by USPS, correct postage prepaid to the Sumter County Deputy Clerk of Court of Common Pleas 03 (Third Judicial Circuit), Sherry Yow and/or James C. Campbell, by sending this Notice of Appeal and these documents attached to it, by USPS, correct postage prepaid, to the Sumter County Deputy Clerk of Court of Common Pleas 03 (Third Judicial Circuit), Sherry Yow and/or James C. Campbell, at 215 N. Harvin St., Sumter, SC 29150, sent on

this 15 th day of April, 2023.

We also certify that on this 15 th day of April, 2023, the foregoing Notice of Appeal and these documents attached to it, was served by us upon the following opposing counsel(s) of record for the Respondent Tony Morales (aka Anthony Morales) -- Smith Robinson Holler DuBose and Morgan, LLC, G. Murrell Smith, Jr., 126 N. Main St., Sumter, SC 29151 and Frederick N. Hanna, Jr., 2530 Devine St., Third Floor, Columbia, SC 29205 by sending this Notice of Appeal and these documents attached to it, by USPS, correct postage prepaid to them (Smith Robinson Holler DuBose and Morgan, LLC, G. Murrell Smith, Jr., 126 N. Main St., Sumter, SC 29151 and Frederick N. Hanna, Jr., 2530 Devine St., Third Floor, Columbia, SC 29205) on this 15 th day of April, 2023.


Tatiana Zavodnik and Gersh Zavodnik

7365 Shadeland Station Way,
Apt. # 174
Indianapolis, In 46256
(812) 617-9994

**PROOF OF SERVICE OF A NOTICE OF APPEAL IN A CIVIL CASE
APPEAL FROM SUMTER COUNTY COURT OF COMMON PLEAS 03 (THIRD**

JUDICIAL CIRCUIT), SUMTER, SC

THE STATE OF SOUTH CAROLINA

RECEIVED

IN THE SOUTH CAROLINA COURT OF APPEALS APR 20 2023

APPEAL FROM THE SUMTER COURT SC Court of Appeals

Kristi F. Curtis, Circuit Court Judge

&

George M. McFaddin, Jr, Circuit Court Judge

Case No. 2020-CP-43-1819

Gersh Zavodnik & Tatiana Zavodnik,

Appellants,

v.

Tony Morales (aka Anthony Morales),

Respondent.

PROOF OF SERVICE

We certify that we have served the Notice of Appeal on upon the following opposing counsel(s) of record for the Respondent Tony Morales (aka Anthony Morales) -- Smith Robinson Holler DuBose and Morgan, LLC, G. Murrell Smith, Jr., 126 N. Main St., Sumter, SC 29151 and Frederick N. Hanna, Jr., 2530 Devine St., Third Floor, Columbia,

SC 29205 by depositing a copy of it in the United States Mail, postage prepaid, on Smith Robinson Holler DuBose and Morgan, LLC, G. Murrell Smith, Jr., 126 N. Main St., Sumter, SC 29151 and Frederick N. Hanna, Jr., 2530 Devine St., Third Floor, Columbia, SC 29205) sent on this 15th day of April, 2023.

April 12th, 2023


Tatiana Zavodnik and Gersh Zavodnik

7365 Shadeland Station Way,
Apt. # 174
Indianapolis, In 46256
(812) 617-9994

LETTER TO CLERK OF LOWER COURT
FILING NOTICE OF APPEAL

April 12th, 2023

The Honorable Deputy Clerk of Court
of Common Pleas 03 (Third Judicial Circuit),
Sherry Yow and/or James C. Campbell,
215 N. Harvin St., Sumter, SC 29150

RECEIVED
APR 20 2023
SC Court of Appeals

RE: Gersh Zavodnik & Tatiana Zavodnik, Appellants, v. Tony Morales (aka Anthony Morales), Respondent, Case No. 2020-CP-43-1819

Dear Ms. Yow and/or Mr. Campbell:

Enclosed for filing is a notice of appeal in the above case and other documents for this case.

Sincerely,


Tatiana Zavodnik and Gersh Zavodnik

7365 Shadeland Station Way,
Apt. # 174
Indianapolis, In 46256
(812) 617-9994
Appellants

CERTIFICATE OF SERVICE

We certify that we have served this letter's copy upon the following opposing counsel(s) of record for the Defendant/Respondent Tony Morales (aka Anthony Morales) -- Smith Robinson Holler DuBose and Morgan, LLC, G. Murrell Smith, Jr., 126 N. Main St., Sumter, SC 29151 and Frederick N. Hanna, Jr., 2530 Devine St., Third Floor, Columbia, SC 29205 by sending this Notice of Appeal and these documents attached to it, by USPS, correct postage prepaid to them (Smith Robinson Holler DuBose and Morgan, LLC, G. Murrell Smith, Jr., 126 N. Main St., Sumter, SC 29151 and Frederick N. Hanna, Jr., 2530 Devine St., Third Floor, Columbia, SC 29205), sent to them on this 15th day of April, 2023.

April 12th, 2023


Tatiana Zavodnik and Gersh Zavodnik

7365 Shadeland Station Way,
Apt. # 174
Indianapolis, In 46256
(812) 617-9994

LETTER TO THE APPELLATE COURT CLERK FILING THE NOTICE OF APPEAL

April 12th, 2023

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

APR 20 2023

SC Court of Appeals

RE: Gersh Zavodnik & Tatiana Zavodnik, Appellants, v. Tony Morales (aka Anthony Morales), Respondent, Case No. 2020-CP-43-1819

Dear Ms. Kitchings:

Enclosed for filing is a notice of appeal in the above case. Also enclosed are the following:

- (1) Notice of Appeal and attached documents.
- (2) Proof of service of the notice of appeal on the respondent[s].
- (3) A copy of the order[s] which are to be challenged on appeal.
- (4) A Verified Motion/Affidavit Of Personal Knowledge ("First Hand Knowledge") To Proceed On Appeal In Forma Pauperis Due To The Appellants' Indigenous Status.
- (5) A Verified Motion/Affidavit Of Personal Knowledge ("First Hand Knowledge") In Support Of Motion To Proceed On Appeal In Forma Pauperis Due To The Appellants' Indigenous Status.
- (6) This letter to you and to the lower court's clerk.

Sincerely,



Tatiana Zavodnik and Gersh Zavodnik

7365 Shadeland Station Way,
Apt. # 174
Indianapolis, In 46256
(812) 617-9994

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*Insurance does not cover certain items. For details regarding claims exclusions see the Domestic Mail Manual at <http://pe.usps.com>.

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

FROM:
 Gersh Lavodnick
 Tatiana
 7365 Shadeland Station Way
 Apt. # 174
 Indianapolis, IN 46256

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 Columbia, SC 29201
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