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Aug 20 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Dale Van Slambrook, Circuit Court Judge

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Appellate Case No. 2024-001734

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Olga Teslenko, Appellant,

v.

Joe Kocsis and Carpet King & Flooring,  
Respondents.

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MOTION FOR RECONSIDERATION OF ORDER DENYING LEAVE TO EXCEED PAGE  
LIMIT (RULES 208(b) & 221, SCACR)

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Appellant respectfully moves the Court to reconsider its denial of her motion for leave to file an oversized brief under Rule 208(b)(1), SCACR, and in support shows the following:

1. Procedural Background. Appellant requested permission to exceed the standard fifty-page limit and allow her amended initial brief to be within 85 pages. Appellant then conditionally filed her brief, consisting of 105 pages. This Court's order denied Appellant's request to exceed the standard page limit. The order did not acknowledge or address the extraordinary circumstances that distinguish this appeal from routine cases.
2. Extraordinary Scope. The standard fifty-page limit is designed for routine appeals raising three to five issues. By contrast, this appeal raises fifteen (15) interrelated issues involving judicial fraud and due process violations under color of law across multiple courts: fabricated findings, spoiled evidence, docket tampering, perjury, systemic

obstruction and deprivation of rights. Each issue is significant both independently and collectively, and demonstrates an extraordinary coordinated structure.

3. Procedural Cause of Scope. The unusually large volume of issues in this appeal is the direct result of the Clerk's January 14 refusal to transfer Appellant's original corrective exhibits for appellate review. Because the evidentiary record was obstructed, Appellant has been compelled not only to raise her constitutional and factual claims, but first to demonstrate that the omitted trial exhibits existed, were reviewed, authenticated, and admitted at trial, and that her corrective exhibits are identical to those omitted. Instead of relying on the record as transmitted, Appellant has been forced to prove the integrity of the record itself before reaching the merits. This necessity has multiplied both the number and scope of arguments, rendering compliance with the standard fifty-page limit impossible without eliminating essential constitutional claims. Moreover, because the record-proving arguments serve as the inextricable foundation for the substantive claims, any reduction of the former would necessarily erase the latter. Thus, forcing Appellant to reduce her initial brief to fifty pages would necessarily erase her constitutional claims from meaningful review.
4. Due Process Concern. Full presentation of these constitutional claims requires 85 pages. Compressing the filed brief into the standard fifty-page limit—less than half of its current size—cannot be achieved by simple editing or summarization, and will necessarily eliminate entire arguments, effectively foreclosing meaningful appellate review. The right to be heard on complex constitutional claims cannot be denied by a procedural limitation applicable to routine claims.
5. Due Process Concern. The order appears to have been issued administratively by the Clerk. Given the constitutional magnitude of her claims, Appellant respectfully submits that the determination of the appropriate page limit for presenting them warrants judicial consideration rather than administrative disposition.
6. Relief Requested. Appellant therefore requests that the Court reconsider its denial and grant leave for her brief to extend to eighty-five (85) pages, nunc pro tunc. Appellant acknowledges that the amended brief already filed exceeds that number, and undertakes to reduce it to eighty-five (85) pages within a reasonable time, if reconsideration is granted

7. Alternatively, in the event the Court declines reconsideration, Appellant will submit a revised 50-page protective brief to avoid dismissal, without waiving or abandoning her objection that the 50-page limit denies meaningful appellate review of her constitutional claims.

Appellant respectfully emphasizes that eighty-five (85) pages is the minimum necessary length to present these constitutional and evidentiary issues, and that further reduction would preclude meaningful review.

WHEREFORE, Appellant respectfully requests that the Court grant this Motion for Reconsideration and permit her to condense the filed brief to the 85-page limit, nunc pro tunc, or grant such other relief as justice may require.

Respectfully submitted,

/s/ Olga Teslenko  
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PROOF OF SERVICE OF MOTION FOR RECONSIDERATION

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Appellant hereby certifies that she has served her Motion for Reconsideration on Respondent, Mr. Joe Kocsis, who at all relevant times represented himself to be the owner of Carpet King & Flooring. Service was made by depositing a copy in Federal Express Mail, postage prepaid, on **August 21, 2025**, addressed to: Mr. Joe Kocsis, Carpet King & Flooring, 532 Broadway Street, Myrtle Beach, SC 29577.

Respectfully submitted,

/s/ Olga Teslenko

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Pro se Appellant.

Dated: **August 21, 2025**