

STATE OF SOUTH CAROLINA

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2026CV221040024
CIVIL CASE NUMBER

COUNTY OF GEORGETOWN

IN THE MAGISTRATE'S COURT

TRANSCRIPT OF JUDGMENT
FIND FOR PLAINTIFF

Names of Parties Against Whom Judgment is Granted	
Mohamad Haisam Kodaimati 1692 South Morgan Avenue Andrews, SC 29510 Attorneys:	

Names of Parties To Whom Judgment is Granted	
Eric James Adamczyk 1692 South Morgan Avenue Andrews, SC 29510 Attorneys:	

DAMAGES AND COSTS

Amount of Judgment:	\$7500.00
Court Costs:	\$80.00
Total Amount of Judgment:	\$7,580.00
Date of Judgment:	5/13/2026

I, John Anthony Love, Magistrate in and for the County of Georgetown, do hereby certify that the foregoing is a correct transcript of the Judgment issued by this Court.



John Anthony Love
Georgetown County Magistrate

May 13, 2026



Georgetown County Fifteenth Judicial Circuit Public Index



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Switch View

VS

Case Number:	2026CP2200424	Court Agency:	Common Pleas	Filed Date:	04/24/2026
Case Type:	Common Pleas	Case Sub Type:	Use AP Case Type 910	File Type:	Non-Jury
Status:	Disposed	Assigned Judge:	Clerk Of Court C P, G S, And Family Court		
Disposition:	Dismissed by Court - not Rule 40J	Disposition Date:	04/28/2026	Disposition Judge:	Clerk Of Court C P, G S, And Family Court
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	Completion Date	Documents
Kodaimati, Mohamad Haisam	Notice/Active Pending Appeal and Automatic Stay/Exhibits	Filing		10/09/2026-14:06		
Adamczyk, Eric James	Order/Form 4/Motion Continued	Order		10/05/2026-16:12		
Adamczyk, Eric James	Motion/Continuance/Pro Se	Motion		10/02/2026-11:23	10/05/2026-11:23	
Kodaimati, Mohamad Haisam	Filing/Return Receipt	Filing		09/29/2026-10:37		
Kodaimati, Mohamad Haisam	10/8/2026_MOTION_Roster/Notice of Case Roster Publication Se	Action		09/28/2026-11:42		
Adamczyk, Eric James	10/8/2026_MOTION_Roster/Notice of Case Roster Publication Se	Action		09/28/2026-11:42		
Kodaimati, Mohamad Haisam	10/8/2026_MOTION_Roster/Notice of Case Roster Publication Se	Action		09/22/2026-09:12		
Adamczyk, Eric James	10/8/2026_MOTION_Roster/Notice of Case Roster Publication Se	Action		09/22/2026-09:12		
Kodaimati, Mohamad Haisam	10/8/2026_MOTION_Roster/Notice of Case Roster Publication Se	Action		09/11/2026-13:43		
Adamczyk, Eric James	10/8/2026_MOTION_Roster/Notice of Case Roster Publication Se	Action		09/11/2026-13:43		
Kodaimati, Mohamad Haisam	Order/Electronic Form 4/Motion to Reconsider/Denied	Order		08/13/2026-14:59		

Kodaimati, Mohamad Haisam	Transcript/Transcript of Testimony	Filing		08/13/2026-08:42		
Kodaimati, Mohamad Haisam	Motion/Return Property and Declaration of Void Execution/Pro	Motion		08/13/2026-08:38		
Kodaimati, Mohamad Haisam	8/13/2026_MOTION_Roster/Notice of Case Roster Publication Se	Action		08/03/2026-11:45		
Adamczyk, Eric James	8/13/2026_MOTION_Roster/Notice of Case Roster Publication Se	Action		08/03/2026-11:45		
Adamczyk, Eric James	Filing/Other/Return Receipt	Filing		08/03/2026-11:35		
Kodaimati, Mohamad Haisam	Filing/Other/Return Receipt	Filing		07/30/2026-15:57		
Kodaimati, Mohamad Haisam	8/13/2026_MOTION_Roster/Notice of Case Roster Publication Se	Action		07/23/2026-08:42		
Adamczyk, Eric James	8/13/2026_MOTION_Roster/Notice of Case Roster Publication Se	Action		07/23/2026-08:42		
Kodaimati, Mohamad Haisam	Order/Court of Appeals/Dismissed with Prejudice	Order		07/14/2026-10:15		
Kodaimati, Mohamad Haisam	Motion/Expidite Ruling on Reconsider/Pro Se	Motion		07/14/2026-10:02	08/13/2026-10:02	
Kodaimati, Mohamad Haisam	Service/Certificate Of Service	Filing		06/05/2026-16:50		
Kodaimati, Mohamad Haisam	Notice of Appeal	Filing		06/05/2026-16:49		
Kodaimati, Mohamad Haisam	Motion/ReconsiderRuling on Appeal Staus & Undertaking/Pro Se	Motion		06/05/2026-16:48	08/13/2026-16:48	 
Kodaimati, Mohamad Haisam	Filing/Return Receipt	Filing		06/05/2026-16:14		
Kodaimati, Mohamad Haisam	Order/Electronic Form 4/See Form 4	Order		06/04/2026-16:33		
Kodaimati, Mohamad Haisam	Filing/Magistrate File	Filing		06/02/2026-12:44		
Adamczyk, Eric James	Filing/Return Receipt	Filing		05/29/2026-12:56		
Kodaimati, Mohamad Haisam	6/4/2026_MOTION_Roster/Notice of Case Roster Publication Sen	Action		05/26/2026-09:43		
Kodaimati, Mohamad Haisam	6/4/2026_MOTION_Roster/Notice of Case Roster Publication Sen	Action		05/26/2026-09:43		
Kodaimati, Mohamad Haisam	6/4/2026_MOTION_Roster/Notice of Case Roster Publication Sen	Action		05/26/2026-09:43		
Kodaimati, Mohamad Haisam	6/4/2026_MOTION_Roster/Notice of Case Roster Publication Sen	Action		05/26/2026-09:43		
Adamczyk, Eric James	6/4/2026_MOTION_Roster/Notice of Case Roster Publication Sen	Action		05/26/2026-09:43		

Adamczyk, Eric James	6/4/2026_MOTION_Roster/ Notice of Case Roster Publication Sen	Action		05/26/2026-09:43		
Adamczyk, Eric James	6/4/2026_MOTION_Roster/ Notice of Case Roster Publication Sen	Action		05/26/2026-09:43		
Adamczyk, Eric James	6/4/2026_MOTION_Roster/ Notice of Case Roster Publication Sen	Action		05/26/2026-09:43		
Kodaimati, Mohamad Haisam	6/4/2026_MOTION_Roster/ Notice of Case Roster Publication Sen	Action		05/19/2026-10:24		
Adamczyk, Eric James	6/4/2026_MOTION_Roster/ Notice of Case Roster Publication Sen	Action		05/19/2026-10:24		
Kodaimati, Mohamad Haisam	Motion/Preservation Order Issuance of Subpoenas/Pro Se	Motion		05/18/2026-15:24	06/04/2026-10:04	
Kodaimati, Mohamad Haisam	6/4/2026_MOTION_Roster/ Notice of Case Roster Publication Sen	Action		05/18/2026-10:40		
Kodaimati, Mohamad Haisam	6/4/2026_MOTION_Roster/ Notice of Case Roster Publication Sen	Action		05/18/2026-10:40		
Kodaimati, Mohamad Haisam	6/4/2026_MOTION_Roster/ Notice of Case Roster Publication Sen	Action		05/18/2026-10:40		
Adamczyk, Eric James	6/4/2026_MOTION_Roster/ Notice of Case Roster Publication Sen	Action		05/18/2026-10:40		
Adamczyk, Eric James	6/4/2026_MOTION_Roster/ Notice of Case Roster Publication Sen	Action		05/18/2026-10:40		
Adamczyk, Eric James	6/4/2026_MOTION_Roster/ Notice of Case Roster Publication Sen	Action		05/18/2026-10:40		
Kodaimati, Mohamad Haisam	Supp Notice/New Evidence/ Cert of Service	Filing		05/15/2026-14:25		
Kodaimati, Mohamad Haisam	Motion/Quash Writ of Ejectment/Pro Se	Motion		05/14/2026-16:16	06/04/2026-16:41	
Kodaimati, Mohamad Haisam	Affidavit/Affidavit in Support of Motions/Exh 1-8	Filing		05/14/2026-16:16		
Kodaimati, Mohamad Haisam	Motion/Address Completed Eviction/Pro Se	Motion		05/14/2026-16:15	06/04/2026-16:36	
Kodaimati, Mohamad Haisam	Motion/Stay Enforcement Eviction/Pro Se	Motion		05/14/2026-16:15	06/04/2026-16:39	
Kodaimati, Mohamad Haisam	Order/Granting in Forma Pauperis	Order		05/14/2026-16:06		
Kodaimati, Mohamad Haisam	Motion and Affidavit to Proceed in Forma Pauperis/ Pro Se	Motion		05/14/2026-16:06	05/14/2026-16:06	
Kodaimati, Mohamad Haisam	Appeal/Notice of Civil Appeal (Workflow)	Action		05/04/2026-12:59	04/28/2026-12:59	
Kodaimati, Mohamad Haisam	Order/Dismissal/Magistrates Court	Order		04/28/2026-16:10	04/28/2026-16:10	

Kodaimati, Mohamad Haisam	Service/Certificate Of Service	Filing		04/24/2026-13:08	04/28/2026-13:08	
Kodaimati, Mohamad Haisam	Filing/Tenants Undertaking to Stay Execution on Appeal	Filing		04/24/2026-13:08	04/28/2026-13:08	
Kodaimati, Mohamad Haisam	Memo/Memo in Support of Not of Appeal/Mot to Stay	Filing		04/24/2026-13:07	04/28/2026-13:07	
Kodaimati, Mohamad Haisam	Motion/Stay Execution of Writ of Ejectment/Pro Se	Motion		04/24/2026-13:05	04/28/2026-13:05	
Kodaimati, Mohamad Haisam	Motion/Appeal/No Docs	Motion		04/24/2026-12:59	04/28/2026-12:59	
Kodaimati, Mohamad Haisam	Appeal/Notice of Civil Appeal/Exhibits	Filing		04/24/2026-12:57	04/28/2026-12:57	 

STATE OF SOUTH CAROLINA-COUNTY OF GEORGETOWN
IN THE COURT OF COMMON PLEAS-FIFTEENTH JUDICIAL CIRCUIT

MOHAMAD HAISAM KODAIMATI,

Appellant/Defendant,

v.

ERIC JAMES ADAMCZYK,

Respondent/Plaintiff.

Case No. 2026-CP-22-00424

FILED
GEORGETOWN COUNTY, S.C.
2026 AUG 13 AM 8:39
ALMA Y. WHITE
CLERK OF COURT

**APPELLANT/DEFENDANT'S MOTION FOR RETURN OF PROPERTY
AND DECLARATION OF VOID EXECUTION**

COMES NOW the Appellant/Defendant, Mohamad Haisam Kodaimati, appearing pro se, and respectfully moves this Honorable Court for a declaration that the execution of the eviction on April 29, 2026, was void *ab initio* and for an immediate order for the return of his property. **This motion is based on the Court's own on-record findings,** the South Carolina Rules of Civil Procedure, and the statutory and case law of South Carolina. In support of this motion, Appellant/Defendant states as follows:

FACTUAL BACKGROUND

1. On April 24, 2026, Appellant/Defendant filed a timely Notice of Appeal and Tenant's Undertaking in this Court, appealing a judgment of eviction from the Georgetown County Magistrate Court.
2. Pursuant to S.C. Code § 27-40-800(b), the filing of the Tenant's Undertaking created an **automatic statutory stay** of the execution of the judgment of ejectment.

3. On April 28, 2026, at approximately 4:10 PM, Deputy Clerk Cynthia Kinder administratively dismissed Appellant/Defendant's perfected appeal. This administrative action was taken without any judicial order or authorization.
4. On April 29, 2026, **while the statutory stay was in effect**, the Georgetown County Sheriff's Office, along with private towing contractors Elite Towing, LLC and Legacy Tow Group, LLC, executed the eviction. They seized Appellant/Defendant's two motorhomes, valued at approximately \$400,000, and personal belongings contained therein, valued at over \$100,000.
5. On June 4, 2026, this Court, the Honorable Benjamin H. Culbertson presiding, held a hearing. **The certified transcript of that hearing confirms that the Clerk's dismissal was a nullity.** At page 4, the following exchange occurred: > **THE COURT:** "Well, that's a letter from the magistrate. Okay. **But there's no circuit court order dismissing the appeal.**" > **CLERK:** "No."
6. By this on-record exchange, **the Court made a judicial finding that the Clerk's administrative dismissal was unauthorized and that no valid order existed lifting the automatic statutory stay.**
7. Immediately following this admission, the Court then proceeded to deny Appellant/Defendant's appeal on June 4, 2026. This denial was the **first valid judicial disposition** of the appeal.
8. Therefore, as established by this Court's own record, Appellant/Defendant's appeal was legally active and the automatic statutory stay was in full legal effect from April 24, 2026, through the Court's denial on June 4, 2026. **The eviction executed on April 29, 2026, occurred during an active statutory stay and was, therefore, void *ab initio*.**

9. On June 4, 2026, this Court signed a Form 4 Judgment electronically at 2:25 PM. The Form 4 states: “All of the appellant’s motions pending in this appeal from an eviction issued by the magistrate are DISMISSED due to the dismissal of this appeal for the appellant’s failure to post the necessary bond.”
10. The certified transcript of the June 4 hearing reveals **seven contradictions** between the Court’s oral statements on the record and the written Form 4 Judgment signed the same hour:
- (a) **Phantom Dismissal:** The Form 4 dismisses “due to the dismissal of this appeal.” But at Tr. 4, the Court stated: “**But there’s no circuit court order dismissing the appeal.**” The clerk confirmed: “No.” The Form 4 relies on a dismissal the Court admitted does not exist.
 - (b) **Revived Bond Ground:** At Tr. 5, after Appellant/Defendant cited S.C. Code § 27-40-800(b) and (c), the Court abandoned the bond argument and shifted to questioning April and May rent. The Form 4 revives the bond ground in writing — a ground the Court retreated from orally when the controlling statute was cited.
 - (c) **Absent Statute:** Appellant/Defendant cited § 27-40-800(b) and (c) at Tr. 5, 8, and 12. The statute declares the Tenant’s Undertaking “sufficient” to stay execution. The Form 4 does not mention the statute, the undertaking, or the word “sufficient” anywhere.
 - (d) **No Disposition of Appeal:** The Form 4 does not check any disposition box — not Affirmed, not Reversed, not Remanded, not Other. The appeal was never disposed of by judicial order, yet the Form 4 dismisses motions based on “the dismissal of this appeal.”
 - (e) **Clerk’s Admission of Custom:** At Tr. 3-4, when the Court asked “Is there an order of dismissal?” the clerk answered: “It’s a letter.” The Court confirmed: “That’s a letter from

the magistrate.” The Court then asked: “But there’s no circuit court order dismissing the appeal?” **The clerk responded: “No. We usually just use the — as the —”** This is an admission that the clerk’s office has a practice of using magistrate letters instead of circuit court orders to dismiss appeals.

- (f) **Deliberate Omission of “Magistrate”:** At Tr. 4, the Court called it “the magistrate bond” — **set by a magistrate who had lost jurisdiction** when Appellant/Defendant filed his appeal on April 24. The Form 4 drops the word “magistrate” and calls it “the necessary bond” — concealing that the Circuit Court judgment is based on a lower court judge’s **extrajudicial letter**.
- (g) **Bond Amount Confusion:** Magistrate Love’s April 28 letter — which is in the record — demanded \$7,500.00, the full judgment amount, as a cash bond. That figure never appears in the transcript as a bond amount. Not from the Court. Not from the clerk. Not from anyone. Instead, at Tr. 8, Appellant/Defendant stated his Tenant’s Undertaking offered \$600 per month — the statutory amount. At Tr. 10, the Court said “He set a bond of six hundred dollars a month” — attributing Appellant/Defendant’s undertaking to the magistrate. The magistrate never set \$600. The magistrate demanded \$7,500. The Court confused Appellant/Defendant’s statutory undertaking with the magistrate’s \$7,500 cash bond demand. The Form 4 says “the necessary bond” without specifying which amount.

LEGAL ARGUMENT

11. **The Clerk’s April 28 Dismissal Was Void.** A deputy clerk is a ministerial officer who lacks judicial authority to dismiss a perfected appeal. The South Carolina Supreme Court has been unequivocally clear that a clerk’s unauthorized acts are void. In *Lebovitz v. Mudd*, 289 S.C. 476, 347 S.E.2d 94 (1986), the Court held that where a clerk improperly

cancelled a lis pendens, **“The clerk’s cancellation is void and the notices shall remain** effective during the pendency of this appeal.” The same principle applies here. The clerk’s dismissal was a void act that had no legal effect on the status of Appellant/Defendant’s appeal or the automatic stay.

12. **The Statutory Stay Was in Effect on April 29.** South Carolina law is clear that an appeal automatically stays the execution of an eviction. **S.C. Code § 27-40-800(b)** states, “The undertaking by the tenant... **stays the execution of the judgment or order of ejectment.**” This is consistent with the general rule that “an appeal acts as a stay.” *Terry v. Terry*, 400 S.C. 453, 734 S.E.2d 646 (2012). Because the Clerk’s April 28 dismissal was a void act, the automatic statutory stay was never lawfully lifted. The stay remained in full force and effect until this Court’s valid judicial denial of the appeal on June 4, 2026.
13. **The Eviction Execution Was Void Ab Initio.** An act taken in violation of an automatic stay is void from its inception. Because the statutory stay was in effect on April 29, the execution of the eviction was a legal nullity. The South Carolina Supreme Court has held that acts performed under void authority are void *ab initio* and cannot be validated retroactively. *See Ward v. West Oil Co., Inc.*, 387 S.C. 268, 692 S.E.2d 516 (2010). The Court of Appeals recently affirmed this principle, stating, “**We are not presented with any authority that subsequent events... can reach back in time and ratify an order that was issued by a court that lacked jurisdiction to do so.**” *Rufus Rivers v. James Smith, Jr.*, No. 2021-001099, 2023 S.C. App. LEXIS 109 (Ct. App. June 7, 2023).
14. **The Court’s June 4 Denial Cannot Retroactively Validate the Void Execution.** This Court’s denial of the appeal on June 4 operates prospectively from that date forward. It

cannot “reach back in time” to retroactively validate an eviction that was void when it occurred on April 29. The eviction was void when it happened, and the passage of time or subsequent judicial action cannot cure that fundamental defect.

- 15. The Court Has Inherent Authority to Order the Return of Property.** The property was seized under color of a writ issued from the jurisdiction of this Court. The Court has the inherent authority to correct the consequences of its own process being unlawfully executed. The principle established in *Miller v. State*, 377 S.C. 99, 659 S.E.2d 492 (2008), that it is not within a Clerk’s authority to refuse a filing, extends to the Clerk’s unauthorized dismissal of a perfected appeal. **This Court must remedy the direct and devastating consequences of its ministerial officer’s void act.**

- 16. Appellant/Defendant Is Suffering Ongoing and Irreparable Harm.**

Appellant/Defendant is a 65-year-old disabled citizen suffering from post-polio syndrome, dangerously high blood pressure, and critical cardiac deterioration requiring an imminent aortic valve replacement. As a direct result of the void execution, he has been rendered homeless and forced to sleep in a standard vehicle, exposed to the elements, since April 29, 2026. His motorhomes, which served as his home and contained over \$100,000 in irreplaceable personal property, medical equipment, and legal documents, remain in the possession of private towing contractors. Every day of continued dispossession constitutes severe and irreparable harm to his health, safety, and property rights.

- 17. All Derivative Acts Are Void — Trespass Notice and Arrest Under *Innovative Waste Mgmt. Inc. v. Crest Energy Partners GP, LLC*, 815 S.E.2d 780 (S.C. Ct. App. 2018), “All**

acts performed under it, and all claims flowing out of it, are void.” Because the eviction execution was void, every act flowing from it is also void.

18. During the void eviction on April 29, 2026, Lieutenant Alan Jackson and Deputy W. Terence Blakely of the Georgetown County Sheriff’s Office — not the landlord — gave Appellant/Defendant a verbal “no trespass” notice at 1746 South Morgan Avenue.
Because the eviction was void, Appellant/Defendant remained a lawful tenant with leasehold rights intact. A lawful tenant cannot be trespassed from property he has a legal right to occupy. Under *State v. Tyndall*, 336 S.C. 8, 518 S.E.2d 278 (Ct. App. 1999), a trespass warning’s validity depends on the person’s right to be on the property. **The notice was void.**
19. On May 27, 2026, Appellant/Defendant was arrested for trespassing at 1692 South Morgan Avenue — a completely different parcel confirmed by Georgetown County GIS records — based on the void trespass notice given at 1746. Under *State v. Hopkins*, 149 S.C. 494, 147 S.E. 595 (1929), an arrest based on void underlying process is “**absolutely void.**” The arrest **lacked probable cause** as a matter of law because the underlying trespass notice was void. Furthermore, under *Bouie v. City of Columbia*, 378 U.S. 347 (1964), South Carolina’s trespass statute requires notice prohibiting entry to the specific property. Notice for 1746 cannot serve as notice for 1692. The arrest was defective on this independent ground as well.
20. **The Form 4 Judgment Contradicts the Court’s Own Record** A written judgment that contradicts the court’s own spoken findings from the same hearing is the type of error that **Rule 59(e), SCRCP**, was designed to correct. The Form 4 creates a narrative that the appeal was properly dismissed for failure to post a bond. The transcript proves the appeal

was destroyed by a clerk acting on a magistrate's letter, without any judicial order, one minute after the letter arrived, when zero dollars were due under the statute.

The "necessary bond" in the Form 4 is either the magistrate's void \$7,500 demand or Appellant/Defendant's \$600 statutory undertaking — **the Court confused the two.** This confusion is the sole basis for the written judgment.

21. **No Payment Was Due When the Clerk Dismissed** Under S.C. Code § 27-40-800, the stay dissolves only if the tenant "fails to make any rental payment within five days of the due date" after signing the undertaking. The first payment was not due until May 1, 2026. The five-day grace period ran through May 6. The clerk dismissed on April 28 — Day 4 — when zero dollars were due. It was statutorily impossible for the stay to have dissolved on April 28 or April 29. The eviction on April 29 occurred during an active stay.
22. **Restoration of the Status Quo Ante.** Because the eviction execution was void ab initio, **the equitable remedy required is restitution — restoring Appellant/Defendant to the position he occupied before the unlawful act.** The motorhomes were located at 1746 South Morgan Avenue when they were unlawfully seized on April 29, 2026. Storage charges at the towing facility now exceed \$20,000 and continue to accrue daily. **These charges exist solely because of the void execution.** Appellant/Defendant, a 65-year-old disabled citizen rendered homeless by the void eviction, has no ability to pay these charges or arrange transportation. The parties responsible for the void seizure — Respondent Adamczyk, who initiated the void proceedings, and the towing contractors who acted under state direction — must bear the full cost of undoing the consequences of their own unlawful conduct. Should an alternative location be required, such location

must have habitability — meaning access to water, power, and sewer (utilities) — as the denial of these essential services was the underlying issue that initiated this entire case.

PRAYER FOR RELIEF

WHEREFORE, Appellant/Defendant Mohamad Haisam Kodaimati respectfully prays for an Order from this Court as follows:

A. A Declaration that the April 29, 2026, execution of the eviction was **void *ab initio*** because it occurred during an active statutory stay under S.C. Code § 27-40-800(b);

B. An Order for the **immediate return** of Appellant/Defendant's two motorhomes and all personal belongings contained therein from any parties currently in possession;

C. An Order enjoining the Respondent, his agents, and any other party from further interference with Appellant/Defendant's property rights;

D. Such other and further relief as this Court deems just and proper.

E. A declaration that the verbal "no trespass" notice given by Lieutenant Alan Jackson and Deputy W. Terence Blakely on April 29, 2026, at 1746 South Morgan Avenue was void because it was issued during a void eviction execution while Appellant/Defendant remained a lawful tenant;

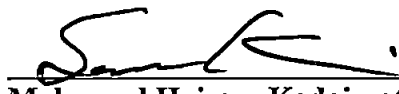
F. A declaration that the May 27, 2026, arrest for trespassing at 1692 South Morgan Avenue was void because it was based on a void trespass notice issued at a different parcel.

G. An Order directing Respondent Eric James Adamczyk to immediately satisfy, pay, or cancel all accrued towing and storage liens held by Elite Towing, LLC and Legacy Tow Group, LLC, and compelling the return and transport of both motorhomes and all personal property contained therein back to 1746 South Morgan Avenue at Respondent's sole expense; or, in the alternative

at Appellant/Defendant's option, to an alternative secure location designated by Appellant/Defendant within 300 miles of Georgetown County, provided such location has habitability — meaning access to water, power, and sewer (utilities) — at Respondent's expense;

H. A Declaration that Appellant/Defendant is not responsible for any towing, storage, or transportation fees arising from the void execution of April 29, 2026, and that all such fees shall be borne by the parties responsible for the void seizure.

Respectfully submitted,


Mohamad Haisam Kodaimati, Pro Se
P.O. Box 417
Huger, SC 29450
Phone: 980-636-9412
Email: kodaimati@gmail.com

Date: August 13, 2026

VERIFICATION

I, Mohamad Haisam Kodaimati, declare under penalty of perjury under the laws of the State of South Carolina that the foregoing statements are true and correct to the best of my knowledge, information, and belief.



Mohamad Haisam Kodaimati

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August 2026, I served a true and correct copy of the foregoing Motion upon the Respondent Eric James Adamczyk by hand delivery in court during the hearing.

Mohamad Haisam Kodaimati

FILED
GEORGETOWN COUNTY, S.C.
2026 AUG 13 AM 9:39
ALMA Y. WHITE
CLERK OF COURT