

March 23, 2016

The South Carolina Court of Appeals  
Jenny Abbott Kitchings, Clerk  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**

MAR 25 2016

SC Court of Appeals

RE: David Ford II v. Richard Campanaro  
Appellate Case No. 2015-000997

Dear Ms. Kitchings:

Please accept this notice as my request for a motion to stay matters involving the Case listed above until such time the request for appeal is heard and or ruled upon. The reasons for my request include:

1. The Judge, in his ruling, stated that "the defendant had plenty of notice regarding the trial and should have appeared" on March 25. As a matter of fact pertaining to this statement, I, the defendant in the matter, received two pieces of correspondence with respect to the actual trial date. The first came directly from Toby Ward's office (the attorney for the plaintiff), this document was date stamped at 3pm. EST on March 24, 2015 by the United States Post Office and received at my place of residence on March 27, 2015, which is two days **AFTER** the trial took place. Please refer to Exhibit A. The second piece of correspondence came directly from Jeannette McBride, the clerk of Court. Her document was date stamped March 25, 2015, at 12:49pm (**after** the trial) signed by Ms. McBride on March 26, 2015 (**after** the trial) and mailed to my residence through the USPS on March 31, 2015 (**after** the trial). I received the notice on April 3, 2015; which was eight (8) days after the trial was heard. Please refer to Exhibit B. This indicates a serious delivery default on the part of the court.
2. The Judge, in his ruling, stated that I, the defendant, received two checks from the plaintiff, when, in fact, it was one; the other clearly indicated that the check was written to the SC DOR without my knowledge, approval, or at my request. The plaintiff was to be working with the SCDOR regarding the matter, however, rather than work through a solution, he chose, on his own accord and without consulting me, the defendant, to pay the tax debt "for me". I had no prior knowledge to this and it was not requested. I could have and would have presented this in trial had I been offered a proper opportunity via the court notice of trial date.
3. On numerous occasions, I, the defendant, requested in written form, through the courts an opportunity at mediation or dismissal with respect to this case given there is not a loan agreement agreed upon and signed that indicates, an interest payment, and other payment terms and conditions between the parties.
4. The Judge accepted, without a proof provided, the notion that the plaintiff paid the defendant *in cash*. This point would have and could have been argued at trial had I, the defendant, been properly notified of the trial date.

5. The courts in South Carolina, despite the request for appeal, has turned the matter over to the courts in the State of Pennsylvania in the county of Lancaster; our state of residence since June 2014. The courts in Pennsylvania have executed on the judgement and are going to sell any property owned exclusively by me, the defendant on April 26, 2016, despite a timely request for a Pennsylvania debtor's exemption hearing. The hearing was originally scheduled for March 22, 2016, but has been moved to May 19, 2016, which is twenty three (23) days AFTER the potential sale of property; Please refer to Exhibit C. Though the amount of property likely will be valued at less than \$200.00, Please Refer to Exhibit D, the proceedings have begun to move forward despite the fact that an appeal has been made in SC. Further, I have yet to have the opportunity to be heard by a judge in the state of Pennsylvania, however, I should not be subject to this action until such time that my appeal had the opportunity to heard and ruled upon. If the sale of my property were to commence in Pennsylvania and then the court in South Carolina ruled in my, the defendants, favor, then I, the defendant, would be forced to initiate a suit against the plaintiff for the return of the value the property.
6. Further, pertaining to the above action of South Carolina to send the judgement to Pennsylvania and the subsequent action to seize my property, my bank account was frozen on February 12, 2016. As a result, I have been irreparably harmed by such action, despite the fact that the rule under PA Code 3525 (c) (i) states: "The first \$10,000 of each account of the defendant with a bank or other financial institution containing any funds which are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or Federal Law". While it will be argued in Pennsylvania under appeal and or a motion for stay, the State of South Carolina has been complicit in this matter going forward without a fair hearing for me, the defendant, in either state due to the forwarding of the case while under appeal. It will cause further irreparable harm should property and funds be taken from me PRIOR to any ruling on the appeal.

In closing, the plaintiff continues to make it his mission to try and impair my opportunities to continue in my career by involving and lying to my industries' governing body; he has maliciously through mutual acquaintances, defamed my character and reputation. Further, prior to court intervention, he used electronic methods to threaten me with harm and made it a point to suggest I would "never make it out of South Carolina" in one piece. Again, I, the defendant, could have and would have shared through the court at time of trial this information had I, the defendant, been notified and or served with timely and proper notice of the exact trial date. Finally, I filed the initial briefs with the court and any deficiencies were noted and responded to properly. The court received these documents on December 7, 2015. In speaking with the courts on February 16, 2016, it was indicated that the respondent's briefs were due on February 18, 2016. They have failed to respond to those. If it pleases the court, the argument for a timely ruling on a motion to stay is simply based on the fact that I, the defendant, should be allowed to be heard fairly prior to any action such a seizure and sale of property and the transfer of frozen assets to the defendant. Opposing council is making efforts to deny me, the defendant, and my right to a fair unbiased decision on appeal and unfairly continues to accelerate collections efforts before court matters can be heard.

I am reachable via USPS at 137 Scarborough Lane, Millersville, PA 17551 or phone at 803-348-4556.

Kindly,



Richard Campanaro

I hereby certify that on March 24, 2016, a copy of this letter and its attachments were sent via USPS first class postage to:

Eric Rothermel  
33 North Duke Street  
Lancaster, PA 17602

Toby Ward  
534 Congaree Avenue  
Columbia, SC 29205

The Honorable Judge Leonard G Brown III  
Lancaster County Court House  
50 North Duke Street  
Lancaster, PA 17602

Lancaster County Sherriff's Office  
50 North Duke Street  
PO Box 83480  
Lancaster, PA 17608-3480

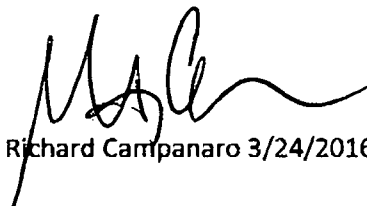
Bank of America  
720 W. Uwchlan Ave.  
Exton, PA 19341

David W. Melynk, ESQ.  
7436 Broad River Road  
Building 1, Suite 110  
Irmo, SC 29063

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MAR 25 2016

SC Court of Appeals



Richard Campanaro 3/24/2016

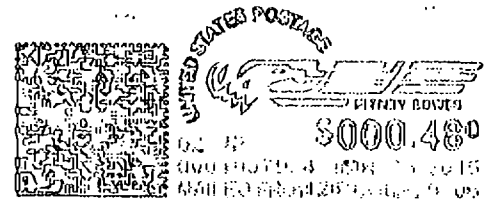
Enclosure: \$25 motion fee

**Exhibit A**

**TOBIAS G. WARD, JR., PA**  
— ATTORNEYS AT LAW —  
P.O. Box 6138, Columbia, SC 29260

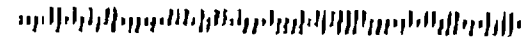
*read  
3/27/15*

COLUMBIA  
SC 29260  
24 JAN 15  
PM 3 IL



Richard G. "Jerry" Campanaro  
137 Scarborough Lane  
Millersville, PA 17551

17551952907



**TOBIAS G. WARD, JR., PA**  
— ATTORNEYS AT LAW —

J. DERRICK JACKSON  
dj@tobywardlaw.com

TOBIAS G. WARD, JR.  
@tobywardlaw.com

March 23, 2015

VIA EMAIL AND US MAIL

Richard G. "Jerry" Campanaro  
137 Scarborough Lane  
Millersville, PA 17551  
jerry.campanaro@yahoo.com

**RECEIVED**

MAR 25 2016

SC Court of Appeals

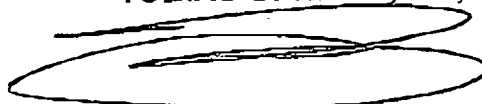
Re: David F. Ford, II v Richard G. "Jerry" Campanaro  
Civil Action No.:2014-CP-40-3488

Dear Mr. Campanaro:

The above referenced civil action is scheduled for trial. Please find enclosed a copy of the Trial Notice. The parties should attend court at the Richland County Judicial Center, 1701 Main Street, Columbia, SC 29201 on March 25, 2015 at 9:00 am for assignment of the trial judge and courtroom and trial of this civil action that day.

Sincerely,

**TOBIAS G. WARD, JR., PA**



Tobias G. Ward, Jr.

TGW, Jr.:wrc

cc: David F. Ford, II, J.D., LL.M. (w/enclosure)

STATE OF SOUTH CAROLINA

)  
) IN THE COURT OF COMMON PLEAS

COUNTY OF RICHLAND

)

DAVID F. FORD, II,

)  
) CIVIL ACTION NO.:2014-CP-40-3488

Plaintiff(s),

)

-vs-

)

Richard G. "Jerry" Campanaro,

) TRIAL NOTICE

**RECEIVED**

MAR 25 2016

Defendant(s).

)

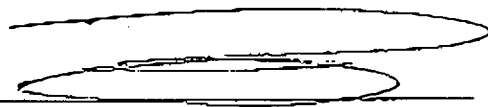
SC Court of Appeals

TO THE DEFENDANT ABOVE NAMED:

PLEASE TAKE NOTICE that this civil action is scheduled for trial: the parties should attend court at the Richland County Judicial Center, 1701 Main Street, Columbia, SC 29201 on March 25, 2015 at 9:00 am for assignment of the trial judge and courtroom and trial of this civil action that day.

TOBIAS G. WARD, JR., PA

BY:

  
Tobias G. Ward, Jr., Esquire  
P.O. Box 6138  
Columbia, SC 29260  
(803) 708-4200  
Attorney for the Plaintiff

Dated:

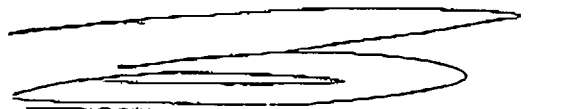
March 23, 2015

**CERTIFICATE OF SERVICE**

I, Tobias G. Ward, Jr., Attorney of the law firm of TOBIAS G. WARD, JR., PA. attorneys for the Plaintiff, do hereby certify that I served the foregoing Trial Notice on the Defendant by e-mail and United States Mail, post prepaid, on March 23, 2015, addressed as follows:

Richard G. "Jerry" Campanaro  
137 Scarborough Lane  
Millersville, PA 17551

[jerry.campanaro@yahoo.com](mailto:jerry.campanaro@yahoo.com)



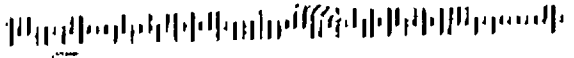
Tobias G. Ward, Jr.

**Exhibit B**

Jeanette W. McBride  
CLERK OF COURT  
RICHLAND COUNTY  
P.O. Box 2766  
Columbia, SC 29202-2766

3/31/2016  
10:42 AM  
UPS STORE

271646798 59 BMDVND 17551



FORM 4

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NUMBER: 2014CP4003488

David F Ford II

Richard G Jerry Campanaro

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: \_\_\_\_\_

Attorney for :  Plaintiff  Defendant or  Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT. This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT. This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  Other \_\_\_\_\_
- ACTION STRICKEN (CHECK REASON):  Rule 40(j), SCRPC;  Bankruptcy;  Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  Other \_\_\_\_\_
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):  Affirmed;  Reversed;  Remanded;  Other \_\_\_\_\_

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED:  See attached order (formal order to follow)  Statement of Judgment by the Court:

ORDER INFORMATION

This order  ends  does not end the case.  
Additional Information for the Clerk :

*Continued to 23 March 2015*

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled
		\$
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

Circuit Court Judge

*[Signature]*

Judge Code

*2156*

Date

*3/16/15*

For Clerk of Court Office Use Only

This judgment was entered on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ and a copy mailed first class or placed in the appropriate attorney's box on this *26* day of *Mar*, 20*15* to attorneys of record or to parties (when appearing pro se) as follows:

Tobias Gavin Ward Jr.

Richard G Jerry Campanaro

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Court Reporter

Clerk of Court

*Janette W. [Signature]*

**Richard G Jerry Campanaro**  
**137 Scarborough Lane**  
**Millersville, PA 17551**

**Exhibit C**

Court of Common Pleas of Lancaster County  
OFFICE OF DISTRICT COURT ADMINISTRATION  
50 NORTH DUKE STREET  
PO BOX 83480  
LANCASTER, PA 17608-3480

PAID  
MAR 25 2016  
LANCASTER, PA 17608-3480

LANCASTER, PA 17608-3480

1755109523 F002



**COURT OF COMMON PLEAS OF LANCASTER COUNTY OF LANCASTER**

**OFFICE OF COURT ADMINISTRATION - SCHEDULING SECTION  
LANCASTER COUNTY COURTHOUSE  
50 NORTH DUKE STREET  
PO BOX 83480  
LANCASTER, PA 17608-3480  
PHONE (717) 299-8041 FAX (717) 295-3599**

March 10, 2016

**JERRY G. CAMPANARO  
137 SCARBOROUGH LANE  
MILLERSVILLE, PA 17551-9523**

**NOTICE OF COURT APPEARANCE**

You are hereby notified that you are required to appear for a Debtor's Claim Exemption Hearing regarding:

Case: CI-16-00652 FORD, II, DAVID F. vs. CAMPANARO, RICHARD G. on March 22, 2016 at 1:30 PM in Location To Be Announced of the Courthouse.

IF THE ATTORNEYS ON RECORD ARE NOT CORRECT, PLEASE CONTACT THE PROTHONOTARY'S OFFICE AT 717-299-8282 WITHIN 10 DAYS.

ATTORNEYS ARE RESPONSIBLE TO NOTIFY THEIR CLIENT(S) AND ALL WITNESSES INVOLVED IN THIS CASE, AS WELL AS OPPOSING PARTIES AND/OR COUNSEL.

**YOU MUST ARRIVE 15 MINUTES PRIOR TO THE HEARING.**

A request to change this hearing must be submitted on a COURT ADMINISTRATION OFFICE SCHEDULING COVER SHEET (CAOSCS) to the Court Administration Office and be accompanied by a rescheduling order (original and two copies). The CAOSCS (with instructions) can be found on the Court website at the following web address:

[www.co.lancaster.pa.us/courts/caoscs](http://www.co.lancaster.pa.us/courts/caoscs)

If a request is submitted less than (4) business days before the hearing, it must be submitted to the assigned judge.

Requests for an interpreter or deaf and hard of hearing services should be made to the Bail Administration Office at 717-295-3584.

**RECEIVED**

MAR 25 2016

SC Court of Appeals

**NA**

[Type the sender company address]

3/25/2016

**FAX**

**To: Jenny Abbott Kitchings**

**Phone: 803-734-1890**

**Company Name: Clerk, South Carolina Court of Appeals**

**Fax: 803-734-1839**

**From: Campanaro, Jerry**

**Phone: 803-348-4556**

**Company Name: NA**

**Fax: NA**

**Number of Pages: 16**

**Urgent: Yes**

**Action Requested: Yes**