

79,085

March 23, 2016

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

RECEIVED
MAR 28 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 as 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

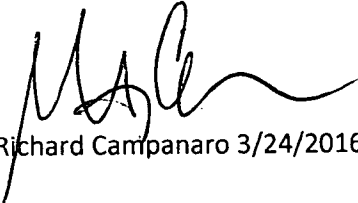
Toby Ward
534 Congaree Avenue
Columbia, SC 29205

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



Richard Campanaro 3/24/2016

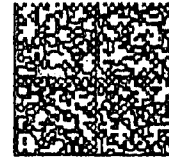
Enclosure: \$25 motion fee


Exhibit A

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

*recd
3/27/15*

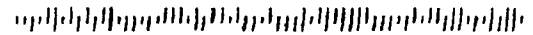
COLUMBIA
SC 29260
24 MAR 2015
12:11



UNITED STATES POSTAGE

HITNEY DOWNS
\$000.48⁰
02 1F
0001067924 MAR 23 2015
MAILED FROM ZIP CODE 29206

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

17551 952337



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

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
COUNTY OF RICHLAND

)
) IN THE COURT OF COMMON PLEAS
)

DAVID F. FORD, II ,
Plaintiff(s).

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

-vs-

Richard G. "Jerry" Campanaro,
Defendant(s).

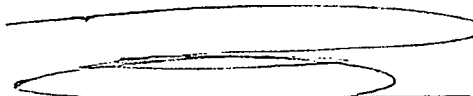
)
) TRIAL NOTICE
)
)
)

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:

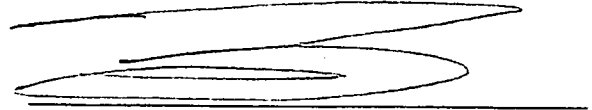
Richard G. "Jerry" Campanaro
137 Scarborough Lane
Millersville, PA 17551

jerry.campanaro@yahoo.com

RECEIVED

MAR 28 2016

SC Court of Appeals



Tobias G. Ward, Jr.

Exhibit B

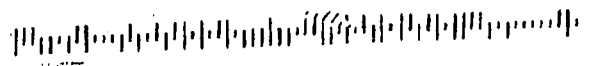
Jeanette W. McBride
CLERK OF COURT
RICHLAND COUNTY
P.O. Box 2766
Columbia, SC 29202-2766

Present
First Class Mail
ComStar



POSTAGE WILL BE PAID BY ADDRESSEE
FIRST CLASS PERMIT NO. 1000 COLUMBIA, SC
POSTAGE \$ 000.43⁵

271646768 59 BMDVNM 17551



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 : <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant or <input type="checkbox"/> 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 *21* 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

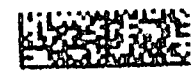
[Signature]

Richard G Jerry Campanaro
137 Scarborough Lane
Millersville, PA 17551

Exhibit C

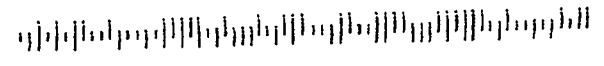
Court of Common Pleas of Lancaster County
OFFICE OF DISTRICT COURT ADMINISTRATION
50 NORTH DUKE STREET
PO BOX 83480
LANCASTER, PA 17608-3480

Hasler FIRST-CLASS MAIL
03/14/2016
US POSTAGE \$000.48⁵



ZIP 17603
011E12650091

1755199529 R002



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

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.

Exhibit D

SHERIFF'S OFFICE OF LANCASTER COUNTY

Mark S. Reese
Sheriff

Brad Harris
Solicitor



Charles Hamilton
Chief Deputy

James Montanez
Lieutenant

DAVID F FORD, II
VS.
BANK OF AMERICA

IN THE COURT OF COMMON PLEAS
OF LANCASTER COUNTY
PENNSYLVANIA
WRIT OF EXECUTION
CI-16-00652

NOTICE OF LEVY

TO DEFENDANT:

RICHARD G. "JERRY" CAMPANARO

Take notice, by virtue of the above order, I have levied upon your tangible non-perishable personal property, as per the attached schedule, located at:

137 SCARBOROUGH LANE
MILLERSVILLE, PA 17551-9523

**YOU WILL THEREFORE NOT REMOVE THIS PROPERTY FROM THE PREMISES
WITHOUT AN ORDER FROM ME**

You are further notified that by virtue of Section 4110 of the Crimes Code 18 Pa. S.S. 4110, a person commits a misdemeanor of the second degree if he destroys, removes, conceals, encumbers, transfers, or otherwise deals with property after levy has been made thereon with intent to hinder enforcement of such interest and upon conviction thereof is subject to a fine not exceeding \$5,000.00 and sentence to imprisonment for not more than two years.

BY: _____
DEPUTY SHERIFF

DATE: 02/24/2016

FOR: *Mark S. Reese*

MARK S. REESE, SHERIFF
COUNTY OF LANCASTER

SHERIFF'S SALE

By Virtue of a Writ of Execution

CI-16-00652

Issued out of the Court of Common Pleas of Lancaster County, Pennsylvania and to me directed, I will expose the following described property at public sale at

137 SCARBOROUGH LANE, MILLERSVILLE, PA 17551-9523

ON

Tuesday, April 26, 2016

10:30 AM

Prevailing Time, the following described property, to wit:

Case Number: **CI-16-00652**

Zone	Levy Item Name	Quantity
GARAGE	TRUE TEMPER YELLOW SNOW SHOVEL	1
GARAGE	CENTRAL FORCE BLACK AND YELLOW HAMMER	1
GARAGE	RED LOUISVILLE STEP LADDER	1
GARAGE	MONKEY DOOR STOP	1
GARAGE	FOUR PRODUCTION TROPHIES	1

Any person claiming any interest in said personal property shall file the same prior to the sale, with the Sheriff's Office. A schedule of distribution will be filed in the Sheriff's Office no later than five (5) days after the date of the sale, and distribution made ten (10) days thereafter unless exceptions are filed with the Sheriff's Office prior thereto.

Seized and taken into execution to be sold as the property of BANK OF AMERICA in suit of DAVID F FORD, II vs. BANK OF AMERICA and to be sold by me.

(4140) Defrauding Secured Creditors. A person commits a misdemeanor of the second degree if he destroys, removes, conceals, encumbers, transfers or otherwise deals with property subject to a security interest or after levy has been made thereon with intent to hinder enforcement of such interest.

Attorney for the Plaintiff:

APPEL & YOST LLP
LANCASTER, PA

Mark S. Reese, Sheriff

LANCASTER COUNTY, Pennsylvania

Stone Mill Plaza
1390 Columbia Ave
Lancaster, PA 17603
(717) 299-9269

Send Report

03/25/16 10:40 AM

We are the one stop for all your
shipping, postal and business needs.

Track your packages at
WWW.GOOGLE.COM - ENTER STORE 3413

Start Time	Time	Mode	Page	Result
03-25 10:40AM	02'20	ECM	016/016	O.K



001 000004 (018) TO \$ 29.85
Fax Service QTY 15
Reg Unit Price \$ 1.99

SubTotal \$ 29.85
Total \$ 29.85

Debit Card \$ 29.85

Receipt ID 89903918676052888982 015 Items
CSH: JAY Tran: 8492 Reg: 003

Sale

*****7218

Debit Entry Method: Swiped
Acct Type: Checking

Trace:00000002 Appr Code:114410
Retrieval #:ML0002918516 Batch #:

Amount \$ 29.85
=====

Merchant Total \$ 29.85

Approved

Thank you for visiting our store.
Please come back again soon.

Whatever your business and personal
needs, we are here to serve you.

We're here to help.
Join our FREE email program to receive
great offers and resources.

www.theupsstore.com/signup

RECEIVED

MAR 28 2016

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

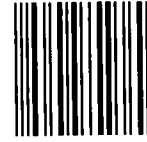
Action Requested: Yes



Richard Campanaro
 137 Scarborough Ln
 Millersville, PA 17551



1000



29201

U.S. POSTAGE
 PAID
 MILLERSVILLE, PA
 17551
 MAR 25, 16
 AMOUNT

\$1.64

R2305K141052-05

THE SOUTH CAROLINA COURT OF APPEALS

JENNY KITCHINGS, CLERK

1220 SENATE ST.

COLUMBIA, SC 29201

RECEIVED

MAR 28 2016

SC Court of Appeals