

April 5, 2016

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

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

RECEIVED

APR 11 2016

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed herein are my rejoinders to the Respondent's (David F Ford II) return to the Appellant's (Richard Campanaro) Motion To Stay.

In response to the Respondent's FACTUAL AND PROCEDURAL BACKGROUND, a money judgement against the Appellant was obtained in a hearing on March 25, 2015 and filed on April 7, 2015. On May 6, 2015 the Appellant sent notification to the office of the Honorable Jenny Abbott Kitchings, Clerk of Courts, a notice of intent to appeal the ruling. Refer to EXHIBIT A. This notice of intent to appeal was sent via fax on May 5, 2015, with a verified receipt and mailed via USPS on May 6, 2015, to the court, The Honorable Judge Benjamin and Toby Ward, attorney for the plaintiff. In part, the appeal of this case was based on the fact that the defendant, Richard Campanaro, was not provided ample notice to attend the actual trial. In fact, it should be noted that the defendant, Richard Campanaro, received notice from Toby Ward, attorney for the plaintiff, of a March 25, 2015 trial date on March 27, 2015, and received notice of the March 25, 2015 trial date from the court on April 1, 2015. The notice sent via the court was dated *after* the actual trial. Please refer to EXHIBIT B. As a result, the defendant, Richard Campanaro, was not afforded rightful due process to be heard equally in front of the presiding judge, whereby he could defend himself. There was a significant default in the notification of the hearing date. Therefore, the defendant's, Richard Campanaro, opportunity to appear was clearly violated and it appears in the ruling that the presiding judge, arbitrarily found that meaningful notice was accorded. It should also be noted that on five (5) occasions, the defendant, Richard Campanaro, requested in writing either a dismissal, the opportunity for mediation or to present himself via phone to be heard and at no time did the court respond or rule upon those requests.

To further respond, the judgement has been domesticated in Pennsylvania, however, given the defendant's, Richard Campanaro, request for appeal, there should be not action taken until such time the appeal is either heard and or ruled upon. At this point, no notice has been given regarding the status of the appeal and yet the Pennsylvania Courts are taking action as if all matters have been decided. Until such time that South Carolina Court of Appeals comes to a ruling on the filed appeal, taking action violates the appellant's, Richard Campanaro, rights to be heard prior to the sale of his

personal property. If, in fact, the ruling is made in the appellant's, Richard Campanaro, favor and the sale of items has already taken place, then there will be no other course of action to take but to initiate a suit on the same matter.

In response to Mr. Ward's ascertains that the defendant, Richard Campanaro, has failed to respond in a timely manner to any and all matters regarding the appeal or the numerous deficiencies that the court has supposedly notified of. It should be stated emphatically that, the defendant has responded. With respect to the timely filing of the appeal, it is noted that the court (see **EXHIBIT C**) notified the defendant, Richard Campanaro, on May 8, 2015, that I had failed to properly pay the filing fee. In fact, the fee had been paid in a timely fashion, (see **EXHIBIT D**). Further, on June 15, 2015 at 3:18pm in a voicemail left by The Honorable Jenny Abbott Kitchings, it was noted that the court failed in its dismissal of the appeal and reinstated it as payment was indeed received several weeks prior. It has been noted on multiple occasions that the defendant, Richard Campanaro, failed to properly request transcripts of the courts proceedings; when it fact it had. Note: On June 4, 2015, the court noted that a transcript had not been request (see **EXHIBIT E**). The written response for the request was formally requested on June 8, 2015. (See **EXHIBIT F**). On June 24, 2015, in a letter directly from the "Court Reporting Section" to Crystal Holmes, the defendant's, Richard Campanaro, formal request for the transcripts was forwarded for processing. (See **EXHIBIT G**). On September 9, 2015, a notice of failure to request the transcripts of the proceedings was received at the defendant's, Richard Campanaro, place of residence. (**EXHIBIT H**) In response, the defendant, Richard Campanaro, responded in kind with previous copies of the request for the transcripts pursuant to Rule 207. (**EXHIBIT I**) Mr. Ward indicated previously that the defendant's, Richard Campanaro, failure to properly request the transcripts should prevent further requests for appeal. The court reporter, Crystal Holmes, requested and received payment for said transcripts in a timely fashion. (See **EXHIBIT J**).

On October 22, 2015, I was able to finally speak with Ms. Snell, who indicated she was speaking on behalf of the Honorable Jenny Abbot Kitchings, Clerk of Court. In that conversation (which was then summarized in a letter and fax), Ms. Snell apologized for failing to respond to the defendant's', Richard Campanaro, repeated messages for a status update on the appeal. She indicated that the appeal had been "Accepted and Loaded" though the defendant, Richard Campanaro, had not been notified as such. Further, Ms. Snell indicated that the brief regarding the appeal were due the following day – October 23, 2015. The defendant, Richard Campanaro, responded with those briefs in the form of fax on October 22, 2015 at 4:03pm and through the USPS on October 23, 2015. In a letter dated November 23, 2015, from the South Carolina Court of Appeals, the defendant, Richard Campanaro, received notification of a deficiency under the SCACR. (See **EXHIBIT K**). The defendant, Richard Campanaro, responded to the deficiencies noted and verified that the receipt of the adjusted briefs occurred on December 7, 2015. This is the last written notification of any kind from either the South Carolina Court of Appeals or Toby Ward, attorney for the plaintiff.

It should be noted that, Mr. Ward's ascertain that the defendant, Richard Campanaro, has failed to respond to "numerous" notifications of deficiencies is incorrect. If there are additional requirements or deficiencies in the filing, it has not been communicated in any fashion by the courts to the defendant, Richard Campanaro. As such, the appellant/defendant, Richard Campanaro, expected the respondent's brief/reply by February 18, 2016. This was verified via conversation on February 16, 2016, with "Shelby" in The Honorable Jenny Abbott Kitchings' office, however, the respondent's briefs have not yet been received. Instead, a request for the dismissal of the motion to stay by the defendant, Richard Campanaro, were received April 5, 2015, wherein their request for a dismissal for the motion to stay is contained. So as to timely responsiveness by parties, Mr. Ward has failed.

Again, in the request for a motion to stay, it should be noted that the defendant/appellant, Richard Campanaro, believes, and has been communicated as such, that the appeal of the original judgement is active, and has not yet been heard or ruled upon as of April 6, 2016. As such, the action taken by the South Carolina Courts to "domesticate" the matters to Pennsylvania for action against the appellant, Richard Campanaro, are unjust, violate civil liberties, unduly harm those, such as the appellant, Richard Campanaro, who cannot afford an attorney, cause irreparable damage by allowing action such as the sale of property PRIOR to a decision of the courts regarding the appeal, and are negatively affecting the defendants, Richard Campanaro, ability to continue working.

For all the reasons set forth herein, the Motion to Stay is requested until such time that a ruling on the appeal can be made.

Respectfully,




Richard Campanaro

I hereby certify that on the 6th of April, a copy of this letter and its attachments were sent via first-class postage to:

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

Toby Ward
PO Box 50124
Columbia, SC 29250



4/6/16

EXHIBIT A

Richard Campanaro
137 Scarborough Lane

5/6/2015

FAX

To: Jenny Abbott Kitchings

Phone: 803-734-1890

Company Name: Clerk, South Carolina Court of Appeals

Fax: 803-734-1839

From: Richard Campanaro

Phone: 803-348-4556

Company Name: Richard Campanaro

Fax: NA

Number of Pages: 12

Urgent: Yes

Action Requested: NA

Original Placed in US Mail, May 6, 2015, sent to 1220 Senate Street, Columbia, SC 2901 with Copies to Attorney, Tobias Ward on behalf of Plaintiff and The Honorable De Andrea G. Benjamin, Circuit Court Judge

May 5, 2015

Tobey Ward

6 Calendar Court

Columbia, SC 29206

RE: David F. Ford II, Respondent, v. Richard G. Campanaro, Appellant, Case No. 2014-CP-40-3488

May 5, 2015

The Honorable De Andrea G. Benjamin

Circuit Court Judge

1701 Main Street, Room 323

Columbia, SC 29202

RE: David F. Ford II, Respondent, v. Richard G. Campanaro, Appellant, Case No. 2014-CP-40-3488

EXHIBIT B

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

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UNITED STATES POSTAGE
PITNEY BOWES
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0001057924 MAR 23 2015
MAILED FROM ZIP CODE 29206


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

17551 9822007



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

DAVID F. FORD, II,

Plaintiff(s),

-vs-

Richard G. "Jerry" Campanaro,

Defendant(s).

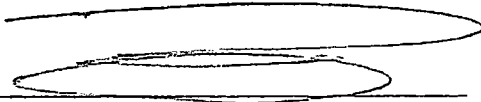
)
) IN THE COURT OF COMMON PLEAS
)
)
) CIVIL ACTION NO.:2014-CP-40-3488
)
)
) TRIAL NOTICE
)
)
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TO THE DEFENDANT ABOVE NAMED:

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:

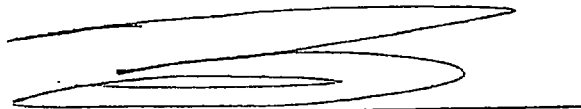
March 23, 2015

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

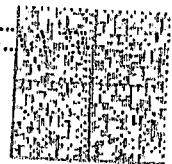
jerry.campanaro@yahoo.com



Tobias G. Ward, Jr.

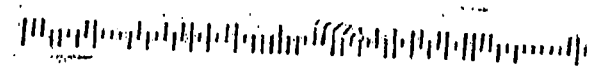
Jeanette W. McBride
CLERK OF COURT
RICHLAND COUNTY
P.O. Box 2766
Columbia, SC 29202-2766

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First Class Mail
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U.S. POSTAGE BY METRE PERMITTED
ZIP 29204 \$ 000.43⁵
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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

3/6/15

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 *21st* day of *Mar*, 2015 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

Jeanette W. McBride

Richard G Jerry Campanaro
137 Scarborough Lane
Millersville, PA 17551

EXHIBIT C



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK
V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

May 08, 2015

Richard G. Campanaro
137 Scarborough Lane
Millersville PA 17551

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

Dear Counsel:

Upon reviewing your notice of appeal, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or your appeal will be dismissed:

- The required filing fee has not been submitted. The correct filing fee is \$100.00.

Very truly yours,

A handwritten signature in black ink that reads "Jenny Abbott Kitchings". The signature is written over a horizontal line.

CLERK

cc: Tobias Gavin Ward, Jr., Esquire

This is to advise that the title in the above matter has been changed to read as follows:

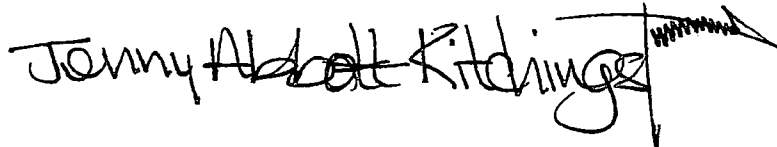
David F. Ford, II, Respondent,

v.

Richard G. "Jerry" Campanaro, Appellant.

All future records in this matter should be changed to reflect this title. If you have any questions, please do not hesitate to contact this office.

Very truly yours,

A handwritten signature in black ink that reads "Jenny Abbott Kitching". The signature is written in a cursive style with a large, sweeping flourish at the end.

CLERK

cc: Tobias Gavin Ward, Jr., Esquire

EXHIBIT D



South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS, CLERK
POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211

COLUMBIA
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FIRST-CLASS MAIL

06/12/2015

US POSTAGE

\$00.48⁵



ZIP 29201
011D12602824

RICHARD G. CAMPANARO
137 SCARBOROUGH LANE
MILLERSVILLE PA 17551

17551952997



The South Carolina Court of Appeals

David F. Ford, II, Respondent,

v.

Richard G. "Jerry" Campanaro, Appellant.

Appellate Case No. 2015-000997

The Honorable L. Casey Manning
Richland County
Trial Court Case No. 2014CP4003488

ORDER

The appellant has failed to pay the notice of appeal filing fee, as required by Rule 203(d) of the South Carolina Appellate Court Rules. Accordingly, this matter is dismissed. The remittitur will be sent as provided by Rule 221(b), SCACR.

FOR THE COURT

BY V. Claire Allen, Deputy
CLERK

Columbia, South Carolina

cc:
Richard G. Campanaro
Tobias Gavin Ward, Jr., Esquire

FILED

June 12, 2015

MILLERSVILLE
 431 N GEORGE ST
 MILLERSVILLE
 PA
 175519998

06/15/2015 (800)275-8777 1:17 PM

Product Description	Sale Qty	Final Price
(Forever) Wedding Roses (Unit Price:\$0.49)	1	\$0.49
First-Class Mail Large Envelope (Domestic) (COLUMBIA, SC 29201) (Weight:0 Lb 2.00 Oz) (Expected Delivery Day) (Thursday 06/18/2015)	1	\$1.20
First-Class Mail Large Envelope (Domestic) (COLUMBIA, SC 29201) (Weight:0 Lb 2.10 Oz) (Expected Delivery Day) (Thursday 06/18/2015)	1	\$1.42
First-Class Mail Large Envelope (Domestic) (COLUMBIA, SC 29206) (Weight:0 Lb 2.00 Oz) (Expected Delivery Day) (Thursday 06/18/2015)	1	\$1.20

Total \$4.31

Cash \$20.00
Change (\$15.69)

Order stamps at usps.com/shop or call 1-800-Stamp24. Go to usps.com/clicknship to print shipping labels with postage. For other information call 1-800-ASK-USPS.

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JERRY CAMPANARO 04-13
137 SCARBOROUGH LN
MILLERSVILLE, PA 17561-9623



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87-448/539 SC
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May 9, 2015
Date

Pay To The
Order Of

Southern Ct of Appeals

\$ 100.00

One hundred & 00/100

Dollars

Bank of America

ACH R/T 053004483

For

[Signature]

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faxed
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*Copies of Appeal
pay print*

*Case/appeal reopened
via
VOICE from J.A.K*

Seq: 185

Batch: 331779

Date: 05/19/15

Seq: 00185 05/19/15

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WT: 01 LIPS: Atlanta ET

DC: Tower DC SC2.01A

EXHIBIT E



South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS, CLERK
POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211

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FIRST-CLASS MAIL

06/04/2015

US POSTAGE

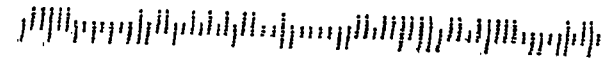
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ZIP 29201
011D12602824

RICHARD G. CAMPANARO
137 SCARBOROUGH LANE
MILLERSVILLE PA 17551

1755189523 F002





The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

June 04, 2015

Richard G. Campanaro
137 Scarborough Lane
Millersville PA 17551

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

Dear Counsel:

Our records indicate that the transcript in the above matter should have been ordered. As of today's date, we have not received any information indicating that the transcript has been ordered. Further, you have not notified us that you have failed to receive the transcript.

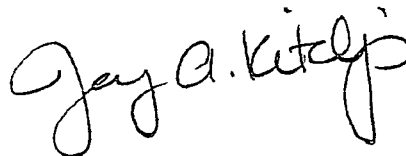
If you have not yet ordered the transcript, Rule 207 of the South Carolina Appellate Court Rules requires you to contact the Office of Court Administration. The address for Court Administration is as follows:

South Carolina Office of Court Administration
1015 Sumter Street, Suite 201
Columbia, SC 29201

Be sure to copy the Court and opposing counsel with all correspondence concerning the transcript.

Please advise the Court of the status of the transcript within ten (10) days of the date of this letter, or your appeal may be dismissed.

Very truly yours,

A handwritten signature in cursive script that reads "Jay A. Kitajp". The signature is written in black ink and is positioned above the printed name "CLERK".

CLERK

cc: Tobias Gavin Ward, Jr., Esquire

EXHIBIT F

The South Carolina Office of Court Administration
1015 Sumter Street, Suite 201
Columbia, SC 29201

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

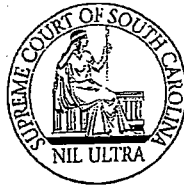
Per yours received June 8, 2015; I am formally requesting a copy of the transcript in the above matter. I have attached both the written notification to do so and the Court's decision on this case. Previously, the request for appeal, the costs associated with the appeal and the formal appeal filing has been sent to the appropriate parties.

Thank you for your attention to this matter.


Richard Campanaro

CC: Jenny Abbott Kitchings, Clerk South Carolina Court of Appeals
Tobey Ward, Attorney

EXHIBIT G



South Carolina Court Administration
South Carolina Supreme Court
Columbia, South Carolina

ROSALYN FRIERSON
DIRECTOR

1220 SENATE STREET, SUITE 200
COLUMBIA, SOUTH CAROLINA 29201

MEMORANDUM

TO: Crystal Holmes
FROM: Court Reporting Section
RE: Request for transcript
DATE: June 24, 2015

I have enclosed a letter from Mr. Richard G. Campanaro who is requesting a transcript from proceedings heard by the Honorable L. Casey Manning on March 25, 2015. Our records reflect that you were assigned to Judge James in a term of Richland County Common Pleas/Common Pleas Non-Jury Court on that day. Please determine if this proceeding was recorded by you and contact Mr. Campanaro to make arrangements for payment for preparation and delivery of the transcript. Kindly copy this office on the correspondence. Thank you for your attention to this matter.

Enclosure

cc: Richard G. Campanaro
137 Scarborough Lane
Millersville, PA 17551

The South Carolina Office of Court Administration
1015 Sumter Street, Suite 201
Columbia, SC 29201

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

Per yours received June 8, 2015; I am formally requesting a copy of the transcript in the above matter. I have attached both the written notification to do so and the Court's decision on this case. Previously, the request for appeal, the costs associated with the appeal and the formal appeal filing has been sent to the appropriate parties.

Thank you for your attention to this matter.



Richard Campanaro

CC: Jenny Abbott Kitchings, Clerk South Carolina Court of Appeals
Tobey Ward, Attorney



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
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1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

June 04, 2015

Richard G. Campanaro
137 Scarborough Lane
Millersville PA 17551

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

Dear Counsel:

Our records indicate that the transcript in the above matter should have been ordered. As of today's date, we have not received any information indicating that the transcript has been ordered. Further, you have not notified us that you have failed to receive the transcript.

If you have not yet ordered the transcript, Rule 207 of the South Carolina Appellate Court Rules requires you to contact the Office of Court Administration. The address for Court Administration is as follows:

South Carolina Office of Court Administration
1015 Sumter Street, Suite 201
Columbia, SC 29201

Be sure to copy the Court and opposing counsel with all correspondence concerning the transcript.

Please advise the Court of the status of the transcript within ten (10) days of the date of this letter, or your appeal may be dismissed.

Very truly yours,

Jay A. Kiteley

CLERK

cc: Tobias Gavin Ward, Jr., Esquire

EXHIBIT H



South Carolina Court of Appeals
JENNY ABBOTT KITCHINGS, CLERK
POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211

Hasler

FIRST-CLASS MAIL

09/02/2015

US POSTAGE

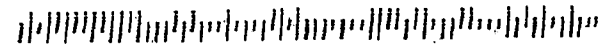
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ZIP 29201
011D12602824

RICHARD G. CAMPANARO
137 SCARBOROUGH LANE
MILLERSVILLE PA 17551

1755189523 R002





The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

September 02, 2015

Richard G. Campanaro
137 Scarborough Lane
Millersville PA 17551

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

Dear Mr. Campanaro:

Upon reviewing the file in the above matter, it does not appear that you have properly ordered the transcript pursuant to Rule 207 of the South Carolina Appellate Court Rules. In accordance with Rule 207, you must contact the court reporter directly in writing to request the transcript. Your written request must include the name of the judge, the date of the hearing you are requesting, payment arrangements and must show that opposing counsel and the Court have been provided copies of the letter.

Furthermore, there appears to be some confusion as to the date of the hearing you need to be transcribed. If the correct date of the hearing is March 25, 2015, you must contact Crystal M. Holmes. If the correct date of the hearing is April 7, 2015, you must contact Bonnie H. Kelly. The addresses for both Ms. Holmes and Ms. Kelly have been provided below for your reference.

Crystal M. Holmes
Post Office Box 611
Columbia, SC 29202

Bonnie H. Kelly
Post Office Box 50614
Columbia, SC 29250-0614

The transcript in this matter must be ordered from the court reporter no later than ten days from the date of this letter. If you fail to order the transcript and provide opposing counsel and the Court with a copy of your letter to the court reporter ordering the transcript within ten days, your appeal may be dismissed.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Tobias Gavin Ward, Jr., Esquire

EXHIBIT I

September 9, 2015

V. Claire Allen, Deputy Clerk
South Carolina Court of Appeals
120 Senate Street
Columbia, SC 29201

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

Dear Ms. Allen:

Please refer to the attached correspondence which clearly indicates that my requests for transcripts have been made, paid for and acknowledged by the court. Specifically you will note:

1. I appealed the original court decision in May 2015; the court formally acknowledged and assigned it an appellate number on May 8, 2015
2. In June, I formally requested a written transcript of the proceedings and subsequently paid for it.
3. On June 15 at 3:18pm I received a voicemail from Ms. Kitchings indicating that the court inaccurately dismissed my request for an appeal due to not receiving payment. In the message Ms. Kitchings acknowledged that my formal request for the transcripts and payment was received and that my appeal was being reinstated.
4. A memorandum from The Court Reporting Section to Crystal Holmes dated June 24, 2015, clearly shows my compliance with Rule 207 whereby I requested the transcripts.

I am not sure what else I need to do with my formal request. It was requested, paid for and sent to Crystal Holmes, along with all supporting documentation showing, the original hearing date, judge, and decision. The original judgement decision was signed on March 25, 2015, but stamped and entered April 7, 2015.

Please note: by way of my response to your most recent request, I am copying both Ms. Holmes and Ms. Kelly so as to properly notify both parties. In addition, I have included a copy of the original decision of the court, a copy of the memorandum (along with supporting documentation as such and a copy of the September 2, request for clarification of my actions with respect to requesting the transcripts.

Respectfully,

Jerry Campanaro

cc: Tobey Ward
Bonnie H. Kelly
Crystal Holmes

EXHIBIT J

October 9, 2015

Crystal M. Holme
PO Box 611
Columbia, SC 29202-0611

RE: Overdue Notice; David Ford II Vs. Richard Campanaro

Dear Ms. Holmes:

Thanks you for yours dated September 24, 2015, indicating a balance due for the ordering of the transcript of the proceedings, which I have received September 13, 2015.

As a result of yours, I have enclosed a check for \$38.15 for the copy provided.

Thank you for your acceptance of the payment.

Richard Campanaro

CC: Jenny Abbott Kitchings, Clerk South Carolina Court of Appeals
Tobias Ward



JERRY CAMPANARO 04-13
137 SCARBOROUGH LN
MILLERSVILLE, PA 17551-9523



197
67-448/539 SC
1856

October 2005 Date

Member FDIC

Pay To The
Order Of

Crystal M. Holmes

\$ 38.15

Twenty Eight & 15/100

Dollars



Security
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Bank of America

ACH R/T 053904483

For

[Handwritten Signature]

⑆053904483⑆ 22301561258710197

CRYSTAL M. HOLMES
P.O. BOX 611, COLUMBIA,
SOUTH CAROLINA 29202-0611

September 24, 2015

OVERDUE-NOTICE

Richard G. Campanaro
137 Scarborough Lane
Millersville, PA 17551

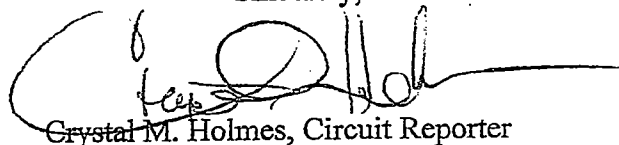
In Re: David Ford II Vs. Richard Campanaro

Dear Mr. Campanaro:

I am in receipt of your letter dated September 9, 2015 wherein you stated you sent me a written request and subsequently paid for it. I have not received a check from you for the above-referenced transcript. I have received a request you send forwarded to me by Court Administration. If you have, in fact, sent a check made out to me, Crystal Holmes, please inform me of the date and the amount so I can give you credit towards your outstanding balance.

According to my records, the Transcript of Record in the above-referenced matter was mailed to you on September 10, 2015. At this time, payment has not been received, making the account now past due. The total past due, is \$38.15. Please remit prompt payment.

Sincerely,



Crystal M. Holmes, Circuit Reporter

cc: Court Administration

Jenny Abbott Kitching, Clerk South Carolina Court of Appeals

October 22, 2015

South Carolina Court of Appeals
Attn: Shelby Snell on behalf of Jenny Abbott Kitchings, Clerk of Courts
PO Box 11629
Columbia, SC 29211

RE: Case No. 2015-000997

Ms. Snell:

Per our conversation today, after many attempts to reach you via voice mail; I am, per your request, including my initial brief of the above numbered case, according to SC Court of Appeals Rule 208.

During our conversation please note that you: 1) Apologized for not having returned my calls, 2) Verified that my Appeal was "Accepted and Uploaded", though I had not yet received written notification of such from the Court, 3) Verified that the brief was due on October 23, 2015 and 4) Provided me with a fax number so as to ensure the brief was received on time. The Fax was verified received at 4:03pm EST on October 22, 2015.

Copies of all have been provided to counsel for the Plaintiff in the case.

Thank you for your attention to this matter.

Kindly,

Richard G Campanaro

Fax Send Report

Date & Time : OCT-22-2015 04:04PM THU
Fax Number : 7172996599
Fax Name : THE UPS STORE
Model Name : SCX-4x26 Series

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10/14/15

Shelby Swell - LM

"Sorry I Did It"

NEVER LOADED / UNLOADED

10/21/15



The South Carolina Court Of Appeals
Jenny Abbott Kitchings, Clerk
PO Box 11629
Columbia, SC 29211

RE: Appellate Case No. 2015-000997

INITIAL
BLUES

DUE TOMORROW

Want to file

as initial
brief

Dear Ms. Kitchings:

I have finally received a copy of the transcripts for the case referenced above, received the bill and have made payment. Please see the attached.

As a result of my compliance with the requests made of me, I am enclosing a complete copy of the Appeal Filing originally sent to the Court in May 2015; with a subsequent copy provided to the Court in July of 2015.

Thank you for your attention to this matter.

Respectfully,

Richard Campanaro

Easy Park

Who is

WWW.GL County

copy



Court Files



Append

Sehain A

Pay # 803
734
1839

← JOB

initial
briefing
process

The UPS Store®
1390 Columbia Ave
Lancaster, PA 17603
(717)299-6599 Fax



FAX

To

SHELBY SNELL

From

JERRY CAMPANARO

Company

SC COURT OF APPEALS

Phone number

903 348 4554

Fax number

903-734-1839

Total pages

6

Date

10-22-2015

Subject:

2015-000997

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MILLERSVILLE
431 N GEORGE ST
MILLERSVILLE
PA

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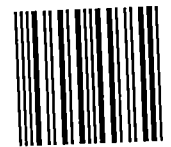
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Millersville, PA

17551



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The Honorable Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC
29211

RECEIVED

APR 11 2016

SC Court of Appeals