

THE SOUTH CAROLINA COURT OF APPEALS

Armando Despaigne Zulveta, Appellant

v.

Charter Communications, LLC., Respondent

Appellate Case No. 2016-001439

TRIAL COURT CASE NO. 2015CP2305171

NOTICE

As an effort of abundant caution Appellant requests also that Stay of Proceeding be placed upon Judge Verdin's order entered on June 28, 2016.

On this date 30th of March, 2016

*Armando Despaigne Zulveta* 08/30/2016

P.O. BOX 24892

Winston-Salem, NC 27114

Email: acere1296@gmail.com

Phone: (864) 305-9480

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SC Court of Appeals

THE SOUTH CAROLINA COURT OF APPEALS

Armando Despaigne Zulveta, Appellant

v.

Charter Communications, LLC., Respondent

Appellate Case No. 2016-001439

TRIAL COURT CASE NO. 2015CP2305171

CERTIFICATE OF SERVICE

This is to certify that a true copy of APPELLANT ZULVETA'S NOTICE regarding Judge Verdin's Order dated January 27, 2016 have been electronically forwarded to GALLIVAN, WHITE & BOYD, PA, Attorney MICHELLE D. YARBROUGH at: (864) 271-7502 before.

On this date 30th of March, 2016

*Armando Despaigne Zulveta* 08/30/2016

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STAY PROCEEDING

Plaintiff-Appellant Armando Despaigne Zulveta now moves this Court to stay this Civil Case pending Appellant Zulveta's completion of the proceeding with the THIRTEENTH JUDICIAL CIRCUIT.

The grounds for this Motion are more fully set forth in the attached Memorandum in Support along with its affidavit.

On this day the 30 of August, 2016

Respectfully Submitted;

*Armando* 08/30/2016  
Armando Despaigne Zulveta

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THE SOUTH CAROLINA COURT OF APPEALS

Armando Despaigne Zulveta, Appellant

vs.

Charter Communications, LLC., Respondent

Appellate Case No. 2016-001439

THE HONORABLE LETICIA H. VERDIN

Greenville County

Trial Court No. 2015CP2305171

APPELLANT ZULVETA'S STAY OF PROCEEDING'S MEMORANDUM OF LAW IN SUPPORT AND AFFIDAVIT

Plaintiff Armando Despaigne Zulveta, Pro Se, respectfully submit the following Memorandum of Support and Affidavit.

STANDARD OF REVIEW

To avoid repetition Plaintiff-Appellant Zulveta refers this Court of Appeals to the complete Roster Of Civil Case Greenville County Civil Case No.: 2015CP2305171 as well as Appellate Case No.: 2016-000229 and No. 2016-001439 filed with this court. In particular, Stay of Proceeding with Its Memorandum in Support filed in this court

STAY OF PROCEEDING MEMORANDUM OF LAW IN SUPPORT OF LAW

Appellant Zulveta being Pro Se with no legal experience is a factor that complicates this civil case. There is a greater factor when just from the start: a) at hearing presided by judge Garrison Hill date January 25, 2016 at the time Plaintiff Zulveta introduced as evidence EXHIBIT "A" and "B" enclosed related to the culture of defaults in court Defendant's Charter's attorneys they have. Judge Hill, defendant's attorneys, and I, we discussed the issue. hearing's presiding Judge Hill was aware that Plaintiff has a pending

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civil case in federal court in which Gallivan, White & Boyd, P.A. was involved with Greenville Hospital System as THE MOVANTS with rest of defendants. Judge Hill was a member of the Greenville Hospital System's Board of Director. As well as Judge Robin Stilwell who was also at said Board of Director and issued order and judgment who favored Defendant's attorney.

On January 27, 2016 at the hearing presided by Judge Leticia Verdin they were two law enforcement police officers that according to their hostile behavior it can be seen they have been prejudiced against me, a party to the proceeding. An investigation will be on the way. (See Exhibit "C") Judge Verdin's order is questionable as well as the great deal of attention I shared with these two police officers. At the hearing, for me they were for me a super distraction.

Appellant requests from the court Stay of Proceeding regarding Stay of Proceeding until this investigation is complete and it can be determine the reason of those police officers there, the way they behave unlike police officers down stairs in charge of Mr. Braggs.

On this day August 30, 2016

Respectfully Submitted;

*Armando Despaigne Zulveta* 08/30/2016  
*Armando Despaigne Zulveta*

Armando Despaigne Zulveta

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THE SOUTH CAROLINA COURT OF APPEALS

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v.

Charter Communications, LLC., Respondent

Appellate Case No. 2016-001439

TRIAL COURT CASE NO. 2015CP2305171

CERTIFICATE OF SERVICE

This is to certify that a true copy of APPELLANT ZULVETA'S STAY OF PROCEEDING WITH ITS MEMORANDUM OF LAW IN SUPPORT regarding Judge Verdin's Order dated January 27, 2016 have been electronically forwarded to GALLIVAN, WHITE & BOYD, PA, Attorney MICHELLE D. YARBROUGH at: (864) 271-7502 before 7:00 A.M. Eastern time.

On this date 30th of March, 2016

P.O. BOX 24892

Winston-Salem, NC 27114

Email: acere1296@gmail.com

Phone: (864) 305-9480

*Armando Despaigne Zulveta* 08/30/2016

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AFFIDAVIT

I, Armando Despaigne Zulveta, state that I am the Appellant in this Civil case and that every statement and Exhibits introduced is true and correct.

On this day the 30th of August, 2016

Respectfully Submitted;

  
Armando Despaigne Zulveta

08/30/2016

P.O. Box 24892

Winston-Salem, NC 27114

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Nick Farr  
A member of the South Carolina Bar  
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NFarr@GWBlawfirm.com



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Post Office Box 10509 (29603)  
Greenville, South Carolina 29603  
Telephone 864.271.9580  
Facsimile 864.271.7502  
www.GWBlawfirm.com

Gallivan, White & Boyd, P.A.  
ATTORNEYS AT LAW

EXHIBIT "A"

October 20, 2015

Mr. Armando Despaigne Zulveta  
Post Office Box 24892  
Winston Salem, SC 27114

Re: Armando Despaigne Zulveta vs. State Automobile Mutual Insurance Company,  
Philpot Law Firm, PA, TC Unlimited, Inc., Steadman Hawkins Clinic of the  
Carolinas, Wilson Jones Carter & Baxley, P.A., Robert P. Restrepo, Jr., Stephen  
R. Bruner, Irvin H. Philpot, III, Tim Case, Curtis Elliott, Wesley J. Shull  
C. A. Number: 6:15-cv-02880-HMH-KFM

Dear Mr. Zulveta:

We are enclosing and serving herewith a copy of the defendants, State Automobile Mutual Insurance Company, Robert P. Restrepo, Jr., and Stephen R. Bruner's Response to Plaintiff's Motion for Entry of Default Judgment in the above-captioned case. Also enclosed is a copy of a certificate of service by mail for same.

Sincerely yours,

GALLIVAN, WHITE & BOYD, P.A.

Nicholas A. Farr

NAF/lzd  
Enclosures

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SC Court of Appeals

Michelle DeLuca Yarbrough  
A member of the South Carolina Bar  
Direct 864.271.5349  
MYarbrough@GWBlawfirm.com



55 Beattie Place, Suite 1200  
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Greenville, South Carolina 29601  
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www.GWBlawfirm.com

**Gallivan, White & Boyd, P.A.**  
ATTORNEYS AT LAW

January 21, 2016

EXHIBIT "B"

**VIA HAND DELIVERY**

The Honorable Paul A. Wickensimer  
Greenville County Clerk of Court  
Greenville County Court of Common Pleas  
305 East North Street  
Greenville, SC 29601

Re: Armando Despaigne Zulveta v. Charter Communications, Inc.  
C.A. No.: 2015-CP-23-05171

Dear Mr. Wickensimer:

Enclosed please find the original and three (3) copies of Charter Communications, LLC's (Charter) Response in Opposition to Plaintiff's Motion for Entry of Default Judgment in the above-referenced matter. I would appreciate you returning clocked copies to me. By copy of this correspondence to The Honorable D. Garrison Hill, I am providing him with a copy of Charter's Response in Opposition to Plaintiff's Motion for Entry of Default Judgment in advance of the motion hearing scheduled for Monday, January 25, 2016 at 2:30 p.m.

Should you have any questions, please do not hesitate to contact our office.

With kind regards,

Sincerely,

*Michelle D. Yarbrough*

Michelle D. Yarbrough  
Direct Dial: 864-271-5349  
Email: myarbrough@GWBlawfirm.com

MDY/smg  
Enclosures

cc: The Honorable D. Garrison Hill (via hand delivery)  
Mr. Armando Zulveta (via e-mail and regular mail) ✓

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THE SOUTH CAROLINA  
DEPARTMENT of ADMINISTRATION

Nikki R. Halcy, Governor  
Marcia S. Adams, Executive Director

CRIME VICTIMS' OMBUDSMAN  
Veronica Swain Kunz, Director  
1200 Senate Street, Suite 101  
Columbia, SC 29201  
803.734.0357  
888.238.0897 toll free  
803.734.1428 fax

July 20, 2016

Mr. Armando Despaigne Zulveta  
Post Office Box 24892  
Winston Salem, North Carolina 27114-4892

EXHIBIT "C"

Dear Mr. Zulveta.

We received your document request a criminal investigation be conducted into the actions you consider to be harassing by "Officer A" and "Officer B" in the Greenville County Courthouse. If you believe you have been the victim of a crime, please report this conduct / incident to the appropriate entity which, in this case, would be the Greenville County Sheriff.

I hope this information is of help to you.

Very truly yours,

Veronica Swain Kunz  
Director, Crime Victims' Ombudsman

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South Carolina Department of Administration  
1200 Senate Street, Suite 460 Columbia, SC 29201  
Post Office Box 2825, Columbia, SC 29211

Ph: 803.734.8120  
Fx: 803.734.9002  
www.admin.sc.gov

Armando Despaigne Zulveta

August 30, 2016

P.O. BOX 24892

Winston-Salem, NC 27114

Email: acere1296@gmail.com

Phone: (864) 305-9480

THE SOUTH CAROLINA COURT OF APPEALS.

CLEK OF COURT

Armando Despaigne Zulveta, Appellant v. Charter Communications, LLC., Respondent

Appellate Case No. 2016-001439 TRIAL COURT CASE NO. 2015CP2305171

Dear Clerk:

Original of Stay Proceeding with its Memorandum in support, affidavit, certificate of Service has been forwarded to you Via United states Postal Service.

Thank you for your concern.

  
Armando Despaigne Zulveta

P.O. Box 24892

Winston, Salem, NC 27114

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SC Court of Appeals