

THE SOUTH CAROLINA COURT OF APPEALS

Armando Despaigne Zulveta, Appellant

vs.

Charter Communications, LLC., Respondent

Appellate Case No. 2016-001439

RECEIVED
SEP 01 2016
SC Court of Appeals

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

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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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

Nick Farr
A member of the South Carolina Bar
Direct 864.271.5347
NFarr@GWBlawfirm.com



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Greenville, South Carolina 29601
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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/lrd
Enclosures

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



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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,

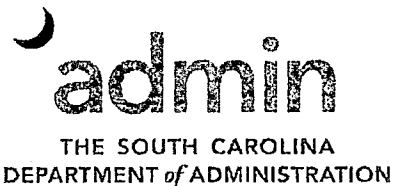
Sincerely,

Michelle D. Yarbrough
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) ✓



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

CRIME VICTIMS' OMBUDSMAN
Veronica Swain Kunz, Director
1200 Senate Street, Suite 101
Columbia, SC 29201
803.734.0357
888.238.0697 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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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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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;

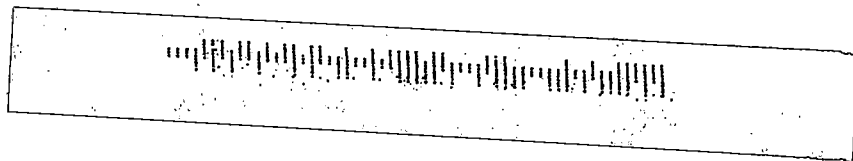
Armando 08/30/2016
Armando Despaigne Zulveta

Armando Despaigne Zolvero

P.O. BOX 24892

Winston-Salem, NC

27114



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SEP 01 2016

SC Court of Appeals

Clerk of Court
South Carolina Court of Appeals
1200 SENATE ST,
Columbia, SC
29201