

STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS
COUNTY OF GREENVILLE THIRTEENTH JUDICIAL CIRCUIT

Armando Despaigne Zulveta)

Plain tiff)

vs.) File No.: 2015-CP-23-05171

Charter Communications, LLC.)

Defendant)

RECEIVED

SEP 23 2016

SC Court of Appeals

FILED-CLERK OF COURT
CITY OF GREENVILLE
PAUL B. MORGAN, JR.
2016 SEP 19 PM 4 27

NOTICE OF INTENTION OF INTRODUCE THIS CASE AS SUPPLEMENTARY IN FEDERAL COURT

This NOTICE is letting you know that 30 days from now this case would be Supplemented to: Greenville District Court Civil Case: 6:15-cv 02880 and IN THE UNITED STATES COURT OF APPEAL FOR THE FOURTH CIRCUIT No.: 15-2561.

On this day the 16 of September, 2016

Respectfully Submitted,

Armando Despaigne Zulveta 09/16/2016
Armando Despaigne Zulveta

CERTIFICATE OF SERVICE

This is to certify that a true copy of PLAINTIFF NOTICE OF INTENTION OF INTRODUCE THIS CASE AS SUPPLEMENTARY IN FEDERAL COURT has been electronically served upon Galivan White & Boyd, P.A, Michelle Yarbrough attorney for defendant at FAX #: (864) 271-7502.

Armando Despaigne Zulveta 09/16/2016
Armando Despaigne Zulveta
P.O. BOX 30361
WINSTON-SALEM, NC 27130
Phone (864) 305-9400 Email: 202181296@gmail.com

STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS
COUNTY OF GREENVILLE THIRTEENTH JUDICIAL CIRCUIT

FILED-CLERK OF COURT
COURT REPORTER
PAUL B. ROBERTSON, JR.
2016 SEP 19 AM 4 27

Armando Despaigne Zulveta)
Plain tiff)
vs.) File No.: 2015-CP-23-05171
Charter Communications, **INC** ADZ)
Defendant) *09/16/2016*

STANDARD OF REVIEW

To avoid repetition Plaintiff-Appellant Zulveta, Pro Se, would refer this Court's Roster for Civil action 2015-CP-23-05171.

MEMORANDUM OF LAW IN SUPPORT WITH AFFIDAVIT

The requisite fraud on the court occurs where "it can be demonstrated, clearly and convincingly, that a party has sentiently set in motion some unconscionable scheme calculated to interfere with the judicial system's ability impartially to adjudicate a matter by improperly influencing the trier of fact or unfairly hampering the presentation of the opposing party's claim or defense." *Aoude v. Mobil Oil Corp.*, 892 F.2d 1115, 1118.

- 1) On 08/21/2015 Plaintiff-Appellant filed with this court Summons and Complaint which were duly served upon Defendant Charter by South Carolina Secretary of State. (See Roster)
- 2) On 10/20/2015 Motion of Entry of Default Judgment with this court was filed against Defendants Charter. As usual, Appellant-Plaintiff's sensitive Motions like this one is not posted in the Roster.

- 3) On December 11, 2015, Defendant Charter wrote me a letter identify themselves. (See Exhibit "A")
- 4) On December 21, 2015 Defendant's attorney Gallivan White & Boyd, Michelle Yarbrough we had a meeting at her office in which she was advised that Motion Entry of default had been filed in court. She agree to take it.
- 5) On December 23, 2015 ANSWER OF DEFENDANT CHARTER COMUNICATIONS LLC was filed with this court (See Roster) but no answer was issued to already filed in court PLAINTIFF ENTRY OF DEFAULT JUDGMENT. Which I question anyhow, I never had it from nobody.
- 6) On December 30, 2015 still no answer to Plaintiff-Appellant's Entry of Default Judgment but very early I had from defendant unlimited and many irrelevant questions of Discovery that is the subject of their AMENDED NOTICE OF HEARING (See filed August 29,2016)
- 7) On January 25, 2016 hearing date for Default Judgment presiding Judge Garrison Hill, Defendant's attorney Michelle Yarbrough, and I, we discussed the culture of defaults in which defendant attorney Gallivan white & Boyd, P.A. has engaged in this court, as well as with The Movants In federal District Court in where I have a pending civil case against Greenville Hospital System. Among other things Judge Hill inspected some of the evidences, ordered me to give them to defendant's attorney Yarbrough (See Exhibit "B" and "C").
- 8) Judge Garrison Hill allowed defendant to bypassed their history of default. Afterwards, Appellant-Plaintiff Zulveta learned judge Hill was a member of Greenville Hospital System's Board of Director, the same medical institution we were talking about at his hearing. To all account he should have recused himself. Judge Hill's judgment has unpair my case.
- 9) Judge Hill denied Plaintiff Zulveta Motion of Reconsideration and Motion to Proceeded in Forma Pauperis. No explanation for. (See Roster 02/09/2016 and 2/23/2016)
- 10) Judge Robin Stillwell who was also member of Greenville nHospital System's Board of direcotr aso denied me Inn Forma to Proceed in Pauperis. No explanation for
- 8) Court Hearing Reporter Hollie Jenkins voluntary's disappearance led to her abuse of discretion which at the same time led to the consequence that at the South Carolina

Court of Appeals Appellant-Plaintiff lost the appeal from order rendered by Judge Hill on January 25, 2015. Another unpairment for my case.

9) On June 27, 2016 date to Compel Discovery hearing presiding Judge Leticia Verdin refused to put any limitation to defendant discovery. (See Exhibit "D" Public Safety issue that arose from Judge Leticia hearing).

10) Appellant-Plaintiff Zulveta has made well founded allegations of bias and prejudice against Administrative Judge Robin Stilwell. Still, Judge Stilwell has chosen to conduct hearing of Defendant Charter's Gallivan White and Boyd's Motion to Dismiss against Plaintiff-Appellant Zulveta on October 05, 2016. A hearing of dismissal that would be conducted by a former member of Greenville Hospital System's Board of Director my employer medical provider which I have in federal court a civil suit pending against for medical fraud. Gallivan White and Boyd also form part of the high profile lawyers team (THE MOVANTS) who are defending same hospital with their history of default judgments tolerated in court. Therefore, most likely Greenville Hospital System is going to dismiss my case also in state court on October 05, 2016. Judge Stilwell's message is very clear.

11) Plaintiff-Appellant Zulveta has no money to pay for translator nor for Motion to proceed this case. My South Carolina Workers Compensation's injured worker's benefit paychecks have been paralyzed at said Commission under similar above circumstances and Appellant-Plaintiff Zulveta blame directly for this execution Chairman T. Scott Beck, Commissioner Michael Campbell, and their Judicial Director Amy Bracy who tampered with my motions as usual allowing said Judges above to destroy my Injured worker claim in behalf of The Movants Wilson J Carter & Baxley, P.A., attorney for Greenville Hospital System.

12) This Honorable Court has a moral obligation with my case that obviously, it represents many of case the way so openly this miscarriage of justice has happened. This court must Void, Nule Judges Garrison Hill's and Leticia Verdin's order and render defendant Charter Communications LLC an Order of Entry of Default Judgment in violation of Constitutional Rights to due process: 42 U.S. Code § 1981 - Equal rights under the law. Grant Plaintiff-Appellant Zulveta every releif stated in this claim.

RULE 15

AMENDED AND SUPPLEMENTAL PLEADINGS

This Rule 15(c) is the same as the Federal Rule.

(d) Supplemental Pleadings

An amendment changing the party against whom a claim is asserted relates back if the foregoing provision is satisfied and, within the period provided by law for commencing the action against him the party to be brought in by amendment (1) has received such notice of the institution of the action that he will not be prejudiced in maintaining his defense on the merits, and (2) knew or should have known that, but for a mistake concerning the identity of the proper party, the action would have been brought against him.

RULE 5

SERVICE AND FILING OF PLEADINGS AND OTHER PAPERS

(b)(1)

Service upon the attorney or upon a party shall be made by delivering a copy to him or by mailing it to him at his last known address or, if no address is known, by leaving it with the clerk of court.

Defendant was properly served at the courthouse as Charter Communications Inc., at the time they known name. Afterwards, he accepted Amended Complaint Charter Communications, LLC. Therefore, defendant is in default. Therefore, Plaintiff-appellant is entitled to every relief state in this claim.

On this day September 16, 2016

Respectfully Submitted;

Armando Despaigue Zolota 09/16/2016
Armando Despaigue Zolota

This is my claim for September 28, 2016 hearing with Judge Grayson, and also, for October 05, 2016⁴ hearing with Judge Stillwell. and hearings afterwards. ~~Armando Despaigue Zolota~~ 09/16/2016
Armando Despaigue Zolota

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

EXHIBIT "A"



55 Beattie Place, Suite 1200
Post Office Box 10589 (29603)
Greenville, South Carolina 29601
Telephone 864.271.9580
Facsimile 864.271.7502
www.GWBlawfirm.com

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

December 11, 2015

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

02900 -

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

Dear Mr. Wickensimer:

This is to advise that we have been asked to represent the defendant, Charter Communications, Inc., in the above-referenced matter. I would appreciate your noting our representation in this case and making certain that all future notices are directed to my attention.

By copy of this letter, I am advising the plaintiff, Armando Despaigne Zulveta, of our representation in this matter.

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.

Michelle D. Yarbrough

Michelle DeLuca Yarbrough
Direct Dial: (864) 271-5349
Email: myarbrough@gwblawfirm.com

MDY/smg

cc: Armando Despaigne Zulveta ✓

*Delivered to
Armando Zulveta
Sent 12/11/15*

EXHIBIT "B"

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



55 Beattie Place, Suite 1200
Post Office Box 10589 (29603)
Greenville, South Carolina 29601
Telephone 864.271.9580
Facsimile 864.271.7502
www.GWBlawfirm.com

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

January 21, 2016

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)

EXHIBIT "C"

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



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

55 Beattie Place, Suite 1200
Post Office Box 10589 (29603)
Greenville, South Carolina 29601
Telephone 864.271.9580
Facsimile 864.271.7502
www.GWBlawfirm.com

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

EXHIBIT "D"

Armando Despaigne Zulveta

September 08, 2016

P.O. Box 24892 Winston-Salem, NC 27114

Phone: (864) 305-9480

Email: acere1296@gmail.com

Commission on Accreditation for Law Enforcement Agencies, Inc. (CALEA)

Board of Commissioners

Mr. John W. Kittredge

13575 Heathcote Boulevard, Gainesville, Virginia 20155

Dear Mr. Kittredge, Commissioner:

On June 27, 2016 at Greenville Court of Common Pleas court at the hearing conducted by Judge Leticia Verdin there were two law enforcement police officers "A", and "B", that according to their hostile behavior it can be seen they have been prejudiced against a party to a civil proceeding, in a civil court. That misconduct is unacceptable, reprehensible. They were no order of protection filed by noone just Judge Leticia Verdin misusing Law enforcements police officers for the purpose of benefit the interest of defendant Charter's attorney Gallivan White & Boyd, P.A.

1) Judge Leticia Verdin is in violation of:

V. Rules Governing the Judiciary, Employees of the Judicial Department, and Others Assisting the Judiciary

501 Code of Judicial Conduct

Canon 1 A Judge Shall Uphold the Integrity and Independence of the Judiciary

Canon 2 A Judge Shall Avoid Impropriety and the Appearance of Impropriety in All of the Judge's Activities

Canon 3 A Judge Shall Perform the Duties of Judicial Office Impartially and Diligently

(1 of 3)

2) Greenville County Common Pleas judge Leticia Verdin violated: 18 U.S. Code § 242 - Deprivation of rights under color of law

3) Greenville Sheriff Police Department's police officers "A" and "B" they are in violation of: 18 U.S. Code § 242 - Deprivation of rights under color of law.

Armando Despaigne Zulveta Plaintiff will request Greenville Sheriff Police Department a criminal investigation over this matter joined by the Federal Bureau of Investigation. I request from your agency an intervention of transparency.

See attached EXHIBIT "A" relating to Judge Leticia Verdin's criminal investigation. See Exhibit "B" letter of apologizing of The South Carolina Court of Appeals I guess said court they felt frustrated and stressed having a situation in which C.A. No: 2015-CP-23-05171 presided Judge Garrison Hill's Court Reporter Hollie M. Jenkins's voluntarily disappearance and abuse of court discretion was an important factor on denial to appeal Judge Hill's order that benefit Greenville Hospital System known in district court as THE MOVANTS, See IN THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT No.: 15-2561, Armando Despaigne Zulveta Plaintiff-Appellant vs Steaman Hawkins Clinic of the Carolinas, Tim Case, Wilson Jones Carter & Baxley, PA, Philpot Law Firm, P.A., TC Unlimited, Inc., Curtis Elliot, Robert P. Restrepo, Jr., Stephen R. Bruner, Irvin H. Philpot, III, and Wesley J. Shull, Defendants-Appellees, Case No.: 6:15-2880-HMH-KFM. See also Exhibit "C" THE MOVANTS, as usually file legal documents whatever they feel as well as Plaintiff Zulveta's Motion and schedule to court hearings and orders, etc., is fixed and tampered by Non Jury Coordinator Steve Lopez in behalf of the Movants. As well as South Carolina Workers Compensation Commission Chairman T. Scott Beck, Commissioner Michael Campbell, along with Judicial Director Amy Bracy (more evidences to come) tamper with Motions in behalf of THE MOVANTS, detriment of South Carolinians's injured workers See Armando Zulveta vs. TC Unlimited Inc. 452483. As usual THE MOVANTS also use financial strategic trying to make a Pro Se unable to proceed the case while tried to lure a party to the proceeding in court into accepting inflated price for mediation. See Exhibit "D" according to THE MOVANTS price charge for Mediation, See Exhibit "E" real price. There is a lot of more judicial misconduct.

Commissioner Kittredge, be vigilant that at Greenville, SC, law enforcement police officers are not use for personal purpose.

On this day 08 of September, 2016

(2 OF 3)

Thank you in advance for your concern.

Armando 09/08/2016
Armando Despaigne Zuiveta.

(3 of 3)

EXHIBIT "A"
admin
THE SOUTH CAROLINA
DEPARTMENT of ADMINISTRATION

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
888.238.0687 toll free
803.734.1428 fax

July 20, 2016

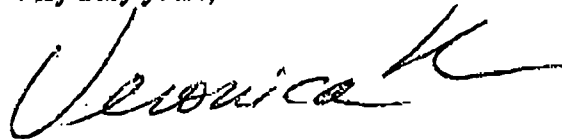
Mr. Armando Despaigue Zulveta
Post Office Box 24892
Winston Salem, North Carolina 27114-4892

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

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

EXHIBIT "B"



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

ROSALYN FRIERSON
DIRECTOR

1220 SENATE STREET, SUITE 200
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1800
FAX: (803) 734-0289

June 3, 2016

Mr. Armando Despaigne Zulveta
P.O. Box 24892
Winston-Salem, NC 27114

Dear Mr. Zulveta:

Your letter dated May 20, 2016 has been received, and I write to you in response. I apologize for the delay. I was waiting for a response to my inquiry from Ms. Jenkins. I have attached the response that she mailed to you on May 31, 2016. I am hopeful by now it has been received by you. Please follow the directions outlined in Ms. Jenkins' letter so that your transcript may be prepared.

If you have further questions regarding court reporters and/or transcripts, please do not hesitate to contact me again.

Sincerely,


Deshae R. Allen
Court Reporter Manager

Enclosure: Letter dated May 31, 2016

CC: Hollie Jenkins, Official Court Reporter

7/30/2016

Print

Subject: RE: Amondo Zulveta vs. TC Unlimited Inc. 452483;
From: Cheesboro, Barbara (BCheesboro@wcc.sc.gov)
To: wjshull@wjlaw.net;
Cc: zulamando@yahoo.com; trsharpless@wjlaw.net;
Date: Monday, July 26, 2016 12:32 PM

EXHIBIT "C"

Mr. Shull, your APAs and exhibits were never uploaded for the file. Please upload for the file.

Thanks,

From: Wes J. Shull [mailto:wjshull@wjlaw.net]
Sent: Wednesday, March 16, 2016 4:43 PM
To: Cheesboro, Barbara
Cc: 'Armando Despaigne zulveta'; Trudy R. Sharpless
Subject: Amondo Zulveta vs. TC Unlimited Inc. 452483:

Barbara,

Please find attached a proposed Decision & Order I have drafted for Commissioner Campbell's signature, per his order instructions.

Since Mr. Zulveta is unrepresented, I am also sending a hard copy of this out via U.S. Mail.

Best regards,

Wes

WJC&B

Wilson Jones Carter & Baxby, PA.

Wesley J. Shull, Attorney
wjshull@wjlaw.net
872 S. Pleasantburg Dr.
Greenville, South Carolina 29607
Phone: (864) 272-2660
Fax: (864) 233-6015
wjclaw.net

This message may be protected by the attorney/client privilege, attorney work product or other privileges. If you received this message in error, please send a reply, delete the message immediately and do not forward this message to any other person.

about:blank

1/2

EXHIBIT "D"



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

On Wed, Apr 13, 2016 at 4:51 PM, Michelle Yarbrough <myarbrough@gwblawfirm.com> wrote:

Armando,

Mediation is mandatory in this case and must be done by July 12th. Mediators usually charge \$250 to \$300 per hour and their fee will be split between us. I am happy to consider any qualified mediators that you recommend. Please let me know when you want to mediate and which mediators you recommend so that we can get the mediation set.

Thank you,

Michelle Yarbrough

Michelle DeLuca Yarbrough

Partner

myarbrough@GWBlawfirm.com

Gallivan, White & Boyd P.A.

Office 55 Beattle Place | Suite 1200 | Greenville SC 29601

864 271 5349 Direct | 864 271 9580 Main | 864 271 7502 Fax

Mailing Post Office Box 10589 | Greenville SC 29603

vCard | BioURL | Website

This message is from the law firm Gallivan, White & Boyd, PA and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.

EXHIBIT "D"



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

Michelle Yarbrough <myarbrough@gwblawfirm.com>

Apr 24 (2 days ago)

to me

Armando,

We can either use a mediator of your choosing or we can use one of the two mediators listed on the mediation notice. Because the mediators or the mediation notice are out of town, it may be possible to do the mediation by phone. Please let me know who you want to use. You may want to consider a bilingual mediator so you do not have to bring an interpreter. Please let me know your choice of mediator and we will get it set up at a time convenient to everyone.

Thank you,

Michelle

Michelle DeLuca Yarbrough

Partner

myarbrough@GWBlawfirm.com

Gallivan, White & Boyd P.A.

Office 55 Beattie Place | Suite 1200 | Greenville SC 29601

864 271 5349 Direct | 864 271 9580 Main | 864 271 7502 Fax

EXHIBIT "E"

David B. Marvel
1000 ...
Greenville, SC 29603-0589
Tel: 864.233.1111
Fax: 864.233.1112
www.davidbmarvel.com

May 5, 2016

Michelle Deluca Yarbrough
P.O. Box 10589
Greenville, SC 29603-0589

Armando Despaigne Zulveta
P.O. Box 24892
Winston Salem, NC 27114

Re: Armando Despaigne Zulveta vs. Charter Communications Inc
Case No. 2015-CP-23-05171

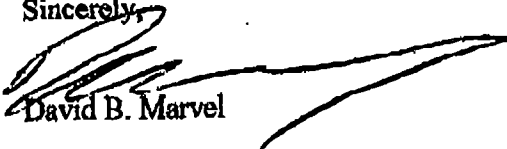
Dear Ms. Yarbrough and Mr. Zulveta,

I hope this letter finds you all well. I have received notice from the Greenville County Court of Common Pleas that I have been appointed to serve as an alternate mediator in this case.

While you are always free to select another mediator, I would be pleased to serve in this matter. Pursuant to Rule 9(b), SCADR, appointed mediators may charge no more than \$175 per hour, which is split between the parties. Noting that the Plaintiff appears to be *pro se*, I would be willing to discuss a lower fee or a flat fee if circumstances make that appropriate.

I have enclosed my C.V. for your review. Over fifteen years of practice, I have appeared in nearly every forum where one can file a claim in South Carolina, representing a wide variety of clients. I am hopeful that I can assist with the resolution of your case.

Please call me at your convenience to discuss the scheduling of mediation. My office is in Charleston, but I would be happy to schedule a convenient location in Greenville County. I look forward to hearing from you soon. With best regards, I remain

Sincerely,

David B. Marvel

/DBM
Enclosure

STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS
COUNTY OF GREENVILLE THIRTEENTH JUDICIAL CIRCUIT

Armando Despaigne Zulveta)

Plaintiff)

vs.) File No.: 2015-CP-23-05171

Charter Communications, Inc.)

Defendant)

RECEIVED

SEP 23 2016

SC Court of Appeals

CERTIFICATE OF SERVICE

This is to certify that a true copy of PLAINTIFF'S ZULOVETA'S OBJECTION TO DEFENDANT AMENDED NOTICE OF HEARING WITH MEMORANDUM IN SUPPORT OF LAW AND AFFIDAVIT has been electronically served upon Galvan White & Boyd, P.A, Michelle Yarbrough attorney for defendant at FAX #: (864) 271-7502.

On this day the 16 of September, 2016

Respectfully Submitted;

Armando 09/16/2016
Armando Despaigne Zulveta

P.O. Box 30361

WINDSTON SALEM, NC 27130

Phone: (864) 305-9480

Email: ~~2015~~1296@gmail.com

STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS
COUNTY OF GREENVILLE THIRTEENTH JUDICIAL CIRCUIT

Armando Despaigne Zulveta)

Plain tiff)

vs.) File No.: 2015-CP-23-05171

Charter Communications, ~~INC.~~ ^{ADD}
Defendant) 9/16/2016

AFFIDAVIT

STATE OF SC

COUNTY OF GREENVILLE

Done 09/16/2016

I, Armando Despaigne Zulveta, being duly sworn, or having duly affirmed to tell the truth, stated personally before me that he is competent under the law to give this affidavit and unless stated have personal knowledge of the facts stated herein:

Sworn or affirmed before me on September 16, 2016.

Jasmine Frater

Notary Public

Commission Expires: July 7, 2026

