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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Armando Despaigne Zulveta,) C.A. No. 6:15-cv-2880-HMH-KFM
Plaintiff,)
vs.)
TC Unlimited Inc, Tim Case)
Defendants)
_____)

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SC Court of Appeals

JUDICIAL NOTICE

NOW COMES Plaintiff Zulveta (referred as PZ) and moves this Honorable District Court into take JUDICIAL NOTICE that on August 13, 2015 with The South Carolina Workers Compensation Commission (referred as The Commission) and pursuant Section 15-27-155 Plaintiff Zulveta (a Claimant there) filed a Motion for an Appointed Interpreter (SEE EXHIBIT "A"). Said Motion was denied by the Commission because \$25 filing motion required fee I did not included.

Immediatly and with ample time (PZ) offered to pay cost of Motion and Translator. for that purpose I called The Commission at this Phone Number (803) 5723 on:

- 08/21/2015 at 9:52 A.M. phone call conversation of 5 min. and 14 sec.
- 08/24/2015 at 10:59 A.M. phone call conversation of 2 min. and 10 sec.
- 08/24/2015 at 2:17 P.M. phone call conversation of 3 min. and 17 sec.

and each time The Commission rejected my request and stated that I would have to use defendants TC Unlimited Inc., and Tim Case's attorneys Wilson Jones Carter and Baxley

P.A., attorney Wesley Shull whom both of them at the time and with the acknowledgment of The Commission they were (are) defendants themselves in this District Court from a civil case that was originated by the same Commission's civil case.

On 08/25/2015 at 9:29 A.M. at (803) 737-5698 a phone call conversation of 5 min. and 12 sec. took place with Chairman Beck's assistant Shane, and I, who tried to convince her that a translator should be appointed, I would pay for. At the time I thought that that, was the procedure to obtain a translator in court. She said she would consult with Chairman Beck and call me back later. She called me back at 10:12 A.M. and we spoke for 11 min. and 45 sec. without reaching an agreement other than to use defedants' translator for the upcoming hearing. Later that day at 4:43 P.M. in a phone conversation and despite my offering to pay costs The Commission's Human Resources Alicia reassured me that I would have to use the translator Defendants TC Unlimited and Tim Case's attorneys Wilson Jones Carter and Baxter P.A. and attorney Wesley J Shull would bring for the upcoming hearing with Chairman T. Scott Beck. At the time the Commission was aware that defendants attorneys were/are defendants in a civil case in this District Court.

On 09/01/2015 against my objection and rejection The Commission presiding hearing Chairman T. Scott Beck ordered that the hearing be conducted using defendants TC Unlimited Inc., and Tim Case's attorneys' translator Otto Zelman who under Oath he made statements that his prior services had been employed by defendants's attorneys for deposition and translation cases. (SEE Docket Sheet filed 10/02/2015 Doc. 40, Exhibit P Transcript page 9, line 21.

This Honorable Court takes Judicial Notice that defendants' translator Mr. Zelman's denial while under Oath and questioned by The Court: Have you been involved in the choice of counsel or law firm in this case? Mr Zelman Answered: No, Sir. (SEE Exhibit P Transcript page 9, line 5-7.

This Honorable Court takes Judicial Notice that when Mr. Zelman was asked by Chairman Beck at least we know that he already has been employed three (3) times by defendants' attorney and then, against Claimant Zulveta's objection Translator Otto Zelman was allowed again to be used as translator on December 09, 2016 (4th occasion this time) date of Commissioner's Michael R. Campbell's presiding hearing. Therefore, there indeed was a business relationship relating to choice of counsel or law firm in this case. This is bias and prejudice against a party to a civil proceeding that we can see benefit defendants above.

This Honorable Court takes Judicial Notice that trying to prevent Plaintiff Zulveta from pursuing these cases (i.e, no internet access, nor public service at the Library, therefore block my access to court) Greenville Library System's Board of Trustess's Chair Chace Campbell (another Campbell) and Vice Chair attorney Allan Hill at their presiding hearing November 09, 2015 they excused the translator I brought only to appointed me one of their own who at their next presiding hearing on 12/14/2015 said translator on my behalf and without I realized called Chair Campbell "JACKASS".

This Honorable Court takes Judicial Notice that on November 23, 2015 at Greenville Circuit Court of Common Pleas Plaintiff Zulveta filed a MOTION OF REQUESTION FOR AN APPOINTED TRANSLATOR. (SEE EXHIBIT "B"). Circuit Judge Garrison Hill (another Hill) granted said Motion and ordered me to pay for the translator which it was no problem as I also offered with the Commission to pay for.

This Honorable Court takes Judicial Notice that Plaintiff Zulveta has no idea of why my case being civil it was sent by Judge Hill to JULIE IN CRIMINAL SECTION (SEE same EXHIBIT "B")

This Honorable Court takes Judicial Notice that Greenville 13th Circuit Court of Common Pleas Judge Garrison Hill was a member of Grenville Hospital System's Board of Directors and he had acknowledgment that (GHS) was a defendant in this District Court. Judge Garrison Hill should have recused himself from (PZ) proceedings.

This Honorable Court takes Judicial Notice that defendants above State Auto's, Robert Restrepo's, and Stephen Bruner's attorney Gallivan White and Boyd, P.A. they were also Charter's attorney at Judge Garrison's presiding hearing and said judge had acknowledgment of this CONFLICT OF INTEREST. As result, Gallivan White and Boyd, P.A., bypassed a default that again caused (PZ) reimbursement money be defrauded again in court.

This Honorable Court takes Judicial Notice that similar to imposed translators above also Translator Alphonso made a great deal of inefficient, incompetent, intentional disregard for her translation.

This Honorable Court takes Notice Judicial that after the hearing was over and at the Common Pleas' parking lot their Translator Alphonso after being paid she refused to write me a Receipt in English and trying to mislead (PZ) she also used the same misleading statement as Clawson and Staubes' secretary Pat: "It doesn't matter it is writing in Spanish, it would be good and accepted anywhere". After this, she turned her

back on me and got into her car while ignored my plead for responsibility doing her job particularly after being paid. (SEE EXHIBIT "C" TRANSLATOR ALPHONSO'S RECEIPT).

On this day the 3rd of March, 2017

Respectfully Submitted;

Armando Despoigne Zolvetz 03/03/2017
Armando DESPOIGNE ZOLVETZ

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CERTIFICATE OF SERVICE

This is to certify that a true copy of PLAINTIFF ZULVETA's JUDICIAL NOTICE dated March 03, 2017 has been electronically served upon Defendants TC UNLIMITED Inc., and TIM CASE's attorney CLAWSON and STABUS attorney TIMOTHY A. DOMIN at FAX #: (843) 722-2867, or (704) 522-9033, or (864) 232-2921, or mailed by USPS, or combination of communication services above.

On this day the 3rd of March, 2017

Armando Despaigne 03/03/2017
Armando Despaigne Zulveta

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Phone No.: (864) 305-9480 Email: acere 1296@gmail.com