

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

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USDC CLERK GREENVILLE, SC
2017 MAR 31 PM 8:59

GREENVILLE DIVISION

Armando Despaigne Zulveta)
Plaintiff,)
vs.)
Tim Case, TC Unlimited, Inc.,)
Defendants)

Case No.: 6:15-2880-HMH-KFM

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MAR 31 2017
SC Court of Appeals
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APR 03 2017

SC Court of Appeals

MOTION TO COMPEL

Defendants are the only ones who are repetitive themselves without produce a response to any subject of matter to none of my motions.

This court should recuse himself from proceed this case as well as the Fourth Circuit Court of Appeals. At this District Court we have Clerk Kieron Campbell the 4th Campbell associated with what clearly appears a judicial misconduct preventing Plaintiff Zulveta from win this case. For a jury, for an outsider who knows about THE CAMPBELLS association with what it appear judicial misconducts in these civil cases if would be very difficult to understand the possibility that Plaintiff Zulveta, and this court, separately we have mistaken my filing dateline having also, two different filing datelines missed according to Defendants Steadman Hawkins Clinic of the Carolinas' attorney Haynsworth Synkler Boyd, P.A. (SEE FILED MARCH 24, 2017).

The same for the Fourth Circuit Court of Appeals' Clerks Mike Raday and Joy Moore using the discretion of the court that allows clerks to not to send Court's Orders and Notifications so Pro Se like me cannot be aware of the status of my case and as result, legally be dismissed while defendants above from same clerks get great help to win. My opinion is that whoever clerk who use the court's discretion of keeping in the dark a party to a civil proceeding in court particularly against a Pro Se which we are the Only one that can be treated that way, said clerk has an important personal interest in the civil case and his/her motivation is to have it dismissed. No clerk who has inches of decency would use this discretion for whatever reason helping a party to illegally, unlawfully win the case. WHATEVER LAW THAT ALLOWS THEM TO DO IT IS UNFAIR AND WHATEVER CLERK WHO USE AGAINST A PARTY TO A CIVIL PROCEDURE TO ALL STANDARD HE/SHE IS VIOLATING THE LAW. THAT IS A TRICKY LAW THAT ALLOWS MEMBERS OF THE JUDICIARY TO GET RICH WITHOUT BEING HELD ACCOUNTABLE FOR WHAT CLEARLY APPEARS A CRIMINAL ACT PREVENTING ME [AND MANY OTHERS] FROM PROSECUTE MY CASE IN A CIVIL

(10 = 3)

COURT OF THE UNITED STATES. THEREFORE, DEFENDANTS ABOVE UNLAWFULLY WIN WITH THE HELP OF THE COURT. JUDGES AND CLERKS ARE NOT THE COURT AND THEY OWE THEIR SERVICE TO THE COMMUNITY, THE PUBLIC, NOT TO DEFENDANTS ABOVE. THEIR JOB IS TO BE IMPARTIAL. OUR MONEY AND PROPERTY ARE INVOLVED AND WITHOUT EQUAOL PROTECTION OF THE LAW IT IS TAKING AWAY FROM US AND FROM THE SAME PEOPLE WHO ARE SUPPOSED TO BE IMPARTIAL WITH THE LAW, HELP PROTECT THE LAW.

What defendants' attorneys Clawson and Staubes ask this court this time is: a) to look at another direction and ignore Dictionary Merriam-Webster's interpretation of the Phrase "TAKE A GOOD SEAT AND WAIT ON ME" particularly referring to this phrase being well defined here in the South, and substitute it for their own misinterpretation in which said misinterpretation derived an Order of Dismissal With Prejudice by this court. They should be better lawyers and do better job trying to overturn a defeated case particularly coming from a Pro Se, instead of cheating, b) defendants ask this court also to ignore the interpretation of FRCP 16, placed upon Plaintiff Zulveta and which get places to an enhancement of their judicial misconduct against a [LITTLE GUY] Pro Se, c) defendants' attorneys ask this court to ignore AN ACT OF THE CONGRESS SECTION I. TITLE I-CIVIL JUSTICE & EXPENSES AND DELAY REDUCTION PLAN SECTION 102. CIVIL JUSTICE REFORM SECTION 102 (1)(2)(3)(4), d) defendants ask this court to ignore The Congress and also Sen. Al Franken (D-Minn.) questioned Gorsuch's ruling in what has become a celebrated case of a trucker who was fired after unhitching his trailer in subzero weather [feared for his life] and driving away in search of warmth and safety. Gorsuch was the lone dissenter in saying a federal law did not protect the driver, but Franken said the judge (Gorsuch) could have ruled that a strict interpretation of the law would lead to an absurd result. "I had a career in identifying absurdity, and I know it when I see it," Franken said. Senator Franken asked Judge Gorsuch what would he have done being in the truck's driver position. (i.e, truck driver's life and others' lives in risk), e) Defendants ask this court to ignore pictures of my family they have sent with their Production of Discovery as a deadly threat to our lives, f) for a jury, for an outsider to entertain this civil case which clearly appears defraud of the Working Class People, and the community, of our property and values the definition of what defendants ask this court is to all of the names involved in this situation including all of the attorneys' in this originated and appeals civil they are asking nothing more than: TO THEM BE SAFEGUARDED FROM THEIR IMCRIMINATING AND IMPEACHMENT OFFENSES. Legally none of those attorneys involved should be allowed to prosecute this appearance of RACKETEER CASE AGAINST THE PUBLIC THEY CONDUCT IN WHICH CLEARLY CAN BE SEEN THAT AT LEAST COURT'S TRANSLATORS, REPORTERS, CLERKS ARE HEAVELY INVOLVED. COMPARED WITH ME, A PRO SE, JUST IMAGINE OF WHAT THE FBI COULD FIND IF THEY GET INVOLVED IN AN INVESTIGATION. COVER THE JUDICIAL SYSTEM WITH AN AURA OF INMACULATION THAT IS NOT THE SOLUTION AND MEANWHILE ACTIONS SAY OTHERWISE. NO AGENCY CREATED BY MAN IS ABSENT ED OF WRONGDOINGS AND WHAT IT CLEARLY APPEARS SUBSTANTIVE AND CIRCUMSTANCIAL EVIDENCES THAT HAVE BEEN IGNORED IT GETS CLEAR INDICATION THAT SOUTH CAROLINA JUDICIAL DEPARTMENT SYSTEM IS NOT AN EXCEPTION TO THAT RULE OF IMPERFECTION MORAL ETHICS THAT THIS COURT FRORCIBLY WANT TO IMPLEMENT WITHA DISMISSAL WITH PREJUDICE WHILE THIS CANCER AGAINST THE COMMUNITY IS GETTING BIGGER AND BIGGER AS RESULT OF THIS IMPOSSIBILITY TO WIN IMPLEMETED BY JUDICIAL MISCONDUCT IN BEHALF OF ALL DEFENDANTS,

Pursuant to Federal Rules of Civil Procedure and Local Rules 37.1 and 37.2, Plaintiff Zulveta hereby move the Court for an order compelling defendants to respond to outstanding discovery and to produce items they are withholding from Plaintiff Zulveta and that are not intended to

(2 OF 3)

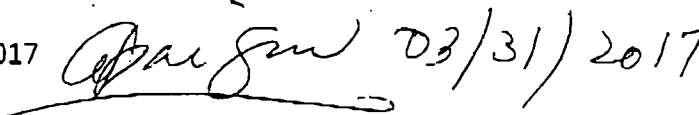
impeach them like TC Unlimited Inc and Tim Case's Twenty Two (22) employees who one way or another they have acknowledgement of my work related accident. Eight of these employees witnessed the accident and only name I know is of Humberto who there (SEE EXHIBIT "A" BUSINESS CARD) he prior has given me.

Defendants have refused to provide the required discovery responses in this matter, have misrepresented when responses would be forthcoming, and have failed to communicate, leaving Plaintiff Zulveta no other choice than to seek Court intervention. Defendants to compel all of my MOTIONS, JUDICIAL NOTICE, AND NOTICE that contain allegation by evidences of their wrongdoing in court and they failed to respond pursuant Rule 33. Defendants to answer why they sent me pictures of my family on their discovery which contrary to what they say they have more than plenty of incrimination discovery I have sent them. Defendants and Plaintiff Zulveta, we shared Discovery.

An Order is an Order and it can be appealable. There is not transparency when this court keeps switching judges to render an Order and then use a Magistrate Judge to issue another Order for their own and defendants' convenience dismissing my case. Long before February 06, 2017 dateline for Discovery defendants knew what they have to provide. It cannot be a trial without witnesses which there were many who witness my work related accident. Regardless, Magistrate Judge extended Discovery's dateline anyhow when ordered me to response defendants' allegations of Discovery until February 23, 2017. That is an extension of Discovery through an Order. Other than that, it is a NON-TRANSPARENCY ORDER THAT AS ALWAYS, IT HELPS DEFENDNATS TO WIN.

Therefore, in particularly having SOUTH CAROLINA GREENVILLE DIVISION CLERK OF COURT KIERON CAMPBELL involved in what clearly appears another Campbell's Judicial Misconduct (4th Campbell) Plaintiff Zulveta respectfully request that this Court recuse himself or either enter an order compelling Defendants to produce the requested discovery responses and produce TC Unlimited and Tim Case's employees' names and address that it was requested anyhow long before February 06, 2017 on January 06, 2017 and January 10, 2017 and December 12, 2016 among others requests and also phone calls requests. THIS COURT TAKE JUDICIAL NOTICE THAT PLAINTIFF ZULVETA NO EVEN ASK FOR A DISMISSAL OF THEIR CASE BUT MY CIVIL CASE BEING HEARD AFTER BEING UNLAWFULLY DISMISSED. Plaintiff Zulveta excludes reasonable expenses incurred in making this motion, travels, etc. Defendants what they do is wasting the community resources with delay.

On this day the 31st of March, 2017
Respectfully Submitted;



Armando Despaigne Zulveta

P.O. Box 30361 Winston-Salem, NC 27130

Phone#: (864) 305-9480 Email: acere1296@gmail.com

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

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2017 MAR 31 PM 3:59

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APR 03 2017

SC Court of Appeals

Armando Despaigne Zulveta)
Plaintiff,)
vs.)
Tim Case, TC Unlimited, Inc.,)
Defendants)

Case No.: 6:15-2880-HMH-KFM

~~RECEIVED~~

~~MAR 31 2017~~

~~SC Court of Appeals~~

*wrong date
VCA
4/3/17*

AFFIDAVIT

STATE OF SOUTH CAROLINA

COUNTY OF GREENVILLE

I, Armando Despaigne Zulveta, state as follows:

- 1) That I am the Plaintiff Zulveta mentioned in Civil Case above.
- 2) That I have no income.
- 6) That I do not own any property of value.
- 7) That this civil is not frivolous or taken solely for the purposes of delay.
- 8) That this civil action is of public interest and that also it appears to be a Class Action Case which Plaintiff-Appellant Zulveta does not have the ability to conduct but as a regular case this court should give the public a chance to observe.

On this day the 31st of March, 2017

Armando Despaigne Zulveta

Armando Despaigne Zulveta 03/31/2017

P.O. Box 30361 Winston-Salem, NC 27130

Phone#: (864) 305-9480

Email: acere1296@gmail.com

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

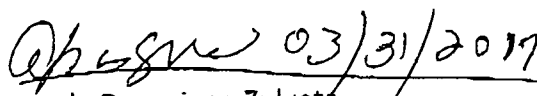
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Armando Despaigne Zulveta) Case No.: 6:15-2880-HMH-KFM
Plaintiff,)
vs.)
Tim Case, TC Unlimited, Inc.,)
Defendants)

CERTIFICATE OF SERVICE

This is to certify the a true copy of Plaintiff Zulveta's MOTION TO COMPEL has been electronically served upon Claus and Stabus attorney Timothy Domin at Fax: (843) 722-2867, or Alternate Fax (864) 232.2921, or Alternate Fax: (704) 522.9033 or United States Postal Service Mail delivering at 126 Seven Farms Drive, Suite 200 Charleston, SC 29492.

On this day the 31st of March, 2017


Armando Despaigne Zulveta

P.O. Box 30361 Winston-Salem, NC 27130

Phone#: (864) 305-9480 Email: acere1296@gmail.com_

61

TRANSMISSION VERIFICATION REPORT

TIME : 01/28/2015 15:20

DATE, TIME	01/28 15:20
FAX NO./NAME	1864449309315212500003301341121824#29607
DURATION	00:00:34
PAGE(S)	01
RESULT	OK
MODE	STANDARD

TRANSMISSION VERIFICATION REPORT

TIME : 01/15/2015 10:03

DATE, TIME	01/15 09:55
FAX NO./NAME	18644493093152125000033013415012980
DURATION	00:00:37
PAGE(S)	01
RESULT	OK
MODE	STANDARD

TC
Unlimited
INCORPORATED

Commercial Janitorial Services Humboldt
Commercial - Residential
Lawn Maintenance
Bonded & Insured
864-49-3093
864-49-3093
FAX 864-850-0298

TM Case

08
864-64371

EXHIBIT 3

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

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

MOTION FOR RECONSIDERATION OF HONORABLE HENRY HERLONG'S OPINION AND ORDER OF DIMISS WITH PREJUDICE FILED 03/14/2017 (docket number 187), MOTION TO REINSTATE PLAINTIFF ZULVETA FOR SANCTIONS (docket number 153) AND MOTION FOR A HEARING REGARDING THE SCHEDULING ORDER (docket number 157), MOTION TO COMPEL TO PRODUCE NAMES AND ADDRESS OF WITNESSES, PLAINTIFF ZULVETA REQUESTION FOR PRODUCTION OF TC UNLIMITED; AND TIM CASE'S EMPLOYEES' NAMES AND ADDRESS UP TO TWO YEARS PRIOR TO WORK RELATED ACCIDENT ON 11/11/2014, JUDICIAL NOTICE (docket number 165), JUDICIAL NOTICE FILED MARCH 03, 2017, AND REINSTATE ANY AND ALL MOTION INCLUDING A PARALLELL CRIMINATION INVESTIGATION TO THIS CASE, MOTION OF REQUESTION FOR A SISTER DISTRICT COURT OUT OF SOUTH CAROLINA DISTRICT AND PREFERIBLE BE HEARD BY A SISTER CIRCUIT COURT UP NORTH OR WEST OF THE COUNTRY, ANY ORDER RELIEF AS THE COURT DEEMED TO SECURE PLAINTIFF ZULVETA'S EQUAL PROTECTION OF THE LAW. IT IS UNDERSTANDABLE THAT ASK THIS COURT TO INVESTIGATE ITSELF IT PLACES A HEAVY BURDEN UPON ON IT BUT SOUTH CAROLINA GREENVILLE DIVISION'S CLERK OF COURT KIERONG CAMPBELL SHE IS THE 4TH CAMPBELL IN WHICH SAID NAME IS IN ONE WAY OR ANOTHER RELATED TO WHAT IT CLEAR APPEARS JUDICIAL MISCONDUCT. THE MORAL RESPONSIBILITY OF THIS COURT IS TO SECURE THAT AN ATTACK FROM THE JUDICIARY SYSTEM IS NOT PLACED AGAINST AND UPON THE PUBLIC, THE PUBLIC'S PROPERTY AND MONEY WHILE BENEFIT ADVERSE POWERFUL SIDE.

NOW COMES Plaintiff Zulvet and moves this Honorable Court unto places Observation and Judicial Notice to these Motions and make Findings and Conclusion based on what Equal Protection of the Law is, fair Due Process that should be meticulous preserved.

This Honorable Court takes Judicial Notice that:

- a) On Sept. 18, 2015 pursuant 55(b)(2) Plaintiff filed Motion to Strike Defendants Tim case and TC Unlimited Inc. Memorandum in Response to Plaintiff's Motion for default against defendants,
 - b) on September 18, 2015 Plaintiff filed Motion for Default (Docket 35)
 - c) on 08/18/2015 Civil Case No.: 15-2561, was closed by Clerk of Court.
 - d) on 08/24/2015 Honorable Order Herlong Jr., Ordered Schedule Conference having solely TC Unlimited and Tim Case as defendants which Plaintiff Zulveta appealed under Rule 41. Appellate Civil Case 16-2078 was born.
- STAY OF APPEAL: only those provisions for which review is sought and matters not affected by the notice of appeal are not stayed. As a group TC unlimited and Tim Case are affected by the appeal while prejudice my case his stance on the case. Discovery is not reachable to co-defendants therefore, it unpair my case. TC Unlimited Inc., and Tim Case should not be allowed to continuous with Honorable Herlong' Jr., Scheduling Conference dated August 24, 2016.
- e) On February 01, 2016 defendants reunited themselves again in Ditric Court as The Movants and they filed a motion to Dismiss my case.
 - f) on 11/17/2015 Honorable Herlong, Jr., conducted a de novo review of the "Plaintiff's motion for default as to all defendants [ECF No. 71]" that was mailed prior to the issuance of Honorable Magistrate McDonald's Report and Recommendation, but was not recieved until after the Report and Recommendation was issued. Honorable Herlong rules that the motion is duplicative and raises no new grounds. The Plaintiff filed no objection, the court is not required to give any explanaion for adopting the recommendation.
 - g) Exactly a year after a similar dismissal was issued on December 21, 2016 at District

Court Honorable Herlong Jr., Order prejudiced me when excluded defendants Steadman Hawskin of the Carolinas, Tim Case and TC Unlimited from answer my allegation of Fraud Upon the Court. I Appealed date on 12/30/2016 subject of confuson between District Court and Appeals. Asually, Plaintiff-Appellant Zulveta served both court proiperly with a copy for each court. Appellate Civil case 17- 1129 was born. This Honorable court for one reason or another it has a tendency of shortening issued scheduling order and every single time Plaintiff is prejudiced while same issued Order benefits defendants above.

This Honorable Court erred in exclude Plaintiff Zulveta from the protection of:

AN ACT OF THE CONGRESS

SECTION I. TITTLE I-CIVIL JUSTICE & EXPENSES AND DELAY REDUCTION PLAN

SECTION 102. CIVIL JUSTICE REFORM

SECTION 102 (1)(2)(3)(4)

The President of The United States duty is to appoint the best qualify judge each time to a new seat on the United States District Court for the District of South Carolina created by 104 Stat. 5089 to provide duly, honest service to the public so their property and money is not taken away without Equal Protection of the Law be afforded.

Local Rules 16 governs 26(f).

LOCAL RULES 16.00: *Exemptions and Stay of Deadlines.*

(A) *Exempt Actions.* Scheduling orders will generally not be entered in any action listed in Fed. R. Civ. P. 26(a)(1)(B)

Cases listed in Fed. R. Civ. P. 26(a)(1)(B) are expressly exempted from: (1) the initial disclosure requirements of Fed. R. Civ. P. 26(a)(1); (2) the conference and report requirements of Fed. R. Civ. P. 26(f); and (3) the related Fed. R. Civ. P. 26(d) bar on discovery before the conference.

(B) *Non Exempt Pro Se Actions.* In any action in which a party is proceeding without counsel ("pro se"), but which is not covered by Fed. R. Civ. P. 26(a)(1)(B)(iii) (prisoner

pro se actions), the Court's initial order shall address whether the Fed. R. Civ. P. 26(f) conference or any other federal or local rule requirements addressed in Local Civil Rules 16.01-16.02 are waived.

Clearly the intention of The Congress when enacted this ACT is to liberate or alleviate everything defendants's attorneys Clawson and Staubes (CHAS) has putted me as a Pro Se party to this civil proceeding in a DISTRICT COURT OF THE UNITED STATES including, VIOLATION OF ABA 3.3. CANDOR. For an outsider who entertain this case he/she would consider that the exclusion of Plaintiff Zulveta from the protection of the an ACT OF CONGRESS should not be an option of consideration.

This Honorable Court has a tendency to place this civil case in an unfavorable position to win. This Honorable Court obligation to the public is to be Impartial. Public's property and money is involved on it. This Court should not be go out of its way to impose burden in a plaintiff.

In addition, rather than render the decision in Findings and Conclusion this Honorable Court has concluded it based on Probable Cause having for base that I was expected to estipulate a meeting with (CHAS) based on my irritated comment of: "TAKE A GOOD SEAT AND [WAIT ON ME]. For that purpose, Plaintiff Zulveta has choosen well internnationally famous and well respected DICTIONARY MERRIAM-WESTER's DEFINITON FOR: "WAIT", and "WAIT ON".

Merriam-Webster SINCE 1828

A) Definition of wait

1a : a hidden or concealed position

b : a state or attitude of watchfulness and expectancy

B) Definition of wait-transitive verb

1: to stay in place in expectation of : await

Definition of transitive

1: characterized by having or containing a direct object a transitive verb

2: being or relating to a relation with the property that if the relation holds between a first element and a second and between the second element and a third, it holds between the first and third elements equality is a transitive relation

Definition of transition

1 a : passage from one state, stage, subject, or place to another : change

b : a movement, development, or evolution from one form, stage, or style to another

C) Definition of wait-intransitive verb

1a : to remain stationary in readiness or expectation.

2a : to look forward expectantly just waiting to see his rival lose

b : to hold back expectantly waiting for a chance to strike

3: an abrupt change in energy state or level (as of an atomic nucleus or a molecule) usually accompanied by loss or gain of a single quantum of energy.

SECTION A) Definitions (1a)(b) above indicates that nothing specific of any kind of result is guarantee that could come up of: "TAKE A GOOD SEAT AND WAIT ON ME". Therefore, there was not stipulation of any verbal agreement among defendants attorneys Chas and Plaintiff Zulveta. As result, CONGRESS'S ACT in which THE PRESIDENT OF THE UNITED STATES relies on SR 1059 expecting fairness it should be fully implemented and administered. CASH represents BIG GUYS with unlimited resources to conduct these kind which by the way there enough indication that defendats's attorneys are not willing to fully comply with the law.

SECTION B) DEFINITION. To stay expectantly. No guarantee of amny result s result of my comment "TAKE A GOOD SEAT AND WAIT ON ME".

SECTION B(1)(a)(b) states that it requires an element between element #1 Plaintiff Zulveta and element #3 (CHAS). In response Plaintiff Zulveta would say that element#2 missed to fulfill a stipulation is TC Unlimited, Inc employees and experts like Dr. Baumgarten who signed FORM 14B PHYSICIAN STATEMENT

THIS IS ELEMENT MISSED #2 THAT CONNECT US IN ORDER TO OUR STIPULATION BE POSSIBLE. IT WAS MISSED: Likewise, a defendant's deposition must be prepared for taking into account: the need for missing information, the defendants' side of the story, the prospect of having to defend a summary judgment motion and the importance of having cross-examination material for trial. Like them I have the right to search for facts, witnesses and probative first-hand testimony that will either illuminate the controversy as one based on speculation and conjecture, or reveal evidence the plaintiff has that may require a re-evaluation of the defendant's likelihood of ultimately prevailing on the merits. I was not afforded by TC Unlimited Inc., and Tim Case's attorneys Clawson and Staubes.

Defending depositions of company witnesses must balance the need to explain the defendants' side of the story against the risk of revealing too much information that could result in a finding by the court that factual disputes preclude summary judgment.

Plaintiff Zulveta can use a deposition to cross-examine and impeach the witness. Fed. R. Civ.

Pro. 32(a)(2)

- To evaluate the witness based on his or her credibility and likely acceptance with a jury
- To demonstrate to an adversary the weakness of his/her case
- To preserve helpful testimony if the witness may not be around because s/he is sick or old, may be out of subpoena range at time of trial and/or is a non-party
- You can take a deposition before normally permitted by Fed. R. Civ. Pro 26(d)

Because Plaintiff Zulveta is Pro Se defendants' attorney job is not to tell this court that as Pro Se, I can not make possible nor produce a reporter, translator and all other elements required for take deposition every single person who can be called in witness to this civil procedure. Plaintiff Zulveta can make that possible with the church's help bears the costs of reporter and translator because they have their own anyway had defendants' attorney make possible our element #2 from Armando Zulveta states in email below:

<acere1296@gmail.com>

12/12/16

to Tim

I would let you know what date is convenient for me but be prepared to take Employer Tim Case and TC Unlimited Inc., for deposition also. Thanks a lot.

Make possible at least names and address of witnesses accorded in our phone conversations (SEE FILED NOTICE February 02, 2017 p. 4) like I repeat asked him until January 10, 2017 (SEE SAME FILED EXHIBIT "G" witness (CHAS) should produce on January 11, 2017 at least, name and address of witnesses that could be called in court.

C) Definition of wait-intransitive verb

C(1a),(2a,b), and (3) offers same result. an element missed, nothing conclusive is comes out of "WAIT ON ME".

According dictionary Merriam Webster expertise: American dialectologists have evidence showing "wait on" to be more a Southern than a Northern form in speech. Handbook writers universally denigrate "wait on" and prescribe wait for in writing. One reason for the continuing use of "wait on" may lie in its being able to suggest protracted or irritating waits. One reason for the continuing use of "wait on" may lie in its being able to suggest protracted or irritating waits.

Therefore, Plaintiff Zulveta used Southern Folklore language that even me whom is notn originally from this area knows and itn is nwhat I did, express my frustration and wrote a complaint against defendants' attorneys (CHAS) after he has failed so much to comply with the production of witnesses and keep askin g me for my participation on

deposition built gave me no kind of response regarding his responsibility other than to dispose me. (SEE FILED NOTICE EXHIBIT "B" February 02, 2017 complaint).

In addition, Plaintiff Zulveta is more than 100 miles away from his chosen location after refused to find a mutual place like one of his location or sister court in Charlotte, NC. (CHAS) could use a Subpoena also they could have available over 10 lawfully requested witnesses.

Therefore, this Honorable Court lack of implementation of CONGRESS ACT benefit and makes easy victory for defendants above. Notice to Take Deposition lacks good cause and that its timing presents unfair difficulties for Plaintiff.

In addition, this Honorable Court erred in no considering photos of my family defendants' attorneys (CHAS) they send me through discovery and evaluate this photos as a DEATH THREAT, PSYCHOLOGICAL COERCION that Defendants TC Unlimited Inc., and Tim Case's attorneys CLAWSON AND STAUBES they have placed against Plaintiff Zulveta's family and myself, a party to a civil proceeding in a civil court of THE UNITED STATES. (SEE EXHIBIT "A" and "B"). An outsider who entertained this case including a JURY, it would conclude that this is a base for defendants case be dismissed automatically. They would not like to situation like this happen to them nor to Your Honor family either putting my shoes on your feet.

Therefore, another lack to perform CONGRESS'S WILL to protect a Pro Se being little guy against any type of BIG GUY i.e. Corporations, Employers, Insurance Carrier's abuse implementation. And that is what we got. A failure to perform a service to the public that is mandated by The Congress. An inefficient and unsupervised Discovery that against The Act and The Public has produced a DISMISSAL WITH PREJUDICE.

To support my claim Plaintiff Zulveta would introduce a portion of CONGRESS' TRANSCRIPT regarding Judge Gorsuch nomination for United States Supreme Court

Senator Feinstein highlighted the case of truck driver Alphonse Maddin, who was fired when he disobeyed a supervisor and abandoned his trailer at the side of a road after the brakes froze in subzero conditions. Gorsuch – a conservative member of the Denver-based 10th US circuit court of appeals – wrote a dissenting opinion as a three-judge panel ruled last year that Maddin was wrongly dismissed and ordered he be reinstated with back pay.

Sen. Al Franken (D-Minn.) questioned Gorsuch's ruling in what has become a celebrated case of a trucker who was fired after unhitching his trailer in subzero weather and driving away in search of warmth and safety. Gorsuch was the lone dissenter in saying a federal law did not protect the driver, but Franken said the judge (Gorsuch) could have ruled that a strict interpretation of the law would lead to an absurd result. "I had a career in identifying absurdity, and I know it when I see it," Franken said. Senator Franken asked Judge Gorsuch what would he

have done being in the truck's driver position.

According to Judge Neil Gorsuch respond if this case go to United States Supreme Court I would have a judge (Gurshed) who would render a decision that benefit me. I have reason to be afraid of defendants' attorneys who pose a risk particularly for my family even, when out of pride I may not express it. Still, Plaintiff Zulveta always was cooperative following court orders and for that reason me, THE CONGRESS, and certain the next US Supreme Court's Justice Neil Gorsuch we disagree with this dismissal. Like they say, Plaintiff Zulveta is the Little Guy here and THE CONGRESS ACT should be implemented to liberate me from abuse.

With this court Plaintiff Zulveta made a record early and often with clear examples of the basis for e.g. the defendants's attorney Chas they are giving me long, rambling, non-responsive answers. In addition, see filed 09/27/2016 and JUDICIAL NOTICE (docket number 165) among others.

Plaintiff Zulveta moves this Honorable Court in to exercise my Equal Protection Clause, to fully implement ACT OF THE CONGRESS SECTION I. TITTLE I-CIVIL JUSTICE & EXPENSES AND DELAY REDUCTION PLAN SECTION 102. CIVIL JUSTICE REFORM SECTION 102 (1)(2) (3)(4).

In the process and according to well known Dictionary Merriam-Webster, like defendants' attorneys Clawson and Staubes obtained from this Honorable Court a dismissal with prejudice based on Probable Cause of my comment [TAKE A GOOD SEAT AND WAIT ON ME] Plaintiff Zulveta also request a parallel criminal investigation relating to South Carolina Judicial System whose name has either involved or connected in what it appears Judicial Misconduct and this Honorable court Clerk of Court Kieron Campbell she is the 4th Campbell who last name is one way or another connected to incidents of what it appears Judicial misconduct: a) William Campbell Disciplinary Counsel at the South Carolina Disciplinary Counsel, b) Commissioner Michael Campbell at South Carolina Worker Compensation Commission, c) Chace Campbell at Greenville Library System's Board of Directors, and d) Clerk Kieron Campbell at South Carolina Greenville Division Court.

On October 05, 2015 last day of my expiration filing from out of state Plaintiff Zulveta arrived at the court around 4:42 P.M. At the metal door CSO Brian Miller and Jeff Melton informed me that Clerk of Court ios cloised since 2:20 P.M., according to the phone call they made to upstairs clerk of court. Since I had to justify I was late for my

filing I obtained their name (SEE EXHIBIT "C" filed October 08, 2017.)

Next day on October 06, 2015 Clerk of Court Kieron Campbell was there having a mayor role leading in this internal inquiries among us. (SEE same EXHIBIT "C" with her signature).

Next day on October 07, 2015 there were defendants attorneys HAYNSWORTH SINKLER BOYD, P.A., telling the court, and to me, that we both separately we had wrongly mistaken our dateline for my filing. The point is that Plaintiff Zulveta is always the subject of errors and adverse orders from every single one of South Carolina Judicial Court. Had haven't had those suignature my case would be dismissed because I see no reason why coming out of state as usually on my last filing day (they now my filing habit) why I can not allow to file my motions particularly having a dateline. (SEE EXHIBIT "C").

Unlike (Chas) who obtained a Dismissal With Prejudice in violation of CONGRESS' Will Pfaintiff Zulveta has genuine Probable Cause to spark a criminal investigation. According to Judge Neil Gorsuch's nomination hearing with the Congress all of them would be set with this case. That avoid all of us a trip to the United States Supreme Court. The Will of The Congress Can not Be Circumvented.

No other district Court in the United States would render this kind of decision particularly against a party to a civil proceeding who has been threaten along with his/her family and whoever who deoesn't seem that way is one of them, defendants above.

According to what clearly it can be seen this Honorable Court intention is to Dismiss this case with prejudice so it can not be more talk about it. Meanwhile, defendants above defraud me again of my paychecks and also defraud the working class people for generation to come. It appears they have been doing for decades because they operate so openly and that was the reason The Working Class People of the United States has sent a message so clear in this election. We working Class People asked for a MESIAH who speaks, spread, heal our suffrering and he arrived under the name of THE PRESIDENT OF THE UNITED STATES DONALD TRUMP, "THE MESIAH".

This is in reference to the political statement that as an Ex Parte Communication and irrelevant to this case defendants' attorney Clauson and Staubes they introduced and this court added as suplement to Discovery's response to (CHAS). My irrelevant email ae missing from this order of dismissal with prejudice. Incomplete Report in Findings and

Conclusions rendered.

Although there is no judge's name to refer to this is for the perception that it is created on people's mind that should not criticize nor speak ill regarding a judge's lack of impartiality because at least, the case would be dismissed. Meanwhile, defendants above and their attorneys benefit while a disservice to the public is so openly rendered and in violation of the Constitution our property and money is being taken away and placed in dishonest hands. Rather than dismiss, this Honorable court owes transparency and honesty to the public. Plaintiff Zulveta's working Compensation benefits checks unlawfully have been stripped from me. This is not an isolated case and defendants' attorneys' appearance is that only they use, abuse, and misuse THE ADMINISTRATIVE ACT for their own personal interest, corporation's, employer, insurance carriers' interest (SEE BELOW).

The United States Supreme Court has recently clarified the typically unlawful misuse of the "Rooker-Feldman" doctrine by the lower federal courts:

The Rooker-Feldman doctrine, is confined to cases of the kind from which the doctrine acquired its name: cases brought by state-court losers complaining of injuries caused by state-court judgments rendered before the district court proceedings commenced and inviting district court review and rejection of those judgments. Rooker-Feldman does not otherwise override or supplant preclusion doctrine or augment the circumscribed doctrines that allow federal courts to stay or dismiss proceedings in deference to state-court actions. In the case before us, the Court of Appeals for the Third Circuit misperceived the narrow ground occupied by Rooker-Feldman, and consequently erred in ordering the federal action dismissed for lack of subject-matter jurisdiction. We therefore reverse the Third Circuit's judgment. (emphasis added). *Exxon Mobil v. Saudi Basic Industries*, 544 U.S. 280, 290, 125 S. Ct. 1517, 161 L. Ed. 2d 454 (2005).

On this day the 23rd of March, 2017

Respectfully Submitted;

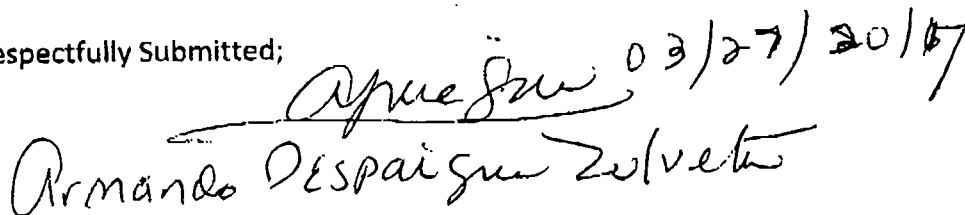

Armando Despaigun Zulveta

EXHIBIT "A"



Armando Moreno Despaigne
January 1, 2014

Share

6 people like this.



Armando Moreno Despaigne Con mi hijo
See Translation
January 1, 2014 at 5:28pm



Niervi Lopez E me parecen conocido jajaja
See Translation
January 1, 2014 at 5:47pm



Armando Moreno Despaigne Jajaja dime lo
socio
See Translation
January 1, 2014 at 5:59pm



Alina Despaigne Oye como se ve que so
Despaigne ...ahahah!!!!
See Translation
January 2, 2014 at 6:34am

People You May Know



Angie Fisher Burgess
8 mutual friends
Add Friend

322

EXHIBIT "B"



Armando Moreno Despaigne's Photo...
in Mobile Uploads

Options Share Send



Armando Moreno Despaigne
January 11 ·

Aquí con el primo y amigos

See Translation

Share

13 people like this.

Sponsored

Go



#1 Rated Mobile Carrier
consumercellular.com
Marna H. says, "I was with my last provider for 13 y
and they kept raising prices. I..."

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COPY EXHIBIT "C"

2015 OCT -3 PM 11:30

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

Armando Despaigne Zulveta)	Case No.: <u>6:15-2880-HMH-KFM</u>
Plaintiff,)	
vs.)	
State Automobile Mutual Insurance Co.)	
Philpot Law Firm, P.A., TC Unlimited, Inc.,)	TO: <u>HONORABLE KEVIN MCDONALD</u>
Steadman Hawkins of the Carolina)	
Wilson Jones Carter & Baxley, PA,)	
Robert P. Restrepo, Jr., Curtis Elliot)	
Stephen R. Bruner, Irvin H. Philpot, III,)	
Tim Case, Irvin H. Philpot, III)	
and Wesley J. Shull,)	
Defendants)	

NOTICE OF REASON FOR DELAY

Honorable Kevin McDonald:

Yesterday, October 05, 2015 at 4:42 P.M. Plaintiff was at the Courthouse for the Purpose of file: MOTION TO STRIKE DEFENDANTS TC UNLIMITED, INC. AND TIM CASE'S AFFIDAVIT AND MEMORANDUM IN RESPONSE TO PLAINTIFF'S MOTION FOR DEFAULT JUDGEMENT AGAINST DEFENDANTS and also, to file additional legal documents.

At the metal detector Plaintiff Armando Despaigne Zulveta was prevented from coming inside of the Courthouse by CSO Brian Miller, and Jeff Melton. Their explanation was that nobody is at the Clerk's office, everybody have left the building at 2:30 P.M. Without success, I explained

that it was my last day to file this Motion, Plaintiff legal documents must be stamped, that Plaintiff needs to speak to a court official or otherwise, Plaintiff would be in default. Finally, I came up with the idea of obtaining their names. CSO Brian Miller wrote both of them names down. (SEE ATTACHED COPY OF EXHIBIT). Also, Clerk Kathy Rich today wrote her and her supervisor's name after I explained the situation.

Today, October 06, 2015 Plaintiff was informed by Clerk Kathy Rich that yesterday as normally past 2:30 P.M. they were at the office processing cases. Clerk Rich spoke with her Supervisor Kieron Campbell over this issue. Subsequently, as result the of the Motion being dated October 06, 2015 a day after its expiration Plaintiff was instructed to address this issue directly to you, Your Honor,

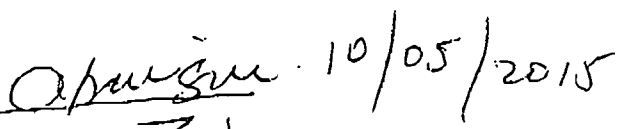
Plaintiff did not give much attention to this incident until after, on my way out I spoke with CSO Brian Miller who this time provided a different version for Plaintiff's impediment to the Courthouse. This time CSO Miller stated: "I have been told that after 4:30 P.M. don't to allow access to anybody into this building, you came here after 4:30." Today CSO Melton was not there, another CSO was at the metal detector site with CSO Miller.

Your Honor, I have not a clear idea of why this incident happened to Plaintiff. At the same time I bring to your attention Your Honor that the fact is that at the door this District Court's schedule time is posted as: 7:30 A.M to 5:00 P.M, Monday to Friday.

I am taking the liberty of suggesting to Your Honor into take a look into this incident. Blocking anyone access to court specially to a party of a civil proceeding is a very serious violation that it should be prevented from happen again.

Respectfully Submitted;

On this day October 07, 2015


Armando Despaigne Zolvetz
P.O. Box 24892

Winston-Salem, NC 27114

Phone#: (864) 305-8490

Kierston Campbell 10/01/15
Kathryn Rich 10/01/15

10/05/2015
J (16/92) ^{gpk}

CSO - Jeff - Melton

CSO Brian Miller

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

Armando Despaigne Zulveta) Case No.: 6:15-2880-HMH-KFM
Plaintiff,)
vs.)
State Automobile Mutual Insurance Co.)
Steadman Hawkins Clinic of the Carolinas)
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,)
Tim Case, and Wesley J. Shull,)
Defendants)

CERTIFICATE OF SERVICE

This is to certify that a copy of the NOTICE OF REASON FOR DELAY was served upon Timothy A. Domin, by depositing in the United States Mail with proper postage, a true and accurate copy on October 07,, 2015

On this day the October 07, 2015, 2015

Armando Despaigne Zulveta 10/07/2015
Armando Despaigne Zulveta

P.O. Box 24892

Parties served at: 126 Seven Farms Drive, Suite 200

Winston-Salem, NC 24892

Charleston, SC 29492-8144

Phone#: (864) 305-9480 Email: acere1296@gmail.com

Responses and Replies

EXHIBIT D

15-cv-02880-HMH-KFM Zulveta v. State Automobile Mutual Insurance Company et al

JRY,PROSE

U.S. District Court

District of South Carolina

Notice of Electronic Filing

The following transaction was entered by Shaw, Kenneth on 10/7/2015 at 1:27 PM EDT and filed on 10/7/2015

Case Name: Zulveta v. State Automobile Mutual Insurance Company et al

Case Number: 15-cv-02880-HMH-KFM

Filed by: Curtis Elliot
Steadman Hawkins Clinic of the Carolinas

Document Number: 50

ocket Text:

RESPONSE to Motion re [46] MOTION for Extension of Time to File Response/Reply as to [22] MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM MOTION to Dismiss for Lack of Jurisdiction response filed by Curtis Elliot, Steadman Hawkins Clinic of the Carolinas. Reply to Response to Motion due by 10/19/2015 (Attachments: # (1) Certificate of Service)(Shaw, Kenneth)

15-cv-02880-HMH-KFM Notice has been electronically mailed to:

Eric K Englebardt eenglebardt@turnerpadget.com, psexton@turnerpadget.com

Ben Alexander balexander@hsblawfirm.com, aclark@hsblawfirm.com, ecowan@hsblawfirm.com

James Adam Russell jarussell@wjlaw.net, jamesadamrussell@yahoo.com, sdmeeks@wjlaw.net

Kenneth N Shaw kshaw@hsblawfirm.com, aclark@hsblawfirm.com, corr@hsblawfirm.com, herring@hsblawfirm.com, ecowan@hsblawfirm.com

Nicholas Andrew Farr nfarr@gwblawfirm.com, ldunn@gvblawfirm.com

Phillip Earl Reeves preeves@gwblawfirm.com, ldunn@gwblawfirm.com, saycrs@gwblawfirm.com

Timothy A Domin tdomin@clawsonandstaubes.com, cfargnoli@clawsonandstaubes.com, aldous@clawsonandstaubes.com

Wilson S Sheldon wssheldon@wjlaw.net, sdmeeks@wjlaw.net

15-cv-02880-HMH-KFM Notice will not be electronically mailed to:

Armando Despaigne Zulveta
PO Box 24892
Winston-Salem, NC 27114

The following document(s) are associated with this transaction:

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Document description:Main Document

Original filename:n/a

Electronic document Stamp:

'AMP dcecfStamp_ID=1091130295 [Date=10/7/2015] [FileNumber=6964505-010e7186abc2da5055b7adb19df456458918cd03515a26dc8d1442db3ceacd0b67e5a114e4b2ed6fecae4379e979c84308e5760db1f0d4acf1933775a07f7]]

Document description:Certificate of Service

Original filename:n/a

Electronic document Stamp:

'AMP dcecfStamp_ID=1091130295 [Date=10/7/2015] [FileNumber=6964505-1cf58e8c5c60c5640f2cf1fa9050668624535eb10a5482593344944cefaace6211c16ee55b4f2c97ff4760fbddc2f03d23f79e10a4b073f06c97d4c69803f3]]

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Haynsworth
Sinkler Boyd, P.A.

ATTORNEYS AND COUNSELORS AT LAW

ONE NORTH MAIN, 2ND FLOOR (28601-2777)
POST OFFICE BOX 2048 (28602-2048)
GREENVILLE, SOUTH CAROLINA
TELEPHONE 864.240.3200
FACSIMILE 864.240.3300
www.hsblawfirm.com

AMY M. CLARK
DIRECT DIAL NUMBER 864.240.3200
aclark@hsblawfirm.com

October 7, 2015

Armando Despaigne Zulveta
PO Box 24892
Winston-Salem, NC 27114

Re: Armando Despaigne Zulveta v. State Automobile Mutual Insurance Company, Philpot Law Firm, PA, TC Unlimited, Inc., Steadman Hawkins Clinic of the Carolinas, Wilson Jones Carter & Baxley, PA, Robert P. Restrepo, Jr., Stephen R. Bruner, Irvin H. Philpot, III, Tim Case, Curtis Elliott, Wesley J. Shull
C.A. No.: 6:15-cv-02880-HMH-KFM
IISB File No.: 08565.0730

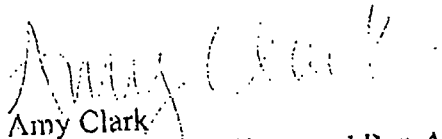
Dear Mr. Zulveta:

Please find enclosed a copy of the following documents that were filed today in Federal Court regarding the above-captioned case:

- Defendants Steadman Hawkins Clinic of the Carolinas and Curtis Elliott, MD's Response to Plaintiff's Motion for Leave to File a Late Answer, Certificate of Service and Notice of Electronic Filing

Feel free to contact our office if you have any questions.

Sincerely,



Amy Clark
Paralegal to Ken Shaw and Ben Alexander

Enclosures

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

Armando Despaigne Zulveta,
Plaintiff,

v.

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, and
Wesley J. Shull,

Defendants.

Civil Action No.: 6:15-cv-02880-HMH-KFM

**Steadman Hawkins Clinic of the
Carolinas and Curtis Elliott's Response to
Plaintiff's Motion for Leave to File a Late
Answer**

Defendants Steadman Hawkins Clinic of the Carolinas ("Steadman Hawkins") and Dr. Curtis Elliott (collectively "these Defendants") are left somewhat confused by Plaintiff's Motion for Leave to File a Late Answer. Plaintiff has filed his motion pursuant to Rule 6(b)(1)(B). That would appear to be an error. Plaintiff correctly points out that these Defendants filed their Motion to Dismiss on September 9, 2015 (Doc. # 22). The following day, the Court entered a Roseboro Order (Doc. # 26), in which Plaintiff was given 34 days from the date of the Order to respond to these Defendants Motion to Dismiss. Contrary to Plaintiff's calculations, pursuant to the Order, his current date for responding should be October 14, 2015.¹ As that still leaves Plaintiff a week to file a response, these Defendants do not believe leave to file a late response is necessary.

If Plaintiff is seeking an extension to respond rather than leave to file a late response, Plaintiff's motion should have been filed pursuant to Rule 6(b)(1)(A); however, Plaintiff has not

¹ The ECF that accompanied the Order stated that a response was due by 10/16/15. These Defendants believe that was an error as that would be 36 days from the date of the Order.

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suggested how much additional time he may need or provided a good explanation for why additional time is necessary. Plaintiff's only excuse is that he does not have a team of paralegals and secretaries helping him; however, that has not thus far appeared to be too much of an issue as he has filed more than his fair share of motions, memorandums and other documents in the last couple of weeks. While Plaintiff certainly has a difficult road to hoe in attempting to pursue this action pro se, that is of his own choosing and is not an excuse for failing to adhere to the law, the Rules of Civil Procedure, or the orders of this Court. *See McNeil v. United States*, 508 U.S. 106, 113 (1993) (holding that "we have never suggested that procedural rules in ordinary civil litigation should be interpreted so as to excuse mistakes by those who proceed without counsel")

Finally, these Defendants must object to Plaintiff's suggestion that he spoke to attorney Ben Alexander and that Mr. Alexander informed him that defendants had held a "hearing" to discuss strategy against Plaintiff. That simply is not true. Mr. Alexander has never spoken to Plaintiff, nor has below signed counsel ever made such a suggestion to Plaintiff.

Respectfully submitted,

By: /s/ Kenneth N. Shaw

Kenneth N. Shaw, Fed. ID No. 10413
J. Ben Alexander, Fed ID No. 07381
HAYNSWORTH SINKLER BOYD, P.A.
ONE North Main, 2nd Floor (29601)
PO Box 2048
Greenville, SC 29602
Telephone: 864.240.3200
Facsimile: 864.240.3300

*Attorneys for Defendants
Steadman Hawkins Clinic of the Carolinas and
Curtis Elliott, MD*

Dated: October 7, 2015
Greenville, SC

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Respectfully submitted,

By: /s/ Kenneth N. Shaw

Kenneth N. Shaw, Fed. ID No. 10413
J. Ben Alexander, Fed ID No. 07381
HAYNSWORTH SINKLER BOYD, P.A.
ONE North Main, 2nd Floor (29601)
PO Box 2048
Greenville, SC 29602
Telephone: 864.240.3200
Facsimile: 864.240.3300

*Attorneys for Defendants
Steadman Hawkins Clinic of the Carolinas and
Curtis Elliott, MD*

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

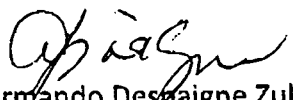
Armando Despaigne Zulveta) Case No.: 6:15-2880-HMH-KFM
Plaintiff,)
vs.)
Tim Case, TC Unlimited, Inc.,)
Defendants)
_____)

AFFIDAVIT

I, Armando Despaigne Zulveta state as follows:

- 1) That I am the Appellant Zulveta mentioned in Civil Case above.
- 2) That I have no income.
- 3) That I do not own any property of value.
- 4) That this civil case is not frivolous or taken solely for the purposes of delay.
- 5) That this civil action is of public interest and that also it appears to be a Class Action Case which Plaintiff-Appellant Zulveta does not have the ability to conduct but as a regular case this Honorable Court should give the public a chance to hear this exceptional cases that by detriment it belong and apply to them: The Public. At least, to South Carolians's injured workers.

On this day the 23rd of March, 2017

 03/27/2017
Armando Despaigne Zulveta