

EXHIBIT 1

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

CYRUS KAMINI,

Plaintiff,

v.

HEIDEH LARIJANI and BANK OF AMERICA, N.A.,

Defendants.

CYRUS KAMINI,

Plaintiff,

v.

HEIDEH LARIJANI,

Defendant.

CYRUS KAMINI,

Plaintiff,

v.

HEIDEH LARIJANI, CHRIS KHAMNEI, SAHAR KHAMNEI, RAHHA LARIJANI, HEIDEH LARIJANI TRUST,

Defendants.

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT

CASE NO. 2016-CP-10-3990

ORDER CONSOLIDATING CASES

CASE NO. 2016-CP-10-5465

FILED
2018 NOV 13 PM 3:26
CLERK OF COURT

CASE NO. 2018-CP-10-3288

RECEIVED
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SC Court of Appeals

THESE CAUSES came before this Court on October 22, 2018, on the motion of Cyrus Kamini ("Cyrus"), to consolidate these cases for all purposes pursuant to Rule 42 of the South Carolina Rules of Civil Procedure, and on the motions of Chris Khamnei ("Chris") and Rahha

Larijani (“Rahha”) to join or intervene in Case No. 2016-CP-10-3990, pursuant to Rules 19 and 24 of the South Carolina Civil Procedure, together with the other motions discussed below. Based on the motions, pleadings, and other papers before the Court, and the arguments of the pro se parties and counsel, it is hereby **ORDERED, ADJUDGED, AND DECREED** that:

1. Complete relief cannot be afforded to the existing parties to No. 2016-CP-10-3990 without joinder of Chris and Rahha, and their joinder will not deprive the Court of subject-matter jurisdiction. Chris’s and Rahha’s motions for joinder in No. 2016-CP-10-3990 are therefore **GRANTED** under Rule 19(a)(1). Because their interests appear to be aligned with Cyrus, they shall join the case as co-Plaintiffs, together with Cyrus.

2. It will serve the interests of justice and avoid unnecessary cost or delay to consolidate these three cases for all purposes, including pleadings, discovery, pre-trial motions, trial, and any other purposes. Case Nos. 2016-CP-10-3990, 2016-CP-10-5465, and 2018-CP-10-3288 are therefore ordered consolidated for all purposes under Rule 42(a), and Cyrus’s motions to consolidate 2016-CP-10-3990 and 2016-CP-10-5465 for trial are hereby **GRANTED** as a part of such general consolidation.

3. Cyrus, Chris, and Rahha shall, within thirty (30) days of the date of this Order, file and serve a consolidated complaint as co-Plaintiffs, in all three of these consolidated cases, in which they shall state all their claims against all other parties in any of the cases, who shall be named as Defendants. Plaintiffs shall, to the maximum extent possible, include all their claims in a single pleading, with the understanding that should any of their claims conflict, they may state such conflicting claims in a separate pleading under the caption of the case in which such claim was initially filed. Plaintiffs may serve any party already served with a summons in any of these three actions pursuant to Rule 5 by service on such party or his or her counsel of record as

provided under such rule. Plaintiffs must obtain personal jurisdiction over any party not already served with process in any of these consolidated cases by service of the summons and complaint pursuant to Rule 4 and as otherwise provided by law.

4. Each Defendant shall have thirty (30) days from the date of service on him or her to answer or otherwise respond to the consolidated complaint and any other complaints served in these actions pursuant to this Order.

5. Cyrus **WITHDRAWS** his motions to enforce settlement and for a pre-trial conference in Nos. 2016-CP-10-3990 and 2016-CP-10-5465. The motion hearing served the purpose of a status conference and reached the determinations set forth above.

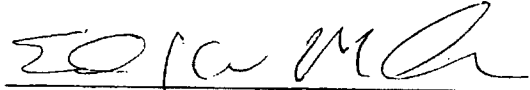
6. Cyrus's motions in No. 2016-CP-10-3990 for entry of default (two motions, filed on June 27, 2018 and September 27, 2018) and for judgment on the pleadings against Defendant Heideh Larijani are **DENIED**, because Cyrus did not produce sufficient proof of service on Defendant Heideh Larijani, and because Defendant Larijani's obligation to respond is hereby subsumed in her response to the consolidated complaint in these actions.

7. Cyrus's motions in No. 2016-CP-10-5465 for entry of default and to strike the answer against Defendant Heideh Larijani are likewise **DENIED**, and Defendant Larijani's obligation to respond is hereby subsumed in her response to the consolidated complaint in these actions.

IT IS SO ORDERED.

This 7 day of ~~October~~, 2018 at Charleston, South Carolina.

November



Edward W. Miller
Circuit Court Judge