

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
J.C. Nicholson, Jr., Circuit Court Judge

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Circuit Court Case No. 2017-CP-10-4112
Appellate Case No.: 2018-000249

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SC Court of Appeals

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Chris **Khamnei**, ..... Appellant,

v.

**Columbus Street Holdings, LLC; Roy T. Willey, IV; and Eric M. Poulin**, ..... Respondents.

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MOTION TO ALLOW LATE FILING FOR THE RECORD ON APPEAL

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April 26<sup>th</sup>, 2019

Chris C. Khamnei, *pro se*  
82 Overlake Park  
Burlington, VT 05401  
Telephone: (802) 222-6090  
Email: [chris@rentinvt.com](mailto:chris@rentinvt.com)  
**Pro Se Appellant**

## MOTION TO ALLOW LATE FILING FOR THE RECORD ON APPEAL

**NOW COMES APPELLANT**, *pro se*, and respectfully requests this honorable court to allow the Record on Appeal to be submitted a little bit late. The following circumstances have occurred contributing to the late submission:

1. On or about April 8<sup>th</sup>, 2019, the South Carolina Court of Appeals sent a letter to Appellant's home in Vermont stating the Record of Appeal was ready to be received;
2. Appellant was in Charleston until April 21<sup>st</sup>, 2019;
3. Upon Appellant's arrival back to Vermont and finding the letter, he respectfully called the SC Court of Appeal's Clerk and requested permission to send the Record On Appeal; and
4. The Appellant is abundantly *pro se* and is learning as he goes about this appeal and respectfully begs for excusable neglect.

The Appellant is grateful for the honorable court's consideration.

**Dated April 26<sup>th</sup>, 2019,**

  
CHRIS C. KHAMNEI  
Chris C. Khamnei, *pro se*  
82 Overlake Park  
Burlington, VT 05401  
Telephone: (802) 222-6090  
Email: [chris@rentinvt.com](mailto:chris@rentinvt.com)  
**Pro Se Appellant**

### **Respondents:**

Stefan B. Feidler  
Anastapoulo Law Firm, LLC  
32 Ann Street,  
Charleston, SC 29403

**Attorney for Respondents**

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Circuit Court Case No. 2017-CP-10-4112  
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Chris Khamnei, ..... Appellant,

v.

Columbus Street Holdings, LLC; Roy T. Willey and Eric M. Poulin, Respondents.

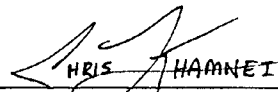
PROOF OF SERVICE

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I certify that I have served the **Record on Appeal** along with a **Motion to Allow Late Filing** on Respondent by depositing a copy of it in the United States Mail, postage prepaid, on April 29<sup>th</sup>, 2019, addressed to Attorney for Respondents at:

Stefan B. Feidler  
Anastopoulo Law Firm, LLC  
32 Ann Street  
Charleston, SC 29403

April 29, 2019,

  
Chris C. Khamnei, *pro se*  
82 Overlake Park  
Burlington, VT 05401  
Telephone: (802) 222-6090  
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Pro Se Appellant

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April 29, 2018

Jenny Abbot Kitchings  
Clerk of the South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29201

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SC Court of Appeals

**RE: Khamnei v. Columbus Street Holdings, et al.**  
**Appellate Case No. 2018-000249**

Dear Ms. Kitchings:

Please find enclosed for filing in the above-referenced case the following:

1. Proof of Service;
2. Motion to Allow Late Filing; and
3. the Record on Appeal.

If you have any questions or require further information, please contact me at 802-777-6007 or at [chris@rentinvt.com](mailto:chris@rentinvt.com).

Thank you for your assistance.

Sincerely,



Chris Khamnei  
Plaintiff, *pro se*

Enclosures

cc: Stefan B. Feidler (Counsel of Record for Columbus Street Holdings)