

The State Of South Carolina  
In the Court of Appeals  
( not in Supreme Court)

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APPEAL FROM BEAUFORT COUNTY  
COURT OF COMMON PLEAS

**SC Court of Appeals**

Marvin H. Dukes III

Case NO 2019-CP-07-01326

The South Beach Village Bluff Apartments Horizontal Property Regime No. 56 Inc., Respondant,

v.

Zbigniew Marek Drzazgowski and Alicja Anna Drzazgowski, Defendants,

Of whom Zbigniew Marek Drzazgowski

## APPELLANT'S INITIAL BRIEF

### STATEMENT OF THE CASE AND FACTS

1. Plaintiff Jannine M. Mutterer open the Case 2019-CP-07-01326 in the Beaufort County, Court of Common Pleas against me, Zbigniew Marek Drzazgowski, presented **fabricated AFFIDAVID OF SERVICE** regarding delivery of SUMMONS to me and my wife Alicja Anna Drzazgowski (Civil Remedies and Procedures, Chapter 9, Article 3 sec. 15-9-210, and sec. 15-9-280). This document never have been signed by me and my wife. The Affidavit of Service Jannine M. Mutterer presented to me on August 3, 2019, **five days before the HEARING** in the Court. **To this time WE have never received the SUMMONS.**
2. With fabricated AFFIDAVID OF SERVICE Jannine M. Mutterer planned to gain \$9583.71 and put my Bluff Villa 1711 unit on foreclosure.
3. Jannine M. Mutterer with her manipulation of fabricated documents and time ( she dated latter July 26 which I got August 3, Saturday , I had 3 days to hearing) eliminated me from self defense in this Case. I requested twice the summons from Jannine M. Mutterer: July, 23 2019 and Aug. 5, 2019
4. In 2015 The South Beach Village Bluff Apartments Horizontal Property Regime No. 56 Inc. broke in to my apartment, make a lot of damage inside of the unit and to the electronic lock which is programmable. The lock provided my guests with codes to access my apartment. Apartment is my rental business.  
Within last 8 years the Management never had problems to access my unit, they always had the keys. **They destroyed the lock and destroyed all the codes in it.** The new key that I

received 2 weeks later, after the Construction company finished the installation of the door panels, did not work. In addition to it, it looked like they used my unit during the installation of the panels. It took me more than a week to repair all damages (that includes the repair of the lock by a specialist, buying a new washer, replacing the lock box and so on). Plus no permit to change the door in my apartment. It proves that the door were installed illegally.

5. Because this unit is my rental business I requested a detailed invoice which I have Never received.
6. During entire process **I found out that the panel door does not have the safety standards which are required in the hurricane and tornado areas.** Plus, very important **this panel door doesn't have the fire standards required for public buildings.** In this situation, when you have guests, safety is very important.  
By more than 3 years I requested to replace my panel door with the standards which obligate in this area like Hilton Head Island . They completely disregarded my request. To this day, with around 50 letters with request to replace the panel door, I am still afraid about safety of my guests staying in my unit.
7. I still request a new panel door with the safety standards for hurricane and tornado areas and most importantly the fire standards for public buildings to be sure that all my guests have the chance to survive any unexpected circumstances.  
**I request a full compensation of my loses that I suffered** after they broke to my apartment and the time which I have to use to bring my unit back to the original condition.  
My loses with the entire Case expenses (travel, sending and preparation of documents) are in the amount of \$21,102.52.00
8. I also request to cancel the fabricated amount of \$9583.71 suggested by Jannine M. Mutterer. The original charge for panel without any safety standards was \$1000.00
9. I would like request permission to serve and file the appellant's initial brief and designation of matter outside of the filing deadlines.

November 24, 2019

  
Sincerely,

Zbigniew Drzazgowski  
9 West District Rd.  
Unionville, CT, 06085  
Appellate  
860 675-4025

Jannine M. Mutterer  
21 Promenade St. Suite 205  
Bluffton, SC 29910  
Respondant  
843 640-5700

Honorable Marvin H. Dukes III  
State of South Carolina  
Court of Beaufort  
The Court of Common Pleas  
P.O. Drawer 1128  
Beaufort, SC 29901

Zbigniew Drzazgowski  
9 W. District Rd.  
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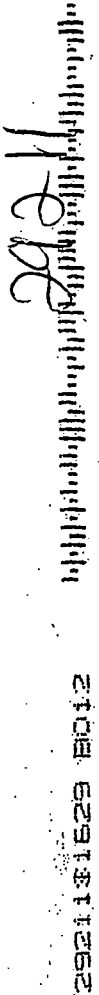


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