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SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Bentley Price, Circuit Court Judge

Case No. 2019-CP-10-04492

Heideh Larijani, Chris Khamnei, Richard Kozlowski, Warren Westbrook Wills,
Respondents,

V.

Cyrus Kamini,

Appellant.

NOTICE OF APPEAL

The Trial Court Plaintiff---Cyrus Kamini-----appeal from the judgement of the Honorable Judge Bentley Price, dated November 25th, 2020, and received by Plaintiff November 30th by US Postal Delivery. Plaintiff also appeals any order denying his Motion for Reconsideration of that judgement as well as any intermediate rulings and orders affecting the judgement.

The Plaintiff filed a timely motion to reconsider on November 10/19/2020, on 25th day of November and order of denial of motion was issued by the J. Bentley Price, (See Ex.1)

1)-Cyrus Kamini seeks to have the appellate division overturn the decision of the J. Bentley Price in that the law is clear regarding J. Bentley Price dismissal of my case "With Prejudice". I am constructively barred from my remedy at law and am no longer able to seek remedy from the parties that have damaged me, this is harsh and unnecessary punishment for Plaintiff (a Pro Se litigant) and is not a proper use of authority in that the Plaintiff has simply made procedural errors in his filings to the court in this matter and should have been granted leave of court to correct said errors and not lose his remedy at law.

2)- SCRCP 12 (b) (1),(4),(6) ad (15) is clear that a dismissal of the Plaintiff's case should have been made without prejudice. Please see Plaintiffs motion for reconsideration submitted to the court here as (See Ex. 2)

3)-The Honorable Judge Bentley Price concludes that no personal jurisdiction over defendant Richard Kozlowski has been established by Plaintiff when factually "overwhelming proof", was presented at the hearing that multiple infringements on the Plaintiff's liberties were perpetrated by the Defendant Richard Kozlowski in Charleston County.

4)-The Plaintiffs claims against other defendants named in the suit are dismissed without reason or rhyme and are subsumed in Judge Bentley's order simply by denying that there is personal jurisdiction over Kozlowski. In fact, the denial of such proof as nonexistent would make the average man shutter at hearing this in light of the overwhelming proof presented at the hearing on this matter in the court room of Honorable Judge Bentley Price.

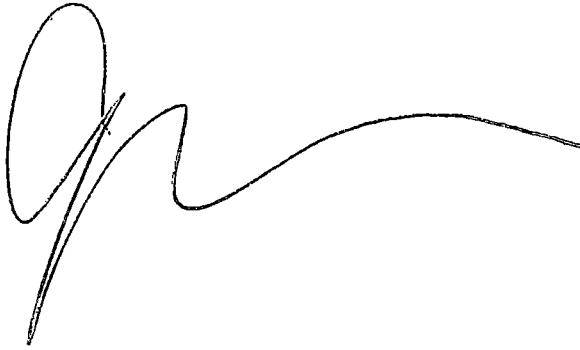
Respectfully Submitted,

December 18, 2020

2021 FEB - 1 AM 11:12
JUDGE BENTLEY PRICE
CLERK OF COURT
BY

Cyrus Kamini In Pro Per

2601 Carner Avenue,
North Charleston, SC
29405 843-460-7462
cvrus.kamni907@gmail.com



OTHER COUNCEL & DEFENDANTS OF RECORD

**Warren Westbrook Wills
III**

2395 Folly Road., Unit 2-E

Folly Beach, SC 29439

wwills@wwillslaw.com

Amanda C. Williams Esq.

Parker Poe Adams & Bernstein
LLP

200 Meeting street, suite 301

Charleston SC, 29401

Chris Khamnei

82 Overlake Park
Burlington VT, 05401

chriskhamnei@gmail.com

Heideh Larijani

412 Farrell St #320,
South Burlington, VT
05403.

PROOF OF SERVICE OF A NOTICE OF APPEAL

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Respondents,

V.

Cyrus Kamini,

Appellant.

FILED
2021 FEB -1 AM 11:13
JAMES J. ARMSTRONG
CLERK OF COURT

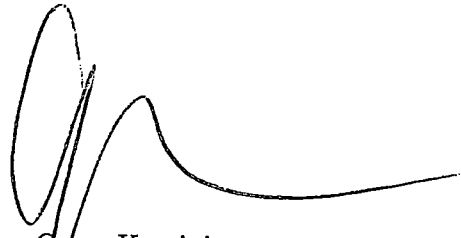
PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Heideh Larijani, Chris Khamnei, Richard Kozlowski, Warren Westbrook Wills, Respondents by depositing a copy of it in the United States Mail, postage prepaid, on February 1, 2021, addressed to:

- 1)- **Warren Westbrook Wills III**
2395 Folly Road., Unit 2-E
Folly Beach, SC 29439
- 2)- **Amanda C. Williams Esq.**
Parker Poe Adams & Bernstein LLP
200 Meeting street, suite 301
Charleston SC, 29401
- 3)- **Heideh Larijani**
412 Farrell St #320, South Burlington, VT 05403.
- 4)- **Chris Khamnei**

82 Overlake Park Burlington VT, 05401
chriskhamnei@gmail.com

February 1, 2021

A handwritten signature in black ink, consisting of a large, stylized initial 'C' followed by a series of loops and a long horizontal tail.

Cyrus Kamini
2601 Carner Avenue
North Charleston, South Carolina 29405
843.460.7462
Appellant

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SC Court of Appeals

CYRUS KAMINI

Pro Se Appellant

2601 Carner Avenue

North Charleston, SC 29405

February 1, 2021

The Honorable Jenny Abbott Kitchings

Clerk, South Carolina Court of Appeals

Post Office Box 11629

Columbia, South Carolina 29211

RE: Cyrus Kamini vs Chris Khamnei

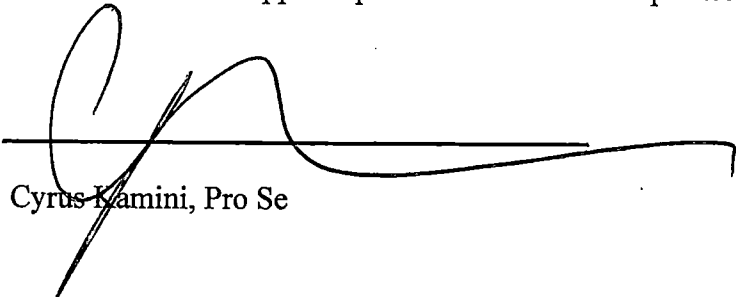
Appellate Case No. 2020-001676

Motion to File and Serve Notice of Appeal Deficiency Corrections OUT-OF-TIME

Dear Ms. Kitchings:

Enclosed please find Appellant's Motion to File Notice of Appeal with Deficiency Corrections Out-of-Time. Please also find the filing fee of \$ 50.00 for said Motion. In addition, please find the Corrected Deficiency Corrections to include:

- (1) The Filing Fee of \$250.00.
- (2) A Clocked copy of the Notice of Appeal with the Charleston County Clerk of Court.
- (3) Proof of Service of the Notice of Appeal upon all Counsel and/or parties that are Pro Se.


Cyrus Kamini, Pro Se

Other Counsel of Record:

Cyrus Kank
2601 Alameda
Ave. Monroeville
Charleston SC
29405



SOUTH CAROLINA COURT OF APPEALS
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Columbia South Carolina 29211

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