

RECEIVED
FEB 05 2021
SC Court of Appeals

STATE OF SOUTH CAROLINA

COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT

CYRUS KAMINI

Plaintiff

vs.

CASE NO.: 2019-CP-10-4492

HEIDEH LARIJANI, et al

Defendants

MOTION FOR RECONSIDERATION

2020 OCT 19 AM 10:32
JULIE J. ARMSBROOK
CLERK OF COURT
FILED

TO ALL PARTIES:

YOU WILL PLEASE TAKE NOTICE that Plaintiff Cyrus Kamini, In Pro Per, will advance the foregoing Motion for Reconsideration of the Honorable Court's Order dated, October 7th, 2020, granting Defendants Motion to Dismiss with Prejudice. This Motion was received by mail and post marked October 9th but received on Saturday October 10th.

The Plaintiff is a Pro Se Litigant out of necessity and should be considered as it is a long held constitutional right as a citizen to have access to and remedy of the court.

The Plaintiff has made procedural errors in his filings. These errors do not warrant or are not grave enough in nature to deprive the Plaintiff of his right to take leave, revise and reassert his claims.

The Defendants together have been involved in a scheme to dispossess the Plaintiff of his Sweat Equity and investments in a number of properties downtown Charleston by and through abuse of their working knowledge of the legal system and have engaged in gross illegal conduct that puts them outside the umbrella of immunity and should be held accountable for their actions.

A dismissal with Prejudice would essentially rob the Plaintiff of his remedy for the wrongdoing of the ^{DEFENDANTS} Plaintiffs which are of a serious nature and deserving of fair hearings, access to courts and deciders of fact as a constitutional issue.

SCRCR P Rues 12(b)(1),(4), (6) and 15 (a) are clear that a dismissal of the Plaintiff's case should be made without prejudice

Cyrus Kamini
2610 Carner Avenue,
North Charleston SC, 29405
Cyrus.kamni907@gamil.com

2020 OCT 19 AM 10: 32
JULIE J. ARMSTRONG
CLERK OF COURT

FILED

CERTIFICATE OF SERVICE

I Cyrus Kamini, certify that on this ~~OCT 19~~ ²⁰²⁰, I served a true and correct copy of the foregoing Motion for Inspection on the Defendants, via email, and delivered

VIA US MAIL

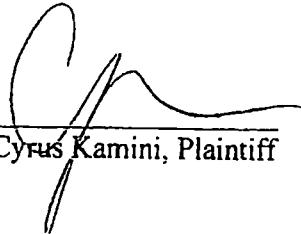
Heideh Larijani 412 Farrel.
Street, #320 South Burlington
Vermont, 05403

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

Richard W. Kozlowski C/O

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


Cyrus Kamini, Plaintiff

FILED
2020 OCT 19 AM 10:32
JULIE J. ARMSTRONG
CLERK OF COURT

Common Pleas

Clerk : Julie Armstrong
Charleston County Judicial Center
Charleston, SC 29401
Phone:(843) 958-5000 Fax:(843) 958-5020

Received From: Kamini, Cyrus

Date: 10/19/2020

Receipt #: 625105

Clerk: COCDGR

Paying for: Self

Transaction Type: Payment

Payment Type: Credit Card \$25.00

Convenience Fee \$0.43

SC.gov Portal Fee \$1.00

Total Paid: \$26.43

Reference #:

Comment:

Non-Refundable

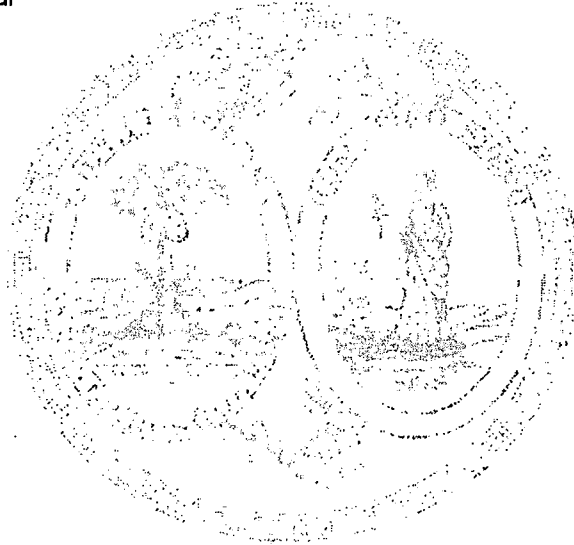
Total Received: \$25.00

Change Due: \$0.00

You may check the status of your Charleston case at:

<http://www.sccourts.org/caseSearch/>

Case #	Caption	Previous Balance	Amount Paid	Balance Due
2019CP1004492	Cyrus Kamini VS Heideh Larijani , defendant, et al	\$25.00	\$25.00	\$0.00



Total Cases: 1

\$25.00

\$25.00

\$0.00

Convenience Fee: \$0.43

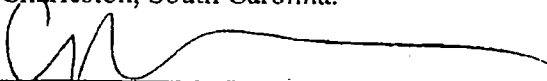
SC.gov Portal Fee: \$1.00

Total Paid: \$26.43

c. Award any other relief deemed appropriate:

This, 9th day of December 2019

at Charleston, South Carolina.


Cyrus Kamini, Plaintiff Pro-Se
2601 Carner Avenue
North Charleston, South Carolina 29405. 843.460.7462

CERTIFICATE OF SERVICE

I Cyrus Kamini, certify that on this ^{DEC. 18th 2020} day, I served a true and correct copy of the foregoing Motion for Inspection on the Defendants, via email, and delivered

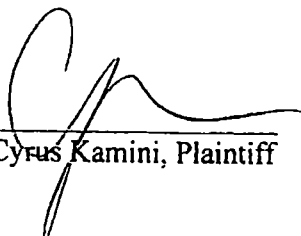
VIA VS MAIL

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Charleston SC 29401


Cyrus Kamini, Plaintiff

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FEB 05 2021
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

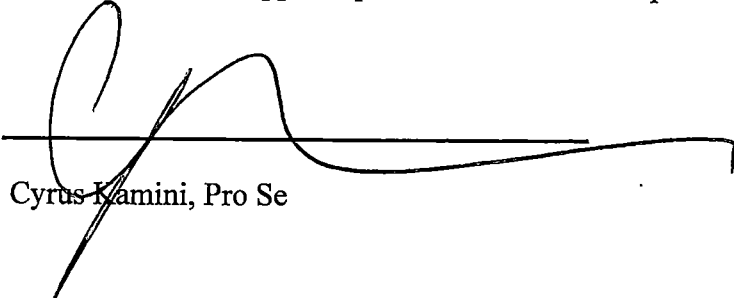
Appellate Case No. 2020-001676

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:

Cyril Rank
2601 Alameda
The Heights
Charleston SC
29405



U.S. POSTAGE PAID
EIGHT DOLLARS
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29405
FEB 03 21
AMOUNT
\$2.20
R2305K142895-21

South Carolina Court of Appeals
Post Office Box 11629
Columbia South Carolina 29211

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