

RECEIVED

Jun 07 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas, 9th Circuit Court

The Honorable Bentley D. Price

Court of Appeals Case No. 2022-000775

Circuit Court Case No. 2021-CP-10-2682

Pet Helpers, Inc..... Respondent

Janet L. Frisco.....Appellant

REPLY TO THE RETURN TO MOTION TO APPEAR IN FORMA PAUPERIS

The Plaintiff’s attorney’s intention in filing this return is to force me into financial insolvency and by doing so, to prevent me from defending myself against his client’s fraudulent lawsuit, which is the same reason he has filed other motions for sanctions in the lower court where to date I have been forced to pay a total of \$7,208.56 or be incarcerated. The Plaintiff was recently granted another \$9,638.48 in sanctions by the order of Judge Bentley Price on May 5, 2022 that I am presently appealing in this court among other orders within it. I am currently employed because I have to work to supplement my Social Security widow’s benefits of \$1084.00 and a \$289.00 annuity from my deceased husband’s retirement. I work over fifty (50) hours a week in the elements to pay my obligations, but may never be able to retire due to Pet Helpers’ criminal lawsuit against me. My home still has a mortgage, a monthly payment of \$504.00 and a large balance is still owed on the property **(EXHIBIT A)**.

In my email the Plaintiff’s attorney, Stephan V. Futeral quoted, was threatening to file a Rule to Show Cause if I didn’t immediately pay \$1774.24 and to request more sanctions when I sardonically said, “At this point money is no object.” because he had already extorted me of \$5,434.32 in earlier sanctions **(EXHIBIT B)**. I’m still in a state of unbelief he was able to take that money from me in the course of this illicit litigation and then he speaks as if I don’t have to pay it back because “I paid it on my credit card”. I had to request a cash advance on two of my credit cards at a high rate of interest and currently have a balance of \$3800.00 since I have been making large payments on the credit cards to avoid finance charges and having a payment that is so high I’m unable to pay it which is Mr.Futeral’s intention. I have a credit score in the 800’s and had no credit balances on my credit cards before the sanctions were imposed. I was using a portion of my income to pay off the mortgage on my home in the hopes of retiring after it was paid off, but now I’m being forced to use those funds to pay the Plaintiff’s legal costs

for the lawsuit they implemented to conceal criminal fraud. I am 68 years-old with age related issues and it is difficult to work the required nine and half hours per day during the week and six hours most Saturdays at my age. I can't afford to take vacations and the only time I take a day off is to go to court hearings. Now I am working partly to pay the unjust sanctions that were requested by the Plaintiff's attorney and granted by the lower court.

My home was built in the late 1960's and I purchased it "as is" in 1997. It currently needs renovations such as a new heating/air conditioning unit. I have no central heat for the past two years and major plumbing problems because of copper pipes that need to be replaced, but instead of using my hard-earned money to purchase a climate control system or upgrade the copper plumbing, Mr. Futeral and The Court of Common Pleas are forcing me to pay Pet Helpers legal costs. In one of his legal cost affidavits, Mr. Futeral requested a \$550.00 round trip charge for travel from his Mount Pleasant office for a hearing scheduled at the courthouse in downtown Charleston when he had made a Motion for a Partial Summary Judgement that same day and had to be there, but now objects to me filing a Motion to Proceed in Forma Pauperis and saving \$250.00 (**EXHIBIT C**). If the Motion to Proceed in Forma Pauperis is granted, that will prevent me from becoming indigent, as well as preserve my right to a jury trial. I work very hard to keep myself financially solvent, and this court should not allow the Plaintiff's attorney to undermine that using his client's malicious and criminal lawsuit. The ultimate irony in his Return is that the Plaintiff is directly responsible for my imminent financial crisis and yet is objecting to me seeking a small relief.

I do not have the funds available to pay the \$9,638.48 that was ordered on May 5, 2022 or that amount available on my credit cards for a cash advance so I would have to try and borrow it or be incarcerated. Even if I did have that amount available for cash advances, I wouldn't be able to make the required payment for that large of an amount (**EXHIBIT D**). When I was incarcerated on November 5- 9, 2021, I was released after four days because Judge Bentley D. Price had ordered thirty (30) days or the payment of the \$5,434.32 as a condition of my early release, but at the hearing and on his Motion to Show Cause, Mr. Futeral had requested that I be incarcerated for one month and then an additional month until I paid the sanction. Mr. Futeral is well aware that his clients committed fraud, that his lawsuit is an abuse of civil process, and that I can take legal action against him, his law firm and his clients for my false imprisonment and other injuries I have incurred as a result of this lawsuit and he wants to avoid that even if he has to jeopardize my life by confining me in jail. He has threatened to take more of my money and even mentioned the forced sale of my house in an attempt to make me settle prior to a trial because he knows I will prevail before an impartial jury. He has had the support of the judges in the Court of Common Pleas throughout the litigation granting all his requests and motions from the restraining orders, consolidation of my complaint, imposition of sanctions, dismissal of my counter claims, permanent injunctions, partial summary Judgement and other default judgments have been granted along with almost \$10,000 in additional sanctions. The lower court has abused the standard of discretion in blocking me from defending myself or presenting evidence that Pet Helpers committed fraud by staging my dog Toby's adoption and then collecting donations and subsidies based on a misrepresentation of finding him a home. They have essentially assisted criminals in covering up a crime as they did in a previous case, Janet Frisco vs. Debra Walker Case #2005-CP-10-1003681 in the Court of Common Pleas. Everything I said in my protest was true except Pet Helpers didn't kill Toby after the fake adoption because I staged the public protest and that drew too much attention to them. Mr. Futeral falsely claimed I committed slander and the Court of Common Pleas totally supported him in that complaint from beginning to end without letting me present my case. The entire lawsuit and all the actions contained it are nothing more than a judicial cover-up of Pet Helpers' crime.

My appeal does involve a fundamental constitutional right and that is a right to a public trial with an impartial jury guaranteed by the Sixth Amendment and due process guaranteed by the Ninth Amendment both of which Mr. Futeral is trying to prevent by destroying my budget with his court costs

to make it impossible for me to bring the case to trial and finally prove my innocence. I have been denied the right to due process because I was not able to present my defense or evidence of Pet Helper's guilt in this litigation. On his return, Mr. Futeral claims that the underlying issue involves civil claims for defamation, permanent injunction and malicious prosecution which are the core of his cover-up of Pet Helpers' criminal fraud. I plan to appeal those issues as well. All the past and present sanctions were implemented to prevent me from being able to defend myself against the lawsuit as a whole. Without the reversal of the \$11,412.72 sanctions included in Judge Bentley Price's orders of May 5, 2022, it may be impossible to continue to defend myself from the other false accusations of defamation and malicious persecution because I will be financially insolvent and could face destitution. Judge Price included the \$1,774.24 past sanction in his order so even though I've already paid it, because Mr. Futeral was threatening he would file a Motion to Show Cause (incarcerate me) if I didn't. It is a subject of this appeal and will be included with the order in its' entirety that I plan to challenge.

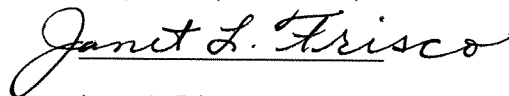
CONCLUSION

(1) This court should grant my Motion to Proceed in Forma Pauperis because Pet Helpers' lawsuit has caused the imminent financial crisis that could cause me to face complete impoverishment.

(2) The court should seek to allow any person who has not been found guilty by a jury and has been heavily and unjustly sanctioned, as I have, to proceed with appeals and motions in forma pauperis to guarantee their right to due process will not be impeded by lack of financial resources. **The right to a public trial and due process are constitution rights guaranteed by the sixth and ninth amendment** respectively and should be honored by this court and anyone associated with the justice system.

(3) Mr. Futeral planned to collect an additional \$9,638.48 in sanctions from me, and thereby prevent me from pursuing this action to trial where all the orders and sanctions will be reversed and he will be exposed for fraud upon the court and misuse of civil process.

Respectfully submitted,



Janet L. Frisco,
Pro Se
203 Cardinal Drive
Summerville, SC 29485
843-804-0875
janetfrisco@yahoo.com

Dated: June 7, 2022

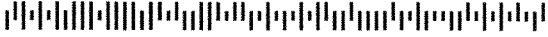


Member Service 1-888-842-6328
 www.navyfederal.org
 P.O. Box 3302 • Merrifield, VA 22119-3302

EXHIBIT A

MONTHLY FIRST MORTGAGE LOAN STATEMENT

1-796-20006-0000738-001-1-010-000-000-000



JANET FRISCO
 203 CARDINAL DR
 SUMMERVILLE SC 29485-7015

Loan Number	8025885461
Statement Date	05/27/2022
Payment Due Date	07/01/2022
Amount Due	\$504.30
<i>If payment is received after 07/16/22, a \$13.96 late fee will be charged.</i>	

Account Information

Borrower's Name:	JANET FRISCO
Property Address:	203 CARDINAL DR SUMMERVILLE SC 29485
Borrower Access Number	03062366
Principal Balance	30,728.60
Amount Deferred	0.00
Escrow Balance	881.60
Escrow Advance Balance	0.00
Suspense Balance	0.00
Interest Rate	3.000%
Contractual Maturity Date	August 2031

The balance shown does not include the payoff interest calculations. If you need a payoff figure, Member Service Representatives are available at 1-888-842-6328 during the following hours: Monday - Saturday: 7:00am-Midnight, Sunday: Noon-Midnight, Eastern Time.

Explanation of Amount Due

Principal	\$272.08
Interest	\$76.82
Escrow	\$155.40
Regular Payment	\$504.30
Other Amounts Owed	
Expenses Paid Balance	\$0.00
Late Charges	\$0.00
Other Fees	\$0.00
Total Amount Due	\$504.30

Past Payments Breakdown

Description	Paid Last Month	Paid Year to Date
First Principal	271.40	*1,470.20
Interest	77.50	*395.46
Deferred Principal	0.00	*0.00
Escrow (Taxes & Insurance)	155.40	*714.90
Life Insurance	0.00	*0.00
Fees / Expenses	0.00	*0.00
Expenses Paid	0.00	*0.00
Suspense	0.00	**
Total:	504.30	2,580.56

* Do not use these figures for reporting to the IRS. You will receive an annual year-end statement for tax purposes.

Transaction Activity (05/19/2022 - 05/27/2022)

Transaction Date	Effective Date	Description	Principal	Interest	Escrow / Rest Esc	Fees	Life/Misc	Suspense/Expense	Total
05/27	05/27	PAYMENT REC'D	271.40	77.50	155.40	0.00	0.00	0.00	504.30

Important Messages

If you are experiencing Financial Difficulty: Contact Navy Federal's Member Outreach Team to know your Loss Mitigation options to avoid Foreclosure at 888-503-7102. Housing Counselor Information: If you would like counseling or assistance, you can contact the following: U.S. Department of Housing and Urban Development (HUD): For a list of homeownership counselors or counseling organizations in your area, go to <http://www.hud.gov/offices/hsg/sfh/hcc/hcs.cfm> or call 800-569-4287.

EXHIBIT B

Re: Rule to Show Cause re: Court-Ordered Sanctions

From: Janet Frisco (janetfrisco@yahoo.com)
To: sfuteral@charlestonlaw.net
Cc: ssmith@charlestonlaw.net
Date: Thursday, April 28, 2022, 01:45 PM EDT

Mr. Futeral,

At this point money is no object. There have been no threats, disruptive or histrionic behavior on my part. I reacted to what Your client did to me when I made the mistake of trusting them. I won't make that mistake again. If you review your emails, you'll see that you and Pet Helpers have consistently threatened and attempted to do me harm after I caught on to their fraud scheme.

You probably don't want me there because you know your staff will realize I'm an innocent victim. I don't have anyone to come to the office. My friend said she was treated like dirt there.

Janet Frisco

Sent from Yahoo Mail on Android

On Thu, Apr 28, 2022 at 1:14 PM, Stephan Futeral
<sfuteral@charlestonlaw.net> wrote:

Ms. Frisco,

You are not allowed at my office because of your histrionic and disruptive behavior, the loathsome and antagonistic things you have written about my staff, and the threats you have made.

If you wish to send a third party with the check, that is fine. If you continue to play games by refusing to pay unless we file a Rule to Show Cause, then do not be shocked when the court orders that you pay additional sanctions for the filing of Rule to Show Cause. You have until Friday to pay.

Best wishes,

Stephan Futeral



Stephan Futeral, Esq.
Civil & Family Court Mediator, Futeral & Nelson, LLC

843.284.5500

charlestonlaw.net

1004 Anna Knapp Ext, Mt. Pleasant SC 29464



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11-9-21



Futeral & Nelson LLC

1004 Anna Knapp Boulevard
Mount Pleasant, South Carolina 29464

Mailing Address:

P.O. Box 1385

Mount Pleasant, South Carolina 29465

Tel: 843-284-5500 | Fax: 843-284-5501

charlestonlaw.net

November 9, 2021

VIA FAX (843) 529-7400 OR (843) 529-7475

Sheriff Al Cannon Detention Center

Attention: Records Department

3841 Leeds Avenue

North Charleston, SC 29405

RE: Pet Helpers, Inv. vs. Janet Frisco

Case: 2021-CP-10-2682

Payment of Fees by Janet Frisco to Opposing Counsel, Stephan V. Futeral, Esquire

Dear Records Department:

Please find attached a copy of the following:

1. Copy of Cashier's Check in the amount of \$5,434.32.
2. Receipt of Cashier's Check in the amount of \$5,434.32.
3. Copy of Certified Form 4, Judgment in a Civil Case.

Pursuant to the attached Form 4, Janet Frisco is to be released upon payment of \$5,434.32 to opposing counsel, Stephan V. Futeral, Esquire.

Should you have any questions or require additional information, please contact our office.

Sincerely,


Michelle McManigal

Paralegal

/mm

enclosure

EXHIBIT C

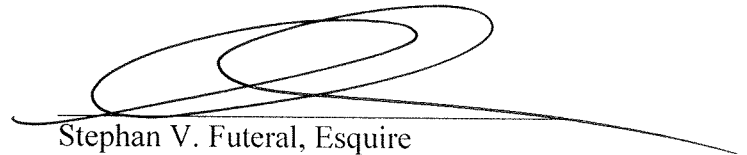
15	12/17/2021	11:30 AM	0:15	Motion/Partial Summary Judgment & crf/srv	Pet Helpers Inc-PLT	06/16/2021	2021CP1002682 Pet Helpers Inc VS Janet Frisco	Slender/Libel 380	Stephan Victor Futeral (843) 284-5500	Janet Frisco	Continued	
16	12/17/2021	11:30 AM		Motion/Compel Discovery & Crf/Srv	Pet Helpers Inc-PLT	07/27/2021	2021CP1002682 Pet Helpers Inc VS Janet Frisco	Slender/Libel 380	Stephan Victor Futeral (843) 284-5500	Janet Frisco	30 days	Completed 11/30/2021
17	12/17/2021	11:30 AM		Motion for Time Change	Janet Frisco-DEF	06/15/2021	2021CP1002682 Pet Helpers Inc VS Janet Frisco	Slender/Libel 380	Stephan Victor Futeral (843) 284-5500	Janet Frisco	denied	
18	12/17/2021	11:30 AM		Motion to Dismiss and Consolidate & Crf/Srv	Janet Frisco-DEF	07/22/2021	2021CP1002682 Pet Helpers Inc VS Janet Frisco	Slender/Libel 380	Stephan Victor Futeral (843) 284-5500	Janet Frisco	denied	
19	12/17/2021	11:30 AM		Motion to Amend Original Answer Pursuant to SCRPC Rule 15 B	Janet Frisco-DEF	10/19/2021	2021CP1002682 Pet Helpers Inc VS Janet Frisco	Slender/Libel 380	Stephan Victor Futeral (843) 284-5500	Janet Frisco	denied	
20	12/17/2021	11:30 AM		Motion/Appel	Oliver J Nelson-APL	06/15/2021	2021CP1002793 Oliver J Nelson VS Willie J Grant	Magistrate Civil 910	Jeffrey Michael Cradup (843) 936-5039	Wynne J Grant	denied	
21	12/17/2021	11:30 AM		Motion/Appel	Nathaniel J Brown-APL	06/16/2021	2021CP1002812 Nathaniel J Brown Plaintiff, et al VS Zemie C Smith	Magistrate Civil 910	Ivone G Brown (843) 991-2224 Nathaniel J Brown (843) 991-2224	Zemie C Smith	denied	

hearing and attending the hearing for a total of 2.4 hours. My time spent in this matter is valued at \$660.00.

13. My paralegal has spent 1.0 hours in communicating with the Defendant and hearing preparation which totals \$150.00.

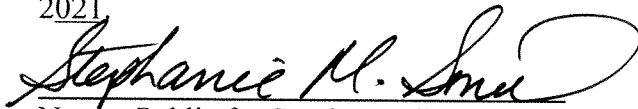
14. The total attorney's fees, costs and expenses related to this matter total **\$810.00**.

15. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by contempt.



Stephan V. Futeral, Esquire

Sworn to before me this 17th of December,
2021



Notary Public for South Carolina
My commission expires: 1/12/2031

<u>Date</u>	<u>Hours</u>	<u>Description</u>	<u>Rate</u>	<u>Billable</u>	<u>User</u>
10/19/21	0.10	Email from Janet encl Motion to Amend (.1)	\$150.00	\$15.00	Stephanie Smith
10/19/21	0.10	Review Motion to Amend Answer	\$275.00	\$27.50	Stephan Futeral
12/9/21	0.10	Email to Def. re Motion to Amend Answer (.1)	\$150.00	\$15.00	Stephanie Smith
12/16/21	0.80	Prepare for hearing; draft affidavit of attorney's fees.	\$150.00	\$120.00	Stephanie Smith
12/16/21	0.30	Prepare for Hearing	\$275.00	\$82.50	Stephan Futeral
12/17/21	2.00	*Travel to/from and attend hearing.	\$275.00	\$550.00	Stephan Futeral
		*Anticipated Time			
		TOTAL ATTY FEES		\$810.00	

EXHIBIT D

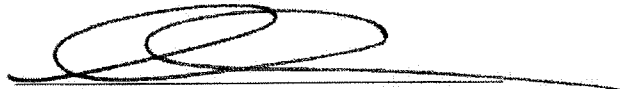
12. As to time spent for the hearing on Plaintiff's Motion for Partial Summary Judgment, Plaintiff's Motion for Sanctions, and Defendant's Motion to Amend, I have spent 28.3 hours in drafting pleadings, reviewing documents filed by Plaintiff, performing legal research, preparing for and attending the motions hearing, and drafting the order.

13. My client was charged 3.1 hours at the hourly rate of \$350.00 which is valued at \$1,085.00. I spent 25.2 hours at the reduced hourly rate of \$275.00 per hour which is valued at \$6,930.00. My total time spent is valued at \$8,015.00.

14. My paralegal spent 10.4 hours in reviewing filing documents, drafting pleadings and affidavits, communicating with the court, and preparing the file for the motions hearing at the hourly rate of \$150.00 for a total value of \$1,560.00.

15. My client has incurred filing fees in the amount of \$63.48.

16. The total attorney's fees, costs and expenses related to Plaintiff's Motion for Partial Summary Judgment, Plaintiff's Motion for Sanctions, and Defendant's Motion to Amend total **\$9,638.48**.



Stephan V. Futeral, Esquire

Sworn to before me this 27th of April,
2022.



Notary Public for South Carolina
My commission expires: 1/12/2031

<u>Date</u>	<u>Hours</u>	<u>Description</u>	<u>Rate</u>	<u>Billable</u>	<u>User</u>
6/15/21	3.10	Research defamation and summary judgment. Draft motion outline. Draft email to Stephanie regarding law and facts for motion for summary judgment. Brief telephone call with client. (2.0) PCs w/ SMS (.3) Drafting Motion for Summary Judgment (.8)	\$350.00	\$1,085.00	Stephan Futeral
6/15/21	0.20	Online filing of Motion for Summary Judgment (.2)	\$150.00	\$30.00	Stephanie Smith
6/29/21	0.10	Receive Objection to MSJ; save to file (.1)	\$150.00	\$15.00	Stephanie Smith
1/19/22	1.30	Research sanctions for failure to comply with order of discovery, review emails, draft motion.	\$275.00	\$357.50	Stephan Futeral
1/24/22	0.40	Ltr to Frisco encl filed Motion for Sanctions; draft certificate of service; email to Frisco encl same (.4)	\$150.00	\$60.00	Stephanie Smith
2/11/22	0.10	Email to court re scheduling of motions (.1)	\$150.00	\$15.00	Stephanie Smith
2/14/22	3.70	PCs w/ SMS (.3) Drafting of memo re Summary Judgment Motion (3.4)	\$275.00	\$1,017.50	Stephan Futeral
2/14/22	0.30	PCs w/ SVF (.3)	\$150.00	\$45.00	Stephanie Smith
2/15/22	1.70	Research and finalize memo in support of summary judgment.	\$275.00	\$467.50	Stephan Futeral
2/17/22	0.20	Review draft memo in support of SJ motion (.2)	\$150.00	\$30.00	Stephanie Smith
2/22/22	0.20	PC w/ clerk of court and email w/ follow up (.2)	\$150.00	\$30.00	Stephanie Smith
3/1/22	2.20	Draft Reply to Defendant's 2nd Motion to Amend Answer and Counterclaims (1.8) PCs w/ SMS (.4)	\$275.00	\$605.00	Stephan Futeral
3/1/22	0.90	PCs w/ SVF (.4) Revise draft reply to 2nd motion to amend answer and submit to court for filing (.3) draft letter to Frisco and email (.2)	\$150.00	\$135.00	Stephanie Smith
3/2/22	0.10	Email from court re scheduling hearing; email to client (.1)	\$150.00	\$15.00	Stephanie Smith
3/3/22	0.30	PC w/ clerk of court; PC w/ SVF (.2) Email to client (.1)	\$150.00	\$45.00	Stephanie Smith

3/22/22	0.20	Email from Court; calendar hearings; email to client (.2)	\$150.00	\$30.00	Stephanie Smith
3/24/22	0.70	Prepare Notice of Hearing and Certificate of Service; efile with court (.4) Draft letter to Frisco; email to Frisco re hearing notice (.3)	\$150.00	\$105.00	Stephanie Smith
3/24/22	0.60	Review 3rd motion to amend. Draft reply to 3rd motion to amend.	\$275.00	\$165.00	Stephan Futeral
3/25/22	0.50	Review draft of reply to 3rd motion to amend; efile; letter to Frisco encl same; email to Frisco (.4) Emails from Frisco to Court; reply to Frisco (.1)	\$150.00	\$75.00	Stephanie Smith
3/28/22	0.30	Review emails from Frisco (.3)	\$150.00	\$45.00	Stephanie Smith
4/5/22	0.10	Review emails from Frisco (.1)	\$150.00	\$15.00	Stephanie Smith
4/5/22	0.10	Review emails from Frisco (.1)	\$275.00	\$27.50	Stephan Futeral
4/6/22	0.10	Emails from Court; forward to client re scheduling (.1)	\$150.00	\$15.00	Stephanie Smith
4/7/22	0.80	PC w/ SVF (.2) Draft Affidavit of Susko in support of Motion for Summary Judgment (.6)	\$150.00	\$120.00	Stephanie Smith
4/7/22	0.20	PC w/ SMS (.2)	\$275.00	\$55.00	Stephan Futeral
4/12/22	0.70	Prepare Memo re SJ Motion for filing; mark exhibits; file w/ court (.4) Draft letter to Frisco encl filed memo; email to Frisco & copy to client (.3)	\$150.00	\$105.00	Stephanie Smith

4/13/22	0.20	Review documents/emails submitted by Frisco (.2)	\$150.00	\$30.00	Stephanie Smith
4/21/22	2.50	Prepare file for motion hearings; index pleadings (.8) Review additional filings from Frisco; email to client (.2) PC w/ SVF (.7) Draft timeline (.8)	\$150.00	\$375.00	Stephanie Smith
4/21/22	3.70	PC w/ SMS and review filings (.9) Prepare for motion hearings (2.8)	\$275.00	\$1,017.50	Stephan Futeral
4/22/22	1.80	Travel to/from and attend hearings (1.6) PCs w/ SMS (.2)	\$275.00	\$495.00	Stephan Futeral
4/22/22	0.20	PCs w/ SVF (.2)	\$150.00	\$30.00	Stephanie Smith
4/24/22	4.00	Drafting of Order.	\$275.00	\$1,100.00	Stephan Futeral
4/25/22	1.90	Drafting of Order.	\$275.00	\$522.50	Stephan Futeral
4/26/22	3.90	Continue drafting order	\$275.00	\$1,072.50	Stephan Futeral
4/26/22	0.10	PC w/ SMS re fee affidavit (.1)	\$275.00	\$27.50	Stephan Futeral
4/26/22	0.10	PC w/ SVF re fee affidavit (.1)	\$150.00	\$15.00	Stephanie Smith
4/27/22	1.20	Drafting of attorney fee affidavit (1.2)	\$150.00	\$180.00	Stephanie Smith
		TOTAL ATTY FEES		\$9,575.00	
		<u>FEES AND COSTS</u>			
		Summary Judgment - Motion fee		\$31.74	
		Sanctions - Motion fee		\$31.74	
		TOTAL		\$63.48	
		TOTAL ATTY FEES AND COSTS		\$9,638.48	

RECEIVED

Jun 07 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas, 9th Circuit Court

The Honorable Bentley D. Price

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Pet Helpers, Inc..... Respondent

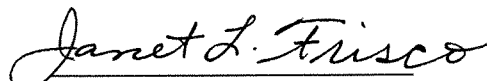
Janet L. Frisco.....Appellate

PROOF OF SERVICE

I certify that I have served the Appellant’s ***Reply to the Return to the Motion to Appear in Forma Pauperis*** by delivering the same via email and United States mail, postage prepaid, on June 7, 2022 addressed to the Respondent as follows:

Stephan V. Futeral,
Attorney for the Respondent
1004 Anna Knapp Blvd., Suite 3
Mt. Pleasant, South Carolina 29464
sfuteral@charlestonlaw.net

Respectfully,


Janet L. Frisco, Pro Se

Dated: June 7, 2022