

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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SC Court of Appeals

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APPEAL FROM THE MASTER IN EQUITY  
BEAUFORT COUNTY  
MARVIN S. DUKES, III, MASTER

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LINDA AMMONS

RESPONDENT

VERSUS

ORMONDO LEOMBRUNO

APPELLANT

---

AMENDED INITIAL BRIEF OF APPELLANT

---

J. Thomas Mikell, Esquire  
P.O. Box 1727  
Beaufort, SC 29901  
843-524-2110  
Attorney for the Appellant

Linda Ammons  
113 Lyford Place  
Beaufort, SC 29902  
The Respondent

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**J. Thomas Mikell, Esquire  
P.O. Box 1727  
Beaufort, SC 29901  
843-524-2110  
Attorney for the Appellant**

**W. Trey Merck, Esquire  
285 Ohkahteeah Road  
Central, SC 29630  
843-925-2175  
Attorney for the Respondent**

## Table of Contents

<u>Item</u>	<u>Page</u>
I. Table of Statutes/Cases/Rules	2
II. Statement of Issues on Appeal	4
III. Statement of the Case	6
IV. Argument	14
V. Conclusions	18

I. Table of Statutes/Cases/Rules

A. <u>Statutes.</u>	<u>Page(s)</u>
a. Sections 16-3-1700 et seq. SC Code of Laws, 1976, as amended.	8, 12, 15
b. Section 14-7-1320 SC Code of Laws, 1976, as amended.	9
c. Section 18-7-20 SC Code of Laws, 1976, as amended.	11
d. Section 18-7-30 SC Code of Laws, 1976, as amended.	11
e. Section 18-7-60 SC Code of Laws, 1976, as amended.	10
B. <u>Cases.</u>	
a. <i>Boan v. Jacobs</i> , 296 SC 419, 373 S.E. 2d 697 (Ct. App. 1998).	14
b. <i>Ex Parte Cannon</i> , 385 SC 642, S.E. 2d 814 (Ct. App. 2009).	14
c. <i>Delta Apparel, Inc. v. Farina</i> , 406 SC 257, 750 S.E. 2d 615 (Ct. App. 2013).	16
d. <i>Wall v. Huguenin</i> , 301 SC 94, 390 S.E. 2d 372 (1990).	18
e. <i>Hemingway v. Mention</i> , 228 SC 211, 89 S.E. 2d 369 (1955).	18
f. <i>Parker v. Parker</i> , 313 SC 482, 443 S.E. 2d 388 (1994).	18
g. <i>State v. Thompson</i> , 355 SC 255, 584 S.E. 2d 131 (Ct. App. 2003).	18
C. <u>Rules.</u>	
a. Rule 18(b) SC Magistrates Court Rules.	10
b. Rule 12(h)(1) SC Rules of Civil Procedure.	11

<u>D. Other.</u>	<u>Page</u>
a. <i>Appellant Practice in South Carolina</i> by Toal, Walker and Baker, 3 <sup>rd</sup> Edition (2016) Chapter 6, Section III, Page 118.	16
b. <i>Appellant Prantice in South Carolina</i> by Toal, Walker and Baker, 3 <sup>rd</sup> Edition (2016) Chapter 9, Section III-A, Page 185.	12
c. The Introduction to Article VII of the Declaration of Covenants in Record Book 2268 at Page 1428. of the Beaufort County Register of Deeds.	1
d. Plat Book 115 at Page 98 of the Beaufort County Register of Deeds.	2
e. 7 SC JURISPRUDENCE Estoppel & Waiver § 22.	18

## II. Statement of Issues

Issue A. Was the dismissal of the Motion For Summary Judgment brought by Leombruno and the granting of the request to reverse the two trial decisions in favor of Ammons based on a lack of jurisdiction of the Court over the subject matter of the case or the lack of jurisdiction of the Court over the parties to the case?

Issue B. If the decision was based on the lack of jurisdiction of the Court over the parties, did the following acts of Ammons throughout the trial court process constitute these legal reasons why she should not be entitled to the claim lack of jurisdiction of the Court:

- i. Failure to follow S.C. Code Sections 18-7-20 and 18-7-30 and Rule 18, SC MCR, which all require a statement in the Notice of Appeal of the ground for the appeal.
- ii. Laches by the failure of Ammons to notify the Court and Leombruno of any ground for the appeals after 18 months of the Notice of the first appeal and 13 months of the Notice of the second appeal.
- iii. Waiver of any ground for appeal for the failure to state any ground after such long time period per Common Law, and Waiver per Rule 12(h)(1) SCRCP.

- iv. Acquiescence in the two decisions of the Court by NOT raising the issue of lack of personal jurisdiction (a) after being involved in two trials, (b) after being involved in two Motions (one of which Ammons instigated), (c) after performing the remedy of the Court by paying the fine issued from a trial, and (d) by filing two Notices of appeal.

### III. Statement of the Case

#### Introduction

The gravamen of this case involves two homeowners that live side by side in adjacent lots (Lot 1 and Lot 2) in a covenant restricted community (by a Declaration of Covenants and Restrictions) known as Lyford Place in Beaufort County, SC. There are eleven narrow Lots and the Declaration in Article VII (1) specifically calls to the attention of the Owners that there are small and narrow Lots and close living conditions that should be considered in the day to day living activities between the Lot Owners. These two homeowners share the use of a common driveway for ingress and egress (2).

The driveway is a Common Area owned by the Community Association.

There have been three trials between these parties. Both parties were represented by counsel at the first trial on May 22, 2018, neither of them was represented by counsel at the second trial of June 17, 2019, and both of them were represented by Counsel at the third trial on November 14, 2019.

In addition to the three trials, there have been these pleadings in these two cases:

An Answer by Ammons to the Rule to Show Cause of October 2019.

Motions by Ammons (a) to consolidate the first Magistrate's Court case with a separate case in Common Pleas, (b) a Notice of Appeal of the trial decision of June 17, 2019, and (c) a Notice of Appeal of the trial decision of November 14, 2019.

Motions by Leombruno (a) for a written Decision of the trial of June 17, 2019, (b) To View the Site, and (c) for Summary Judgment.

In none of these three trials and in none of the first five Motions did Ammons raise the issue of lack of jurisdiction. It was only upon the filing of the Motion for Summary Judgment did the issue finally come to light.

When the first Notice of Appeal to the Circuit Court of the decision by the Magistrate of June 17, 2019 was filed by Ammons, the Clerk of Common Pleas assigned it Calendar Number 2019-CP-07-02798. When the second Notice of Appeal to the Circuit Court of the decision of the Magistrate of November 14, 2019 was filed by Ammons, the Clerk of Common Pleas assigned it Calendar Number 2020-CP-07-00581. Thus, the reason for the two calendar numbers.

## Statement of Facts

1. By Counsel, the Plaintiff (Ammons) filed a Summons and Complaint in the Beaufort County Magistrate's Court in May of 2018, alleging that certain acts of Leombruno constituted a breach of SC Code Section 16-3-1700 (A) defined as harassment and/or stalking (3). No written Motion, Answer, nor Response was filed by the Defendant (Leombruno). The trial date was set for May 22, 2018, at which date both parties appeared with Counsel. It was announced to the Court by Counsel that a Mutual Restraining Order had been entered into by the parties and the Court issued a written Order on May 30, 2018, to confirm the agreement of the parties (4). The Order did not state a time for the expiration of the agreement of the parties, nor a time for the expiration of the Order. The agreement and Order provided for a Mutual Restraining Order that (a) the parties were restrained from verbal communication or interaction with each other and they cannot enter the private property of the other, (b) that both acknowledge the common property to the north of their lots which includes a shared vehicle access that is well defined on the subdivision plat, there is to be no verbal or other contact in that common area, and (c) both parties are to comply with the Lyford Place Covenants, Restrictions and By-Laws.

2. Without counsel, Leombruno filed a Rule to Show Cause in May of 2019 (5), alleging violations by Ammons of the previously agreed to and written Restraining Order. Some of the alleged violations were of Items 1 and 2 of the

Agreement/Order of May 30, 2018, and some of the alleged violations were of Item 3. A trial was conducted before the Magistrate on June 17, 2019, without either party having counsel. Ammons did not raise any defense of lack of jurisdiction of the Court. The trial resulted in an oral holding of contempt by the Magistrate against Ammons. Upon a Motion in November of 2019 (6), a written Order was filed November 14, 2019 (7) which was then appealed to the Circuit Court (8). No objection was raised of the lack of personal jurisdiction to the Motion for a Written Order. The Notice of Appeal did not state any ground for the appeal, nor did it raise the issue of lack of personal jurisdiction.

3. Without counsel, Leombrano filed a Second Rule to Show Cause in October 2019 (9), again alleging violations by Ammons of the previously agreed to and written Restraining Order of May 30, 2018. Again, some of the alleged violations were Items 1 and 2 of the agreement/Order of May 30, 2018, and some of the alleged violations were of Item 3 of that same Order. An Answer was filed by Counsel for Ammons (10). A trial with Counsel for both parties was conducted on November 14, 2019. The same Magistrate again issued an Order (11) that held Ammons in contempt and fined her \$250.00. Ammons did not raise any defense in her Answer nor at trial to the lack of personal jurisdiction. After the issuance of the fine, Ammons paid the fine.

4. After the filing of the Second Rule, but before the trial, Leombrano filed a Motion pursuant to SC Code Section 14-7-1320 (12) for the Magistrate to view the

two lots of the parties and the joint driveway. The Motion was granted (13) and the Magistrate (with the parties and their counsel) viewed the site on November 14, 2019. Ammons did not raise any defense to the lack of personal jurisdiction during the Motion hearing nor during the viewing at the site.

5. After the filing of the Second Rule, but before the trial, Ammons filed a Motion to consolidate the case (14) with a pending case in Common Pleas entitled *Lyford Place Community Association, Inc. vs. Linda Ammons* (CA 2019-CP-07-02310). Leombruno filed a Return to the Motion (15). That Motion was denied by the Magistrate (16). During this Motion process by Ammons, she did not raise any issue of the lack of personal jurisdiction.

6. Ammons filed a separate Notice of Appeal (17) of the decision of the trial of November 14, 2019 upon the issuance of the written Order. The Notice did not state any ground for the appeal nor did it raise the issue of lack of personal jurisdiction.

7. The Magistrate filed Returns (called Transcripts) (18) and (19) of the two appeals with the Circuit Court pursuant to SC Code Section 18-7-60 and Rule 18(b) SC MCR. In the second Return/Transcript, the Magistrate stated that Ammons had not raised any issue of the lack of personal jurisdiction. That issue was not addressed in the first Return/Transcript of the Magistrate.

8. After some eighteen (18) months from the filing of the Notice of Appeal of the June 2019 decision for contempt issued in writing in November of 2019, Leombruno filed a Motion for Summary Judgment on April 14, 2021 (20), to have both appeals dismissed. The stated grounds for the Motion were these:

- a. Failure to follow SC Code Sections 18-7-20 and 18-7-30 and Rule 18, SC MCR, which all require a statement in the Notice of Appeal of the ground for the appeal.
- b. Laches by the failure of Ammons to notify the Court and Leombruno of any ground for the appeals after 18 months of the Notice of the first appeal and 13 months of the Notice of the second appeal.
- c. Waiver of any ground for appeal by the failure to state one after such a long time period per Common Law, and Waiver per Rule 12(h)(1) SCRCP.
- d. Acquiescence in the two decisions of the Court by (i) being involved in two trials, (ii) being involved in two Motions (one of which Ammons instigated), (iii) performing the remedy of the Court by paying the fine issued from a trial, and (iv) filing two Notices of appeal and NOT raising the issue of lack of personal jurisdiction in any of those processes.

9. A Response to the Summary Judgment Motion was then filed by Ammons on April 22, 2021 (21), which asserted for the first time the lack of jurisdiction of the Court based on the expiration of the Restraining Order of one year from May 30, 2018, pursuant to SC Code Section 16-3-1700. No ground for either appeal has yet been stated.

10. A Return to the Response was filed by Leombruno on July 9, 2021 (22) pointing out the failure of Ammons to comply with the four basic requirements to preserve an appeal as set forth in *Appellant Practice in South Carolina* by Toal, Waler and Baker, 3<sup>rd</sup> Ed. (2016) – Chapter 9, Section III-A, Page 185.

11. The Special Circuit Judge/Master In Equity for Beaufort County heard presentation of Counsel on the Motion and Appeals on July 9, 2021, and received Briefs on the Issues (23) and (24).

12. The Special Circuit Court Judge/Master In Equity In Equity issued an Order on October 21, 2021 (25) (a) dismissing the Motion for Summary Judgment, and (b) ruling in favor of Ammons on the two appeals. Both decisions were based on the expiration of the one year Restraining Order issued on May 30, 2018, pursuant to SC Code Section 16-3-1700(A); i.e., lack of jurisdiction of the Court (without stating which category of jurisdiction applied and without referring to the defenses raised by Leombruno).

13. Leombruno filed a Motion For Reconsideration (26).

14. The Special Circuit Court Judge/Master In Equity denied the Motion For Reconsideration (27). Again, the Order did not state which category of lack of jurisdiction applied to the decision nor did the Order refer to any of the matters set forth in Paragraph 8 above.

## IV. Argument

### Issue A

The concept of jurisdiction refers to the power of a Court to bring a person into its adjudicative process (designated as personal jurisdiction) or the power of a Court to hear and determine a particular type of action (designated as subject matter jurisdiction). (28)

Subject matter jurisdiction is the power of a Court to hear and determine cases of the general class to which the proceedings in question belong. (29) Personal jurisdiction refers to the ability of a Court to bring a particular person into its adjudicative process. (30)

What are the facts of the instant case that will determine if the power of the Court has been challenged for either lack of subject matter jurisdiction or lack of personal jurisdiction? The Order of October 21, 2021 does not state which category of jurisdiction applies. (31)

These facts apply in making the decision of which type of jurisdiction applies in this case.

1. The Complaint brought in May 2018 refers to specific statute sections which are SC Code Sections 16-3-1700 et seq. commonly called the Harassment Statute. (32)
2. All subsequent proceedings thereafter refer to and were conducted pursuant to this same Harassment Statute.
3. The two Orders of October 21, 2021 state (paragraphs 2, 3, & 4) that the case was brought and continuously pursued pursuant to that Harassment Statute. (33)
4. The Orders of October 21, 2021 state (paragraph 3) that the reason the Court is granting the appeals from the two Magistrates Court decisions is because the time duration of the Harassment Statute of one year had expired so the Court did not have the authority to issue an Order of Contempt. (34)

The only conclusion that can be drawn from this set of facts is that the Harassment Statute was the basis of all the proceedings, but that subject matter no longer applied after one year. The subject matter of the Harassment Statute, i.e., whether or not there had been a harassment or stalking was still applicable; but it could not apply to the litigants. The acts of the litigants were not specifically

ruled on in the October 21, 2021 Orders (the statement on page 2 just above the holding).

So, the decision from which these appeals arise is from the lack of jurisdiction over the parties and not lack of jurisdiction over the subject matter (the Harassment/Stalking Statute).

#### Issue B

Notwithstanding the claim of lack of personal jurisdiction, that claim can be waived by the acts of the claimant (35).

What facts exist in the instant case to support the claims by Leombruno that Ammons (a) did not follow the statutes of this state, (b) nor did she follow the Rules of the Court, and that her actions constitute (c) laches, (d) a waiver of her rights, and (e) an acquiescence in the two decisions of the Magistrates Court?

A plenary reading of the Statement of this Case reveals these facts in summary.

- 1: After the Original Mutual Restraining Order of May 30, 2018, she thereafter personally participated in two trials more than one year later on June 17, 2019 and November 14, 2019 without raising any claim.

2. She participated in five Motions (some brought by her) more than one year later without raising any claim.
3. She personally participated in a Site View on November 14, 2021 (with her attorney, opposing attorney and party, and the Magistrate) more than one year later without raising any claim.
4. She did not state any grounds for either of her two appeals made more than one year later as required by the statute and Court Rules and has not yet to this day stated any ground for the appeals.
5. She did not raise the claim of lack of jurisdiction in either of her two appeals made more than one year later.
6. Upon being found in Contempt and fined \$250 in the trial of November 14, 2021, more than one year later, she paid the fine, i.e., she accepted jurisdiction of the Court by that act and waived any claim of lack of personal jurisdiction.

These legal principals are cogently applicable to the acts of Ammons after the expiration of the one year.

- a. Laches is neglect of a claim for an unreasonable and unexplained length of time on circumstances that permit the assertion of the right

by one who later seeks to enforce it (36). Equity aids the vigilant, not those who slumber on their rights (37).

- b. Waiver is defined as the intentional relinquishment of a known right (38). Where the facts are not in dispute, waiver can be decided by the Court (39).

In addition to (a) the acts of Ammons that are a breach of the Statutes (Section 18-7-20 and 18-7-30 by the failure to state grounds for an appeal after 22 months) and (b) the acts of Ammons that are a breach of the Court Rules [Rule 18(b) SC MCR and Rule 12(g) SCRCP], it is not a very difficult view to see that the same acts of Ammons also constitute laches and waiver.

### CONCLUSIONS

A. The claim of lack of jurisdiction of the Court by Ammons is a lack of personal jurisdiction of the Court.

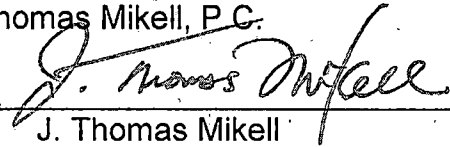
B. The lack of personal jurisdiction of a Court can be waived by the acts of the claimant.

C. In the instant case, the acts of Ammons clearly constitute a failure to comply with the Statutes, a failure to comply with the Court Rules, and constitute the legal concepts of laches and waiver.

January 14, 2022.

J. Thomas Mikell, P.C.

By:



J. Thomas Mikell

P.O. Box 1727

Beaufort, SC 29901

[tom@mikelllaw.com](mailto:tom@mikelllaw.com)

843-524-2110

## Footnotes

1. See Article VII of the Declaration of Covenants. ROA # \_\_\_\_\_.
2. See Subdivision plat in Plat Book 115 at Page 98. ROA # \_\_\_\_\_.
3. Complaint. ROA # \_\_\_\_\_.
4. Mutual Restraining Order. ROA# \_\_\_\_\_.
5. Rule to Show Cause #One – May 2019. ROA # \_\_\_\_\_.
6. Motion for Written Order. ROA # \_\_\_\_\_.
7. Order for Contempt after Trial in June 2019. ROA # \_\_\_\_\_.
8. Notice of Appeal #One. ROA # \_\_\_\_\_.
9. Second Rule to Show Cause. ROA # \_\_\_\_\_.
10. Answer to Second Rule to Show Cause. ROA # \_\_\_\_\_.
11. Order for Contempt #Two. ROA # \_\_\_\_\_.
12. Motion to View Site. ROA # \_\_\_\_\_.
13. Order Granting Motion. ROA # \_\_\_\_\_.
14. Motion to Consolidate. ROA # \_\_\_\_\_.
15. Return to Motion. ROA # \_\_\_\_\_.
16. Order Denying Motion. ROA # \_\_\_\_\_.
17. Notice of Appeal #Two. ROA # \_\_\_\_\_.
18. Return/Transcript from Trial of June 17, 2019. ROA # \_\_\_\_\_.
19. Return/Transcript from Trial of November 14, 2019. ROA # \_\_\_\_\_.
20. Motion for Summary Judgment. ROA # \_\_\_\_\_.
21. Response to Motion for Summary Judgment. ROA # \_\_\_\_\_.
22. Return to Response. ROA # \_\_\_\_\_.
23. Brief to Summary Judgment by Ammons. ROA # \_\_\_\_\_.

24. Brief to Summary Judgment by Leombruno. ROA #\_\_\_\_\_.
25. Order Dismissing Summary Judgment and Granting Appeals. ROA #\_\_\_\_\_.
26. Motion for Reconsideration. ROA #\_\_\_\_\_.
27. Denial of Motion for Reconsideration. ROA #\_\_\_\_\_.
28. *Boan v. Jacobs*, 296 SC 419, 373 S.E. 2d 697 (Ct. App. 1998).
29. *Ex Parte Cannon*, 3851 SC 642, 685 S.E. 2d 814 (Ct. App. 2009).
30. *Boan v. Jacobs*, supra.
31. Order Denying Motion for Summary Judgment. ROA #\_\_\_\_\_.
32. SC Code Sections 16-3-1700 et. seq.
33. ROA #\_\_\_\_\_.
34. ROA #\_\_\_\_\_.
35. *Delta Apparel, Inc. v. Farina*, 406 SC 257, 750 S.E. 2d 615 (Ct. App. 2013) and *Ex Parte Cannon*, supra; and *Appellant Practice in South Carolina* by Toal, Walker and Baker, 3<sup>rd</sup> Edition (2016) Chapter 6, Section III, Page 118.
36. *Wall v. Huguenin*, 301 SC 94, 390 S.E. 2d 372 (1990).
37. *Hemingway v. Mention*, 228 SC 211, 89 S.E. 2d 369 (1955).
38. *Parker v. Parker*, 313 SC 482, 443 S.E. 2d 388 (1994) and *State v. Thompson*, 355 SC 255, 584 S.E. 2d 131 (Ct. App. 2003).
39. 7 SC JURISPRUDENCE Estoppel & Waiver § 22.

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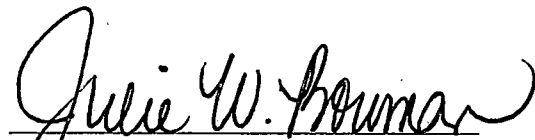
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Jenny Abbott Kitchings  
P.O. Box 11629  
Columbia, SC 29211

2. W. Trey Merck, Esquire  
285 Ohkahteeah Road  
Central, SC 29630  
Attorney for the Respondent

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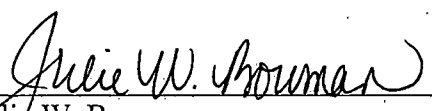
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Jenny Abbott Kitchings  
P.O. Box 11629  
Columbia, SC 29211

2. Linda Ammons  
113 Lyford Place  
Beaufort, SC 29902  
The Respondent

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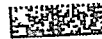
  
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