

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Hon. J.C. Nicholson, Jr., Circuit Court Judge

ROOSEVELT SIMMONS..... Plaintiff, Petitioner

Vs.

HATTIE BAILUM, RUBY BAILUM
VERDONE BAILUM, JULIE B. JOHNSON,
MONICA MIDDLETON, MARIE SMITH,
MELVIN SINGLETON, FRANKLIN SMITH,
LMC, LLC, JOHN MARTIN, ESQ. as
TRUSTEE.....Defendants, Respondents

APPENDIX TO PETITION FOR WRIT OF CERTIORARI

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Melvin Singleton, LMC, LLC and
John Martin, Esq. as Trustee

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**THIS OPINION HAS NO PRECEDENTIAL VALUE. IT SHOULD NOT BE
CITED OR RELIED ON AS PRECEDENT IN ANY PROCEEDING
EXCEPT AS PROVIDED BY RULE 268(d)(2), SCACR.**

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

Roosevelt Simmons, Appellant,

v.

Hattie Bailum, Ruby Bailum, Verdona Bailum, Julie B.
Johnson, Monica Middleton, Marie Smith, Melvin
Singleton, Franklin Smith, LMC, LLC, and John Martin,
Esquire as Trustee, Respondents.

Appellate Case No. 2011-189009

Appeal From Charleston County
J. C. Nicholson, Jr., Circuit Court Judge

Unpublished Opinion No. 2013-UP-082
Heard January 15, 2013 – Filed February 20, 2013

AFFIRMED

Edward A. Bertele, of Charleston, for Appellant.

John A. Massalon and I. Sonja Taylor, both of Wills
Massalon & Allen, LLC, of Charleston, for Respondents.

PER CURIAM: In this action arising from the partitioning of four parcels of
property on John's Island, Roosevelt Simmons appeals from the trial court's order

granting summary judgment to Hattie Bailum, Ruby Bailum, Verdone Bailum, Julie B. Johnson, Monica Middleton, Marie Smith, Melvin Singleton, Franklin Smith, LMC, LLC, and John Martin, Esq. as Trustee (collectively, Respondents). Simmons argues the trial court erred in (1) granting summary judgment on the basis of *res judicata*; (2) granting summary judgment on his claim of fraud on the court; (3) granting summary judgment based solely on the dismissal of the prior appeal; (4) granting summary judgment because no discovery had occurred; (5) not disqualifying Respondents' attorney and dismissing Respondents' motion to dismiss; and (6) not issuing a temporary injunction. We affirm pursuant to Rule 220(b), SCACR, and the following authorities:

1. As to Simmons' issues numbered one to four: We adopt by reference the reasoning set forth in the trial court's order filed on January 11, 2011. See *Grosshuesch v. Cramer*, 367 S.C. 1, 6, 623 S.E.2d 833, 835 (2005) (adopting the reasoning set forth in the trial court's order as to some of the issues on appeal).

2. As to Simmons' assertion the trial court erred in not disqualifying Respondents' attorney Bruce Berlinsky and dismissing Respondents' motion to dismiss: *First Sav. Bank v. McLean*, 314 S.C. 361, 363, 444 S.E.2d 513, 514 (1994) (noting when a party fails to cite authority or when the argument is simply a conclusory statement, the party is deemed to have abandoned the issue on appeal); *State v. Love*, 275 S.C. 55, 59, 271 S.E.2d 110, 112 (1980) ("In order to establish the [attorney-client] privilege, it must be shown that the relationship between the parties was that of attorney and client and that the communications were of a confidential nature."); *id.* (stating the burden of establishing an attorney-client privilege is upon the person asserting it); *id.* ("Whether a communication is privileged is for the trial judge to decide in the light of a preliminary inquiry into all of the facts and circumstances; and this determination by the trial judge is conclusive in the absence of an abuse of discretion."); *Crawford v. Henderson*, 356 S.C. 389, 395, 589 S.E.2d 204, 207 (Ct. App. 2003) (stating "to obtain the status of a client, the person must communicate in confidence with an attorney for the purpose of obtaining legal advice," and "[t]he advice or assistance must be sought with a view to employing the attorney professionally whether or not actual employment occurs").

3. As to Simmons' assertion the trial court erred in not issuing a temporary injunction: *FOC Lawshe Ltd. P'ship v. Int'l Paper Co.*, 352 S.C. 408, 413, 574 S.E.2d 228, 231 (Ct. App. 2002) ("The decision to grant or deny temporary injunctive relief is within the sound discretion of the trial judge and will not be

overturned absent an abuse of discretion."); *id.* at 416; 574 S.E.2d at 232 ("A plaintiff's entitlement to an injunction requires the complaint to allege facts sufficient to constitute a cause of action for an injunction while establishing that an injunction is reasonably necessary to protect the legal rights of the plaintiff during the litigation."); *id.* ("Generally, to obtain an injunction, a party must demonstrate irreparable harm, a likelihood of success on the merits, and an inadequate remedy at law.").

AFFIRMED.

SHORT, KONDUROS, and LOCKEMY, JJ., concur.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Case No. 2009 - CP -10 - 5343
Hon. J.C. Nicholson, Jr., Circuit Court Judge

ROOSEVELT SIMMONS)
Plaintiff, Appellant)
Vs.)
HATTIE BAILUM, RUBY BAILUM,)
VERDONE BAILUM,)
JULIE B. JOHNSON,)
MONICA MIDDLETON,)
MARIE SMITH, MELVIN SINGLETON,)
FRANKLIN SMITH, LMC, LLC,)
JOHN MARTIN, ESQ. as TRUSTEE)
Defendants, Respondents)

APPELLANT’S PETITION FOR REHEARING

Appellant herewith submits his Petition for Rehearing of the appeal by this Court pursuant to SCACR 221(a). Appellant’s reasons may be summarized as follows. Appellant contends this Court overlooked his arguments under Points II, III and IV and the Reply Brief Point IV. These Points were directed at the Circuit Court’s dismissal of the First Count of the Complaint and the need to conduct discovery on both counts. See Appellant’s Brief at pages 35-46, Reply Brief at pages 13-236.

The First Count sought relief based upon the existence of exceptional circumstances including the Special Referee’s lack of jurisdiction and racial bias resulting in denial of due process. R p. 34-37. This is more fully discussed below. See Section A. However, almost all of the Circuit Court’s decision (18 pages) dealt with the allegations of fraud on the Court involving the ancestral relationships of the Bailum and Singleton families. See R p. 1-18. In the remainder

of its decision (2 pages) the Circuit Court found that every issue raised in the complaint could have been addressed in the earlier Bailum trial and in the appeal; and by failing to perfect the appeal, appellant abandoned these issues and they were res judicata. R p. 18, 20.

However, as set forth in Point II a & b of appellant's Brief and Reply Brief Point II, the Circuit Court's decision finding that attorney Houston's abandonment of the appeal is attributable to appellant is not supported by applicable authority and that Court clearly did not consider whether all of the facts produced a denial of due process. See Section B. below. Appellant asserts that this Court's adoption of the Circuit Court's finding that appellant abandoned the earlier appeal must be reexamined because it flies in the face of any sense of justice and should offend the Court's own conscience.

Similarly, in any SCRCF 60(b) independent action, precedent requires that the application of res judicata must be balanced with equitable considerations . See Section C. As appellant demonstrated in Point II, III and IV, the Circuit Court did not correctly apply the law to the issues and facts asserted in opposition to dismissal. By adopting the Circuit's Court decision, appellant contends that this Court overlooked these matters and respectfully urges rehearing and reconsideration of its decision.

Appellant also asserts that this Court may have overlooked the procedural history of the case before the Circuit Court which related to appellant's claim that discovery was not complete. The Circuit's Court's decision was the result of that Court's own motion to consider an issue raised for the first time at the August 27th motion hearing by the Bailum's former attorney Martin. The allegation was that there were two different Monica Middletons involved in the 2002 Monica Middleton quiet title action and the 2004 Bailum quiet title action which if true would have factually negated appellant's claim of a fraud on the court. R. p. 338, line 9- 14; p.

340, line 21 to 341 line 18. Appellant's counsel agreed to this procedure but asserted on the record that it would not resolve the other allegations in the Complaint. See R. p 342 lines 11-14. The motion record is clear that both counsel were limited to evidence of different Monica Middletons. R. p. 345, line 16-25. However, attorney Martin later withdrew that statement, R. p. 353 and submitted the transcript of the 2002 Monica Middleton hearing instead. R. p. 107-127. The Circuit Court decision was not based on what the Court stated as the reason for considering summary judgment. See Section D below.

Accordingly, appellant requests rehearing so that the Court may consider these matters which it may have overlooked as more fully discussed below. Each of these reasons alone could support rehearing so that appellant believes that together they make a compelling argument. The applicable authorities are discussed below.

A. The Circuit Court never addressed the merits of the First Count

The First Count alleged numerous procedural defects in the earlier proceeding including a statutory violation in the appointment of the Special Referee depriving him of jurisdiction, see S.C. Code Ann Section 14-11-60, Simmons objection to his appointment and the Bailum parties failure to serve the motion to appoint the Special referee on Simmons who was pro se. Simmons had always demanded that his claims be brought before the Master in Equity and fired attorney Cupp when she failed to follow his request. R p. 29, para. 14. Appellant claimed that the Special Referee exhibited racial animus exhibited toward him because he opposed the appointment and refused to permit Simmons to complete the purchase of the 18 acres pursuant to the Amended Order Quiet Title Partition and Sale. . R p. 34 to 35; R p. 169 para. 6.

The jurisdictional violation and the other procedural defects were raised before the Circuit Court . R p. 82, Id at p. 87-88. At the August 27th motion hearing, appellant asserted that these

procedural deficiencies resulted in a denial of due process. R. p. 327, line 11 to p.331, line 15. The Circuit Court indicated that it was familiar with those issues. R. p. 327, line 18. However, the Circuit Court's decision did not specifically address the allegations of the First Count of the Complaint, i.e. whether there were exceptional circumstances to justify vacating the Special Referee's Amended Order Quiet Title Partition and Sale and the deeds to the heirs' property. See R. p. 1-20. R 236. Instead, the Circuit Court lumped all of these together under the conclusion that appellant could have raised these at trial and on appeal but had abandoned them. R. p. 18. As demonstrated in Points II, III and IV, the Circuit Court overlooked facts which were in dispute or legal arguments which undermined its ruling as a matter of law. These are summarized below.

1. The Special Referee lacked jurisdiction and Simmons did not waive this defect.

The Record on Appeal contains the Order appointing Special Referee. R. p. 357. The Order does not contain any findings as to the existence of just cause since there was a sitting Master in Equity in Charleston County. See S.C. Code Ann. Section 14-11-60. Simmons did not waive this jurisdictional defect because he objected to the appointment of Joseph Mendelsohn in particular. See R p. 169. Simons was pro se at the time that the Bailum parties filed the motion to appoint Mendelsohn and was not served with it. Brief at p. 41, R p. 356, 461. Appellant's then counsel Louis Condon, Esq. filed a new trial motion based upon Simmons objections to the Special Referee. R. p. 464-465. The motion was denied and Simmons filed a Notice of Appeal pro se. R. p. 470. The issue was never decided by this Court due to attorney Houston's abandonment of the appeal.

The jurisdictional issue was asserted in the pleadings and in appellant's opposition to the motion to dismiss. The Circuit Court acknowledged these at the second motion hearing.

Jurisdictional defects in an earlier case are able to be raised in a later proceeding including an independent action to vacate the earlier judgment. See Bunkum v. Manor Properties, 321 S.C. 95, 99-100, 467 S.E.2d 758 (S.C. App. 1996). Therefore, this Court should not have adopted the Circuit Court's decision which failed to address a fundamental aspect of the Special Referee's decision, i.e. whether he had jurisdiction.

2. There was evidence of racial bias by the Special Referee

Appellant asserted that the Special Referee made a racial remark to him during an informal conference held before he was officially appointed. R p. 169, para. 9, p. 207. Subsequent to his Amended Order Quiet Title Partition and Sale granting appellant the right to purchase the 18 acres, see R. p. 392, para.2, the Special Referee conducted a post trial hearing at which he found that appellant's financial backers were the real purchasers and refused to issue a deed to appellant for the 18 acres. R p. 165 -166. Appellant realized that the Special Referee was biased against him after he denied appellant the right to purchase the 18 acres. R p. 169, para. 6. Appellant was represented at the hearing by attorney Houston, R. p. 160, but he never filed an amended Notice of Appeal and this issue was also never reviewed by this Court.

This is another fundamental aspect of the case which the Circuit Court should have addressed, whether there was a lack of fairness in the Bailum case. By adopting the Circuit Court's decision, this Court is rejecting the appellant's position that a racially motivated decision by the Special Referee is a prima facie denial of due process. That is the practical effect of this Court's affirmance of the Circuit Court and it should reconsider its decision.

3. Fraud is an element of the cause of action in the First Count.

Appellant vigorously disputed the Circuit Court's determination that any fraud regarding Monica Middleton's ancestry was intrinsic. See Brief at p. 29-32. Without waiving his

opposition, appellant also demonstrated that intrinsic fraud was an element of the exceptional circumstances justifying relief under the First Count. Brief at p. 39. The controlling authority is this Court's decision in T v. T, 378 S.C. 127, 662 S.E. 2d 413(Ct. App. 2008): "Even if we were to assume based on precedent that any fraud is intrinsic, the judgment is nonetheless vulnerable to attack outside the fraud context . . . and through an independent action if the appropriate circumstances are present." 378 S.C. at 136. The Circuit Court failed to recognize that intrinsic fraud could be a basis to support the claim of exceptional circumstances.

The above facts and legal authorities formed the basis for appellant's contention that there were exceptional circumstances due to which he was denied due process and fundamental fairness in the earlier proceedings. Appellant asserts that a lack of jurisdiction and a biased judge are the hallmarks of a denial of due process. None of these were addressed by the Circuit Court (or this Court); instead the rationale for dismissal of the First Count is to be found in a single sentence of the Circuit Court opinion that appellant abandoned all of the issues, presumably (but not explicitly stated) because of attorney Houston's misconduct. The Circuit Court found that appellant abandoned the prior appeal and never reached these issues in connection with the claim of exceptional circumstances. The Circuit's Court's finding of abandonment of the appeal and res judicata must be considered as inadequate because the application of those principles demands a balancing of interests which never occurred. See Sections B & C. below. This Court's omission of any discussion of that represents a reason for rehearing.

B. Attorney Abandonment of the Appeal was erroneously determined to bind Appellant

Appellant has argued below and to this Court that the misconduct and misfeasance by Simmons appellant attorney Houston in allowing the appeal to be dismissed 3 times should not be attributed to Simmons. See R p. 90-91, Brief at p. 36-37. The Circuit Court posed that

question at the March 1 hearing. See R. 293, line 9-12. The Circuit Court's dismissal of the entire complaint because "appellant abandoned his appeal" does not rely upon any citation of authority dealing with attorney misconduct of the type shown to have existed here. As explained in appellant's Brief, p 35-36 the cases utilized by the Circuit Court are entirely distinguishable. Instead appellant has presented what should be the guiding principles: neglect of an attorney imputed to the client "is not a hard and fast rule. Rather, it is one that is to be applied rationally, with a fair recognition that justice to the litigants is always the polestar." Brown v. Butler, 347 S.C. 259, 554 S.E. 2d 431 (Ct. App. 2001). "Conscience requires this Court to charge the attorney alone with his gross dereliction of duty and not to visit its consequences upon an innocent client." Graham v. Town of Loris, 272 SC 442,452-453, 248 S.E. 2d 594 (1978) (willful and unilateral abandonment). Respondents did not present any authority which supports the conclusion that repeated failures to advance an appellant's valid claims are mere negligence and not abandonment by the attorney.

As appellant as previously argued, in essence, a SCRCP 60(b) action is an equitable action to correct an injustice in a prior judgment. Brief at p. 38. The facts in the record overwhelmingly show that appellant has been diligent in the prior proceedings. He attempted to protect his family property in 2000 by hiring attorney McFarland to bring a quiet title action as to all of the heirs' property including what Monica Middleton later claimed. R p. 167. When attorney McFarland did nothing for appellant's case but unbeknownst to appellant filed Monica Middleton's case, appellant fired him. Id. Appellant hired a former Master in Equity as trial counsel, who according to the Circuit Court failed to adequately represent him. R p. 18, 20. Appellant then hired attorney Houston as appellate counsel and to represent him at a new trial motion. Houston failed to file an amended notice of appeal to preserve the issues arising from

his denial of appellant's purchase of the 18 acres. He failed to file a brief after 3 prior dismissals of the appeal. The Record reflects that attorney Houston exceeded the bounds of negligence in his handling of the appeal and exhibited a willful refusal to adhere to this Court's directives to perfect the appeal issued over more than 14 months. See R. p. 398, 415,417,419. Therefore, the Circuit Court's conclusion that **appellant** abandoned the appeal shows a total lack of understanding of the facts which were largely uncontested by respondents.

At oral argument, this Court inquired about whether appellant had acquiesced to this delay. Appellant's counsel pointed to the Record as containing evidence that Simmons attempted to contact attorney Houston several times about the progress of the appeal but was unsuccessful. See R. p. 167.

By adopting the Circuit Court's opinion, this Court is accepting its finding that Simmons abandoned his appeal, an appeal in which he had meritorious arguments as to a lack of jurisdiction and alleged racial bias which affected the Special Referee's refusal to allow him to purchase the 18 acres; that his attorney's course of conduct over 14 months of which appellant had no knowledge and had never given approval would be attributed to him. Appellant believes that such a finding is fundamentally unfair and should offend the conscience of the Court.

By adopting the Circuit Court's opinion, this Court is abandoning its role to insure that justice is done. No precedent supports this conclusion and this Court should hesitate to create one which affects only appellant. This case is appellant's only adequate remedy. Only this Court can enable him to prosecute his claim that he should have been permitted to acquire the 18 acres but was prevented by racial prejudice and arbitrary conduct. Ethics complaints and malpractice suits will never achieve that result. The finding of abandonment by appellant cannot be justified.

C. The application of res judicata must be balanced with fairness

In finding that res judicata barred this action; the Circuit Court relied on a formulaic approach, i.e. an identity of the parties and claims. R p. 16. However, appellant argued that the principle applicable when addressing collateral attacks on a final judgment was set out in Hagy v. Pruitt, 339 S.C. 425, 529 S.E.2d 714 (2000): the court must balance the need for finality (underlying the principle of res judicata) against the need for a fair and just resolution of the dispute. Brief at 40. There is no indication in the Circuit Court's decision of any such balancing. Appellant also relied upon the decision in T v. T, 378 S.C.127, 135, 662 S.E.2d 413 (Ct. App. 2008), an action under SCRCP 60(b) to vacate a judgment in which Judge Pieper said: "While this court acknowledges the policy considerations which thrive for the finality of judgments, the equities of a case may be just as significant in overriding such finality."

Appellant made a prima facie showing of a lack of fairness in the Bailum case. The Special Referee's Amended Order Quiet Title Partition and Sale granted appellant the right to purchase 18 acres which the Special Referee found that Simmons had protected for forty years. Later the Special Referee refused to allow appellant to complete the transaction because he concluded that the appellant had not obtained financing. Appellant contended before the Circuit Court that his decision was arbitrary and racially motivated, as evidenced by an earlier racial remark he made to Simmons. R 87-88, 169, 206-207. The Circuit Court never recognized its obligation to consider whether it should preserve a result that had jurisdictional deficiencies and alleged racial bias by a strict application of res judicata. This Court should be guided by Judge Pieper's analysis of the application of res judicata in a SCRCP 60(b) action and grant a rehearing of the appeal.

D. The procedural history affected the lack of discovery

As an additional reason for rehearing, appellant suggests that this Court did not fully understand why a lack of discovery should have justified denial of summary judgment of the entire complaint. The progress of the case before the Circuit Court provides the explanation. The complaint filed on August 24, 2009 set forth two independent causes of action seeking the same relief. R p. 26. On September 16, 2009, the Bailum defendants in lieu of filing an Answer moved to dismiss based upon res judicata. R p 45, 49. Appellant responded based in part upon the provisions of SCRCF 60(b) permitting an independent action to vacate a prior judgment. R.p.80. While the motion was pending unheard appellant did not initiate any discovery since the status of the complaint had not been ruled on by the Circuit Court. At the March 1 motion hearing, the Circuit Court acknowledged that fact. R. p. 289, lines 11 -16. The motion was continued without decision until August 27, 2010. R. p. 300, line 20-22; R. p. 306-307. At the August 27 hearing, the former Bailum attorney Martin claimed that two Monica Middletons were involved in the two cases. R. p. 338, line 9-12. The Circuit Court reacted by requesting the respondents to submit affidavits or other evidence to support the claim. Appellant's counsel asserted that this would not affect the claim of exceptional circumstances as a basis for relief. R p. 342, line 11-14. The court then limited the submission to what was pertinent to that issue. R p. 342, line 18-20, R 343, line 6-9. Appellant's counsel did not understand that any other discovery would be needed to address the Court's request. R p. 239.

These facts are pertinent to the appellant's argument that summary judgment was premature since no discovery had been done. R 234-235. At oral argument, this Court inquired about the discovery issue. This Court's affirmation of the Circuit Court decision indicates that it believes that a lack of discovery was not established, as respondents have asserted. However, the

Circuit Court acknowledged the lack of discovery while the motion was pending and discouraged discovery in favor of a limited submission relating to the claim of two Monica Middletons. All of this was spread on the motion record. Appellant presented authority that an R 60(b) case requires consideration of all of the circumstances after they have been fully developed. T v. T, 378 S.C.127, 135, 662 S.E.2d 413 (Ct. App. 2008). The record of what occurred before the Circuit Court does not establish that appellant waived his right to discovery or failed to conduct it when needed, only that he was guided by the Circuit Court's direction to address the respondent's allegations about two Monica Middletons. In his opposition to summary judgment, appellant continued to remind the Circuit Court of the discovery issue. R pp. 141, 234. As appellant pointed out, there was no record of what discovery occurred in the original action. Brief at p. 33. However, appellant contended and respondents have not refuted the contention that they changed position at trial from their admission in the pleadings that appellant was entitled to an heirs interest in the remainder of the 54 acres and that there was but one Sam Bailum involved in the two transaction. Therefore appellant's reliance upon the pleadings in the Bailum case represented at the very least a question of fact which should have resulted in denial of summary judgment on the fraud issue whether extrinsic or intrinsic. See Section A 3.

By affirming the Circuit Court , this Court has said in effect that appellant should have conducted discovery even though the Circuit Court acknowledged that discovery had been deferred based upon continuance of the motion; and then limited the issues which it wanted addressed; and then issued a broad based decision based in part upon a lack of discovery. This is an accurate statement of events. It is not meant as a criticism of the motion judge, only as a way to focus this Court on why discovery was in the state it was. Appellant believes that this is another reason for rehearing.

In summary, appellant should be granted a rehearing of his appeal based upon this Court's adoption of the Circuit Court's decision. The Circuit Court's opinion contains a harsh and unjustified application of the rule imputing attorney misconduct to the client. The Circuit Court opinion did not address the allegations of the First Count of a lack of jurisdiction, racial bias which is largely uncontested and which are the elements of appellant's claim of exceptional circumstances and a denial of due process. The Circuit Court did not conduct any balancing of the interests of justice in applying res judicata necessary in an action under R 60(b) as this Court has mandated. The Circuit Court dismissed the entire case knowing that no discovery had been done on the First Count. These are all fundamental errors. Appellant respectfully requests the Court to recognize that fundamental fairness has been denied to a worthy plaintiff and grant a rehearing on these issues.

CONCLUSION

For the reasons contained above, appellant respectfully requests that the Court grant a rehearing of the appeal to address the issues presented herein.

Respectfully submitted,

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Dated: March 6, 2013
Charleston, SC

The South Carolina Court of Appeals

Roosevelt Simmons, Appellant,

v.

Hattie Bailum, Ruby Bailum, Verdone Bailum, Julie B. Johnson, Monica Middleton, Marie Smith, Melvin Singleton, Franklin Smith, LMC, LLC, John Martin, Esquire as Trustee, Respondents.

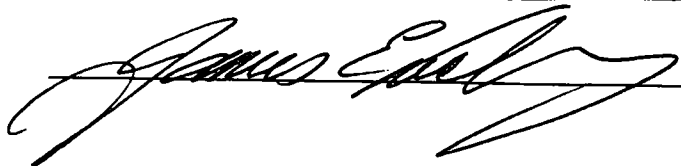
Appellate Case No. 2011-189009

ORDER

After careful consideration of the petition for rehearing, the Court is unable to discover that any material fact or principle of law has been either overlooked or disregarded, and hence, there is no basis for granting a rehearing. Accordingly, the petition for rehearing is denied.


_____ J.


_____ J.


_____ J.

Columbia, South Carolina

cc:
Roosevelt Simmons
John F. Martin
Anastasios Hugh Chakeris
John A. Massalon

FILED

18 April 2013

App 18

Edward A. Bertele
Ilonka Sonja Taylor

App 19