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SC Court of Appeals

FORM 13
BRIEF OF APPELLANT

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

2020CP3201461 Walton J. McLeod,

IV,

Appellate Case No. 2022-

000263

James B. Lybrand, Junior,
Esquire
Attorney for the Defendant,
General Joe VanLier — Respondent,

v.

William Lee Klotz, Pro se
Plaintiff, — Appellant.

INITIAL BRIEF OF APPELLANT

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s/ William Lee Klotz
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Arguments

1. STANDARD OF REVIEW: REVIEWABLE DE NOVO.

AT THE BEGINNING OF TRIAL PROCEEDINGS . RESPONDENT COUNSEL WALKED UP TO THE HONORABLE JUDGE MCLEOD WHO WAS IN FRONT OF THE BENCH AND APPELLANT HEARD COUNSEL SAY "THIS CASE IS ABOUT A LOT OF MONEY." APPELLANT COULD NOT HEAR FURTHER DISCUSSION AS IT WAS CONDUCTED IN A LOW VOICE. APPELLANT READS IN THE TRANSCRIPT THAT MEDICAL BILLS IN THE CASE WERE ABOUT $120,000, AND TOTAL VALUE WITH THE "OLD FASIONED" FACTOR OF 3 WOULD BE $360,000. THIS EX PARTE COMMUNICATION SET THE TONE AND TENOR OF THE TRIAL AND PROVIDED A PROCEDURAL, SUBSTANTIVE, AND TACTICAL ADVANTAGE TO DEFENSE COUNSEL. AT A PREVIOUS VIRTUAL PRE-TRIAL MEETING WITH JUDGE WILLIAM P. KEESLEY AND RESPONDENT COUNSEL, THE COUNSEL INFORMED JUDGE KEESLEY HE WOULD APPEAR PRE-TRIAL INLIMINE REGARDING ADMISSABILITY OF MY EXHIBITS. IT APPEARED TO ME THIS WAS INTENDED TO BE DONE EX PARTE, SO I IMMEDIATELY OPPOSED BY FILING A MOTION FOR RULE 16 REVIEW. IN SUBSEQUENT EMAILS WITH RESPONDENT COUNSEL HE REPEATEDLY INDICATED A HEARING WOULD BE HELD, BUT IT WAS NOT. APPARENTLY THE STRATEGY ALL ALONG WAS TO APPEAR PRE-TRIAL THE DAY OF THE TRIAL TO PREVENT USE OF MY EXHIBITS. I SUSPECT STATE FARM INSURANCE WAS PERTURBED BECAUSE RESPONDENT COUNSEL HAD PROVIDED DISCOVERY TO ME, AND DEMANDED THIS STRATEGY BE USED, OTHERWISE I WOULD HAVE A STRONG CASE. HOWEVER, A WIN WITHOUT HONOR IS NO WIN AT ALL. THIS INCLUDES DECEPTION. I DON'T BELIEVE IT ORIGINATED WITH THE

COUNSEL, BECAUSE HE WAS HELPFUL IN THE PAST.

2. STANDARD OF REVIEW: REVIEWABLE DE NOVO

AT THE START OF THIS TRIAL CASE, ALL CLAIMS AND ALL THEIR PARTS ARE ALLEDGED, AS NO PROOFS HAVE BEEN ESTABLISHED AND APPELLANT MADE NO SUCH STIPULATION. IN FACT, RESPONDENT COUNSEL'S ANSWER TO COMPLAIN CONFIRMS THAT "AXLE BREAK" IS ALLEGED. NEVERTHELESS, COUNSEL PROCEEDS TO CONSIDER IT ESTABLISHED FACT AT TRIAL.

3. STANDARD OF REVIEW: REVIEWABLE FOR CLEAR ERROR

PRE-TRIAL BRIEF SHOULD HAVE BEEN VOLUNTARY. APPELLANT PROVIDED A DETAILED BRIEF, THEREBY REVEALING LEGAL STRATEGY AND TECHNICAL DETAILS TO RESPONDENT'S COUNSEL THAT COULD HAVE BEEN USED TO INFLUENCE RESPONDENT'S AND WITNESS TESTIMONY. RESPONDENT'S PRE-TRIAL BRIEF IS DEVOID OF ANY TECHNICAL EVIDENCE AND CONTAINS INACCURACIES. FOR EXAMPLE, IT STATES APPELLANT'S VEHICLE (NOT RESPONDENT'S) STRUCK A BARRICADE. ON THE STAND TROUPER ANTLEY CONFIRMED THIS WAS A TYPO IN THE POLICE REPORT. RESPONDENT COUNSEL'S BRIEF STATES THAT RESPONDENT PROCEEDED FROM THE LOSS OF WHEEL LOCATION UP TO WHERE OFFICER ANTLEY WAS, RESPONDENT'S TESTIMONY APPARENTLY WAS MODIFIED TO SAY THE TROOPER CONVERSATION TOOK PLACE AT THE WHEEL LOSS LOCATION. IN FACT, RESPONDENT'S TESTIMONY APPEARS TO HAVE BEEN DESIGNED TO CONTRADICT APPELLANT'S BRIEF. THE ACCIDENT REPORT DRAWING SHOWS RESPONDENT'S TRUCK FRONT STRIKING APPELLANT'S PRIUS' REAR. RESPONDENT STATES HIS TRUCK MOVED SIDEWAYS AND ITS REAR DENTED THE PRIUS, AN ABSURD STATEMENT. TWICE IN TESTIMONY RESPONDENT SPREAD HIS HANDS APART IN AN AWKWARD HISTRIONIC GESTURE OF AMAZEMENT AND SAID HE LOOKED AND ASKED HIMSELF "WHERE IS MY TIRE". THIS SUGGESTS COACHING. APPELLANT TESTIFIED AT TRIAL AND IN DEPOSITION THE TIRE WAS THERE IN THE MEDIAN STRIP, AND RESPONDENT WOULD HAVE SEEN IT EXITING THE DRIVER SIDE DOOR. RESPONDENT COUNSEL'S INTRODUCTION OF OUTSIDE AND INSIDE LANES AS TERMS SEEMED INTENDED TO CONFUSE THE JURY BUT IN FACT CONFUSED RESPONDENT. SEVERAL TIMES COUNSEL IMPORTUNED RESPONDENT TO SAY "INSIDE LANE" WHEN RESPONDENT ACTUALLY TESTIFIED MEDIAN LANE OR FAST LANE. RESPONDENT IN TESTIMONY SHOWED CLEAR EVIDENCE OF COACHING AND SELF-

AND SELF-CONFLICTING TESTIMONY WAS GIVEN AND THE JURY WAS THEREBY MISLED. REVIEW OF ACCIDENT PROGRESSION MUST NOW BE INVESTIGATED BY THE SC MAIT. TROOP 9 MULTI-DISCIPLINARY ACCIDENT INVESTIGATION TEAM AND IS HEREBY REQUESTED. APPELLANT INFORMED RESPONDENT COUNSEL HE COULD NOT EMPLOY AN ACCIDENT RECONSTRUCTOR WITHOUT AN ATTORNEY, AND SUGGESTED COST SHARING FOR SUCH AS PART OF THE ADA, AS WE HAD COST SHARED FOR THE MEDIATOR. HOWEVER COUNSEL REFUSED. ALTHOUGH OBJECTING TO THE COURT THAT A PROFESSIONAL RECONSTRUCTOR WAS REQUIRED FOR THIS CASE, AND IMPUGNING THE QUALIFICATIONS OF APPELLANT AS A LICENSED PROFESSIONAL ENGINEER BY EXAMINATION, PRACTICE, AND CONTINUED EDUCATION, COUNSEL PRESENTED AS WITNESS FOR ENGINEERING ANALSIS TO GIVE OPINION ON CAUSE AND PROGRESSION OF THE ACCIDENT, A STATE TROOPER NOT LICENSED AS AN ENGINEER WITH STATED EXPERIENCE “WORKING WITH CARS WHILE IN HIGH SCHOOL AND COLLEGE”. PICKUP TRUCKS, THE SUBJECT OF THIS CASE, ARE QUITE DISTINCT FROM CARS, AND ACCIDENT PROGRESSION REQUIRES ENGINEERING JUDGEMENT, WHICH CAN ONLY BE GIVEN BY A LICENSED PROFESSIONAL ENGINEERE OR EMPLOYEE OF A COMPANY EMPLOYING LICENSED ENGINEERS. THE LAW WAS NOT INTERPRETED EVEN HANDEDLY.

7. STANDARD OF REVIEW: REVIEWABLE DE NOVO

APPELLANT’S FORMER ATTORNEY, MR. MARION CHACE HAWK OF GEORGIA FIRM LOCATION, INFORMED HIM THAT UNDERLYING THE ABSOLUTION OF FAULT FOR SUDDEN MECHANICAL FAILURE IS THAT THIS IS AN “ACT OF GOD.” ANY UNDERLYING PRESUMPTION THAT A MECHANICAL FAILURE MAY BE UNFORESEEABLE AND EQUIVALENT TO AN “ACT OF GOD” HAS NO BASIS IN ANY SCIENCIFIC, THEOLOGIC, OR PHILOSOPHIC KNOWLEDGE AS TO WHEN OR WHY THE DEITY WOULD ACT IN SUCH CIRCUMSTANCES, SO PRESUMPTION OF “NO FAULT” IS NOT POSSIBLE. AS AN EXAMPLE, CLIMATE CHANGE RESULTING FROM MANKIND’S ACTIONS ELIMINATES WEATHER CATASTROPHES AS A GOLD STANDARD FOR ACTS OF GOD.

8. STANDARD OF REVIEW: REVIEWABLE FOR ABUSE OF DISCRETION

IN FACT, THIS SILENCING OBSTRUCTED THE IMPLEMENTATION OF APPELLANT’S RIGHT TO ACT PRO SE, AS PROVIDED BY THE UNITED STATES CONSTITUTION. A STATEMENT OF QUALIFICATIONS OF

APPELLANT WILL BE PROVIDED AS DESIGNATED MATTER TO ELABORATE ON THIS.

9. STANDARD OF REVIEW: REVIEWABLE FOR ABUSE OF DISCRETION

   RESPONDENT'S REQUESTED DAY CERTAIN WITH ONLY TWO DAYS FOR TRIAL AND A LATER OVERLY SIMPLIFIED VERDICT FORM ALLOWED JURORS TO REALIZE THEY COULD COMPLETE DELIBERATIONS IN ONLYABOUT ONE HOUR BY SELECTING "SUDDEN MECHANICAL FAILURE" AND GO HOME TO A VALENTINE'S DINNER, CHOCOLATES AND CHAMPAGNE,

10. STANDARD OF REVIEWABLE FOR ABUSE OF DISCRETION

    RESPONDENT'S COUNSEL BY THESE ACTIONS HAS MADE INFLAMMATORY DISCLOSURES TO A LIKELY CONSERVATIVE JURY RESENTFUL OF ELITISTS, ELECTRIC VEHICLES, AND CHARACTERIZING APPELLANT AS RACIST. IN FACT, APPELLANT HAD REQUESTED A DIVERSIFIED JURY IN HIS VOIR DIRE. THERE ARE 12 TESLA SUPERCHARGERS IN LEXINGTON NEAR THE COURT HOUSE.AND THE APPEALS BOARD SHOULD CONSIDER THESE TO AVOID EV BIAS THEMSELVES. IN AS MUCH AS APPELLANT'S STATUS AS PRO SE DEPENDS ON CONSTITUTIONAL GUARANTEES, AND 30% OF AMERICANS ARE CONSERVATIVELY IN FAVOR OF A NEW CONSTITUTION, THESE QUESTIONS ARE RELEVANT TO IDENTIFYING HOSTILE JURORS.

11. STANDARD OF REVIEW: REVIEWABLE FOR ABUSE OF DISCRETION

    WHILE RULE 16 IS DISCRETIONARY, ITS DISREGARD IN THIS CASE HAS BEEN ABUSIVE IN THAT IT HAS ALLOWED RESPONDENT TO SUPPRESS APPELLANT'S EXHIBITS IN A CRUDE AND OVERBEARING MANNER, ABETTED BY THE COURT'S DISRUPTION OF THE ORDER OF PRESENTATION REQUESTED IN HIS MOTION, AND THE ABSENCE OF ANY CITATION OF RULES OF EVIDENCE BY RESPONDENT'S COUNSEL, WHO ONLY OBJECTED TO "DOWNLOADED FROM THE INTERNET." APPELLANT'S EXHIBITS INCLUDED, IN ADDITION TO THOSE ADMITTED, DOCUMENTS PROVIDED BY COUNSEL IN RESPONSE TO DISCOVERY, DOCTORS' REPORTS (MEDICAL PUBLICATIONS FROM REFEREED JOURNALS AND DOCTORS' NOTES WHICH HAD BEEN PROVIDED TO COUNSEL AND THE LOWER COURT DOCKET ON TWO OCCASIONS AT COUNSEL'S REQUEST FOR HEARING, RESPECTED TRADE JOURNAL DOCUMENTATION OF DEFECTS IN THE 2008 DODGE RAM DRIVEN BY RESPONDENT THAT

WOULD HAVE CAUSED THE ACCIDENT, AND DOCUMENTATION REFLECTING LACK OF MAINTENANCE AND MULTIPLE OWNERS OF RESPONDENT'S TRUCK AS NEGLIGENCE, LACK OF DUE DILIGENCE IN OPERATING THE TRUCK, AND DOCUMENTION OF SPECIFICATIONS OF THIS PARTICULAR DODGE RAM TRUCK INDICATING MULTIPLE BRAKES INCLUDING EMERGENCY BRAKES THAT COULD HAVE AVOIDED THE COLLISION OR MITIGATED IT, AND ALLOWED RESPONDENT TO CONTROL AND STOP HIS VEHICLE BEFORE PROCEEDING A SUBSTANTIAL DISTANCE DOWN HWY 20. MEDICAL JOURNALS SUMMARIZE PAPER CONTENTS IN ABSTRACTS AND CONCLUSIONS NOT REQUIRING AN EXPERT WITNESS FOR PRESENTATION, AND DRS' NOTES ARE NOW DESIGNED TO BE UNDERSTOOD BY LAY PATIENTS AND ARE AVAILABLE ONLINE THROUGH PATIENT PORTALS. MY CHIEF CARDIOLOGIST'S STATEMENT REGARDING THE ACCIDENT AS THE CAUSE OF MY ATRIAL FLUTTER WAS AVAILABLE TO BE VIEWED ONLINE IN MY COMPUTER AT SANGER INSTITUTE, AND I HAD BROUGHT A LARGE ONE FOOT MODEL OF A HEART WITH COMPONENTS REMOVABLE AND DESCRIBED BY KEY TO EDUCATE THE JURY. COUNSEL AND STATE FARM INSURANCE WERE UNCOOPERATIVE WITH REGARD TO DISCOVERY, WHICH WAS ONLY PROVIDED WHEN APPELLANT INFORMED COUNSEL HE COULD NOT PROCEED WITH ADA UNLESS DISCOVERY WAS AVAILABLE. COUNSEL INITIALLY ASKED APPELLANT TO COMMUNICATE DIRECTLY REGARDING PROPERTY DAMAGES, BUT ON EACH TELEPHONE CALL MADE WITH STATE FARM A DIFFERENT AGENT WAS ASSIGNED WHO WAS IGNORANT OF CLAIM DETAILS. COMPLETE MEDICAL INFORMATION AND BILLS WERE PROVIDED TO COUNSEL AND BECAME PUBLIC DOMAIN ONCE ENTERED IN COUNSEL'S AND COURT FILES, SUBJECT TO FREEDOM OF INFORMATION REQUEST, SUPOENA, ETC. THE COURT ERRONEOUSLY STATED THIS WAS PROTECTED INFORMATION.

12. STANDARD OF REVIEW: REVIEWABLE DE NOVO

TROOPER ANTLEY LEFT THE SCENE SOON AFTER ARRIVING BECAUSE HE WAS CALLED TO ANOTHER ACCIDENT ON U.S. 20. THIS COULD BE VERIFIED BY THE TROOPER'S CALL LOG FOR FEBRUARY 22, 2015. DEFENSE COUNSEL'S PRE-TRIAL BRIEF STATES THAT RESPONDENT TRAVELED UP THE HIGHWAY TO MEET WITH THE TROUPER. THIS WOULD HAVE HAD TO BE WITH THE TOW TRUCK, BECAUSE THE COLLISION TRUCK WAS NOT DRIVEABLE. APPELLANT OBSERVED AND PHOTOGRAPHED THIS MEETING IN AN ADMITTED PHOTOGRAPH WITH A TIME OF 5:07 PM FROM THE JPG PROPERTIES DETAIL. THE ACCIDENT REPORT WAS REVIEWED ON

2/23/20015 BY RD MARTIN, BUT HE WAS NOT CALLED AS A WITNESS. TROOPER ANTLEY TESTIFIED HE SELECTED “73 TIRES/WHEEL” AS VEHICLE DEFECT BECAUSE NO OTHER CHOICE WAS AVAILABLE, HOWEVER “72 POWER PLANT” AND “88 OTHER” WERE POSSIBLE CHOICES. THIS INFLUENCED THE JURY AS IT WAS BROUGHT UP IN RESPONDENT COUNSEL’S SUMMATION. LIKEWISE IT SHOULD BE CONSIDERED THE CHOICE OF RD MARTIN, REVIEWER.

13. STANDARD OF REVIEW: REVIEWABLE DE NOVO

    APPELLANT OBJECTED AT TRIAL BY STATING THAT THIS REQUIRED BY STATING THAT THIS WAS ONLY APPLICABLE IF A THIRD PARTY OR CAUSE WAS INVOLVED. THE COURT WAS GOING TO PROVIDE RESEARCH. APPELLANT DOESN’T KNOW IF THIS WAS DONE, BUT IT WASN’T PROVIDED. IT WAS CHARGED TO THE JURY AND IS LIKELY CAUSE FOR RETRIAL, AS RESPONDENT BY HIS TESTIMONY WAS ONLY REACTING TO MOVING CLOSER TO MY CAR, HARDLY AN EMERGENCY. BOTH WITNESSES MADE THE UNLIKELY AND SUSPECT STATEMENT THAT THE TRUCK PROCEEDED WILDLY DOWN THE ROAD WITH NO CONTROL, AGAIN NOT A CAUSATIVE FACTOR FOR THE PRECEDING COLLISION. RESPONDENT COULD HAVE SIMPLY TAKEN HIS FOOT OFF THE GAS, APPLIED THE EMERGENCY HANDBRAKE, STEERED FORCEFULLY, AS STEERING AXLES WERE NOT BROKEN, PUT ON EMERGENCY FLASHERS, OR SOUNDED HIS HORN.

14. STANDARD OF REVIEW: REVIEWABLE FOR CLEAR ERROR

    APPELLANT HAD BEEN IN ATRIAL FIBRILLATION AND ATRIAL FLUTTER SINCE DECEMBER 2021 AND AN APPOINTMENT FOR CARDIOVERSION TO CORRECT THIS UNTIL FRIDAY AFTER THE TRIAL ON THE DAY CERTAIN. THIS CONDITION AFFECTED APPELLANT’S VOICE INTENSITY AND GENERAL COMPORT. THE TRIAL COURT CHARGED THE JURY TO WATCH FOR ABNORMAL DIFFERENCES IN TESTIMONY. THIS CHARGE AND GENERAL CONDITION WOULD HAVE AFFECTED APPELLANT’S PERCEPTION BY THE JURY.

TABLE OF AUTHORITIES*

CASES

STATUTES

OTHER AUTHORITIES

STATEMENT OF ISSUES ON APPEAL

1. DID THE TRIAL COURT ERR IN ALLOWING AN EX PARTE COMMUNICATION OF THE PRESIDING JUDGEWITH DEFENSE COUNSEL ON FEBRUARY 14, 2022
2. DID THE TRIAL COURT ERR IN ALLOWING COUNSEL FOR RESPONDENT TO PRESENT ACCIDENT CAUSATION BY BROKEN AXLE WHEN IT WAS NOT STIPULATED IN APPELLANT'S CLAIM.
3. DID THE TRIAL COURT ERR IN FAILING TO NOTIFY WITHESSES OF SC LAW REGARDING PRETRIAL COACHING AND ACCESSING PRETRIAL BRIEFS.
4. OATH VIOLATION AND UNCONSTITUTIONALITY OF DOCTRINE OF FORBIDDING MENTION OF INSURANCE AGENCIES AND COVERAGE AT TRIAL.
5. DID THE COURT ERR IN SILENCING THE APPELLANT'S RIGHT TO SPEAK ON TECHNICAL AND MEDICAL MATTERS IN WHICH HE HAS SCIENTIC AND ENGINEERING EDUCATIONAL TRAINING TO A VERIFIABLE EXTENT AND COMPLIANT WITH RULE 701
6. DID THE TRIAL COURT ERR BY ALLOWING A WITNESS TO TESTIFY AS TO ACCIDENT PROGRESSION AND CAUSALITY ON AN EXPERT BASIS WITHOUT EVIDENCE OR DEMONSTRATION OF QUALIFICATIONS OR TRAINING SIMPLY BY VIRTUE OF BEING A SC STATE TROUPER.
7. DID THE TRIAL COURT ERR IN DETERMINING THAT SOUTH CAROLINA LAW DETERMINED THE FAULT AND LIABILITY OF RESPONDENT AND HIS INSURANCE COMPANY STATE FARM INSURANCE IN THIS CASE, RATHER THE LAW OF THE STATE OF GEORGIA, WHERE RESPONDENT WAS INSURED, WOULD HAVE OBTAINED (SEE CASE 1).
8. DID THE TRIAL COURT ERR BY SETTING ASIDE APPELLANT'S OBJECTIONS IN HIS RULE 16 MOTION.
9. DID THE TRIAL COURT ERR BY PROVIDING INSUFFICIENT TIME FOR EXHIBIT PRESENTATION AND RUSHING THE TRIAL.
10. DID THE TRIAL COURT ERR IN FAILING TO PRESENT APPELLANT'S VOIR DIRE QUESTIONS AS TO DOES ANYONE BELIEVE THE 2020 ELECTION WAS STOLEN, OR IN WHITE SUPREMACY, WHILE ALLOWING A BATSON CHALLENGE TO APPELLANT WITH JURY PANELISTS STILL IN THE COURT ROOM, AS SHOWN BY TRANSCRIPT, AND FURTHER ALLOWING RESPONDENT'S COUNSEL TO IRRELEVANTLY INQUIRE AS TO APPELLANT'S FINANCIAL MEANS BYASKING HOW MUCH DID YOU PAY FOR YOUR TESLA (($110,000) AND HOW MANY CARS DO YOU OWN?
11. DID THE TRIAL COURT ERR IN FAILING TO REVIEW APPELLANTS MOTION FOR A RULE 16 HEARING.
12. DID THE TRIAL COURT ERR IN ALLOWING TROOPER ANTLEY'S TESTIMONY THAT RELIED ON THE INADMISSABLE FORMS FR-10/TR310

AND DIAGRAM

13. DID THE COURT ERR REGARDING CHARGING OF NO FAULT FOR SUDDEN EMERGENCY OR SUDDEN MECHANICAL FAILURE WITH EVIDENCE NOT ALLOWED TO THE CONTRARY AND WHEN NO THIRD PARTY OR EXTERNAL CAUSE WAS INVOLVED
14. DID ASSIGNMENT OF A DAY CERTAIN FOR TRIAL WORK AN INEXORABLE HARDSHIP IN APPELLANT PRESENTING HIS CASE.

ARGUMENTS ARE PRESENTED BY
CORRESPONDING NUMBER IN
SECTION 1.

STATEMENT OF THE CASE

On February 13, 2018, Marion Chase Hawk, former attorney for Appellant, brought this action for accident damages against General Joe VanLier and entered under Docket No. 20 1 8CP3200527, After a one year delay this Case was timely reentered with the new current docket number.

On February 15, 2022, the case was tried by a jury which found no fault for General Joe VanLier with no further findings. On February 28, 2022, William Klotz served the Notice of Appeal on General Joe VanLier.

STANDARD OF REVIEW

A SEPARATE SCTION OF STANDARD OF REVIEW HEADS EACH ARGUMENT.

FACTS

THE SALIENT FACTS CAN BE FOUND IN THE ARGUMENTS OF SECTION 1 , HIGHLIGHTED TRANSCRIPT SECTIONS AND THE EXHIBITS OF THE RECORD ON APPEAL AND THE EXHIBITS SUBMITTED TO THE LOWER COURT, BY RULE 208(B)(4), SCACR.

CONCLUSION

Conclusion TRIAL VERDICT SHOULD BE VACATED AND PROVISION FOR A NEW TRIAL MADE AS THE ONLY REMEDY POSSIBLE FOR THE DEFECTS IN PROCESS AND RULINGS FOR THE SUBJECT TRIAL 2

Respectfully submitted,

August 15, 2022

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