

RECEIVED

Mar 17 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2023-000135
Unpublished Opinion No. 2022-UP-413

Lucas Marchant,Respondent,

v.

John Doe and John Doe d/b/a Democrats for Marchant, Defendants,

Of which John Doe is thePetitioner.

REPLY TO RESPONDENT'S RETURN
TO PETITION FOR A WRIT OF CERTIORARI

Samuel D. Harms
S.C. Bar No: 13537
Double Aught Injury Lawyers
33 Market Point Drive
Greenville, SC 29607
SamuelHarms@Call00.com
(864) 453-0000
Attorney for Petitioner

INTRODUCTION

In the respondent's return, the return often fails to clearly differentiate between John Doe 1 and John Doe 2. The respondent's return will occasionally refer to John Doe 1 as "John Doe." The respondent's return will occasionally refer to John Doe 2 as "John Doe." This creates confusion when the respondent describes the legal filings and legal arguments of John Doe 1 but attributes them to a generic "John Doe;" and at the same time, uses the generic phrase "John Doe" to describe the legal filings and legal arguments of John Doe 2. Since both defendants are named John Doe by the plaintiff in the ethics complaint, and to avoid confusion, this reply uses the description John Doe 1 to refer to the first defendant to file an answer and uses the description John Doe 2 to refer to the second defendant to file an answer to the ethics complaint. This reply is filed by John Doe 2.

FACTS

In response to the return of the plaintiff, defendant John Doe 2 highlights two additional facts in this reply. In the ethics complaint, the plaintiff alleges that the "Defendants' actions violate ... criminal acts." (R. pp. 22-23) (Complaint para. 19). The complaint asks the trial court to issue a declaratory judgment that would declare that the "Defendants actions violate criminal acts." (R. pp. 22-23) (Complaint para. 19). The plaintiff's complaint does not ask for a jury trial. These facts are important because of the discussion of subject matter jurisdiction in the concurring opinion in *Rainey v. Haley*, 404 S.C. 320, 745 S.E.2d 81 (2013). Can the Court of Common Pleas, in the context of an ethics complaint, declare that the defendants committed a crime? The plaintiff's return states that: "Marchant filed a lawsuit to accomplish two things: ... (2) to declare

the deceptive, anonymous activity related to an election illegal.” (Resp. Return p. 4). John Doe 2 asks this Court to issue a writ of certiorari and file a decision holding that the Court of Common Pleas does not have subject matter jurisdiction to declare the defendant guilty of a crime.

ARGUMENTS

PART ONE: SUBJECT MATTER JURISDICTION

Question 1. The plaintiff filed a campaign ethics complaint against the defendants in the Court of Common Pleas instead of the South Carolina State Ethics Commission. Does the Court of Common Pleas have subject matter jurisdiction over the campaign ethics complaint?

The Court of Appeals’ Opinion fails to recognize that the Court of Common Pleas (and the Court of Appeals) do not have subject matter jurisdiction over the ethics complaint. The Supreme Court should grant a writ of certiorari because the Opinion conflicts with the Supreme Court’s decision in *Rainey v. Haley*, 404 S.C. 320, 745 S.E.2d 81 (2013), and because *Rainey v. Haley* was resolved on a split decision with 3 Justices forming the majority opinion and 2 Justices concurring in the result.

In his return, the plaintiff’s primary argument is that “the [Ethics] Act does not apply to private entities,” and therefore, the plaintiff cannot file the complaint with the State Ethics Commission (or state house and state senate), but instead, the plaintiff must file the complaint with the Court of Common Pleas. (Resp. Return. p. 12). The argument of the plaintiff is without merit, as the campaign ethics laws cover lobbyist, political parties, individuals, groups, candidate committees, ballot-measure committees, non-candidate committees who attempt to influence the results of an election (special interest groups), and other “private entities.” The plaintiff is arguing that lobbyist, political

parties, and non-candidate committees (special interest groups) are not subject to the campaign ethics laws. If this is true, then lobbyists, special interest groups, and political parties do not have to make disclosures of contributions and expenditures to the State Ethics Commission. If the plaintiff is correct, that private entities are not subject to the Ethics Act, then the defendants in this case are not subject to the prohibitions in the Act since they are private entities. The plaintiff's complaint alleges that the defendants are violating "the Act" by making illegal anonymous campaign contributions. If the defendants are not subject to "the Act," what does it matter if the defendants are making anonymous campaign contributions? The plaintiff cannot have it both ways. Either the defendants are subject to the campaign finance laws, and the plaintiff's ethics complaint must be filed with the State Ethics Commission; or the defendants are not subject to the Act, and the plaintiff's complaint is nonsensical since it accuses the defendants of conduct that is not illegal.

The only case cited by the plaintiff in support of his argument that "the Act does not apply to private entities" is *Shah v. Richland Memorial Hosp.*, 350 S.C. 139, 564 S.E.2d 681 (Ct. App. 2002). In *Shah*, a radiologist who worked at Richland Memorial Hospital sued Richland Memorial Hospital for breach of contract, unfair trade practices, and for violating the State Ethics Act because the new director of the radiology department stopped referring work to Shah, and instead, allegedly engaged in self-dealing by referring most of the radiology work to a company owned by the new director. The Court of Appeals held that the two self-dealing statutes at issue, S.C. Code Ann. §§ 8-13-700 and 8-13-775 (2019), do not apply to a private entity (Richland Memorial Hospital) because the self-dealing statutes only apply to a "public official,

public member, or public employee” pursuant to the plain language of the statutes. The *Shah v. Richland Memorial Hosp.* case is not relevant to any issues in the present case. The present case does not involve any allegations of financial self-dealing by a public official.

Next, the plaintiff argues that he could have filed a separate, stand alone, lawsuit for defamation against the defendants so it is “harmless” that the defamation action was brought by amending the original complaint. (Resp. Return. pp. 14-15). In response, John Doe 2 states that the plaintiff did not file a separate, stand alone, lawsuit for defamation. The Court should not issue an advisory opinion on what could have happened if the plaintiff filed a separate, stand alone, lawsuit for defamation. The Court should issue its decision based on the actual legal filings of the parties. The distinction is not “harmless” as argued by the plaintiff.

The plaintiff amended his ethics complaint, more than 10 days after filing the original ethics complaint, to add a cause of action for defamation. However, a trial court cannot reacquire subject matter jurisdiction after the trial court has lost subject matter jurisdiction (after 10 days). *Fielden v. Fielden*, 274 S.C. 219 fn. 1, 262 S.E.2d 43 fn. 1 (1980). The *Fielden* footnote, from a Family Court case, is the only citation that appears to address the issue of the reacquisition of subject matter jurisdiction after it has been lost by the trial court. This issue is novel because the instant case is filed in the Court of Common Pleas, not Family Court. For this reason, the plaintiff’s argument in his return raises an issue of first impression in South Carolina, and the Court should issue a writ of certiorari to issue a ruling on this issue. If the Court of Common Pleas never had subject matter jurisdiction, or if the Court of Common Pleas lost subject matter jurisdiction after

10 days, can the Court of Common Pleas reacquire subject matter jurisdiction if the original complaint is amended to add a cause of action for defamation? The Supreme Court should grant a writ of certiorari because the trial court's order and the Court of Appeals' Opinion conflicts with the Supreme Court's decision in *Rainey v. Haley*, 404 S.C. 320, 745 S.E.2d 81 (2013), and the issues raised by both parties are novel questions of law.

PART TWO: THE IMMEDIATE APPEALABILITY OF THE TRIAL COURT'S ORDER

Question 2. The order of the trial court will unmask the identity of John Doe 2. Once the identity of John Doe 2 is unmasked, the appellate courts have no remedy to correct the trial court, so the order of the trial court determines the action and prevents a subsequent appealable judgment. The Court of Appeals found that the order of the trial court was not immediately appealable and dismissed the appeal. Did the Court of Appeals err in dismissing the appeal?

The order of the trial court will unmask the identity of John Doe 2 because it allows Facebook to respond to the subpoena. The order of the trial court is immediately appealable. This issue is an issue of first impression in the context of a plaintiff seeking to unmask the identity of a John Doe defendant in a civil lawsuit. Once the identity of John Doe 2 is revealed, by Facebook responding to the subpoena, the appellate courts have no remedy to correct the trial court, so the order of the trial court in effect determines the action and prevents an appealable judgment. In addition, the trial court's order affects a substantial right of John Doe 2 - the constitutional rights to anonymous political speech and the anonymous distribution of political speech of third parties. The plaintiff's return fails to address those two issues. The plaintiff's return does not cite to any case law that indicates the appellate courts have a remedy that can grant anonymity to John Doe 2 after John Doe 2's identity is unmasked by Facebook. Since

this is an issue of first impression, and there are substantial constitutional issues directly involved, the Supreme Court should grant John Doe 2's petition.

PART THREE: FEDERAL AND STATE CONSTITUTIONAL RIGHTS

Question 3. Does John Doe 2 have a federal constitutional right to anonymous political speech and the anonymous distribution of political speech of third parties? Did the Court of Appeals err in not reaching the issue?

John Doe 2 has a federal constitutional right to anonymous political speech and the anonymous distribution of political speech of third parties, however, the trial court held: "The Defendant does not have a constitutional right to speech at issue in this case." (R. pp. 8-9) (Order 08/28/2019 pp. 6-7) and "that John Doe 2 does not have a federal constitutional right to anonymous political speech or a federal constitutional right to anonymous distribution of political speech." (R. p. 9) (Order 08/28/2019 p. 7). The plaintiff's return does not cite any South Carolina cases addressing this issue. As such, this is an issue of first impression in South Carolina in the context of a civil lawsuit. In addition, substantial constitutional issues are directly involved with this issue. The Court should issue a writ of certiorari to provide clarity on this important and novel constitutional issue.

Question 4. Does John Doe 2 have a state constitutional right to anonymous political speech and the anonymous distribution of political speech of third parties? Did the Court of Appeals err in not reaching the issue?

In additional to the federal constitutional rights of John Doe 2, the defendant has a right to freedom of speech and a right to freedom of the press guaranteed by the South Carolina Constitution, and those rights include the right to anonymous political speech and a right to the anonymous distribution of political speech of third parties. The

plaintiff's return does not cite any South Carolina cases addressing this issue. As such, this is an issue of first impression for the Court. Also, substantial constitutional issues are directly involved with this issue. The Court should issue a writ of certiorari to provide clarity on this constitutional issue of first impression.

PART FOUR: THE DEFAMATION CLAIM

Question 5. The plaintiff is a politician who alleges that he was defamed during his campaign for political office. Can a politician bring a defamation action when the politician alleges that the defendants acted with mere malice? Did the Court of Appeals err in not reaching the issue?

The plaintiff is a politician who alleges that he was defamed during his campaign for political office. His amended complaint alleges that the defendants acted with malice, but not actual malice. (R. p. 28) (Amended Complaint para. 27). The plaintiff argues that: "In construing a complaint, this Court should review the entire pleading," and refers the appellate court to paragraphs 12, 13, 14 and 18 of the amended complaint to create an allegation of "actual malice." (Resp. Return. p. 20). Those paragraphs do not allege actual malice. The plaintiff apparently concedes that the phrase "actual malice" does not appear in the amended complaint. The plaintiff's return does not cite any South Carolina cases holding that a politician, campaigning for public office, can maintain a cause of action for defamation when the defendants acted with mere malice. The decision of the trial court is in conflict with a prior decision of the Supreme Court, and as such, the Supreme Court should grant a writ of certiorari. *Elder v. Gaffney Ledger*, 341 S.C. 108, 533 S.E.2d 899 (2000).

PART FIVE: MOTION TO QUASH THE SUBPOENA TO FACEBOOK

Question 6. The plaintiff's attorney issued a subpoena to Facebook to unmask the identity of the defendants without first commencing a lawsuit. Can a plaintiff's attorney issue a subpoena without first commencing a lawsuit? Did the Court of Appeals err in not reaching the issue?

The plaintiff's attorney issued a subpoena to Facebook to unmask the identity of the defendants. (R. pp. 286-294) (Subp. Cover Letter, SC Subp. and Calif. Subp.). The attorney issued the subpoena without first commencing a lawsuit. This issue, surprisingly, is a novel question of law in the context of a motion to quash in a civil case. The plaintiff's return does not cite any South Carolina cases addressing this issue. John Doe 2 asks the Supreme Court to grant a writ of certiorari to provide clear guidance to the trial courts and attorneys on whether attorneys can issue subpoenas when there is no pending lawsuit. This issue affects all civil cases, and the practice of law, and as such, is an important issue.

Question 7. The plaintiff's attorney issued a subpoena to Facebook to unmask the identity of the defendants but did not serve the subpoena on either defendant. Is a plaintiff's attorney required to serve a subpoena to a non-party on a defendant? Did the Court of Appeals err in not reaching the issue?

The plaintiff's attorney issued a subpoena to Facebook to unmask the identity of the defendants. (R. pp. 286-294) (Subp. Cover Letter, SC Subp. and Calif. Subp.). The plaintiff's attorney did not serve the subpoena on either defendant. This issue, surprisingly, is a novel question of law in the context of a motion to quash in a civil case. The plaintiff's return does not cite any South Carolina cases addressing this issue. John Doe 2 asks the Supreme Court to grant a writ of certiorari to provide clear guidance to the trial courts and attorneys on whether attorneys must serve a subpoena to a non-

party on the opposing party. This issue affects all civil cases, and the practice of law, and as such, is an important issue.

PART SIX: ADDITIONAL GROUNDS

In the plaintiff's return, the plaintiff raises two additional grounds to deny the petition for a writ of certiorari. John Doe 2 does not believe that those grounds are relevant in a return to a petition for a writ of certiorari (as opposed to the parties' briefs on the merits), but out of an abundance of caution, John Doe 2 will address the comments of the plaintiff.

A. John Doe 2 is a defendant in this action.

In the plaintiff's return, the plaintiff argues that John Doe 2 does not have standing to be a defendant in this case. The plaintiff does not cite any case law in support of his argument or explain why a defendant must have "standing" (as opposed to a plaintiff needing standing). Instead, the plaintiff states that he sued only one "John Doe individually and 'doing business as' Democrats for Marchant." (Resp. Return. p. 6) The plaintiff further argues "[t]here is nothing in the complaint to suggest these are two separate Defendants, nor is there any allegation in the Complaint that a group of people was running the fake Facebook page." (Resp. Return. p. 6). The plaintiff argues that John Doe 1 should be the only defendant in the case. The plaintiff's argument is without merit and is completely inconsistent with the allegations in his complaint and amended complaint.

The plaintiff should not be surprised that two John Does have appeared in this case. The plaintiff filed a complaint and amended complaint against two distinct John

Does. The captions for both the original and amended summons name “John Doe and John Doe d/b/a Democrats for Marchant” as defendants (emphasis added). (R. pp. 20, 25) (Complaint, Amended Complaint). The captions for the summons do not say “John Doe, individually, and d/b/a Democrats for Marchant” as the plaintiff alleges in his return. The two, separate, John Does are also named in the caption of both the original and amended complaints. (R. pp. 21, 26). The titles used by the plaintiff for the opposing party in the four captions (summons and complaints times two versions) both read “Defendants” - the plural of defendant. The line identifying who the pleading is directed to reads: “TO: THE DEFENDANTS ABOVE-NAMED” - indicating there is more than one defendant. (emphasis added). (R. pp. 20, 25). Paragraph two, of both the complaint and amended complaint, reads: “Defendants, upon information and belief, are residents of Greenville County, South Carolina.” (R. pp. 21, 26). The plaintiff alleges that there are “defendants” (plural) residing in the state. Paragraph three, of both the complaint and amended complaint, reads: “Defendants’ identities ...” - the plural of defendant. The plaintiff uses the term “defendants” (plural) in the following paragraphs of the complaint: 2, 3, 18 (twice), 19, 21, 24 (twice), and 25. The plaintiff uses the term “defendants” (plural) in the following paragraphs of the amended complaint: 2, 3, 5 (twice), 22 (twice), 23, 24, 25, 27, 30. In paragraph eleven of the complaint, and in paragraph twelve of the amended complaint, the plaintiff used the word “group” to describe the defendants. (R. pp. 22, 27). The plaintiff served discovery on John Doe 2, which can only be done if John Doe 2 is a defendant to the action. (R. pp. 187-198).

The plaintiff named both defendants John Doe in the complaint. This creates confusion. Normally, a plaintiff would name the defendants John Does 1-[number]. The

plaintiff created this confusion, has confused himself, tried to confuse the trial court, and now wants to confuse the Supreme Court. The plaintiff is trying to dismiss John Doe 2 as a defendant to the lawsuit. Normally, a defendant would gladly be dismissed as a defendant. However, if John Doe 2 is dismissed, the plaintiff will be able to issue subpoenas to Facebook to unmask John Doe 2's identity with no notice to John Doe 2 or an opportunity to be heard. John Doe 2 needs to remain a defendant to the lawsuit.

John Doe 2 is a defendant in this action, and as such, does not have to intervene as a defendant. John Doe 2 set up the Facebook page Democrats for Marchant. (R. p. 104, line 22 - p. 105, line 8; p. 106, lines 15-17) (June 25, 2019 Hrg. Tr. p. 49, line 22 - p. 50, line 8; Hrg. Tr. p 51, lines 15-17). In addition, John Doe 2 has potential legal jeopardy because of the lawsuit. *Id.* The plaintiff spends a lot of time in his return being confused over the differences between Facebook "accontholders," Facebook account "creators," and Facebook account "maintainers." Defendant John Doe 2 will attempt to clarify this matter. John Doe 2 "set up" the Facebook page Democrats for Marchant. Facebook owns Facebook accounts and the content on the Facebook pages. Facebook can remove content from a page or suspend and delete an account at any time - because it is the owner of the account. Facebook determines the color schemes, the text size, and the layout of the pages - because it is the owner of the account. The individuals who use Facebook are "users," not owners, creators, or maintainers. Facebook "created" the Facebook page and "maintained" the page because Facebook owns the software and servers that allow "Democrats for Marchant" to exist. The plaintiff throws out the term "accontholder" in his return, but he does not define that term, and that term can mean different things to different people in different contexts. The

plaintiff's return uses the terms "set up," "created," and "maintained" interchangeably, even though they have different meanings. John Doe 2 agrees that the term "set up" accurately describes John Doe's participation in the Democrats for Marchant account, but John Doe 2 does not agree that the terms "created" or "maintained" accurately describe John Doe 2's conduct. John Doe 2's identity will be revealed if Facebook responds to the subpoena. John Doe 2 has potential legal jeopardy in this case. For these reasons, John Doe 2 is a defendant in this case.

B. John Doe 2 was not precluded from making arguments at the June 25, 2019 hearing because John Doe 2 was not given notice of the January 24, 2019 hearing or an opportunity to be heard.

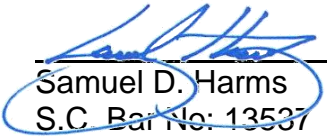
On January 24, 2019, the trial court held a hearing on John Doe 1's motion to quash the subpoena to Facebook. John Doe 2 was not served with the motion pursuant to Rule 5, SCRPC. John Doe 2 was not served with the summons and complaint. The plaintiff did not provide John Doe 2 with notice of the hearing. In addition, John Doe 2 was not given an opportunity to be heard at the hearing. On appeal, the plaintiff argues that John Doe 2 should not have been allowed by the trial court to be heard at the June 25, 2019 hearing because John Doe 1 already had a hearing in January. The plaintiff does not cite any case law to support his argument. The United States Constitution, Amendment 5, guarantees John Doe 2 the procedural due process rights of notice and an opportunity to be heard in any state court proceeding. U.S. Const. amend. V. See also S.C. Const. Art. 1, Sec. 3 (requiring due process of law). Since John Doe 2 was not served with the motion to quash, was not served with the summons and complaint, did not receive notice of the hearing, and was not given an opportunity to be heard at the January 24, 2019 hearing, the procedural due process rights guaranteed to John Doe 2

in the United States Constitution and the South Carolina Constitution allowed John Doe 2 to be heard at the June 25, 2019 hearing.

CONCLUSION

The plaintiff's return fails to address the defendant's arguments for a writ of certiorari. This appeal presents several novel questions of law, substantial constitutional issues, and the decision of the trial court, and the decision of the Court of Appeals are in conflict with a prior decision of the Supreme Court. For these reasons, this Court should grant the petition for a writ of certiorari.

March 17, 2023


Samuel D. Harms
S.C. Bar No: 13537
Double Aught Injury Lawyers
33 Market Point Drive
Greenville, SC 29607
(864) 453-0000
Attorney for Petitioner

RECEIVED

Mar 17 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2023-000135
Unpublished Opinion No. 2022-UP-413

Lucas Marchant,Respondent,

v.

John Doe and John Doe d/b/a Democrats for Marchant, Defendants,

Of which John Doe is thePetitioner.

PROOF OF SERVICE

I certify that I have served, on March 17, 2023, Petitioner John Doe’s Reply to Respondent’s Return to Petition for a Writ of Certiorari, on

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

via email, and,

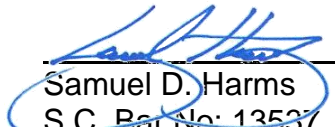
on Lucas Marchant, via email, pursuant to paragraph (d)(1) of the Order Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended May 6, 2022) (Appellate Case No. 2020-000447), as follows:

Joshua S. Kendrick
Josh@KendrickLeonard.com
Kendrick & Leonard, P.C.
P.O. Box 6938
Greenville, SC 29606

Christopher S. Leonard
Chris@KendrickLeonard.com
Kendrick & Leonard, P.C.
P.O. Box 886
Columbia, SC 29202

A copy of the sent e-mail serving the document is enclosed with this proof of service.

March 17, 2023


Samuel D. Harms
S.C. Bar No: 13537
Double Aught Injury Lawyers
33 Market Point Drive
Greenville, SC 29607
(864) 453-0000
Attorney for Petitioner

Samuel Harms

From: Samuel Harms
Sent: Friday, March 17, 2023 2:31 PM
To: 'Joshua Snow Kendrick'; 'Chris Leonard'
Subject: Lucas Marchant v. John Doe; Appellate Case No. 2023-000135; JOHN DOE'S REPLY TO RESPONDENT'S RETURN TO PETITION FOR A WRIT OF CERTIORARI
Attachments: John Doe 2 - To Supreme Court - From 00 - Proof of Sevice Reply Petition for Writ of Certiorari TO BE FILED - 03-17-2023.pdf; John Doe 2 - To Supreme Court - From 00 - Letter Filing Reply for Petition for Writ of Certiorari TO BE FILED - 03-17-2023.pdf; John Doe 2 - To Supreme Court - From 00 - Reply for Petition for Writ of Certiorari TO BE FILED - 03-17-2023.pdf

Josh and Chris: I am serving on you the attached John Doe's Reply to Respondent's Return to Petition for a Writ of Certiorari , a Proof of Service, and a letter to the Clerk of the S.C. Supreme Court.

Sincerely,

Samuel Harms, Esq.



**DOUBLE AUGHT
INJURY LAWYERS**

BRYAN RAMEY SAMUEL HARMS

RECEIVED

Mar 17 2023

SC Court of Appeals

March 17, 2023

The Honorable Patricia A. Howard
Clerk, South Carolina Supreme Court
1231 Gervais Street
Columbia, SC 29201

Via Filing by E-mail

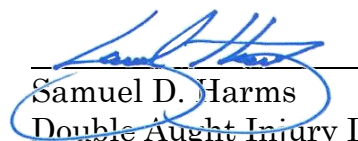
RE: Lucas Marchant, Respondent, v. John Doe and John Doe d/b/a
Democrats for Marchant, Defendants, Of which John Doe is the
Petitioner.
Appellate Case No. 2023-000135
Unpublished Opinion No. 2022-UP-413

Dear Ms. Howard:

Please find attached Petitioner John Doe's Reply to Respondent's
Return to Petition for a Writ of Certiorari. Also enclosed are the following:

1. A Proof of Service of the Reply on the Clerk of the South
Carolina Court of Appeals and on the Respondent.

Sincerely,



Samuel D. Harms
Double Aught Injury Lawyers
33 Market Point Drive
Greenville, SC 29607
Attorney for Petitioner

cc: Clerk, South Carolina Court of Appeals

[Continued Next Page]

RE: Lucas Marchant, Respondent, v. John Doe and John Doe d/b/a Democrats for Marchant, Defendants, Of which John Doe is the Petitioner.

Joshua S. Kendrick
Kendrick & Leonard, P.C.
P.O. Box 6938
Greenville, SC 29606
Josh@KendrickLeonard.com

Christopher S. Leonard
Kendrick & Leonard, P.C.
P.O. Box 886
Columbia, SC 29202
Chris@KendrickLeonard.com

Attorneys for Respondent