

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Honorable Heath P. Taylor

Trial Court Case No. 2023-CP-18-01621
Appellate Case No. 2024-000564

EADIE’S CONSTRUCTION COMPANY, INC. and EADIE’S INDUSTRIAL, INC., Appellants /
Plaintiffs,

vs.

EADIE’S DIVA D ENTERPRISES, LLC, Dawn Eadie, Jordan Jones,
Justine Lawson, Kevin Lawson, Hunter Basco, and Mackel Malekar, Respondents
/ Defendants /
Third-Party Plaintiffs,

vs.

Keith Eadie, Third-Party
Defendant.

**APPELLANTS’ REPLY TO RESPONDENTS’ RESPONSE TO
APPELLANTS’ MOTION TO DISQUALIFY COUNSEL FOR RESPONDENTS**

Appellants, EADIE’S CONSTRUCTION COMPANY, INC. and EADIE’S INDUSTRIAL, INC., (“the Companies”), respectfully submit their Reply to the opposition to Appellants’ Motion to Disqualify Steven L. Smith as Counsel for Respondents (“Respondents’ Opposition”) filed on behalf of Respondents and their legal counsel, Steven L. Smith, (collectively “Mr. Smith”).

Summary of the Reply Arguments

1. Respondents' Opposition and Mr. Smith's affidavit highlight the basis for this motion to have Mr. Smith disqualified: *Mr. Smith represented one or more of the jointly operated "Eadie entities" in at least six separate legal matters over the nine years between 2014 and 2023, not including this lawsuit.*¹ The positions taken in Respondents' Opposition and Mr. Smith's affidavit are not consistent with the obligations of every lawyer practicing in South Carolina, mandating that they maintain the confidentiality of "*all information* related to the representation of a client."

2. Respondents' Opposition misapprehends the disqualification relief sought by this Motion is designed to minimize the *risk* that confidential information Mr. Smith obtained while representing these jointly operated "Eadie Entities," including the Companies, during the nine years of representation on at least six legal matters is not used adversely against the Companies. The *nature* of Mr. Smith's representation of the former clients (the Companies) and his adverse current representation creates a substantial risk that Mr. Smith previously possessed confidential factual information that would disadvantage the Companies in the present matter. The focus of this motion should be on the nature of the two representations, the information Mr. Smith likely obtained, and its likely relevance and prejudicial effect on the Companies.

3. Respondents' Opposition and Mr. Smith's affidavit do not contain the factual information necessary to rebut the presumption that Mr. Smith obtained confidential information concerning the Companies that could be used adversely to the Companies in this lawsuit. Notwithstanding, identifying at least six legal matters where Mr. Smith was counsel for these jointly operated "Eadie

¹ The "Eadie entities" described in Mr. Smith's affidavit include EADIE'S CONSTRUCTION COMPANY, INC.; EADIE'S INDUSTRIAL, INC.; and EADIE'S DIVA D ENTERPRISES, LLC, all of which are parties to this lawsuit and were owned and jointly operated at the relevant times by Keith Eadie and his wife, Dawn Eadie.

Entities,” neither Respondents’ Opposition nor Mr. Smith’s affidavit included copies of any engagement letters or contracts of representation identifying the alleged “limited representation” described in Mr. Smith’s affidavit. It is simply the representative of the Companies’ word against Mr. Smith’s as to the scope of the representations and what confidential information Mr. Smith obtained over the last almost 10 years.

4. Respondents’ Opposition and Mr. Smith’s affidavit contain no response to the concerns under Rule 3.7, RPC, that Mr. Smith is or likely will be a necessary witness in this lawsuit.

5. South Carolina’s public policy supports granting the motion to disqualify, as it better protects client confidences and encourages clients to be more forthcoming in seeking legal advice without the fear that their confidences will be used adversely against them in later disputes.

6. Mr. Smith’s personal attacks against Mr. Eadie should be disregarded as they are false or not relevant to the Motion.

Arguments in Reply

The United States Fourth Circuit Court of Appeals has employed the following persuasive standard for resolving motions to disqualify counsel:

In determining whether to disqualify counsel for conflict of interest, the trial court is not to weigh the circumstances with hair-splitting nicety but, in the proper exercise of its supervisory power over the members of the bar and with the view of preventing ‘the appearance of impropriety,’ it is *to resolve all doubts in favor of disqualification*.

Neither is the court to consider whether the motives of counsel in seeking to appear despite his conflict are pure or corrupt; in either case the disqualification is plain.

United States v. Clarkson, 567 F.2d 270, 273 n. 3 (4th Cir. 1977) (emphasis added). The Companies respectfully submit this Court should apply this standard as it follows lawyers’ and the legal system’s duties to “preserv[e] client confidences [to] serve[] the public interest because people are more likely to seek legal advice, and thereby heed their legal obligations, when they

know their communications will be private.” Preamble [8] to the South Carolina Rules of Professional Conduct.

I. Mr. Smith is deemed to have necessarily obtained confidential information about the Companies’ operations based on the nature of Mr. Smith’s representation of the jointly operated Eadie Entities.

The claim in Respondents’ Opposition that “Appellants disclosed [n]o confidential information to Smith or his firm during his limited representation of Appellants” must be rejected. This position flatly ignores the Rules of Professional Conduct mandating that lawyers “shall not reveal information relating to the representation of a client unless the client gives informed consent,” with a few limited exceptions not applicable here. *See* Rule 1.6(a), RPC, Rule 407, SCACR; Rule 1.9(c)(2), RPC, Rule 407, SCACR (“A lawyer who has formerly represented a client in a matter or whose present or former firm has formerly represented a client in a matter shall not thereafter: reveal information relating to the representation except as these Rules would permit or require with respect to a client.”).

It is clear from the allegations in the Complaint that EADIE’S CONSTRUCTION COMPANY, INC., EADIE’S INDUSTRIAL, INC., and EADIE’S DIVA D ENTERPRISES, LLC were all jointly operated by the husband-and-wife team of Keith Eadie and Dawn Eadie. *See* (Complaint, pp. 2-3, ¶¶ 12-20). The plain inference is that information related to contracts, operations, and general coordination for any of these Eadie Entities is likely related to the others, at least for activities occurring after February 2016, when EADIE’S DIVA D ENTERPRISES, LLC was formed.

Multiple statements in Mr. Smith’s affidavit contain material omissions. Mr. Smith’s statement in Paragraph 13 a. in his affidavit that he “handled a collection case for Eadie’s Diva D against the Somerville Speedway approximately 10 years ago” is false because EADIE’S DIVA D

ENTERPRISES did not exist until two years later.² Any legal services Mr. Smith provided in 2014 for any of the Eadie Entities would have been legal services provided for the Companies. Another material omission in Mr. Smith's affidavit relates to his statements in Paragraph 13 c. claiming he filed a lien and a foreclosure action for EADIE'S DIVA D ENTERPRISES. Mr. Smith omits that the work performed at the trailer park in 2019 involved a joint operation by EADIE'S CONSTRUCTION and EADIE'S DIVA D ENTERPRISES. Similarly, Mr. Smith's statements in Paragraph 13 e. omit making any reference to the fact that the work performed on properties owned by James Hardie involved another joint operation by EADIE'S CONSTRUCTION and EADIE'S DIVA D ENTERPRISES.

Respondents' Opposition and Mr. Smith's affidavit do not overcome the presumption that Mr. Smith obtained the Companies' confidential information during his representation.

It is well settled that once an attorney-client relationship has been established, an irrebuttable presumption arises that confidential information was conveyed to the attorney in the prior matter. In seeking disqualification, the moving party does not have the evidentiary burden of showing actual disclosure of confidences.

Livingston v. Copart of Connecticut, Inc., No. 3:17-CV-02543-JFA, 2020 WL 8167496, at *4 (D.S.C. Nov. 19, 2020) (internal quotes and citations omitted).

A former client is not required to reveal the confidential information learned by the lawyer in order to establish a *substantial risk* that the lawyer has confidential information to use in the subsequent matter. A conclusion about the possession of such information may be based on the nature of the services the lawyer provided the former client and information that would in ordinary practice be learned by a lawyer providing such services.

Rule 1.9 [Cmt. 3], RPC, Rule 407, SCACR (emphasis added).

As the language of the Comment and other authorities note, a finding of a substantial relationship does not require a finding that information gained in the earlier representation has been or will be used in the latter representation. Instead, it focuses on the *risk* of such use. See

² Mr. Smith's affidavit also misstates the identity of the defendant. It was actually the Dorchester Drive Strip and not the Somerville Speedway involved in that matter.

Rule 1.9 [Cmt. 3], RPC, Rule 407, SCACR; RESTATEMENT (THIRD) OF THE LAW GOVERNING LAWYERS § 132 (2000) (“current matter is substantially related to the earlier matter . . . If there is a substantial risk that the representation of a present client will involve the use of information acquired in the earlier matter that has not become generally known.”).

Similarly, the focus of the inquiry is not on the actual content of the communications in the earlier representation but on the *nature* of the representation, from which inferences can be drawn as to the type of information likely shared.

A concern to protect a former client's confidential information would be self-defeating if, in order to obtain its protection, the former client were required to reveal in a public proceeding the particular communication or other confidential information that could be used in the subsequent representation. The interests of subsequent clients also militate against extensive inquiry into the precise nature of the lawyer's representation of the subsequent client and the nature of exchanges between them.

The substantial-relationship test avoids requiring disclosure of confidential information by focusing upon the general features of the matters involved and inferences as to the likelihood that confidences were imparted by the former client that could be used to adverse effect in the subsequent representation. The inquiry into the issues involved in the prior representation should be as specific as possible without thereby revealing the confidential client information itself or confidential information concerning the second client. When the prior matter involved litigation, it will be conclusively presumed that the lawyer obtained confidential information about the issues involved in the litigation. When the prior matter did not involve litigation, its scope is assessed by reference to the work that the lawyer undertook and the array of information that a lawyer ordinarily would have obtained to carry out that work.

RESTATEMENT (THIRD) OF THE LAW GOVERNING LAWYERS § 132, Cmt. *d* (iii) (2000). *See also*, Rule 1.9 [Cmt. 3], RPC, Rule 407, SCACR (“A former client is not required to reveal the confidential information learned by the lawyer in order to establish a substantial risk that the lawyer has confidential information to use in the subsequent matter. A conclusion about the possession of such information may be based on the nature of the services the lawyer provided the

former client and information that would in ordinary practice be learned by a lawyer providing such services.).

As noted in the Companies' Motion, the Companies are operating under an information disability as the allegations in the Complaint demonstrate that a substantial part of the Companies' records were altered or destroyed by the Defendants, which substantially impairs the Companies' ability to identify with specificity many of the issues in the six lawsuits identified Mr. Smith's affidavit or the corporate contractual matters provided to Mr. Smith for legal analysis, as stated in Mr. Eadie's affidavit. Suffice it to say that Mr. Smith's affidavit provides sufficient information to identify the *nature* of his representation of the Companies and the other Eadie Entities. *See, e.g.*, (Complaint, p. 3, ¶ 23, referring to the Companies' "contracts with third-party companies").

Several courts have explained the court's duties in resolving a motion for disqualification as requiring a multi-part inquiry:

The party seeking disqualification must show that 1) the moving party and the opposing counsel actually had a prior attorney-client relationship; 2) the interests of opposing counsel's present client are adverse to the movant; and 3) the matters involved in the present underlying lawsuit are substantially related to the matters for which the opposing counsel previously represented the moving party. All three elements are required.

Dixon v. Charles Schwab & Co., No. 22-CV-2933 (JWB/LIB), 2023 WL 4421787, at *3 (D. Minn. Mar. 16, 2023), *aff'd*, No. 23-2494, 2023 WL 8791599 (8th Cir. Dec. 19, 2023), *cert. denied*, No. 23-984, 2024 WL 1839130 (U.S. Apr. 29, 2024) (internal quotations omitted). *See also*, *Persichette v. Owners Insurance Co.*, 1462 P.3d 581, 586 (Col. 2020).

There is no dispute about the existence of a prior client-lawyer relationship between the Companies and Mr. Smith. There is no dispute that the interests of Mr. Smith's current clients in this lawsuit are adverse to those of Mr. Smith's former clients, the Companies. As explained in the next section, the matters involved in this lawsuit are substantially related to the matters in which

Mr. Smith previously represented the Companies. This Court should issue an Order disqualifying Mr. Smith from representing the Respondents in this lawsuit.

II. Issues of proof in this lawsuit are substantially related to the prior matters in which Mr. Smith represented the Eadie Entities.

Respondents' Opposition and Mr. Smith's affidavit contain the factual information necessary to show that the issues in this lawsuit are substantially related to his prior representation, without regard to the information in Mr. Eadie's affidavit also supporting a finding these matters are substantially related.

The company entities that are plaintiffs and defendants in this lawsuit are identical to those Mr. Smith represented, as shown in Mr. Smith's affidavit. *See* (Smith affidavit, p. 3, ¶13 a. to f.). Both this dispute and the disputes in the prior matters involve corporate operations, policies, and procedures. *Compare*, (Smith affidavit, p. 3, ¶13 b. *Peace* lawsuit involving claims and the Companies' insurance policies) and (Smith affidavit, p. 3, ¶13 e. filing a lien for EADIE'S DIVA D in a matter in which EADIE'S INDUSTRIAL, INC. was also a named party) and (Smith affidavit, p. 3, ¶13 f. defending claims and evaluating company insurance policies) *with* (the allegations in the Complaint filed in this matter, pp. 3-4, ¶¶ 18-27, alleging facts related to the Respondents' actions interfering with the Companies' contracts). All these matters involved the Companies' operational activities while performing contracts for third parties.

To be clear, the Companies are not alleging Mr. Smith acted with any specific malicious or nefarious intent to prejudice them in the current litigation. Instead, the relief sought in this motion seeks to eliminate the risk that Mr. Smith will reveal confidential information belonging to the Companies obtained during his representation to the Companies' disadvantage.

As noted in the Motion, Mr. Smith should be disqualified if the evidence shows Mr. Smith "would have or reasonably could have learned confidential information in the first representation

that would be of significance in the second.” *See, Townsend v. Townsend*, 323 S.C. 309, 317, 474 S.E.2d 424, 429 (1996). *See also*, Rule 1.9 [Cmt. 3], RPC, Rule 407, SCACR (“Matters are ‘substantially related’ for purposes of this Rule if they involve the same transaction or legal dispute or if there otherwise is a substantial risk that confidential factual information as would normally have been obtained in the prior representation would materially advance the client’s position in the subsequent matter.”). The combination of the facts stated in Mr. Eadie’s affidavit and Mr. Smith’s affidavit satisfy the “substantially related” test in *Townsend*. Mr. Smith should be disqualified as counsel for Respondents in this matter. The Company should not be tasked with disclosing otherwise confidential information to satisfy the “substantial risk” test. *See Persichette*, 1462 P.3d at 590 n. 6.

Mr. Smith’s prior representation of the Companies involves matters “substantially related” to the matters at issue in this lawsuit. As a result, Mr. Smith should be disqualified from the representation of the Respondents.

III. South Carolina’s public policy supports granting the motion to disqualify, as it better protects client confidences and encourages clients to be more forthcoming in seeking legal advice without the fear that their confidences will be used adversely against them in later disputes.

South Carolina has a public policy to protect the attorney-client privilege and confidentiality of information. *See e.g., Hartsock v. Goodyear Dunlop Tires N. Am. Ltd.*, 422 S.C. 643, 648, 813 S.E.2d 696, 699, *opinion after certified question answered sub nom. Hartsock v. Goodyear Dunlop Tires N. Am. Ltd.*, 723 F. App’x 224 (4th Cir. 2018) (citing *Drayton v. Industrial Life & Health Ins. Co.*, 205 S.C. 98, 31 S.E.2d 148 (1944) (recognizing long-standing public policy favoring confidentiality of the client-lawyer communications and information); *Wilson v. Preston*, 378 S.C. 348, 359, 662 S.E.2d 580, 585 (2008) (“The attorney-client privilege is based upon a public policy that the best interest of society is served by promoting a relationship between the

attorney and the client whereby utmost confidence in the continuing secrecy of all confidential disclosures made by the client within the relationship is maintained.”); *State v. Doster*, 276 S.C. 647, 284 S.E.2d 218 (1981) (the attorney-client privilege exists to further the public policy of encouraging clients to fully confide in and disclose all relevant facts to their lawyers. Therefore, the privilege can be claimed only by the client and may not be independently asserted by the lawyer.); Rule 26(b)(3), SCRCF (protecting attorney-work product); Rule 501, SCRE - General Rule on privileges. *See also, Baird v. Koerner*, 279 F.2d 623, 629 (9th Cir. 1960) (“While it is the great purpose of law to ascertain the truth, there is the countervailing necessity of [e]nsuring the right of every person to freely and fully confer and confide in one having knowledge of the law, and skilled in its practice, in order that the former may have adequate advice and a proper defense.”).

South Carolina’s public policy supports granting this Motion to Disqualify as such a ruling will protect client confidences and encourage clients to be more forthcoming in seeking legal advice without the fear that their confidences will be used adversely against them in later disputes. This stance ensures that clients feel secure in their communications with their lawyers, fostering a more honest and open client-lawyer relationship. By disqualifying lawyers with conflicts of interest or possessing confidential information that could be used against former clients, the legal system reinforces the importance of maintaining trust and integrity within the legal profession. This policy ultimately benefits the justice system as a whole by promoting ethical conduct and safeguarding the confidential nature of attorney-client communications.

IV. Mr. Smith’s personal attacks against Mr. Eadie are false or not relevant to this Motion.

Mr. Smith’s affidavit contains material omissions, leaving the reader to reach false conclusions about Mr. Eadie personally, and contains other personal attacks on Mr. Eadie not

relevant to Mr. Smith's conflict of interest and the basis for the Motion for disqualification. For example, Mr. Smith states in Paragraph 5 of his affidavit that Mr. Edie "was arrested in 2022 for manufacture, distribution, etc. of cocaine base," Mr. Smith omits, however, that those drug charges have been dismissed.

Mr. Smith's affidavit also falsely claims that Mr. Eadie had "an armed 'body guard'" (sic.) with him at a deposition taken in the underlying case arguing this was "just another example of the bullying and intimidation being employed by Keith Eadie." (Smith aff., p. 2, ¶¶ 5-6). These statements are false. Mr. Eadie did not have an armed bodyguard with him at the deposition. The picture included with the affidavit is a picture of Mr. Eadie's driver and friend, Mr. Jason Grayson, who is shown sitting/slouching in the deposition room, not standing over anyone, and Mr. Grayson was not armed. Mr. Eadie and Mr. Grayson have known each other for 25 years. Although EADIE'S INDUSTRIAL formerly employed Mr. Grayson as a supervisor, he is now employed as a driver , based on their long-standing relationship and mutual trust.

Conclusion

Mr. Smith should be disqualified as counsel for Respondents in this matter pursuant to Rules 1.6, 1.7, 1.9, and 3.7, RPC, Rule 407, SCACR, as set forth in the Motion to Disqualify and in this Reply.

Respectfully submitted,

/s/ Thomas A. Pendarvis

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Motion to Disqualify Mr. Smith*

Beaufort, South Carolina

June 7, 2024

Other Counsel of Record:

Zachary J. Closser, Esq.

Stephen L. Smith, Esq.

APPEAL FROM DORCHESTER COUNTY

Honorable Heath P. Taylor

Trial Court Case No. 2023-CP-18-01621

Appellate Case No. 2024-000564

EADIE'S CONSTRUCTION COMPANY, INC. and EADIE'S INDUSTRIAL, INC., Appellants / Plaintiffs,

vs.

EADIE'S DIVA D ENTERPRISES, LLC, Dawn Eadie, Jordan Jones, Justine Lawson, Kevin Lawson, Hunter Basco, and Mackel Maleckar, Respondents

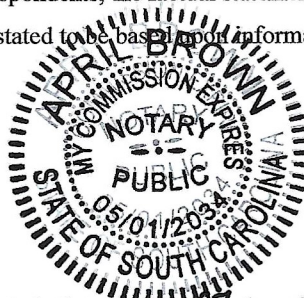
/ Defendants / Third-Party Plaintiffs,

vs.

Keith Eadie, Third-Party Defendant.

VERIFICATION

PERSONALLY appeared before me, Keith Eadie, who, first being duly sworn, says he has read the foregoing Appellants' Reply to Respondents' Response to Appellants' Motion to Disqualify Counsel for Respondents, the factual statements contained therein are true to the best of his knowledge except as to those stated to be based upon information and belief, as to which he believes such matters to be true.



EADIE'S CONSTRUCTION COMPANY, INC. and EADIE'S INDUSTRIAL, INC

By: Keith Eadie
Keith Eadie

Sworn to before me this 01 day of June, 2024

April Brown
NOTARY PUBLIC FOR SOUTH CAROLINA
My commission expires: 05/01/2024

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Honorable Heath P. Taylor

Trial Court Case No. 2023-CP-18-01621

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Justine Lawson, Kevin Lawson, Hunter Basco, and Mackel Maleckar, Respondents
/ Defendants /
Third-Party Plaintiffs,

vs.

Keith Eadie, Third-Party
Defendant.

PROOF OF SERVICE

Under Rules 240 and 262, SCACR, I certify that I have served APPELLANTS’ REPLY TO RESPONDENTS’ RESPONSE TO APPELLANTS’ MOTION TO DISQUALIFY COUNSEL FOR RESPONDENTS on Respondents, EADIE’S DIVA D ENTERPRISES, LLC, Dawn Eadie, Jordan Jones, Justine Lawson, Kevin Lawson, Hunter Basco, and Mackel Mal, and on Steven L. Smith, Esq., by emailing a copy of it on June 7, 2024, using the lawyers for Respondents and on Mr. Smith using the lawyers’ primary email address listed in the Attorney Information System to their attorneys of record as follows:

Steven L. Smith, Esq.
ssmith@scnlaw.com

Zachary J. Closser, Esq.
zclosser@scnlaw.com

Per Paragraph (d) in the Supreme Court of South Carolina's Order Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), a .pdf copy of the email serving this reply is included with this Proof of Service as Exhibit 1.

Respectfully submitted,

/s/ Thomas A. Pendarvis

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Beaufort, South Carolina

June 7, 2024

PENDARVIS LAW



June 7, 2024

Via Email Only

The Honorable Jenny Abbott Kitchings
SOUTH CAROLINA COURT OF APPEALS
ctappfilings@sccourts.org

RE: *EADIE'S CONSTRUCTION COMPANY, INC. and EADIE'S INDUSTRIAL, INC. vs. EADIE'S DIVA D ENTERPRISES, LLC, Dawn Eadie, Jordan Jones, Justine Lawson, Kevin Lawson, Hunter Basco, and Mackel Maleckar*
Civil Action No. 2023-CP-18-01621
Appellate Case No. 2024-000564

Dear Mrs. Kitchings:

Please see the following for filing regarding the above-referenced matter:

1. Appellants' Reply to Respondents' Response to Appellants' Motion to Disqualify Counsel for Respondents;
2. Verification; and
3. Proof of Service.

By copy of this correspondence, we are serving the enclosed documents, via email, to all counsel of record.

With warmest personal regards, I am

Sincerely,

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in blue ink that reads "Thomas A. Pendarvis". The signature is fluid and cursive, with the first name "Thomas" being the most prominent.

Thomas A. Pendarvis

TAP/tll

Enclosures

ec: Steven L. Smith, Esq.
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