THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Appellate Case No.: 2015-001718
Circuit Court Case No.: 2010-CP-38-0670

Wanda Mack, ... **Appellant,**

v.

Carmen Gates, ... **Respondent.**

FINAL BRIEF OF APPELLANT

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STATEMENT OF THE ISSUES ON APPEAL

I. DID THE TRIAL COURT ERR IN DENYING APPELLANT'S MOTION TO RECONSIDER AND TO ALTER OR AMEND ITS RULING DENYING APPELLANT'S MOTION TO RESTORE HER CASE TO THE ACTIVE GENERAL DOCKET WHEN APPELLANT WAS NEVER SERVED WITH A FILED COPY OF THE ORDER OR WRITTEN NOTICE OF ENTRY OF THE ORDER STRIKING THE CASE PURSUANT TO RULE 40(j) OF THE SOUTH CAROLINA RULES OF CIVIL PROCEDURE?

II. DID THE TRIAL COURT ERR IN FAILING TO RESTORE APPELLANT'S CASE TO THE ACTIVE DOCKET PURSUANT TO RULE 40(j) WHEN THE APPELLANT HAD PREVIOUSLY FILED HER COMPLAINT WITHIN THE STATUTE OF LIMITATIONS AND WHERE THE CASE HAD BEEN STRICKEN FROM THE ACTIVE DOCKET AND PLACED IN AN INACTIVE STATUS?

STATEMENT OF THE CASE

This action arises from an automobile accident on March 10, 2009 in which the Appellant Wanda Mack was a passenger in a vehicle which collided with a vehicle driven by the Respondent Carmen Gates. Appellant Mack was on Highway 6 in Orangeburg County when the vehicle in which she was riding was struck by the vehicle operated by Respondent Gates. Mack was injured as a result of the accident and incurred medical expenses and lost wages.

On May 12, 2010 Mack filed suit against Gates, alleging that the respondent failed to yield the right away, causing the wreck and Appellant's injuries. (R. pp. 11-13). Respondent Gates answered the lawsuit on June 3, 2010. (R. pp. 14-16). Between June 3, 2010 and October 21, 2010 Carmen Gates' file was handled by Attorney Damon C. Wlodarczk of McDonald, McKenzie, Reuben, Miller and Lybrand, LLP. On October 21, 2010 Appellant Mack was copied on a letter from Attorney Wlodarczk to the Orangeburg County Clerk of Court notifying the Court that he was switching law firms and that Attorney James B. Lybrand, Jr. would be representing the Respondent. (R. pp. 55).

The parties conducted discovery and on December 9, 2010 Mack was deposed. The parties continued to engage in discovery until July 27, 2011 when the parties mediated the case. (R. pp. 54). The parties were unable to resolve the dispute at mediation. (R. pp. 54) After mediating the case, the parties identified certain issues related to Wanda Mack's employment that required additional discovery. At the suggestion of Attorney Lybrand, the parties mutually agreed that it would be appropriate to strike the case pursuant to Rule 40(j) of the SCRCP. (R. pp. 53).

On September 29, 2011, Steven D. Murdaugh, attorney for the Appellant, mailed a proposed Consent Order striking the case under Rule 40(j) to Attorney Lybrand, attorney for the Respondent. (R. pp. 50). On October 6, 2011 Attorney Lybrand signed the Consent Order and forwarded the signed Consent Order to the Honorable Edgar W. Dickson, enclosing a return envelope and instructing the Court to return the filed copy of the signed Consent Order to his office. (R. pp. 49). On October 23, 2011, Judge Dickson signed the Order and forwarded the Order to the clerk of court for filing and entry of the order. (R. pp. 9-10). The Order was filed in the Clerk's office on October 28, 2011. (R. pp. 9-10) Attorney Lybrand testified that he received a filed copy within a few weeks after the Order was signed in the return envelope he sent with the proposed Order. (R. p. 34, lines 19-22). Neither the Appellant nor the attorneys for the Appellant ever received a filed copy of the Order or written notice that the Consent Order had been entered. (R. pp. 20-25; R. pp. 42-46).

The parties continued in good faith to engage in discovery and on January 26, 2012, the attorneys for the appellant provided supplemental discovery responses relating to Mack's employment and lost wage claim that were identified during mediation. (R. pp. 48).

In January of 2013, Appellant's attorney contacted the Respondent's counsel by phone to inquire about restoring the case to the active docket. Attorney for the Respondent initially agreed to restore the case, but after reviewing his file notified Appellant's counsel that he could not consent because more than a year had elapsed since the Order striking the case was signed and the statute of limitations has expired. (R. pp. 47).

After learning that the case had been stricken from the roster for more than a year, the Attorney for the Appellant went to the Orangeburg County Clerk of Court's office to retrieve a copy of the signed Order. Upon inspection of the file, it contained a copy of the October 6, 2011 letter from Attorney Lybrand to Judge Dickson, a Form 4 Order with a handwritten note that the case had been stricken under Rule 40(j), as well as a Motion and Order Information Cover Sheet signed by Attorney Lybrand which was filed on October 28, 2011 and a copy of the signed Order striking the case under Rule 40(j) dated October 23, 2011. The file also contained a copy of an October 13, 2011 email from the Clerk of Court's office to Attorney Lybrand notifying him that the case appeared on the court roster and a response from Attorney Lybrand informing the Court that the case had been stricken under Rule 40(j). A hand written note appeared at the bottom of the email which stated that a Form 4 had been prepared for the Judge to sign and that the case would be removed from the roster. Neither Appellant nor her attorney was copied on the email.

On February 21, 2013, Appellant filed a Motion to Restore the case to the general active docket. (R. pp. 17-19). For reasons outside of the control of the Appellant or the Respondent, the motion was not heard until October 6, 2014. The Honorable Maite' Murphy presided over the hearing and on November 25, 2014 Judge Murphy signed an order denying the Appellant's motion to restore. The Order was entered on December 3, 2014. (R. pp. 4-8).

On December 12, 2014 Appellant filed a Motion to Reconsider and to Alter or Amend the Court's Order denying the Motion to Restore the case. (R. pp. 20-25). A hearing was held on June 1, 2015 and on June the 8, 2015 Judge Maite' Murphy signed a

Form 4 Order denying Appellant's Motion to Reconsider and to Alter or Amend. (R. pp. 1-3). The Order was filed in the Orangeburg County Clerk of Court's office on July 8, 2015. (R. pp. 1-3) On August 12, 2015, Appellant served the Notice of Appeal on the Respondent. (Notice of Appeal).

STANDARD OF REVIEW

In South Carolina the Appellate Court is free to decide questions of law and equity with no particular deference to the lower court. *See* S.C. Const. art. V, §§ 5 and 9; S.C. Code Ann. §§ 14-3-320 and -330 (1976 & Supp.1999); S.C. Code Ann. § 14-8-200 (Supp.1999) (granting Supreme Court and Court of Appeals the jurisdiction to correct errors of law in both law and equity actions); *I'On v. Town of Mt. Pleasant,* 338 S.C. 406, 526 S.E.2d 716 (2000).

Appellate courts owe trial courts no particular deference when reviewing legal rulings over questions of law. *Moriarity v. Garden Sanctuary Church of God*, 341 S.C. 320, 327, 534 S.E.2d 672, 675 (2000). This lack of deference includes reviewing the trial judge's application of the law to stipulated or undisputed facts. *J.K. Const., Inc. v. Western Carolina Regional Sewer Auth.*, 336 S.C. 162, 166-167, 519 S.E.2d 561, 563 (1999). The South Carolina Supreme Court thus leaves it for itself to say what a statute means or what the law is and how it applies.

Trial judges by necessity devote their energies and resources to presiding over individual trials, hearing witnesses, and reviewing evidence. They thus lack the structural advantages that appellate Judges and Justices enjoy from their extended time for reflection, their benefit of honed appellate briefs, and their ability to collaborate with the

other Appellate Judges or Justices on the court. *See Salve Regina College v. Russell,* 499 U.S. 225, 231-235 (1991) (explaining basis for de novo review).

ARGUMENT

I. The Trial Court Erred In Denying Appellant's Motion To Reconsider And To Alter Or Amend Its Prior Ruling Denying Appellant's Motion To Restore the Case To The Active General Docket When Appellant Was Never Served With A Filed Copy Of The Order Or Written Notice Of Entry Of The Order Striking The Case Pursuant To Rule 40(j) Of The South Carolina Rules Of Civil Procedure.

The trial Court erred by denying the Appellant's Motion to Reconsider and to Alter or Amend its prior ruling whereby the Court Denied Appellant's Motion to Restore Appellant's case to the active general docket when the Appellant was never served with a filed copy of the Order or written notice of entry of the Order striking the case pursuant to Rule 40(j) of the South Carolina Rules of Civil Procedure. Appellant filed its motion pursuant to Rules 52 and 59 of the South Carolina Rules of Civil Procedure. The Form 4 Order denying Appellant's Motion to Reconsider and to Alter or Amend amounts to an error of law because it did not address the requirement that the Appellant receive written notice of the entry of the order.

It is undisputed that on September 29, 2011 Steven D. Murdaugh, attorney for the Appellant, mailed a proposed Consent Order striking the case under Rule 40(j) to James B. Lybrand, Jr., attorney for the Respondent. (R. pp. 50). It is also undisputed that on October 6, 2011 attorney Lybrand signed the Consent Order and forwarded the Order to Judge Dickson, enclosing a return envelope and instructing the Court to return the filed copy of the signed Consent Order to his office. (R. pp. 49). On October 23, 2011, Judge Dickson signed the Consent Order and forwarded the order to the Clerk of Court for filing and entry of the order. The Order was filed in the Clerk's office on October 28,

2011. (R. pp. 9-10). Attorney Lybrand informed the Court that he received the filed copy within a few weeks after mailing the Consent Order to the Court. (R. p. 34, lines 19-22). Neither the Appellant nor Appellant's counsel, ever received a filed copy of the Consent Order or written notice that the Consent Order had been entered. (R. pp. 20-25; R. pp. 42-46).

In its initial Order denying the Appellant's Motion to Restore, the trial court outlined the requirements of Rule 40(j) SCRCP regarding the one year period of time to file a motion to restore when a party wants to take advantage of the tolling of the statute of limitations. (R. pp. 4-8). However, the trial court failed to address the Appellant's argument that the time limit to restore the case to the active docket does not begin to run until Appellant receives written notice that the Order has been entered into the record by the Clerk of Court. (R. pp. 4-8)

A. Application of Rule 40(j)

Rule 40(j), SCRCP governs when a case may be stricken from and restored to the active general docket as follows:

> **Case Stricken From Docket by Agreement.** A party may strike its complaint, counterclaim, cross-claim or third party claim from any docket one time as a matter of right, provided that all parties adverse to that claim, counterclaim, cross-claim or third party claim agree in writing that it may be stricken, and all further agree that <u>if the claim is restored upon motion made within 1 year of the **date stricken**, the statute of limitations shall be tolled as to all consenting parties during the time the case is stricken,</u> and any unexpired portion of the statute of limitations on the date the case was stricken shall remain and begin to run on the date that the claim is restored. A party moving to restore a case stricken from the docket shall provide all parties notice of the motion to restore at least 10 days before it is heard. Upon being restored, the case shall be placed on the General Docket and proceed from that date as provided in this rule.

The rule provides that a party may restore a claim upon motion made within one year of the "date stricken." Rule 40(j) does not define "date stricken." When any case is stricken from the active docket whether by motion of a party or upon the action of the court, it requires that an Order be signed by the Judge and entered into the record. Therefore, in order to determine when a case is "stricken" it is proper to look to the rules governing the Notice of Orders or Judgments.

B. Rule 77(d) SCRCP

Rule 77(d) SCRCP governs Notice of Orders and states in part:

> **(d) Notice of Orders or Judgments.** Immediately upon the entry of an order or judgment the clerk **shall** serve a notice of the entry by first class mail upon every party affected thereby who is not in default for failure to appear, and shall make a note in the case file or docket sheet of the mailing. ...

The rules of civil procedure, like statutes, should be given their plain meaning. *Valentine v. Davis,* 319 S.C. 169, 173, 460 S.E.2d 218, 220 (Ct. App. 1995). Rule 77(d) SCRCP requires that the Clerk **shall** serve a notice of entry of the Order by first class mail upon every party. In the instant case, it is undisputed that the notice of entry of Judge Dickson's Order striking the case from the docket was not served on the Appellant.

The trial court, in its initial Order denying Appellant's Motion to Restore held that the Appellant's position that she was never served with notice of the entry of the Order lacked merit because the Appellant's attorney signed the Consent Order and forwarded it to the Respondent's attorney and the Respondent's attorney copied Appellant's attorney on the letter forwarding the Order to the Court for approval. (R. pp. 4-8). The Court further held that since the attorney for the appellant had signed the Consent Order that the attorney was on notice that the Order would be eventually be signed and that notice was

sufficient for the one year time period to toll the statute of limitations to begin to run. (R. pp. 4-8) This ruling does not comport with the plain language of Rule 77(d) SCRCP and therefore the case was not properly stricken from the original docket and should have been placed on the active trial docket.

While it is true that the attorney for the Appellant signed the Consent Order and was copied on the letter forwarding the Consent Order to the Court, the Court should not be excused from following the rules governing notice.

C. Rule 203(b)(1) SCACR

Rule 203(b)(1), SCACR, governs notice of appeal and the time for service of appeals from the Court of Common Pleas. That rule states in part:

> **(b) Time for Service.**
>
> **(1) Appeals From the Court of Common Pleas.** A notice of appeal shall be served on all respondents within thirty (30) days after receipt of written notice of entry of the order or judgment. ....

The Supreme Court addressed the issue of when an order became a valid order in *Upchurch v. Upchurch,* 367 S.C. 16, 24; 624 S.E.2d 643 (2006). In *Upchurch* the Supreme Court held that the Court of Appeals erred in dismissing Wife's appeal of a Family Court Order as untimely. The order was signed by the judge and the judge's administrative assistant sent a letter attaching the original signed order to the Clerk of Court for entry into the record. The letter enclosing the signed order was carbon copied to the Husband and Wife's attorney. However, neither the wife nor the wife's attorney ever received written notice from the Clerk of Court that the order had been entered into the record. The Supreme Court held that the time to appeal pursuant to 203 (b), of the SCACR, begins to run when written notice that the order has been entered into the record by the

Clerk of Court has been received. Accordingly, the Court held that the letter from the judge's administrative assistant was not sufficient notice of entry of judgment. Id. 367 S.C. 16, 24; 624 S.E. 2d 643, 647.

In the instant case, neither Appellant nor Appellant's attorney ever received written notice that the order had been entered into the record by the Clerk of Court. In fact, unlike *Upchurch*, neither Appellant nor Appellant's attorney ever received a signed copy of the judge's order. Based on the Supreme Court's holding in *Upchurch* and the Court's interpretation of the South Carolina Appellant Court rules, the Appellant's one year period of time to file her Motion to Restore would not begin until the appellant or her attorneys received written notice that the order has been entered into the record. In the instant case, because neither the appellant nor her counsel ever received written notice that the order has been entered, the Order would not be valid and the Appellant's case should be placed on the active general docket.

II. The Trial Court Erred in Failing to Restore Appellant's Case to the Active Docket Pursuant to Rule 40(j) of The South Carolina Rules of Civil Procedure When the Appellant Had Previously Filed Her Complaint Within The Statute of Limitations And Where The Case Had Been Stricken From The Active Docket and Placed In An Inactive Status.

Assuming the Order signed by Judge Edgar W. Dickson on October 23, 2011 was effective as to Appellant's case, the trial Court still erred in failing to restore the Appellant's case to the active docket pursuant to Rule 40(j) SCRCP when the Appellant had previously filed her Complaint within the statute of limitations.

The statute of limitations provides that "[c]ivil actions may only be commenced within the periods prescribed in this title after the cause of action has accrued...." S.C. Code Ann. § 15-3-20(A) (2005). Thus, the statute of limitations applies to the date a

lawsuit is "commenced." Rule 3(a) of the South Carolina Rules of Civil Procedure provides, "A civil action is commenced when the summons and complaint are filed with the clerk of court if: (1) the summons and complaint are served within the statute of limitations....." Section 15-3-530 of the South Carolina Code (2005) prescribes the limitations period for this case as three years.

The Appellant's cause of action arises out of a motor vehicle accident which occurred on March 10, 2009. Accordingly, the time limit within which the appellant would have had to file her lawsuit would have been three years from the date on which the cause of action accrued. Appellant filed suit on May 12, 2010, well within the time limits prescribed by S.C. Code Section 15-5-530(5) (2005).

The respondents argue that the Appellant did not comply with the tolling provisions of Rule 40(j), SCRCP. However, because the lawsuit had already been commenced, there was nothing to toll. Therefore, the tolling provisions are irrelevant.

The circuit court also relied on Rule 40(j), SCRCP in denying Appellant's motion. The court erred in its application of Rule 40(j) to the instant case. Rule 40(j) *does not require* that a party move to restore the case to the docket within one year after it was stricken. Instead, the rule provides that, *if* the claim is restored within one year after it is stricken, the statute of limitations is tolled for that period. A party can move to restore a case to the docket more than one year after the claim was stricken without running afoul of Rule 40(j); the party simply cannot take advantage of the one year tolling period provided by the rule. *Maxwell v. Genez*, 356 S.C. 617, 620-21, 591 S.E.2d 26, 28 (2003).

Rule 40(j) does not set a deadline for restoring a case therefore the applicable deadline remains the statute of limitations. *Goodwin v. Landquest Dev., LLC,* Op. No. 5342 (S.C. Ct. App. Filed Aug. 12, 2015, Withdrawn, Substituted and Refiled Dec. 16, 2015) (Few Adv. Sh. No 49 at 12). Because the Appellant commenced her lawsuit within the statute of limitations, there was nothing to toll and the tolling provision in Rule 40(j) would have been irrelevant. Additionally, the requirement of complying with the statute of limitations after a case is stricken pursuant to Rule 40(j) depends on the event of "striking" being considered a dismissal. (Id.) While there is a basis in our law for considering a case stricken pursuant to the rule as the equivalent of a dismissal, our rules do not clearly provide that striking a case pursuant to Rule 40(j) is a dismissal. (Id.)

In the notes to the 1994 amendments to the South Carolina Rules of Civil Procedure, Rule 40(j) is described as "substantially revis[ing] the procedure for *dismissing* a case previously found in Rule 40(c)(3)." (Id.) Rule 40, SCRCP Notes, Notes to 1994 Amendments (emphasis added). The notes go on to state, "Rule 40(j) now requires all adverse parties to consent to the dismissal in writing, but, the consent also operates to toll the statute of limitations for one year after the case is stricken... . Any remaining portion of the statute of limitations begins to run one year after the case was stricken unless the case has previously been restored...." *Id.*; *see also*, *Maxwell*, 356 S.C. at 621, 591 S.E.2d at 28 (relying on the notes in interpreting Rule 40(j)). Moreover, the tolling period would not be necessary if striking the case pursuant to Rule 40(j) were not the equivalent of a dismissal. *See Maxwell*, 356 S.C. at 620, 591 S.E.2d at 27 ("In interpreting the meaning of the South Carolina Rules of Civil Procedure, the Court applies the same rules of construction used to interpret statutes.");

State v. Sweat, 386 S.C. 339, 351, 688 S.E.2d 569, 575 (2010) ("A statute should be so construed that no word, clause, sentence, provision or part shall be rendered surplusage, or superfluous."); *Nucor Steel, a Div. of Nucor Corp. v. S.C. Pub. Serv. Comm'n*, 310 S.C. 539, 545, 426 S.E.2d 319, 323 (1992) ("[W]here possible, all provisions of a statute must be given full force and effect.").

There is also a historical basis for considering a case stricken pursuant to Rule 40(j) as the equivalent of dismissed. We adopted our Rules of Civil Procedure in 1985. *See* Rule 86(a), SCRCP ("These rules shall take effect on July 1, 1985."). Before then, the circuit court had the power to dismiss an action without prejudice if it was called for trial and the parties were not ready to proceed. *See Small v. Mungo*, 254 S.C. 438, 441, 443, 175 S.E.2d 802, 803, 804 (1970) (holding the inability of counsel "to contact plaintiff and his witnesses and be ready for trial" and "the failure of plaintiff and his counsel to appear when the case was called for trial constituted a failure to proceed with the case . . . and a ground for dismissal of the action"). When the supreme court decided *Small*, former Circuit Court Rule 81 was in effect. The rule provided, "[w]hen a case is reached on the Common Pleas trial roster and is called for trial, . . . if counsel are not ready to go forward with the case it shall be placed... at the foot of the Calendar." S.C. Code Ann. vol. 22, Circuit Court Rule 81 (Supp. 1984) (repealed 1985). In 1985, former Rule 40(c)(3), SCRCP, took effect.

Similar to the procedure described in *Small*, Rule 40(c)(3) applied only if the parties were not prepared to proceed when the case was called for trial. However, the rule allowed the circuit court to **"strike"** the action. The rule provided: When an action is reached on the trial roster and is called for trial, it shall not be continued by

consent, and if counsel are not ready to go forward the court shall strike the action from the calendar (file book) with leave to restore, unless continuance is granted for good cause shown. Rule 40(c)(3), SCRCP (West 1994) (repealed 1995).

The rule did not use the word "dismissed," but tracking the language of former Circuit Court Rule 81, it required a restored case to "be placed at the foot of the calendar (file book) and a new case number assigned." Rule 40(c)(3); *see* Rule 40(c)(3), Notes ("This Rule 40 is substantially a compendium of present Circuit Court Rules . . . .").

Rule 40(c)(3) SCRCP was the predecessor to the current Rule 40(j) SCRCP. The interpretation of the prior Rule 40(c)(3) regarding the treatment of a case that was "stricken" from the docket varied. *See Graham v. Dorchester Cnty. Sch. Dist.*, 339 S.C. 121, 122, 125 n.1, 528 S.E.2d 80, 81, 82 n.1 (Ct. App. 2000) (stating in a case "struck . . . from the trial roster . . . pursuant to former Rule 40(c)(3), SCRCP" that "the statute of limitations clearly expired" before the motion to restore was filed). *But see Robinson v. J.F. Cleckley & Co.*, 751 F. Supp. 100, 105 (D.S.C. 1990) (stating for purposes of calculating timely removal pursuant to 28 U.S.C. § 1446(b) (2012), "an action which has been removed from the docket pursuant to [Rule] 40(c)(3) is pending while it is off of the docket" and is not "commenced when it is restored to the calendar").

While it is unclear under the prior Rule 40(c)(3) whether a case "stricken" from the roster is a dismissal, there is one important distinction in the current Rule 40(j) SCRCP. Striking a case pursuant to Rule 40(j) may be done **only** by consent. *See* Rule 40(j), SCRCP (providing the party asserting a claim may strike it only when "all parties adverse to that claim . . . agree in writing that it may be stricken"). In determining the

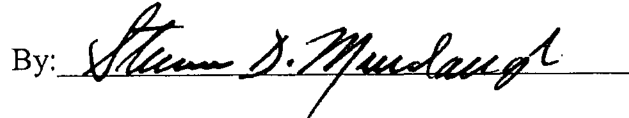
status of a case stricken from the active docket the most logical place for the Court to look is at the language in the Consent Agreement between the parties. In the instant case the Consent Agreement between the Appellant and the Respondent states that "this action shall stricken from the active docket with leave to restore pursuant to Rule 40(j) SCRCP." (R. pp. 9-10). The Consent Agreement goes on to say "that while the case remains in an **inactive status**, the parties are allowed to continue with all forms of discovery provided for and authorized under the South Carolina Rules of Civil Procedure and to pursue mediation." (R. pp. 9-10) Based on the language of the Consent Agreement between Appellant and Respondent, it is clear that the parties did not intend for the case to be dismissed, but rather placed in an inactive status. Since the case had not been dismissed and because the lawsuit was commenced within the time limits prescribed by the statute of limitations, the tolling provisions under Rule 40(j) SCRCP are irrelevant.

CONCLUSION

The Appellant and her Attorney never received a filed copy of Judge Dickson's Order Striking the Case Pursuant to Rule 40(j) SCRCP or written notice that the order had been entered into the record by the Clerk of Court. Based on interpretation of the South Carolina Rules of Civil Procedure and the South Carolina Appellate Court Rules, that order was not valid until the Appellant received a filed copy of the Order or written notice that the order had been entered into the record by the Clerk of Court. Additionally, even if Judge Dickson's Order Striking the Case Pursuant to Rule 40(j) SCRCP was effective as to the Appellant, the striking of the case did not amount to a dismissal and therefore the tolling provisions under Rule 40(j) SCRCP are irrelevant. Accordingly, this Court should reverse

the trial court's denial of Appellant's Motion to Reconsider and to Alter or Amend and restore the Appellants case to the general active docket as a matter of law.

Respectfully submitted,

By: 

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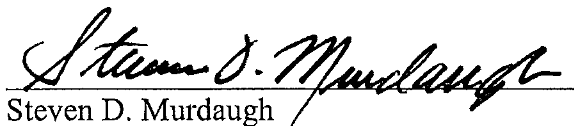
CERTIFICATE OF COUNSEL

The undersigned hereby certifies that the Final Brief of Appellant contains all material proposed to be included by any of the parties and not any other material.

May 18, 2016
Walterboro, South Carolina



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