

STATE OF SOUTH CAROLINA)
)
 COUNTY OF ORANGEBURG)
)
 Price Oulla and Bonnie Oulla,)
)
 Plaintiffs,)
)
 vs.)
)
 Lisa Velazques, Harbison Community)
 Association, Inc., Cody Sox, and Patten)
 Seed Company, d/b/a Super Sod,)
)
 Defendants.)

IN THE COURT OF COMMON PLEAS
 FIRST JUDICIAL CIRCUIT
 CASE NO. 2014-CP-38-1590

PLAINTIFFS' NOTICE OF MOTION AND
 MOTION FOR RELIEF FROM JUDGMENT

RECEIVED

APR 10 2017

SC Court of Appeals

FILED FOR RECORD
 MINNIE B. CLARK
 2017 APR -6 PM 10:32
 CLERK OF COURT
 ORANGEBURG, SC

TO: EDWARD RAYMOND MOORE, III, ATTORNEY FOR DEFENDANT PATTEN SEED COMPANY D/B/A SUPER SOD

PLEASE TAKE NOTICE that within ten days after service hereof, or as soon thereafter as counsel may be heard, Plaintiffs Price and Bonnie Oulla will move, pursuant to Rules 15(a) and 60(b), SCRPC, and the Order of the South Carolina Court of Appeals entered on March 23, 2017,¹ for relief from the Order Granting Patten Seed Company d/b/a Super Sod's Motion for Summary Judgment and the Order Denying Plaintiffs' Motion to Reconsider. The basis for the motion is that the Court should reopen the action to consider and grant Plaintiffs' Motion to Amend the Complaint, which was filed on June 29, 2016 but never ruled upon by the Court.²

While this motion may technically be a Rule 60(b) motion, it is governed by the more liberal standard of Rule 15; SCRPC. The reason is that the sole subject of the motion is a Rule 15 motion to amend that had been filed and was pending, but had never been ruled upon, when

¹ A copy of the Order is attached as Exhibit A.

² A copy of the Motion is attached as Exhibit B. The proposed Amended Complaint was attached to the Motion as Exhibit A and is included again herewith.

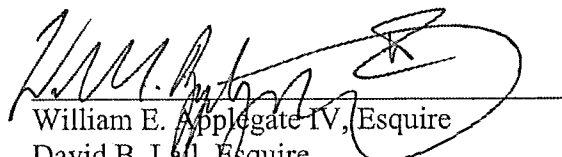
the Court entered final judgment. See, e.g., *Laber v. Harvey*, 438 F.3d 404, 427 (4th Cir. 2006) (providing that parties are permitted to file a motion for leave to amend the complaint at any time during the litigation, even after entry of final judgment, but first the judgment must be vacated to reopen the proceedings); *Katyle v. Penn Nat'l Gaming, Inc.*, 637 F.3d 462, 471 (2011) (providing that even where a motion to amend has been filed *after* entry of final judgment, “[t]o determine whether vacatur is warranted...the court need not concern itself with either of [Rule 59 or Rule 60’s] standards,” but rather should consider the motion “under the same legal standard as a similar motion filed before judgment was entered” pursuant to Rule 15) (quotation omitted). Under the liberal standard of Rule 15, Plaintiffs’ motion to reopen the action and permit amendment of the complaint should be granted.

Even if the Court were to find that the more rigorous standard of Rule 60(b) applies, Plaintiffs’ motion should still be granted. The unusual circumstances leading to the lack of a ruling on Plaintiffs’ motion to amend prior to entry of judgment constitute the “mistake, inadvertence, surprise, or excusable neglect” contemplated in Rule 60(b)(1).

Under either standard, the Court should grant the motion, reopen the action, and permit Plaintiffs to amend their complaint to plead a cause of action for breach of the implied warranty of merchantability against Defendant Super Sod.

YARBOROUGH APPLGATE LLC

291 East Bay Street, Floor 2
Charleston, South Carolina 29401
843-972-0150 office
843-277-6691 fax


William E. Applegate IV, Esquire
David B. Lal, Esquire
ATTORNEYS FOR THE PLAINTIFFS

April 3, 2017

CERTIFICATE OF SERVICE

The undersigned employee of Yarborough Applegate LLC hereby certifies that on April 4, 2017 she served, via first-class U.S. mail, postage paid, copies of Plaintiff's Notice of Motion and Motion for Relief from Judgment upon:

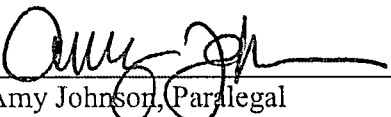
The Honorable R. Knox McMahon
Lexington County Judicial Center
205 E. Main Street
Lexington, SC 29072

E. Raymond Moore, III
Murphy & Grantland, P.A.
4406-B Forest Drive
Post Office Box 6648
Columbia, SC 29260

E. Mitchell Griffith
Kelly D. Dean
Griffith Sharp & Liipfert, LLC
600 Monson Street
Post Office Drawer 570
Beaufort, SC 29901

Mark B. Tinsley
Gooding and Gooding, P.A.
265 Barnwell Highway
Post Office Box 1000
Allendale, SC 29810

April 4, 2017



Amy Johnson, Paralegal
Yarborough Applegate LLC

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ORANGEBURG, SC

The South Carolina Court of Appeals

CLERK OF COURT
ORANGEBURG, SC

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FILED FOR RECORD
WINNIFA B. CLARK

Price Oulla and Bonnie Oulla, Appellants,

v.

Lisa Velazques; Harbison Community Association, Inc.;
Cody Sox; and, Patton Seed Company d/b/a Super Sod,
Defendants,

Of Whom Patton Seed Company d/b/a Super Sod is the
Respondent.

Appellate Case No. 2017-000093

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ORDER

Appellants' motion for leave to file a motion pursuant to Rule 60, SCRPC, with the circuit court is granted. This appeal shall be held in abeyance for ninety days to allow the circuit court to consider this matter. Counsel for Appellants shall provide this court with proof that the motion has been filed with the circuit court within fifteen days of this order, and counsel for Appellants shall immediately notify this court when the motion has been resolved.

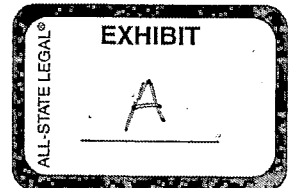
James E. Applegate
FOR THE COURT

Columbia, South Carolina

cc:
William E. Applegate, IV, Esquire
David Breault Lail, Esquire
Edward Raymond Moore, III, Esquire
The Honorable R. Knox McMahon

FILED

March 23, 2017



STATE OF SOUTH CAROLINA)
)
 COUNTY OF ORANGEBURG)
)
 Price Oulla and Bonnie Oulla,)
)
 Plaintiffs,)
)
 vs.)
)
 Lisa Velazques, Harbison Community)
 Association, Inc., Cody Sox, and Patten)
 Seed Company, d/b/a Super-Sod,)
)
 Defendants.)

IN THE COURT OF COMMON PLEAS
 FIRST JUDICIAL CIRCUIT
 CASE NO. 2014-CP-38-1590

**PLAINTIFFS' MOTION TO
 AMEND COMPLAINT**

RECEIVED

APR 10 2017

SC Court of Appeals

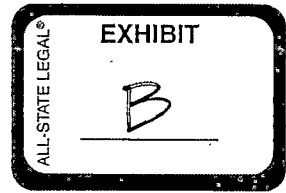
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 ORANGEBURG, SC
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 WINNIFRA B. CLARK

PLEASE TAKE NOTICE that Plaintiffs, by and through their undersigned attorneys, respectfully move this Court to allow the Plaintiffs to amend the pleadings by adding a cause of action against Patten Seed Company, d/b/a Super-Sod for Breach of the Implied Warranty of Merchantability. The proposed Amended Complaint is attached hereto as **Exhibit A**.

Amendments of pleadings are controlled by Rule 15, SCRPC, which provides in pertinent part that "a party may amend his pleading only by leave of court or by written consent of the adverse party; and leave shall be freely given when justice so requires and does not prejudice any other party." A motion to amend is addressed to the sound discretion of the trial judge. *Stanley v. Kirkpatrick*, 357 S.C. 169, 592 S.E.2d 296 (2004); *City of North Myrtle Beach v. Lewis-Davis*, 360 S.C. 225, 599 S.E.2d 462 (Ct.App.2004). Leave to amend pleadings pursuant to Rule 15, SCRPC, shall be liberally and freely given when justice so requires and does not prejudice any other party. *Crestwood Golf Club, Inc. v. Potter*, 328 S.C. 201, 493 S.E.2d 826 (1997); *Pruitt v. Bowers*, 330 S.C. 483, 499 S.E.2d 250 (Ct.App.1998). The prejudice Rule 15 envisions is a lack of notice that the new issue is going to be tried, and a lack of opportunity to refute it. *Tanner v.*

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Winnifra B. Clark
 CLERK OF COURT
 ORANGEBURG COUNTY, SC



Florence County Treasurer, 336 S.C. 552, 521 S.E.2d 153 (1999); *Lewis-Davis*, 360 S.C. at 232, 599 S.E.2d at 465. The party opposing the amendment has the burden of establishing prejudice. *Foggie v. CSX Transp., Inc.*, 315 S.C. 17, 431 S.E.2d 587 (1993); *Pruitt*, 330 S.C. at 489, 499 S.E.2d at 253. This rule strongly favors amendments and the court is encouraged to freely grant leave to amend. *Jarrell v. Seaboard Sys. R.R.*, 294 S.C. 183, 363 S.E.2d 398 (Ct.App.1987).

In support of the motion, the Plaintiffs state the following:


1. Plaintiffs seek to amend the Complaint in order to add an additional cause of action against Patten Seed Company, d/b/a Super-Sod for Breach of the Implied Warranty of Merchantability.

2. This amendment, if ordered, will not prejudice the Defendants in their defense of this case.

For the reasons set forth above, Plaintiffs respectfully requests that the Court grant their Motion to Amend the Complaint.

SIGNATURE PAGE TO FOLLOW

YARBOROUGH APPEGATE LLC
291 East Bay Street, Floor 2
Charleston, SC 29401
843-972-0150 office
843-277-6691 fax
william@yarboroughapplegate.com
dlail@yarboroughapplegate.com



William E. Applegate IV, Esquire
David B. Lail, Esquire

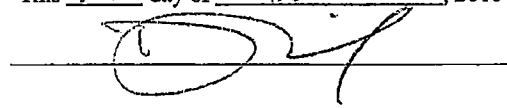
ATTORNEYS FOR THE PLAINTIFFS

6-29, 2016
Charleston, South Carolina

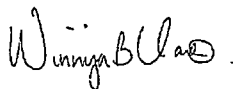
CERTIFICATE OF SERVICE

I certify that on this date a copy of the foregoing was served on each party or counsel of record by mailing, e-mailing or hand delivery in the manner prescribed by the applicable Rule of Civil Procedure.

This 29th day of June, 2016



ATTEST: TRUE COPY



CLERK OF COURT
ORANGEBURG COUNTY, SC

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ORANGEBURG COUNTY, SC

2016 JUN 29 3:24

FILED FOR RECORD
WINNIE B. CLARK

STATE OF SOUTH CAROLINA)
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 COUNTY OF ORANGEBURG)
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 Price Oulla and Bonnie Oulla,)
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 Plaintiffs,)
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 vs.)
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 Lisa Velazques, Harbison Community)
 Association, Inc., Cody Sox, and Patten)
 Seed Company, d/b/a Super-Sod,)
)
 Defendants.)

IN THE COURT OF COMMON PLEAS
 FIRST JUDICIAL CIRCUIT
 CASE NO. 2014-CP-38-1590

**AMENDED COMPLAINT
 (Jury Trial Demanded)**

FILED FOR RECORD
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 ORANGEBURG, SC

The Plaintiffs, Price Oulla and Bonnie Oulla, and the undersigned attorneys, complaining of the Defendants, jointly and severally, allege the following:

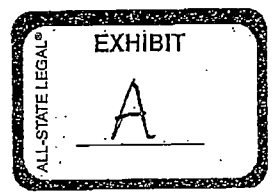
PARTIES, JURISDICTION, AND VENUE

1. The incidents that are the subject of this action occurred in Orangeburg County, South Carolina on July 22, 2014.
2. Plaintiffs Price Oulla and Bonnie Oulla are citizens and residents of Charleston County, South Carolina.
3. Upon information and belief, Defendant Lisa Velazques (hereinafter "Velazques") is a resident and citizen of Charleston County, South Carolina and was operating a motor vehicle on the highways of Orangeburg County, South Carolina on July 22, 2014 when she collided into the rear of Plaintiff Price Oulla's vehicle.
4. Upon information and belief, Defendant Patten Seed Company, d/b/a Super-Sod (hereinafter "Super-Sod") is a Georgia corporation that owns and operates a sod and seed company located on Five Chop Road in Orangeburg County, South Carolina.

ATTEST: TRUE COPY

Winnifra B. Clark

CLERK OF COURT
 ORANGEBURG COUNTY, SC



5. Upon information and belief, Defendant Cody Sox is a citizen and resident of Lexington County, South Carolina.

6. Upon information and belief, Defendant Harbison Community Association, Inc. (hereinafter "Harbison") is a South Carolina corporation organized and existing under the laws of South Carolina and conducts business in Orangeburg County, South Carolina. Harbison was procuring sod from Defendant Super-Sod's Orangeburg County location on the date the incidents that are the subject of this action occurred.

7. Upon information and belief, Defendant Cody Sox was acting as an employee, agent, servant, and/or legal representative of Defendant Harbison and was at all times acting in the course and scope of his employment, agency and business with Defendant Harbison on the date the incidents that are the subject of this action occurred.

8. At all times relevant to the Complaint, Defendants Super-Sod and Harbison were, and continue to be, responsible for the acts and/or omissions of their employees, agents, and/or servants.

9. Defendants Super-Sod and Harbison had the right and/or power to direct and control their employees, agents, and/or servants while doing business for a fee and/or profit, and they are personally, jointly and severally liable for the acts and/or omissions committed herein.

10. This Court has personal and subject matter jurisdiction over this case and venue is proper in this Court.

FACTS

11. On July 22, 2014, Defendant Sox, driving a pick-up truck with a trailer in tow for Defendant Harbison, travelled to Defendant Super-Sod's business located on Five Chop Road in Orangeburg County, South Carolina to obtain a load of sod for Defendant Harbison.

12. Upon information and belief, Defendants Super-Sod and Sox loaded two pallets of sod onto the trailer and did not secure or attach the load to the trailer.

13. After the pallet loads of sod were placed on the trailer, Sox left Super-Sod on Five Chop Road and eventually merged onto Interstate 26 ("I-26"), and headed westbound through Orangeburg County towing an unsecured load.

14. While Defendant Sox was pulling the trailer for Defendant Harbison on I-26, the unsecured and unattached load of sod spilled onto the roadway creating a hazard to other drivers.

15. Upon information and belief, the spilled load of unsecured sod obstructed travel on I-26 in Orangeburg County causing a traffic jam.

16. Plaintiff Price Oulla was also travelling westbound on I-26 – behind Sox and the spilled load of sod on the roadway. As Mr. Oulla approached the traffic jam, he slowed his vehicle accordingly and was nearly stopped behind a line of backed-up traffic when Defendant Velazques collided into Mr. Oulla's vehicle.

17. Defendant Velazques, travelling directly behind Mr. Oulla, did not slow her vehicle down for the spilled sod traffic jam on I-26 and she collided into the rear of Mr. Oulla at a high rate of speed forcing Mr. Oulla to then collide with the vehicle in front of him.

18. Mr. Oulla sustained traumatic and permanent injuries in the collision.

FOR A FIRST CAUSE OF ACTION AGAINST DEFENDANTS HARBISON AND SOX
(Negligence, Gross Negligence, Negligence *Per Se*)

19. Plaintiff realleges and reincorporates Paragraphs 1 through 18 above as if fully set forth herein verbatim.

20. At all times relevant to this Complaint, Defendant Sox was, upon information and belief, acting as an employee, agent, servant, and/or legal representative of Defendant Harbison and he was acting in the course and scope of his employment.

21. Defendant Harbison is vicariously liable for Defendant Sox's actions on July 22, 2014 and the consequences of those actions.

22. Defendant Sox at all times pertinent hereto had a duty to the general public, including Plaintiff, to properly secure his load of sod and operate his vehicle in a safe manner and in compliance with the statutory and common laws of South Carolina.

23. Defendant Sox breached his duty owed to Plaintiff by carelessly, negligently, and willfully operating a motor vehicle on a public roadway with an unsecured and unattached load of cargo that spilled onto the roadway, subsequently causing a collision.

24. Mr. Oulla was operating his vehicle in a safe, prudent, and reasonable manner at all times relevant to the Complaint.

25. The collision, injuries, and damages described in this Complaint were the direct, foreseeable and proximate result of the negligent and careless, willful, wanton, reckless, and grossly negligent acts or omissions of Defendants Harbison and Sox in the following particulars:

- a. Driving a motor vehicle in such a manner as to indicate a willful, wanton, reckless, grossly negligent, and negligent disregard for the safety of others, in violation of S.C. Code Ann. § 56-5-2920;
- b. In violating S.C. Code Ann. § 56-5-4100 et seq.;
- c. In failing to secure or attach a load of cargo during transport;
- d. In failing to prevent any of the load of cargo from dropping or otherwise escaping onto the roadway;
- e. In failing to maintain proper control of the vehicle;
- f. In failing to operate the vehicle in a safe manner;
- g. In failing to properly train and/or supervise employees and/or agents, and/or failing to have policies and procedures in place regarding how to properly load and secure cargo to prevent harm to others, including Plaintiff;

- h. Failing to use the degree of care and caution that a reasonable person would have used under the circumstances then and there prevailing; and
- i. In such other and further particulars as the evidence at trial may show.

All of which acts and omissions, or both, were the actual, direct and proximate cause of the damages and injuries claimed herein.

FOR A SECOND CAUSE OF ACTION AGAINST DEFENDANT SUPER-SOD
(Negligence, Gross Negligence, Negligence *Per Se*)

26. Plaintiff realleges and reincorporates Paragraphs 1 through 25 above as if fully set forth herein verbatim.

27. Upon information and belief, Defendant Super-Sod sold Defendant Harbison two pallets of sod from its business location on Five Chop Road in Orangeburg County and undertook the task of loading the sod onto the trailer being pulled by Defendant Sox.

28. Upon information and belief, Defendant Super-Sod knew that Defendant Sox would be transporting the loaded pallets of sod on South Carolina public roadways.

29. Defendant Super-Sod had a duty of care to the general public, including Plaintiff, to properly and safely load and secure the pallets of sod onto the trailer for transport.

30. Defendant Super-Sod breached its duty owed to Plaintiff by carelessly negligently, and willfully loading sod pallet loads of cargo onto a vehicle and not securing or attaching the cargo such that it spilled onto the roadway, subsequently causing a collision.

31. The collision, injuries, and damages described in this Complaint were the direct, foreseeable and proximate result of the negligent and careless, willful, wanton, reckless, and grossly negligent acts or omissions of Defendant Super-Sod in the following particulars:

- a. In failing to properly and safely load the sod pallets on the trailer;
- b. In failing to properly and safely distribute the weight of the sod pallets on the trailer;
- c. In failing to secure and attach the sod pallet loads to the trailer;

- d. In violating S.C. Code Ann. § 56-5-4100 et seq.;
- e. In failing to use the proper tools and equipment to secure the sod pallet loads to the trailer;
- f. In failing to inspect the sod pallet loads on the trailer before it left Super-Sod's place of business and entered the public roadways;
- g. In failing to properly train and/or supervise employees and/or agents, and/or failing to have policies and procedures in place regarding how to properly load and secure cargo to prevent harm to others, including Plaintiff;
- h. Failing to use the degree of care and caution that a reasonable person would have used under the circumstances then and there prevailing; and
- i. In such other and further particulars as the evidence at trial may show.

All of which acts and omissions, or both, were the actual, direct and proximate cause of the damages and injuries claimed herein.

FOR A THIRD CAUSE OF ACTION AGAINST DEFENDANT SUPER-SOD
(Breach of Implied Warranty of Merchantability)

32. Plaintiff realleges and reincorporates Paragraphs 1 through 31 above as if fully set forth herein verbatim.

33. Defendant Super-Sod is a "merchant" and the sod it sold to Defendant Harbison were "goods" as defined by the South Carolina Commercial Code, § 36-2-103 et seq. . . .

34. In selling the sod to Defendant Harbison, Defendant Super-Sod impliedly warranted that it was merchantable, including that it was adequately contained and packaged, as set out in South Carolina Code § 36-2-314.

35. Defendant Super-Sod improperly hand-wrapped and packaged the sod with plastic in a way that allowed it to later tear under normal transport conditions.

36. Defendant Super-Sod did not exclude or modify the implied warranty of merchantability.

37. Defendant Super-Sod's implied warranty of merchantability flows to Plaintiffs pursuant to South Carolina Code § 36-2-318.

38. Defendant Super-Sod breached the implied warranty of merchantability in that the sod was, in fact, not merchantable, fit, suitable, or safe for use as set out above.

39. As a direct and proximate result of Defendant Super-Sod's breach of the implied warranty of merchantability, Plaintiffs suffered the injuries described above.

40. Due to Defendant Super-Sod's breach of the implied warranty of merchantability, Plaintiffs are entitled to recover consequential damages pursuant to South Carolina Code § 36-2-715, and actual and punitive damages as determined by a jury.

FOR A FOURTH CAUSE OF ACTION AGAINST DEFENDANT VELAZQUES
(Negligence, Gross Negligence, Negligence *Per Se*)

41. Plaintiff realleges and reincorporates Paragraphs 1 through 40 above as if fully set forth herein verbatim.

42. Defendant Velazques at all times pertinent hereto had a duty to the general public, including Plaintiff, to operate her vehicle in a safe manner and in compliance with the statutory and common laws of South Carolina.

43. Defendant Velazques breached her duty owed to Plaintiff by carelessly, negligently, and willfully operating a motor vehicle on a public roadway and subsequently causing a collision when she collided into the rear of Mr. Oulla's vehicle.

44. Mr. Oulla was operating his vehicle in a safe, prudent, and reasonable manner at all times relevant to the Complaint.

45. The collision, injuries, and damages described in this Complaint were the direct, foreseeable and proximate result of the negligent and careless, willful, wanton, reckless, and grossly negligent acts or omissions of Defendant Velazques in the following particulars:

- a. Driving a motor vehicle in such a manner as to indicate a willful, wanton, reckless, grossly negligent, and negligent disregard for the safety of others, in violation of S.C. Code Ann. § 56-5-2920;
- b. Traveling too fast for conditions;
- c. Following too closely;
- d. Failing to maintain a proper lookout;
- e. Failing to keep the motor vehicle she was operating under control;
- f. Failing to apply her brakes;
- g. Failing to operate her vehicle in a safe manner;
- h. Failing to use the degree of care and caution that a reasonable person would have used under the circumstances then and there prevailing; and
- i. In such other and further particulars as the evidence at trial may show.

All of which acts and omissions, or both, were the actual, direct and proximate cause of the damages and injuries claimed herein.

46. As a direct and proximate cause of the acts and omissions, or both, of all Defendants, and/or their employees, agents, and/or servants, Mr. Oulla was severely injured, and suffered great and permanent physical harm which has caused, and in the future will cause him to suffer one or more of the following elements of damage:

- a. Past and future physical pain and suffering;
- b. Loss of income;
- c. Loss of enjoyment of life;
- d. Substantial past expenses for medical services;
- e. Future medical expenses;
- f. Permanent injury to his body;
- g. Increased susceptibility to future injury;

- h. Mental anguish, emotional distress, shock, fear, and embarrassment;
- i. Incidental expenses related to time out of work and medical care; and
- j. Other particulars as discovery and the evidence at trial may show.

47. Plaintiff is informed and believes that he is entitled to judgment against all Defendants for the damages he has suffered and will suffer in the future.

FOR A FIFTH CAUSE OF ACTION AGAINST ALL DEFENDANTS
(Loss of Consortium)

48. Plaintiff realleges and reincorporates Paragraphs 1 through 47 above as if fully set forth herein verbatim.

49. As a direct, foreseeable, and proximate result of the joint concurring negligent, grossly negligent, careless, wanton, and reckless acts and/or omissions of the Defendants and/or their employees, agents, and/or servants, as alleged above, Plaintiff Bonnie Oulla has been forced to endure substantial losses of the marital rights to company, society, cooperation, affection, assistance, fellowship, aid, and relations with her spouse. And, Plaintiff Bonnie Oulla has suffered and incurred expenses and costs, and other damages to be shown through discovery and trial.

Plaintiffs are entitled to judgment against Defendants, jointly and severally, for the above-described actual damages and injuries to Plaintiffs, and for punitive damages to be determined by a jury.

WHEREFORE, Plaintiff prays for the following:

- i. A trial by jury;
- ii. Judgment against Defendants for damages pled herein in an amount to be determined by the jury;
- iii. For the costs of this action; and
- iv. For such other and further relief as this court deems just and proper.

YARBOROUGH APPELGATE LLC

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Charleston, SC 29401

843-972-0150 office

843-277-6691 fax

william@yarboroughapplegate.com

dlail@yarboroughapplegate.com

William E. Applegate IV, Esquire

David B. Lail, Esquire

AND

TATE JOHNSON LAW LLC

Tate Johnson, Esquire

6049 Winding Creek Blvd.

Liberty Township, OH 45011

ATTORNEYS FOR THE PLAINTIFFS

_____, 2016
Charleston, South Carolina