THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of General Sessions

Robin B. Stilwell, Circuit Court Judge

Case No. 2013-002752

State of South Carolina

Respondent,

v.

Michael Levant Mealor

Appellant.

PETITION FOR REHEARING

Pursuant to Rule 221(a) of the South Carolina Appellate Court Rules, the petitioner respectfully requests rehearing on the following grounds:

I. **The Court misapprehended and overlooked the South Carolina Supreme Court's holding in *State v. Cain* when it affirmed the trial court's denial of Appellant's motion for a directed verdict.**

This Court respectfully misapprehended and overlooked the precedent set forth in *State v. Cain* when it affirmed the trial court's denial of Appellant's directed verdict motion. In *Cain*, unlike the present case, the defendant was *arrested with actual equipment and ingredients* used to manufacture methamphetamine. 419 S.C. 24, 27, 795 S.E.2d 846, 848 (2017) (emphasis added). At trial, an expert *forensic chemist* testified as to the theoretical yield of methamphetamine from pseudoephedrine. *Id.* (emphasis added). The Supreme Court found the

trial court erred in not granting the directed verdict motion because "the jury [was] in the position of having to speculate as to Cain's efficiency at making methamphetamine, and therefore having to guess at how much of the drug he attempted to manufacture." *Id.* 31, 795 S.E.2d at 850. Additionally, it found that a directed verdict motion was proper because the state offered "no evidentiary basis on which [a] jury could have determined—*without speculating*—the quantity of methamphetamine Cain attempted to manufacture. . . ." *Id.*

When the court affirmed the denial of Appellant's directed verdict motion, it did not consider that "subsection 44-53-375(C) does not criminalize the theoretical possibility of manufacturing methamphetamine." *Id.* at 31, 795 S.E.2d at 849-50. While this Court was correct when it noted that multiple witnesses testified Appellant allegedly provided them with methamphetamine, the record is devoid of any specific amount of methamphetamine Appellant allegedly did or attempted to produce. In order to provide a specific amount, the State would have had to offer testimony regarding how much of the ingredients, other than pseudoephedrine, were needed to produce methamphetamine and how much of these ingredients Appellant had at his disposal. Additionally, the State would need to offer expert testimony regarding Appellant's capabilities to establish the level of efficiency in actual methamphetamine production given the ingredients he utilized as well as the conditions of the environment he used in allegedly producing methamphetamine.

The State presented none of this at trial. Instead, it relied upon Captain Brooks' testimony of a theoretical yield, which contained no opinion as to Appellant's specific capabilities. In addition, the State relied upon testimony from co-conspirators, who did not testify as to the specific amounts of methamphetamine allegedly received from Appellant or testify with certainty as to the specific amounts of pseudoephedrine they allegedly gave to Appellant.

Moreover, the record does not indicate any specific amounts of the additional ingredients of methamphetamine the co-conspirators allegedly observed Appellant to be in possession. Without testimony regarding the same, the jury was forced to speculate as to the amount of methamphetamine Appellant allegedly attempted to manufacture.

While the Opinion of this Court distinguishes the facts from *Cain*, it overlooks *Cain*'s ultimate holding, which was that "[b]ecause the State did not establish the *level of efficiency* Cain could have achieved in his attempt to manufacture methamphetamine, the jury was forced to speculate as to whether Cain could have actually produced the requisite quantity." *Id.* at 33, 795 S.E.2d at 851. Here, there is no evidence of Appellant's level of efficiency. The only testimony the State offered was a theoretical yield explanation and co-conspirators' testimony that they received an unspecified amount of methamphetamine from Appellant.

Moreover, this Court's reliance on Captain Brooks' testimony of "40 to 50% is the lowest yield percentage of methamphetamine one could possibly get from pseudoephedrine" is troublesome for a number of reasons. *State v. Mealor*, Op No. 5590, Shearouse's Adv. Sh. # 33 at 28. First, as articulated more fully below, Captain Brooks was without the requisite scientific knowledge to testify as to such. Most importantly, neither Captain Brooks or any of the other State's witnesses offered testimony and evidence as to Appellant's specific capabilities at manufacturing methamphetamine. Moreover, Captain Brooks admitted that there were "a lot of different recipes [for manufacturing methamphetamine] on the internet, I mean, *thousands of them*." R. p. 447 (emphasis added). However, no testimony of Appellant's alleged methamphetamine recipe was offered at trial. In sum, the evidence offered by the State left the jury to guess what products and the amount of products Appellant allegedly used to manufacture methamphetamine and how proficient of a manufacturer Appellant allegedly was. This is

exactly what the Court in *Cain* wanted to prevent. This Court acknowledges that "we do not have specific testimony that [Appellant] was a 'good cook. . . .'"[1] *Id.* It is axiomatic that if there is no specific testimony of the proficiency level of Appellant in allegedly attempting to manufacture methamphetamine, then the only way a jury could determine a specific quantify regarding the same would be by pure conjecture and speculation. Accordingly, this Court misapprehended and overlooked the Supreme Court's holding in *Cain*.

Lastly, as this Court acknowledges, the State's theory in the present case was one of "attempt." Attempt has been defined by our courts as "an overt act done with the intent to commit a crime but that falls short of completing the crime." *State v. Reid*, 383 S.C. 285, 293, 679 S.E.2d 194, 198 (Ct. App. 2009). Thus, by definition, an attempt either ends in failure in which case it remains an attempt, or it ends in the completion of the act in which case it becomes the completed offense.

To this end, custody of pseudoephedrine or allegedly having some of the ingredients required for methamphetamine production is not evidence of an attempt to manufacture the same—especially given the State's theory that would assume all of the ingredients were all part of one single attempt. Viewing evidence in the light most favorable to the State, nothing supports that the hypothetical amount of pseudoephedrine was ever possessed at a single time as part of a larger plan to create a quantity of methamphetamine in excess of 28 grams. It is undisputed that witnesses testified of different occasions in which they either allegedly gave their pseudoephedrine to Appellant and/or allegedly received methamphetamine from Appellant and/or witnessed methamphetamine production or ingredients of the same. Presumably, it would take all of these different occasions added together to obtain the theoretical yield in order for

[1] It is important to note that the court in *Eide* denoted a "good cook" as "capable of producing a 40 to 50 percent yield." *United States v. Eide*, 297 F.4d 701 (8th Cir. 2002). Appellant contends that if he was not a good cook of methamphetamine, his level of efficiency would fall below the 40 percent yield.

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Appellant to have *attempted* to manufacture over 28 grams of methamphetamine. This is troublesome as the State is aggregating each of these different occasions into one single act despite the testimony that Appellant had control of those ingredients at the individual times he allegedly produced methamphetamine. Essentially, because those different occasions as testified by the co-conspirators are all part of the State's one alleged "attempt" to traffic methamphetamine, the State must offer at least some evidence of a nexus between the Appellant and the items that were used in the purported manufacturing. Because the State failed to do this, there can be no inference that Appellant intended to produce the requisite quantity of 28 grams of methamphetamine, and thus the jury was forced to speculate that Appellant attempted to manufacture the same. Consequently, this Court misapprehended and overlooked the law concerning speculative evidence derived from *Cain* when it affirmed the trial court's denial of Appellant's directed verdict.

II. The decision respectfully misapprehended the rules of issue preservation and overlooked the fact that Appellant's argument that the National Precursor Log Exchange (NPLEX) were improperly introduced into evidence was fully and properly preserved.

This Court respectfully misapprehended the rules of issue preservation and overlooked that Appellant's issues regarding whether the NPLEX logs where improperly introduced was properly preserved because Appellant made numerous motions regarding the same at trial. Before the start of the actual trial, the State indicated its intent to enter the NPLEX records under SCRE 803(6), while Appellant's codefendant indicated its intent to object. R. p. 28-29. The court then stated it would likely permit the introduction of the NPLEX records under the business records objection should a proper foundation be laid and also informed Appellant and codefendants specifically that the court will "give [Appellant and codefendants] the opportunity [to respond], but unless y'all tell me otherwise, *I assume that whoever responds is responding*

for everyone. If that's an inappropriate assumption, y'all just let me know, okay." R. p. 29 (emphasis added). Indeed, the court instructed Appellant and codefendants that the court would assume and understood that whomever was objecting and arguing for a particular defendant was collectively objecting for the three codefendants at trial unless instructed otherwise. After the court instructed Appellant and codefendants of this, neither the Appellant or codefendants informed the court that this was an inappropriate assumption.

While this Court was correct in stating in Section I of Opinion No. 5590 that if "an appellant does not object or join in a codefendant's objection at trial, an issue cannot be raised by the appellant on appeal even though the appellant's codefendant objected[,]" it overlooked the fact that the court instructed and understood Appellant's and codefendants' responses were to be considered jointly and collectively unless told otherwise. In *State v. Page*, this Court ruled that an issue was preserved for appellant review when, although a motion was made by a codefendant rather than the appellant whom sought issue preservation, "the trial judge noted that the motion itself indicated it was a 'joint motion' . . . [and] understood the motion involved [the] Appellant [seeking preservation]." 406 S.C. 272, 283, 750 S.E.2d 623, 629 (Ct. App. 2013). This mirrors the present case as the trial court specifically instructed Appellant and codefendants of this assumption. At no point directly after this instruction or during the introduction of the NPLEX records at trial did Appellant or codefendants instruct the court not to assume that their arguments were not to be considered collectively. Moreover, while this Court was correct when it stated Appellant did not specifically state that he was joining in the arguments of codefendants, it failed to consider that Appellant never stated that it was not joining in codefendants' arguments as per the trial court's earlier instructions.

Though Appellant did state he, along with codefendants, had separate arguments in regards to the NPLEX records' introduction, nothing in the record indicates that Appellant's or codefendants' separate arguments were not made collectively on behalf of all codefendants. Additionally, the trial court's instructions demonstrate that the court understood that the separate arguments were being made collectively unless otherwise noted by Appellant or codefendants. Throughout the introduction of the NPLEX records during Paul Forst's testimony, the court indicated it understood that Appellant's and codefendants' objections and arguments were to be considered jointly on multiple occasions:

- R. p. 112 – "I'm going to find that it is admissible as a business record. . . .I'm going to note all parties objections."
- R. p. 114 – "Subject to the previously posed objection [State's Exhibit No. 22] is admitted." Additionally, before admitting the State's Exhibit Number 23, the court directly asks codefendants if they raise the same objections, to which they reply in the affirmative.
- R. p. 115 – The court states "[s]ubject to the same objection state's 24 through 26 are admitted" after Appellant objects.
- R. p. 116 – "Subject to the same objection, State's 30, 31 and 32 are admitted into evidence." "Subject to the standing objection the same is admitted into evidence."
- R. p. 117 – Before admitting the State's Exhibits Number 33-35 and 36-38, the court asks codefendants if they raise the same objections, to which Appellant replies "Yes, sir" and "Yes, Your Honor", respectively.
- R. p. 118 – "Subject to the same objections, 39 and 40 are admitted."

These statements demonstrate that it was understood between the court and codefendants that such objections and arguments made regarding the introduction of the NPLEX records were made collectively and jointly as the court did not differentiate between the arguments in its admitting of the records and also when the court permitted one codefendant to speak for the collective group. Accordingly, this Court overlooked that Appellant joined with codefendants' objection in regards to the NPLEX records' introduction. To rule otherwise would essentially be telling Appellant to disregard a specific instruction from the court.

Additionally, this Court misapprehended Appellant's objections when it determined that Appellant's objections were "not the same reasons [Appellant] raises on appeal in support of his argument. . . ." *State v. Mealor*, Op No. 5590, Shearouse's Adv. Sh. # 33 at 28. It is well settled in South Carolina that a party need not use any magic language or the precise name of a legal doctrine in order to preserve an issue for appellate review. *See e.g., Herron v. Century BMW*, 395 S.C. 461, 446 (2012) (stating that a party need not use magic language or the precise name of a legal doctrine so long as it is sufficiently clear as to the nature of the alleged error so that it could have been reasonably understood by the court); *see also Delta Apparel, Inc. v. Farina*, 406 S.C. 257, 268-69 (Ct. App. 2013). These cases support the proposition that Appellant need only to state his argument to such a degree that it is reasonably clear to the trial court what the basis for his objection is. *See e.g., id.*

In the present case, this Court correctly stated that Appellant's arguments as to the introduction of the NPLEX records were due to the records' lack "trustworthiness and reliability"; however, it incorrectly found Appellant's issues were not preserved for appellate review. *Mealor*, Op. No. 5590, Shcrouse's Adv. Sh. # 33 at 28. "While a party may not argue one ground on appeal, . . . [the South Carolina Supreme Court] do[es] not require a party *to use the same language on appeal as it do at trial.*" *Cain*, 419 S.C. at 34, 795 S.E.2d at 851 (citations omitted) (emphasis added). In the present case, while Appellant may not have specifically stated verbatim his objection under the business records exception to hearsay (although Appellant maintains it joined in codefendants' specific objections to the same), this Court did not consider that Appellant's reliability and trustworthiness argument is essentially the same. Unquestionably, the crux of not permitting the introduction of hearsay is because of its' questionable reliability and trustworthiness. *See State v. Burdette*, 355 S.C. 34, 44, 515 S.E.2d

525, 530 (1999) (stating the proposition that "[h]earsay statements are admissible . . . where the statement bears adequate 'indicia of reliability.'") (citations omitted); *see also State v. LaCoste*, 347 S.C. 153, 172, 553 S.E.2d 464, 474 (Ct. App. 2011) (finding that "[t]rustworthiness is the *cornerstone of Rule 803* exceptions to the hearsay rule.") (citations omitted) (emphasis added).

Here, Appellant's questioning of the NPLEX logs' reliability and trustworthiness certainly preserves Appellant's issues presented for review, even if this court does not determine that Appellant joined in codefendants' objections. The trial court acknowledged its' understanding of the same when it stated after Appellant's specific objection to the NPLEX records introduction that it was "going to find that [the NPLEX records] [are] admissible *as a business record.*" R. p. 112 (emphasis added); *see also* R. p. 110 (the court stated it was satisfied in the NPLEX's records' "reliability for purposes of admissibility."). Therefore, this Court incorrectly determined that Appellant's arguments regarding the NPLEX records' introduction were not preserved for appellate review "because [the issues] [were] raised to and ruled upon by the trial court." *Cain* at 34, 795 S.E.2d at 851.

III. The Court misapprehended and overlooked the law regarding expert witness qualifications when it affirmed the trial court's finding that Captain Brooks was an expert in clandestine lab manufacturing and that his testimony was reliable.

This Court respectfully misapprehended and overlooked that the trial court abused its discretion in qualifying Captain Chad Brooks in clandestine lab manufacturing and permitting him to testify as to the theoretical yield of methamphetamine from pseudoephedrine. While the Court was correct in stating that South Carolina has yet to discuss the expertise required to testify about yield of methamphetamine while noting other jurisdictions' analysis of the same, it disregarded those jurisdictions whose prosecution police experts were qualified as to only the investigation and identification methamphetamine labs rather than the actual theoretical yield.

See, e.g., Murrell v. State, 273 Ga. App. 735, 739, 615 S.E.2d 780, 785 (2005) (police officer with similar background as Captain Brooks was not qualified as an expert in clandestine lab manufacturing but correctly qualified "in the identification of methamphetamine and methamphetamine labs."); *Davenport v. State*, 308 Ga. App. 140, 144, 155, 706 S.E.2d 757, 762-63, 770 (2011) (police officer with similar background as Captain Brooks was qualified as an expert in *identification* of clandestine lab manufacturing) (emphasis added); *Gentry v. State*, 281 Ga. App. 315, 319, 635 S.E.2d 782, 786 (2006) (police detective who was "a senior drug investigator with years of experience and training in [the] field, testified at trial as an expert in the *detection* and *investigation* of methamphetamine laboratories.") (emphasis added); *State v. McPherson*, 111 Wash. App. 747, 760-62, 46 P.3d 284, 292-93 (2002) (finding a detective qualified as an expert on "meth labs").

In none of the above cited cases do the offered police experts, with similar training and background as Captain Brooks, testify as to the theoretical yield of methamphetamine from pseudoephedrine. Appellant cannot dispute that Captain Brooks was qualified as an expert in investigation and detection of methamphetamine labs; rather, Appellant contends that this court misapplied the laws concerning expert testimony when it contended Captain Brooks could testify as to chemical processes such as methamphetamine production. This is in line with recent precedent set by the South Carolina Supreme Court. In *State v. Cain*, the Supreme Court noted that the State's expert explained the methamphetamine yield from pseudoephedrine could be calculated "[u]sing a *scientific theory* known as stoichiometry. . ." 419 S.C. at 27, 795 S.E.2d at 848 (noting later that stoichiometry is "the *quantitative relationships involving the substances in chemical reaction*.") (citations omitted) (emphasis added). Indeed, Captain Brooks admits in his testimony that methamphetamine production involves chemical reactions. *See* R. p. 438 (when

questioned about the methamphetamine production process when ingredients are placed in a plastic two-liter bottle, Captain Brooks states "it starts pretty much an instant chemical reaction. . ."). Appellant's and codefendants' *voir dire* of Captain Brooks demonstrate that he has no specialized chemical training "other than high school chemistry." R. p. 428. Consequently, this Court misapplied the laws of expert qualification when it found that the trial court did not abuse its discretion in qualifying Captain Brooks as an expert in clandestine lab manufacturing.

Moreover, while this Court noted in its opinion that Appellant "maintain[ed] the trial court erred in finding [Captain Brooks'] testimony reliable," it did not provide any explanation or conclusion of the same. *State v. Mealor*, Op No. 5590, Shearouse's Adv. Sh. # 33 at 28. However, Appellant maintains that Captain Brooks' testimony was unreliable. In South Carolina, the gatekeeping function of the trial court in regard to the admission of expert testimony is two-fold, it is not a singular inquiry. This gate-keeping function looks at the "qualification" of the witness as an expert and then, after the witness has been qualified, a determination as to the reliability of the testimony the expert purports to offer. *See State v. Tapp*, 398 S.C. 376, 388, 728 S.E.2d 468, 474 (2012). This vetting of reliability requires that after the purported expert is qualified, the proponent of this evidence must demonstrate, and the trial Court must find, the purported testimony to be reliable. *See id.* The reliability of scientific expert testimony is determined by application of the "*Jones* standard," which provides that "the standard for admitting scientific evidence" is "the degree to which the trier of fact must accept, on faith, scientific hypotheses not capable of proof or disproof in court and not even generally accepted outside the courtroom." *State v. Jones*, 273 S.C. 723, 731, 259 S.E.2d 120, 124 (1979). In applying the *Jones* standard the Court "looks at several factors, including: (1) the publications and peer review of the technique; (2) prior application of the method to the type of evidence

involved in the case; (3) the quality control procedures used to ensure reliability; and (4) the consistency of the method with recognized scientific laws and procedures." *State v. Council*, 335 S.C. 1, 19, 515 S.E.2d 508, 517 (1999) (citations omitted).

This Court did not specifically evaluate the *Council* factors in its Opinion but did cite other jurisdictions' rulings purportedly to offer the reliability of methamphetamine conversion ratios. However, this Court disregards that in a number of the cases in which it relies, the facts are vastly different from the present case, in that with the relied upon cases, the defendants were found with a number of the precursor ingredients used to make methamphetamine and sometimes methamphetamine itself. As an example, in *Harmon v. State*, the defendant was arrested with a codefendant who attempted to throw bags of methamphetamine during flight from the police, and during the search of an automobile incident to arrest, officers recovered "three empty boxes of pseudoephedrine, cold packs, lithium battery strips, a jar of lye, a bottle of Liquid Fire, cut straws and pen casings, and aluminum foil[,]" and coffee filters which contained substances which tested positive for methamphetamine. 971 N.E.2d 674, 676 (Ind. Ct. App. 2012). Additionally, in *Buelna v. State*, a defendant was arrested with "methamphetamine precursors and tools used to manufacture methamphetamine: a pot, eight spent reaction vessels, pseudoephedrine pills, several hydrochloric acid generators, lithium batteries, cold packs, salt, a coffee grinder, and coffee filters" and was actually in the process of manufacturing methamphetamine using the one-pot lab method at the time of his arrest. 20 N.E.3d 137, 140 (Ind. 2014). Most importantly, in *People v. Wilke*, the defendant was arrested with a number of items, including blister packs, gas tanks, pseudoephedrine tablets, plant food, and lithium batteries, and the State's expert opinion was "based on the *combination* of the items recovered." 367 Ill. App. 3d 130, 132-33, 854 N.E.2d 275, 278-79 (2006) (emphasis added). These cases, on

which this Court relies, are certainly distinguishable from the present case as the defendants in those cases were found with actual methamphetamine and/or ingredients to make the same.

Moreover, to purportedly demonstrate that the theoretical yield calculation is consistent with recognized scientific laws, this Court noted that Captain Brooks' testified that the pseudoephedrine to methamphetamine conversion is "basically[] a mathematical equation[] [b]y taking the grams of [p]seudoephedrine that are introduced into the lab. . . ." *State v. Mealor*, Op No. 5590, Shearouse's Adv. Sh. # 33 at 28. However, this Court overlooked that Captain Brooks' testimony relies on only one of the many ingredient needed to manufacture methamphetamine. Indeed, his theoretical yield testimony in this case is not a yield calculation based on the multiple necessary ingredients to manufacture methamphetamine, but only with regard to the single ingredient of pseudoephedrine. His testimony offered no evidence of the specific quantities of other ingredients in order to support his calculations. The record is devoid of any testimony regarding how much, for example, batteries, ammonium nitrate, or sulfuric acid is needed to support his calculation.

Additionally, the record does not contain any specific evidence as to the actual quantity of these other materials Appellant allegedly had at his disposal. Without this, Captain Brooks' theoretical yield testimony is simply evidence of what a theoretical chemist could make given the required amount of other ingredients. This is not reliable as it could not assist the jury in determining the alleged methamphetamine producing capabilities of Appellant himself. *See Cain*, 419 at 33, 795 S.E.2d at 851 (holding that the State's expert, a forensic chemist, did not provide "the jury [any] basis on which to determine how much methamphetamine" the defendant could have actually produced when she testified only as to theoretical yield.). Indeed, Captain Brooks' "testimony [could be] permissible as long as the method [he] uses for showing final

yield is accurately tailored to the specific manufacturing conditions, ingredients, and skill of [Appellant]." *Bulena*, 20 N.E.3d at 146. However, in the present case, it was not. Accordingly, this Court misapprehended the rules of expert testimony and reliability of the same when it stated the trial court did not abuse its discretion in permitting Captain Brooks' testimony.

WHEREFORE, because this Court has misapprehended or overlooked the points outlined above, the Appellant respectfully requests that this Court rehear the matter and consider the arguments presented in his Initial Brief.

Respectfully submitted,

August 29, 2018

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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Court of General Sessions

Robin B. Stilwell, Circuit Court Judge

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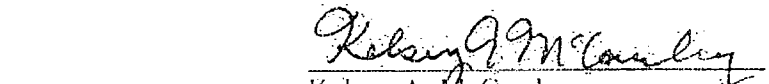
CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies Appellant's Petition for Rehearing regarding the above-referenced case has been served upon Deborah R.J. Shupe, Esquire, Office of the Attorney General, P.O. Box 11549, Columbia, SC 29211 this 29th day of August, 2018.



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August 29, 2018

SENT VIA FIRST CLASS MAIL AND FACSIMILE TO 803-734-1632

Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: *The State v. Michael L. Mealor*
Case No.: 2013-002752

Dear Ms. Kitchings:

I hope you are well. Enclosed please find the original and seven (7) copies of Appellant's Petition for Rehearing regarding the above-referenced appeal. Please file the original and six (6) copies and return a clocked copy in the enclosed envelope.

Also, please be advised that beginning September 1, 2018, my firm's physical and mailing address will be 222 W. Coleman Blvd., Mt. Pleasant, SC 29464. Please update your records accordingly.

Thank you very much for your assistance with this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Ryan C. Andrews, Esq.
Enclosures

Cc: Robert Dudek, Esq. (w/ enclosures)
Debra R.J. Shupe, Esq. (w/ enclosures)
Michael Mealor (w/ enclosures)

FAX COVER SHEET

TO	
COMPANY	
FAX NUMBER	18037341839
FROM	Cobb Dill & Hammett Law Firm
DATE	2018-08-29 15:48:13 GMT
RE	State v. Mealor Case 2013-002752

COVER MESSAGE

Good morning,

Attached please find a copy of Appellant's Petition for Rehearing regarding the above-referenced matter. The hard copies with the original was placed in the mail today.

Please also let this serve as confirmation that the Court will consider this filing timely as it received it via facsimile prior to the filing deadline.

Thank you for your assistance with this matter.

Ryan C. Andrews
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We will be moving on September 1, 2018. Please update your records with our new address.

Cobb Dill & Hammett, LLC
222 West Coleman Boulevard
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Our offices are in Building 2, opposite the Executive Center. The entrance is located in the Courtyard.

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