6

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEALS FROM THE ADMINISTRATIVE LAW COURT
H.W. Funderburk, Jr., Administrative Law Judge

RECEIVED
AUG 20 2018
SC Court of Appeals

Case No. 16-ALJ-30-0410-CC
Appellate Case No. 2017-002455

Wayne's Automotive Center, Inc., Appellant-Respondent,
v.
South Carolina Department of Public Safety, Respondent-Appellant.

RECORD ON APPEAL
(Vol. 3 pp.967-1141)

Raymon E. Lark, Jr.
AUSTIN & ROGERS, P.A.
508 Hampton Street, Suite 203
Post Office Box 11716
Columbia, South Carolina 29211
Phone: (803) 256-4000
Email: relark@austinrogerspa.com

Attorneys For Appellant-Respondent

Andrew F. Lindemann
LINDEMANN, DAVIS & HUGHES, P.A.
5 Calendar Court, Suite 202
Post Office Box 6923
Columbia, SC 29260
Phone: (803) 881-8920
Email: andrew@ldh-law.com

Marcus Gore, General Counsel
SOUTH CAROLINA DEPARTMENT OF PUBLIC SAFETY
Post Office Box 1993
Blythewood, SC 29016
Phone: (803) 896-7780
Email: marcusgore@scdps.gov

Attorneys for Respondent-Appellant

INDEX

ORDERS

1. ALC Order For Prehearing Statements, filed December 19, 2016.....6

2. ALC Order Granting Motion For Extension And Stay, filed January 18, 2017.8

3. ALC Order Denying Petitioner's Motion and Amended Motion. filed January 27, 2017.....9

4. ALC Order Granting, In Part, And Denying, In Part Petitioner's Motion To Expand Discovery, filed March 16, 2017.....11

5. ALC Final Order, filed September 19, 2017.....13

6. ALC Order Denying Motions For Reconsideration, filed October 31, 2017....23

7. Court of Appeals Order temporarily granting stay and allowing Appellant-Respondent to seek writ of supersedeas from ALC, filed December 8, 2017.....24

8. Court of Appeals Order extending deadline to order transcript preparation until January 8, 2018, filed December 11, 2017.....25

9. ALC Order Granting Petition For Supersedeas, filed December 28, 2017.....26

10. Court of Appeals Order granting motion of The Honorable Jana Shealy for extension of deadline of transcript preparation until March 28, 2018, filed March 15, 2018...27

PETITIONS, MOTIONS, PREHEARING STATEMENTS, FINAL ARGUMENTS, POST-TRIAL BRIEFS

11. Petition For Contested Case Hearing And Motion For Temporary Restraining Order (TRO) and Injunctive Relief with Memorandum of Law, **Exhibits A-D**, and Verification and Affidavit Of Jeffry Corbett, filed December 14, 2016.....28

12. Amended Motion For Writ Of Mandamus and/or Summary Judgment and/or Stay and/or TRO And Injunctive Relief And Proposed Order As Memorandum of Law, Supplemental Verification And Affidavit, Petitioner's 2017 Wrecker Rotation Schedule (**Exhibit E**) and Petitioner's 2015 Wrecker Rotation Schedule (**Exhibit F**), filed December 29, 2016.....98

13. Petitioner's Prehearing Statement, initially filed February 2, 2017, as revised/corrected with Reg. 38-600 (from State Register), and SCDPS Wrecker Disciplinary Policy (200.19) 113

14. Respondent's Prehearing Statement, initially filed February 2, 2017, as revised.....145

15. Petitioner's Motion To Expand Number Of Depositions And Discovery Completion Deadline And Provide Related Relief (With Attachment), filed March 3, 2017.....153

16. Petitioner's Final Arguments, filed August 21, 2017.....162

17. Respondent's Post-Trial Brief, dated August 11, 2017.....174

18. Respondent's Reply To Petitioner's Final Arguments, dated August 28, 2017.....188

19. Petitioner's Motion For Reconsideration Of Final Order, filed September 29, 2017.....198

20. Respondent's Motion For Reconsideration Of Final Order, dated October 2, 2017.....207

21. Respondent's Response To Petitioner's Motion For Reconsideration, dated October 9, 2017.....213

22. Petitioner's Response In Opposition To Respondent's Motion For Reconsideration, filed October 11, 2017.....219

23. Appellant-Respondent's (Petitioner's) Motion To Impose A Supersedeas To Stay Matters Decided in SCALC Orders, filed November 29, 2017 (with Notice of Appeal and 2 Orders on appeal).....226

24. Respondent's Return In Opposition To Appellant-Respondent's Motion For Writ Of Supersedeas, filed December 4, 2017.....243

25. Appellant-Respondent's (Petitioner's) Reply To Respondent-Appellant's Return In Opposition To Motion To Impose A Supersedeas To Stay Matters Decided In SCALC Orders And Verification And Affidavit Of Walter Jeffry Corbett With Attachments (2016, 2017, and 2018 Wrecker Schedules) And (2) Motion For Extension Of Time To Order Transcript, filed December 8, 2017.....247

26. Petitioner's Petition For Supersedeas Or Other Ruling To Continue Stay Through Appeal Process with Verification And Affidavit Of Walter Jeffrey Corbett attaching the 2016, 2017, and 2018 Wrecker Schedules, filed with the Administrative Law Court and received by the Court of Appeals on December 13, 2017.....263

27. Petitioner's Reply To Respondent's Response To Petition For Supersedeas Or Other Ruling To Continue Stay Through Appeal Process, filed with Administrative Law Court and received by Court of Appeals on December 27, 2017.....280

TRANSCRIPT

28. Entire Contested Case Proceeding Transcript with Index and corrected p. 5.....282

EXHIBITS

Petitioner's Exhibits Admitted/Proffered

29. **Petitioner's Exhibit Number 1** 791
(Petition for Contested Case Hearing and Motion}

30. **Petitioner's Exhibit Number 4**.....862
(Responses to Petitioner's Request for Admission)

31. **Petitioner's Exhibit Number 5**.....865
(DPS FOIA Responses)

32. **Petitioner's Exhibit Number 6**.....936
(E-mails)

33. **Petitioner's Exhibit Number 9**.....967
(Shipment Confirmation)

34. **Petitioner's Exhibit Number 13**.....968
(Accident Photos)

35. **Petitioner's Exhibit Number 15 - Proffered.** 1011
(Boundary Maps)

36. **Petitioner's Exhibit Number 27**.....1013
(E-mail From Pilato To Kozelek and Zottneck - 3/7/16)

37. **Petitioner's Exhibit Number 28 - Proffered**.....1014
(South Carolina Schedules for 2013 ,2014, 2015(and 2017))

Respondent's Exhibits Admitted

38. **Respondent's Exhibit Number 1**.....1020
(King March 4th Report)

39. **Respondent's Exhibit Number 2**.....1023
(E-mail From Watson To King - 2/19/16)

40. **Respondent's Exhibit Number 3**.....1024
(Check From Premier Transportation)

41. **Respondent's Exhibit Number 5**.....1025
(E-mail From Hughes To Watson - 2/15/16)

42. **Respondent's Exhibit Number 6**.....1027
(E-mail From Watson To King - 2/17/16)

43. **Respondent's Exhibit Number 8**.....1034

(E-mail From Watson To King - 3/7/16)

44. **Respondent's Exhibit Number 9**.....1035
(Dispatch Intake Form - 2/9/16)

45. **Respondent's Exhibit Number 10**.....1036
(E-mail From Sweezy To Corbett - 2/10/16)

46. **Respondent's Exhibit Number 11**.....1037
(E-mail From Insurance Group To Corbett -2/16/16)

47. **Respondent's Exhibit Number 12**.....1039
(E-mail From Watson To Corbett - 2/16/16)

48. **Respondent's Exhibit Number 13**.....1041
(E- mail From (Watson) To Corbett - 2/16/16)

49. **Respondent's Exhibit Number 14**.....1048
(E-mail From Coppolino To Gosti and Corbett - 2/18/16}

50. **Respondent's Exhibit Number 20**.....1049
(E-mail From Felix To Swords - 2/11/16)

51. **Respondent's Exhibit Number 21**.....1061
(E-mail From Felix To Corbett - 2/15/16)

52. **Respondent's Exhibit Number 22**.....1062
(E-mail From Felix to Corbett - 2/15/16)

53. **Respondent's Exhibit Number 23**.....1063
(Invoice 2/10/16 Wayne's)

54. **Respondent's Exhibit Number 24**.....1065
(Invoice 2/10/16 Wayne's)

55. **Respondent's Exhibit Number 25**.....1067
(Invoice 2/10/16 Wayne's)

56. **Respondent's Exhibit Number 26**.....1072
(Timekeeping)

57. **Respondent's Exhibit Number 27**.....1077
(Vern's Invoice 2/10/16)

58. **Respondent's Exhibit Number 28**.....1078
(E-mail From Watson To Hughes with Attachments 2/15/17)

59. **Respondent's Exhibit Number 29**.....
(2010 Complaint filed with the West Virginia Public Service Commission by Martha Gaynell Rochester).....1123

OTHER MATERIALS OR DOCUMENTS

60. **Petitioner's Exhibit 15** (proffered) re Google Map showing Georgia-South Carolina boundaries under Savannah River Bridge over I-20.....1134

61. **Petitioner's Exhibit 28** (proffered) re SCDPS Wrecker Schedules for 2013, 2014, 2015, and 2017.....1136

The undersigned hereby certifies that the Record on Appeal contains all material proposed to be included by any of the parties and not any other material.

August 20, 2018

Raymon E. Lark, Jr.
SC Bar No. 3134
AUSTIN & ROGERS, P.A.
508 Hampton Street, Suite 203
Post Office Box 11716
Columbia, South Carolina 29211
Phone: (803) 256-4000
Fax: (803) 252-3679
Email: relark@austinrogerspa.com

Attorneys For Appellant-Respondent

RECEIVED
AUG 20 2018
SC Court of Appeals

Diamond Pet Foods

9

Shipment Confirmation

2016/02/08 9:14:59PM CT

Customer Order #: A439772
Customer Name: TRACTOR SUPPLY
Customer Address: TRACTOR SUPPLY #120
151 TRACTOR DRIVE
MACON GA 31216
UNITED STATES
Customer PO Number: 1016787032
Delivery Site: Gaston
Ship Via: CUST P/U
Planned Ship Date: 02/04/2016

Part Number / Description	Unit Weight	Quantity Ordered	UoM	Actual Weight	Quantity Shipped	EPC Number
1857 Customer P/N:5138507 4HEALTH 18# PUPPY	18.00	300	BG	5,400.00	300	MLP0201-16
1862 Customer P/N:5138515 4HEALTH 35# LG BR ADULT	35.00	560	BG	19,600.00	560	4HL0201-16
1855 Customer P/N:5149532 4HEALTH 18# L&R	18.00	200	BG	3,600.00	200	4HR0104-16
1858 Customer P/N:5149566 4HEALTH 35# PUPPY	35.00	364	BG	12,740.00	364	MLP0201-16

Total Actual Weight For this Order: 41,340.00

Drivers Signature: _____
Truck (Carrier) Company: _____
Trailer/Container #: 288
Loaders Signatures: _____
Seal # & Loaders: 4712908
Loaded By: DSLAGLE

Pallet 40" X 48"
W=H = 33 To 48 lbs

Common Pallet Configuration
Truck can Carry A
max of 30-pallets
two Double Stacked 60
OR 28- Bottom loaded
Double Stacked 56 pallets

1424 Bags
DF Dog Food
Total weight 41,340 lbs
56 pallets X 40 lbs = 2240
40" X 48"

000406

ment Confirmation

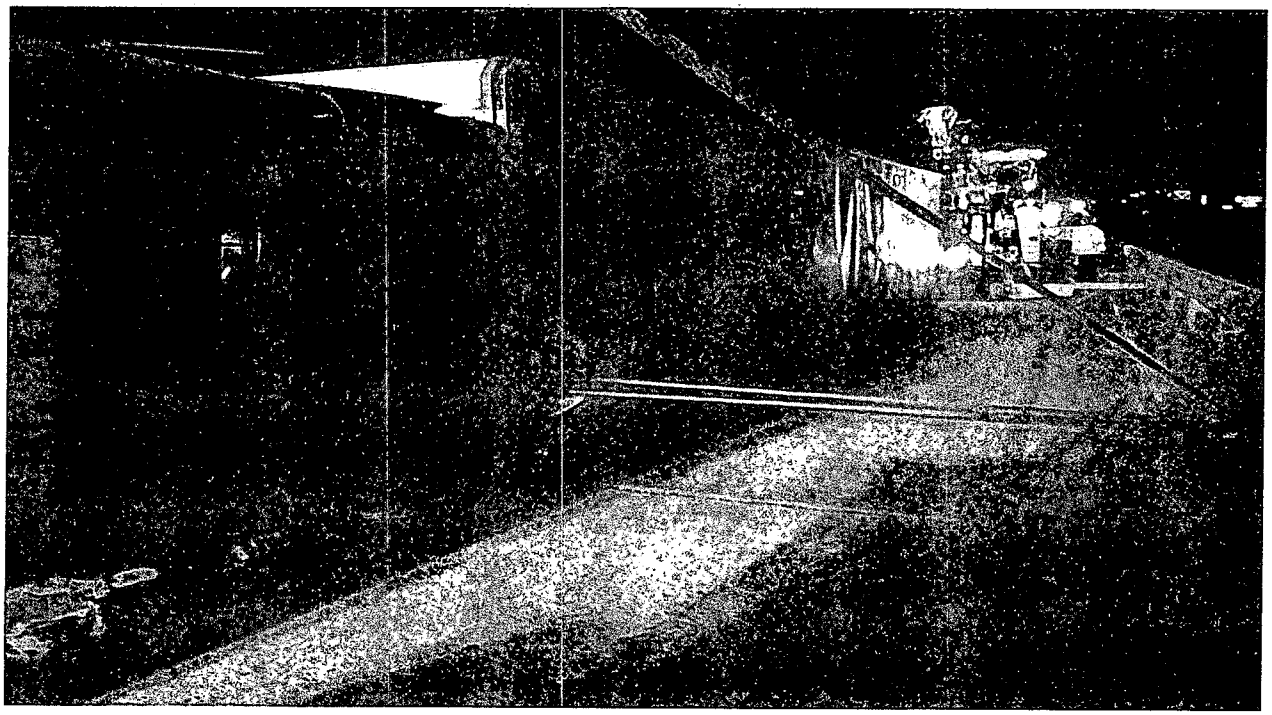
Diamond Pet Foods
103 N. OLIVE
META, MO 65058

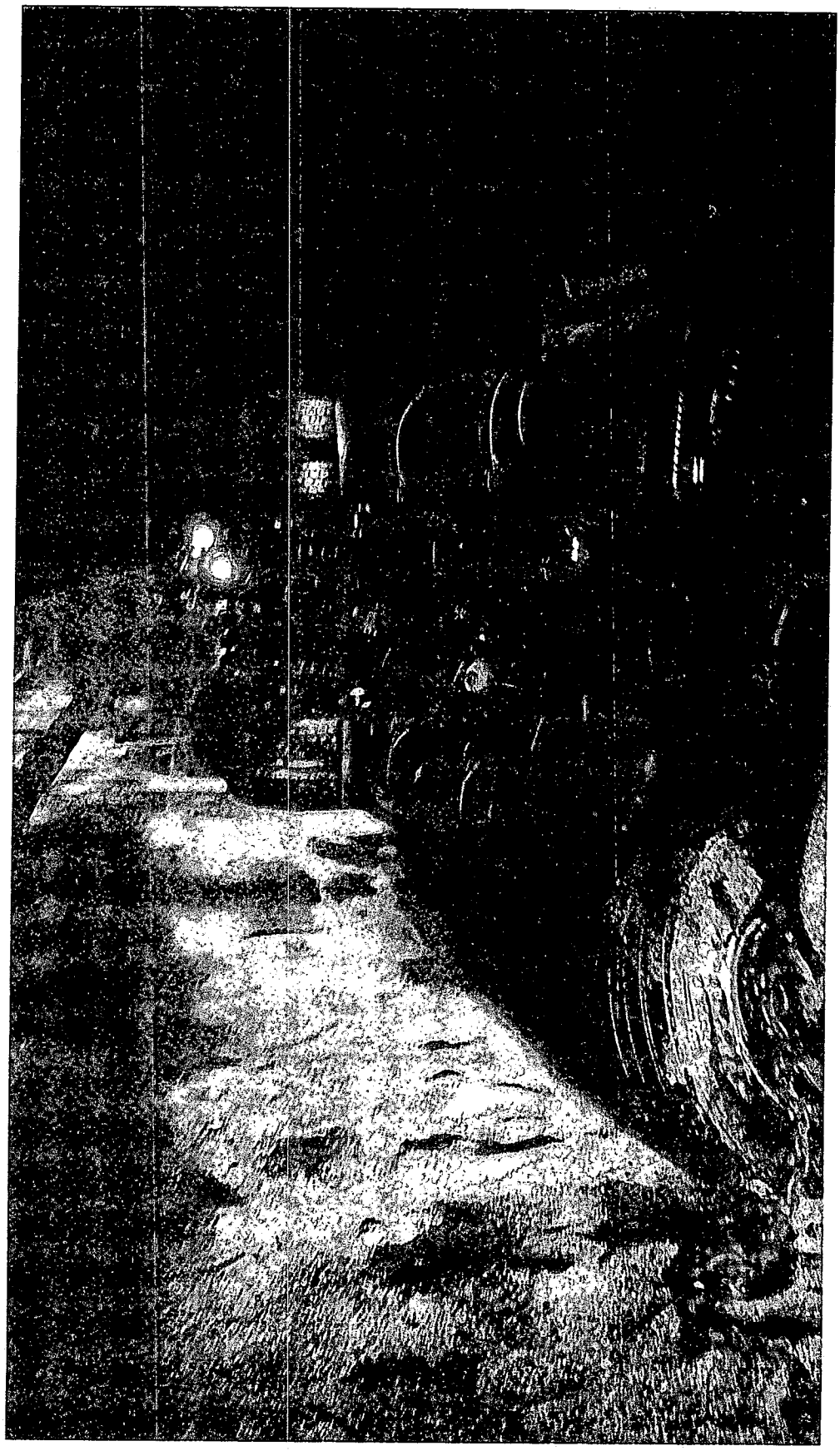
Page 1 of 1

000967

5321 2/9/16 5:29 AM

000564



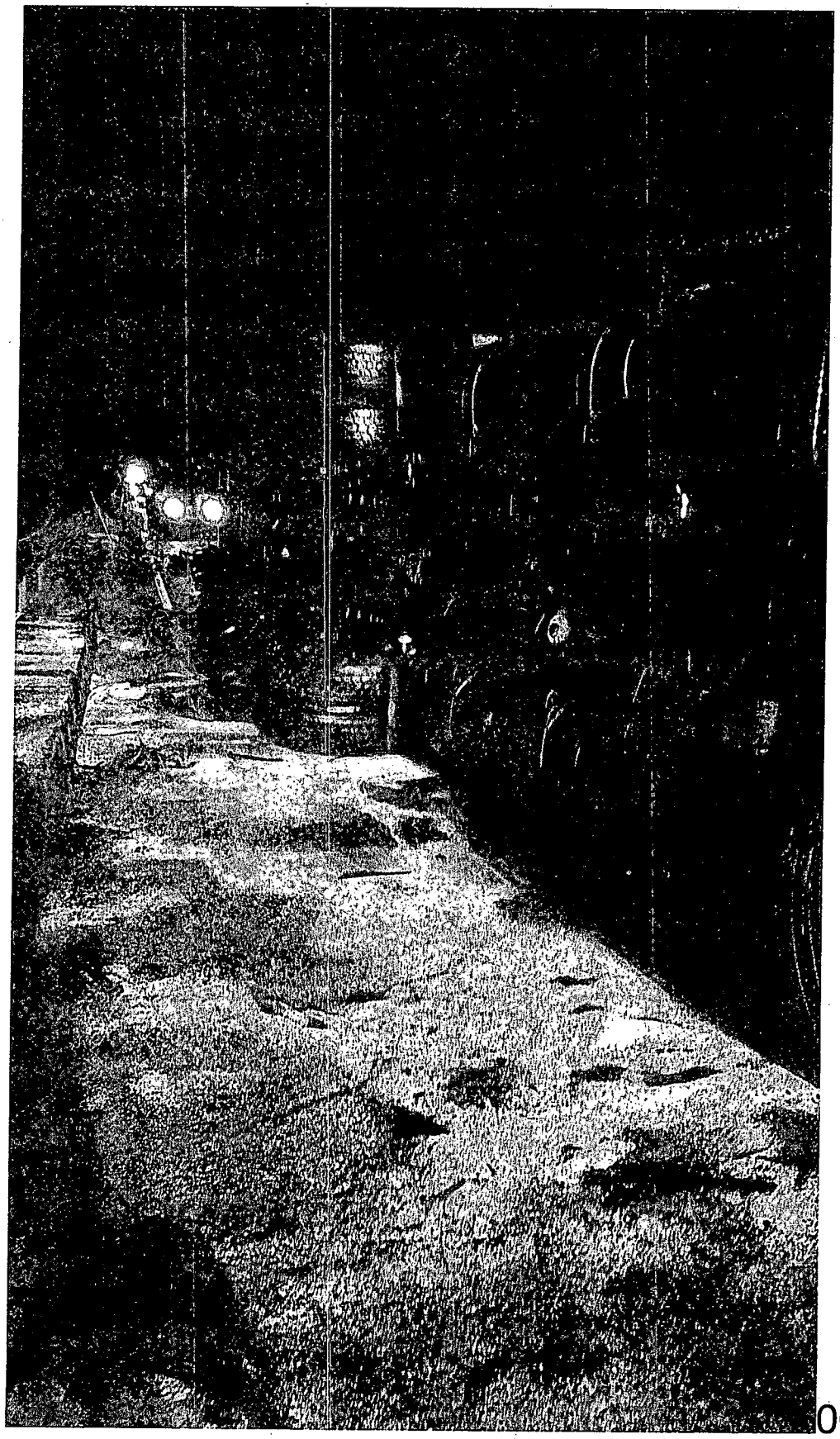


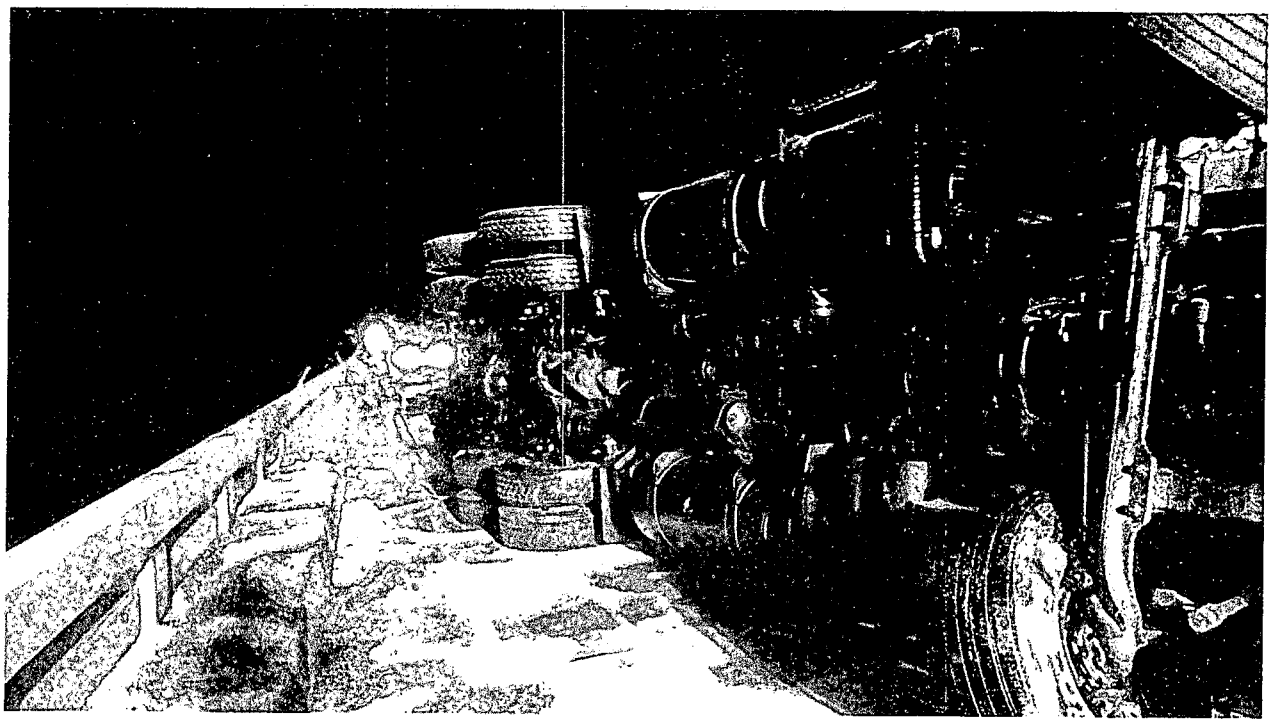
690 5:29 AM

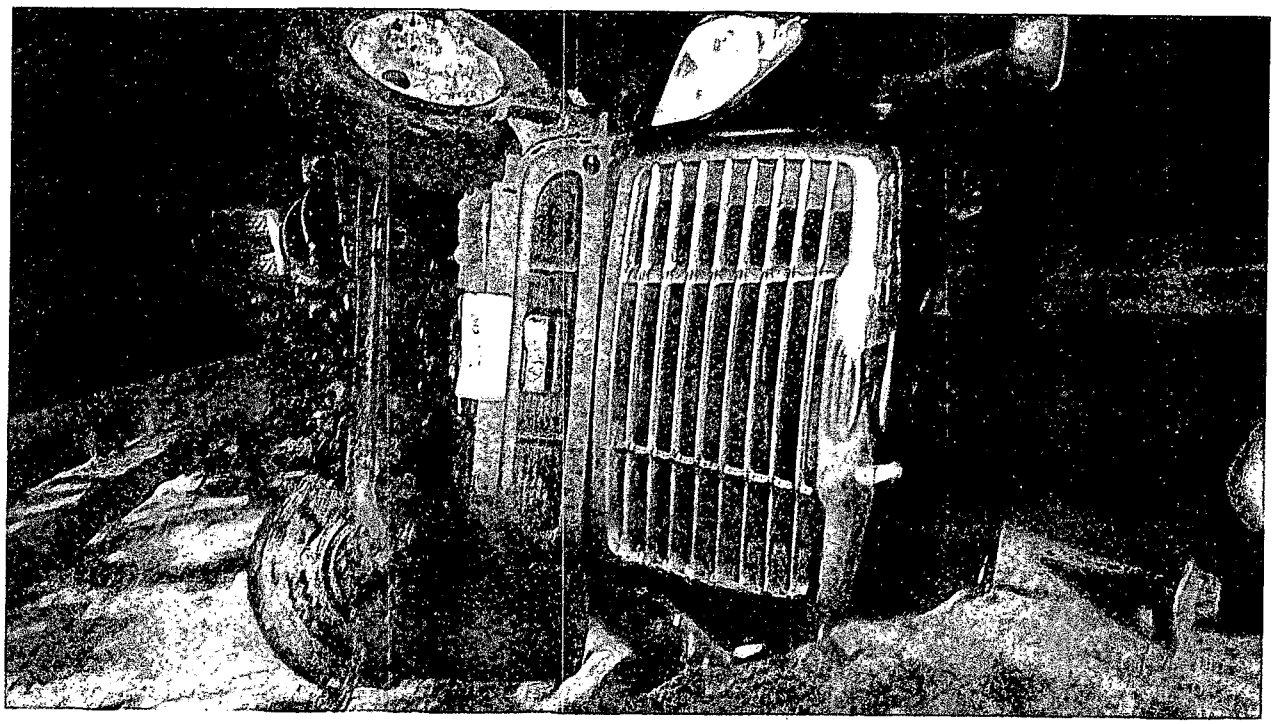
000565

"Z

000969

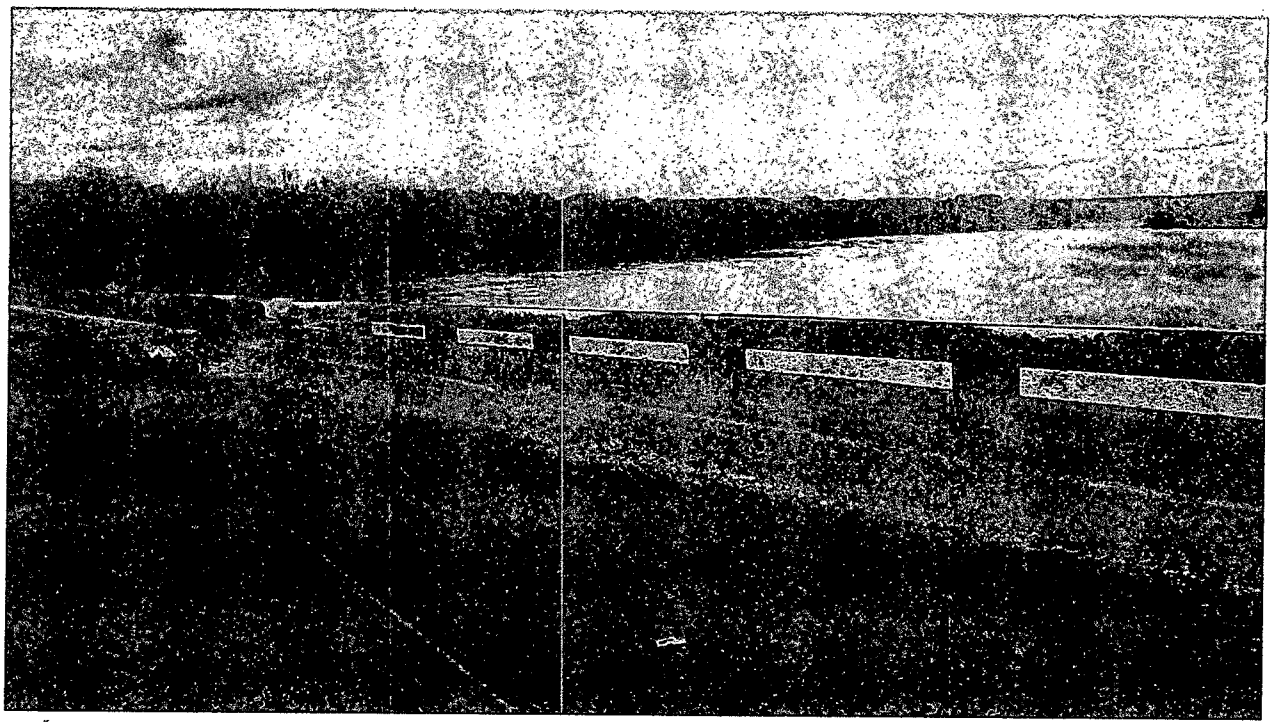






5812 7:58 AM

000569

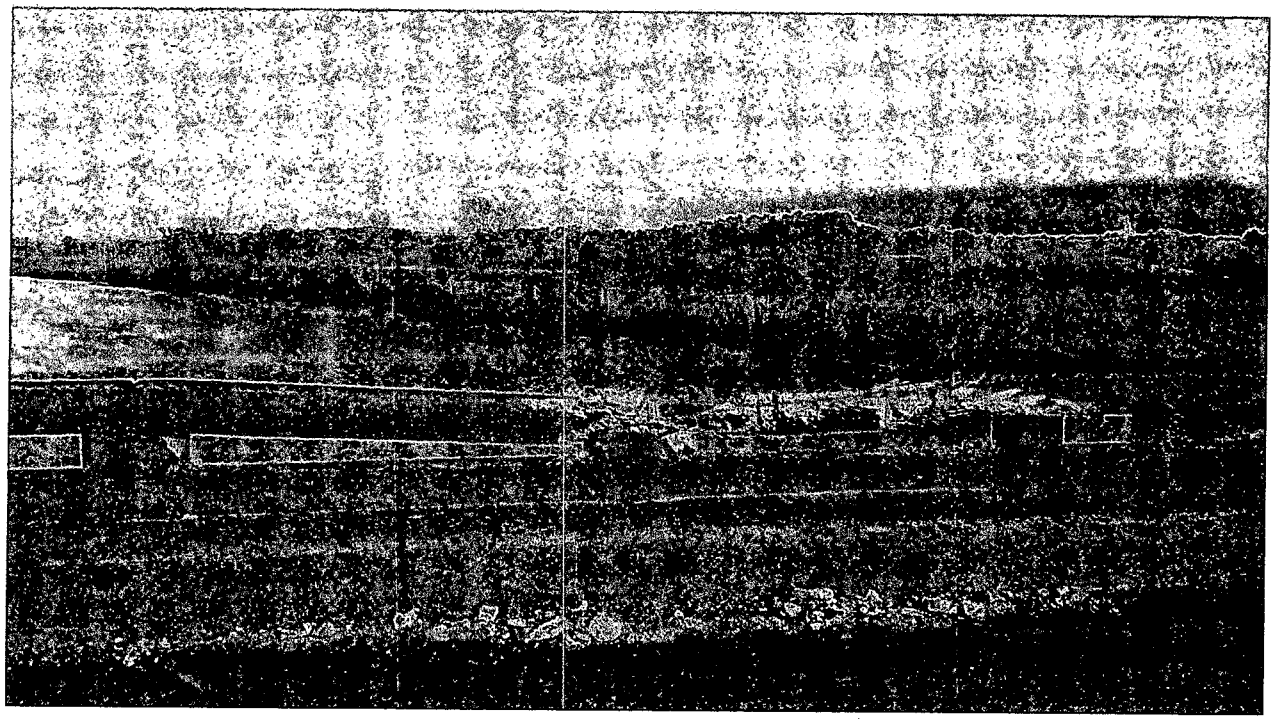


6

000973

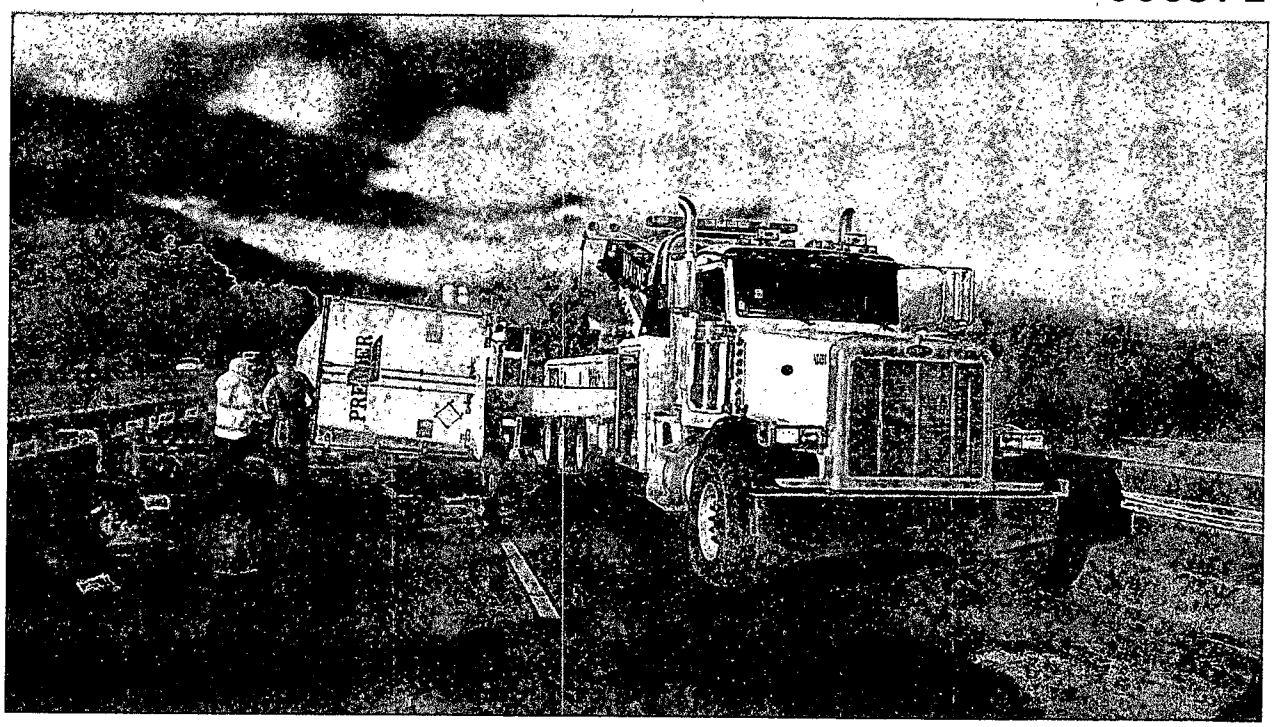
5814 7:58 AM

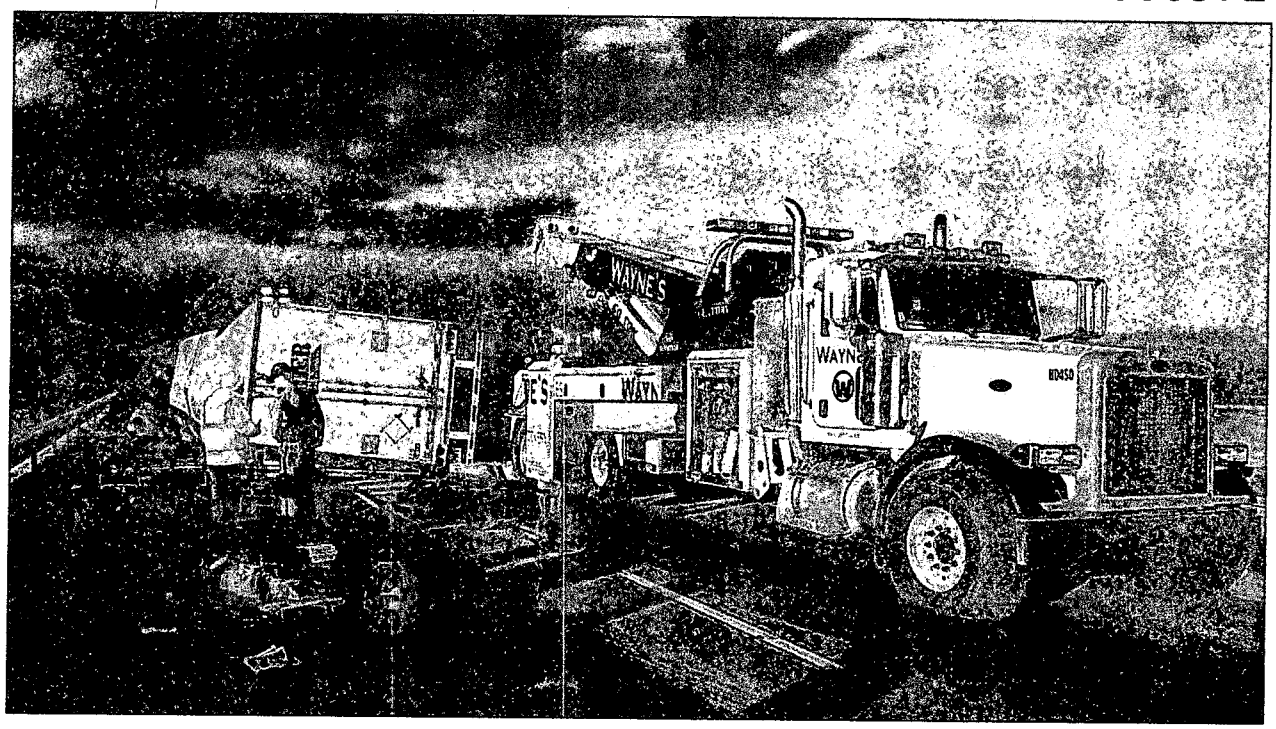
000570

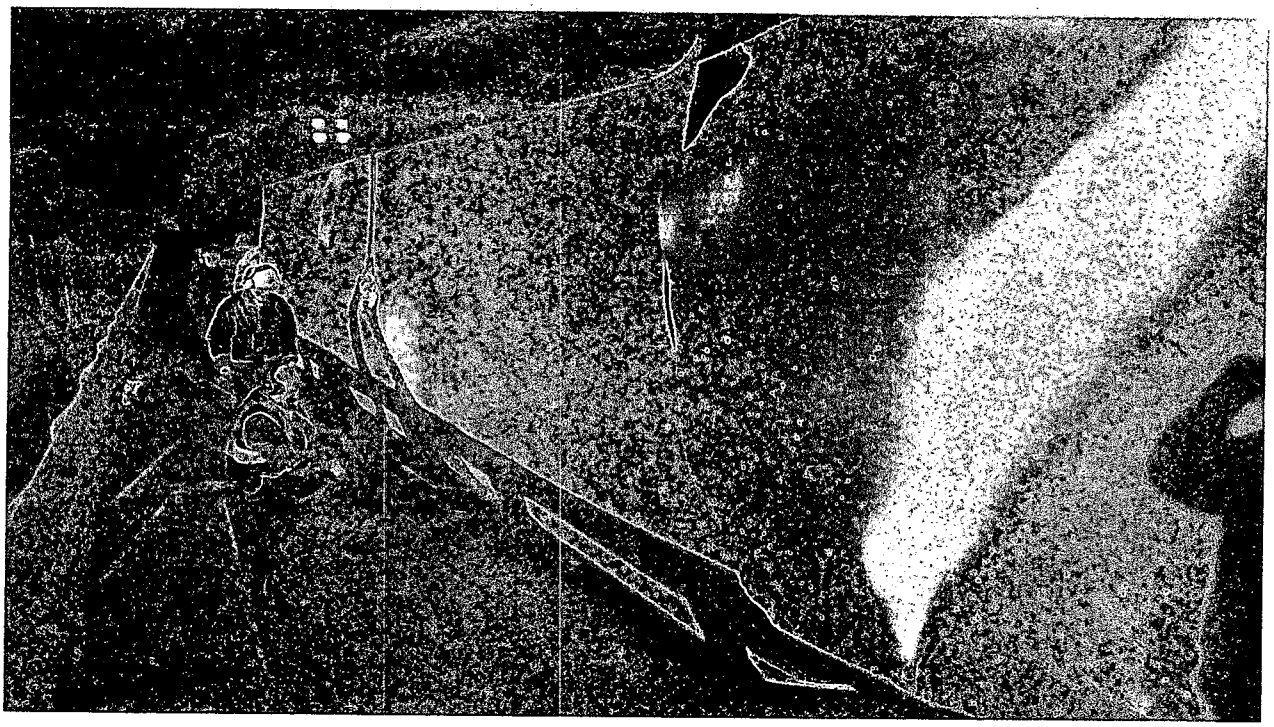


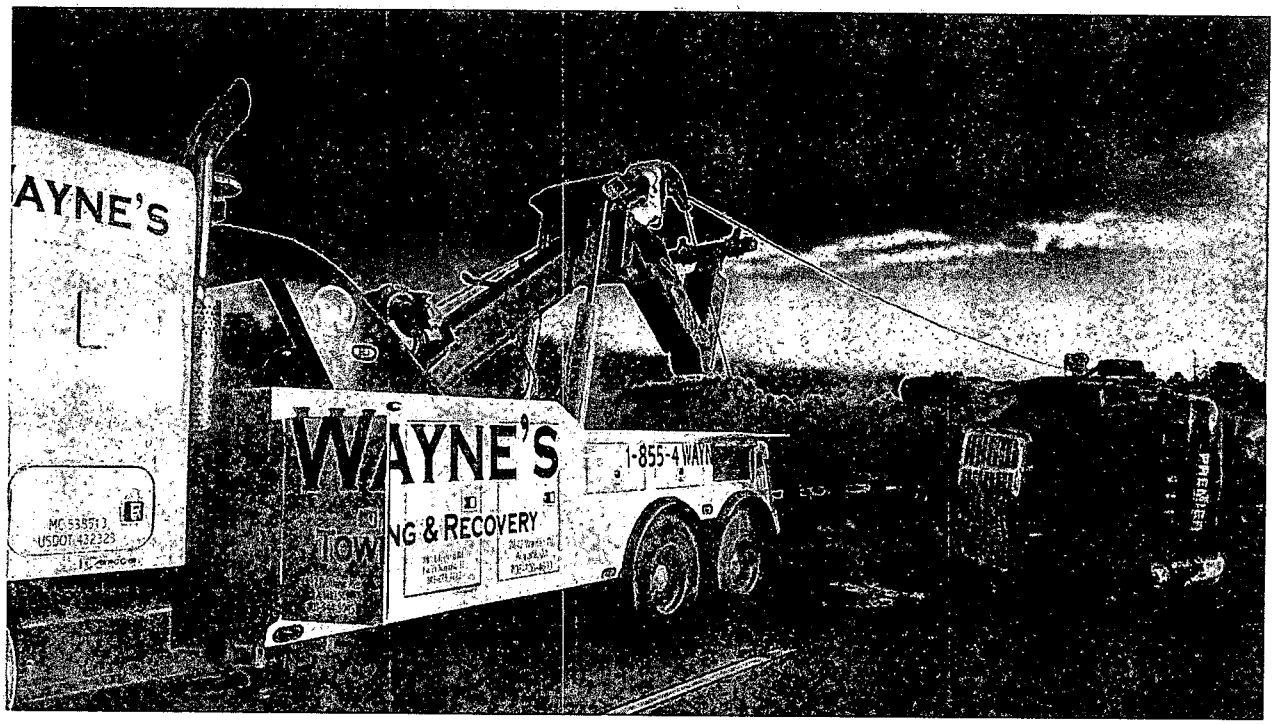
7

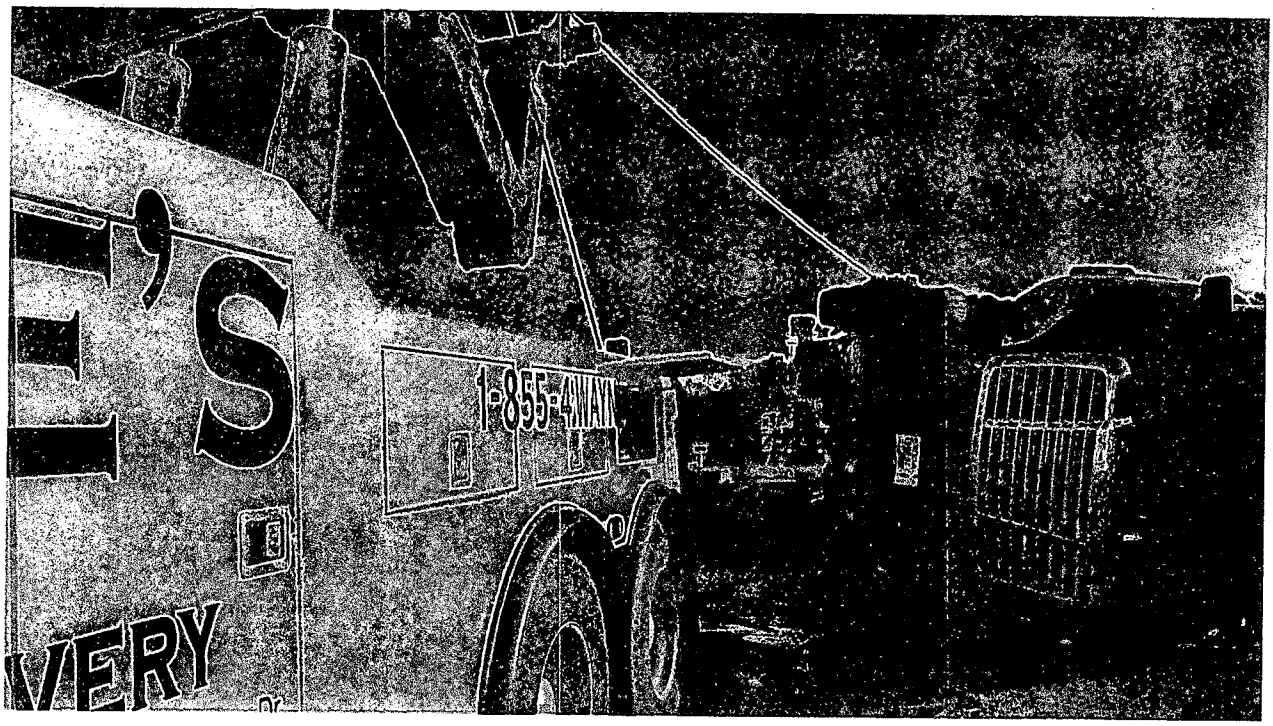
000974


PREMIER

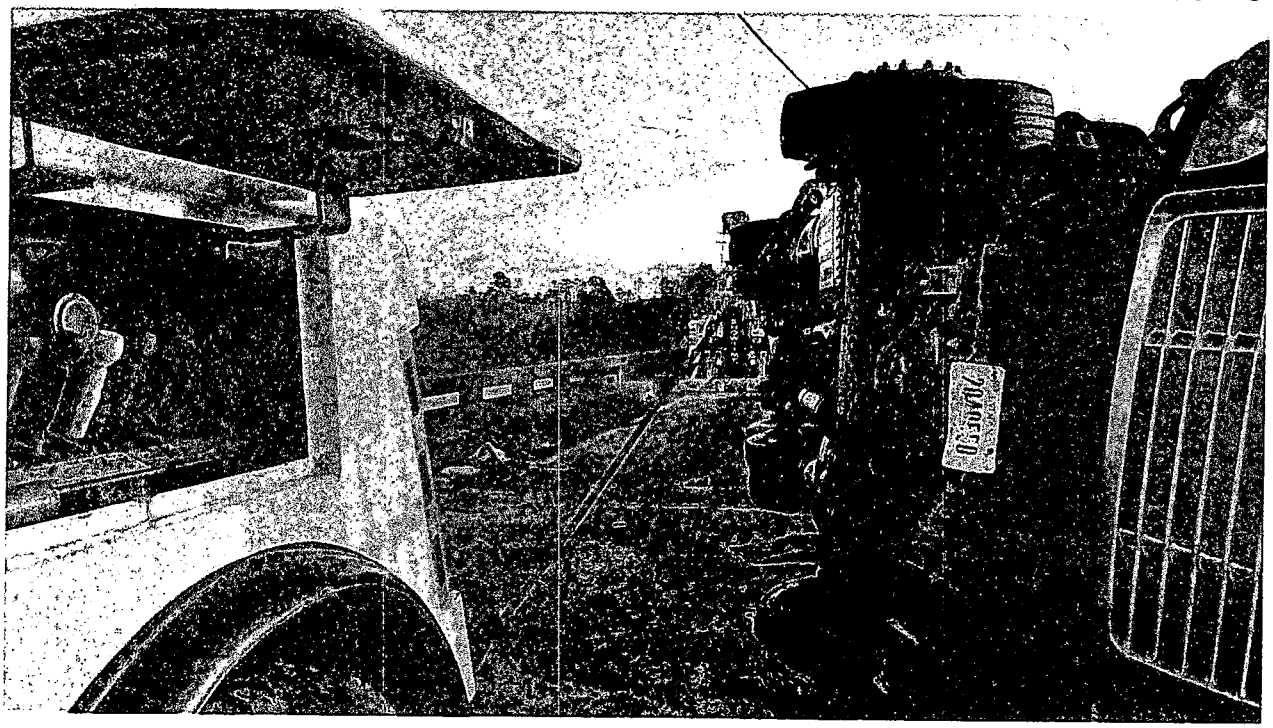

WAYNE'S
WAYN
WAYN
RD450

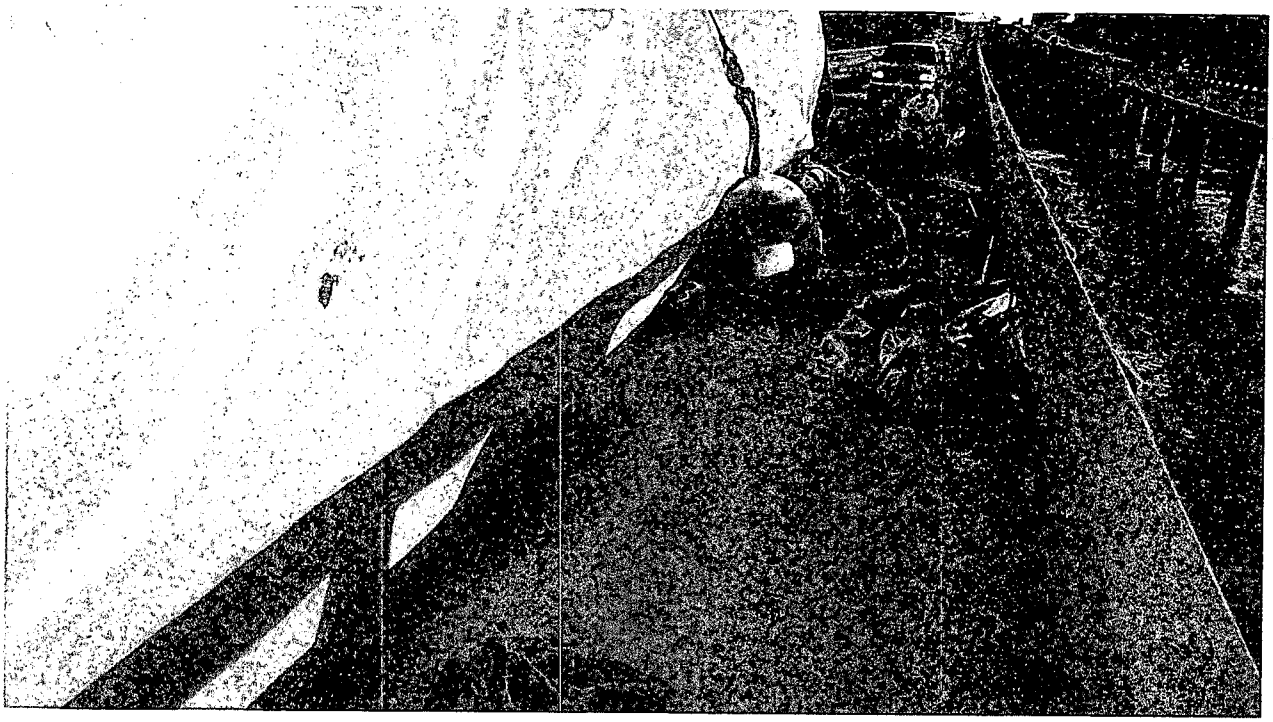


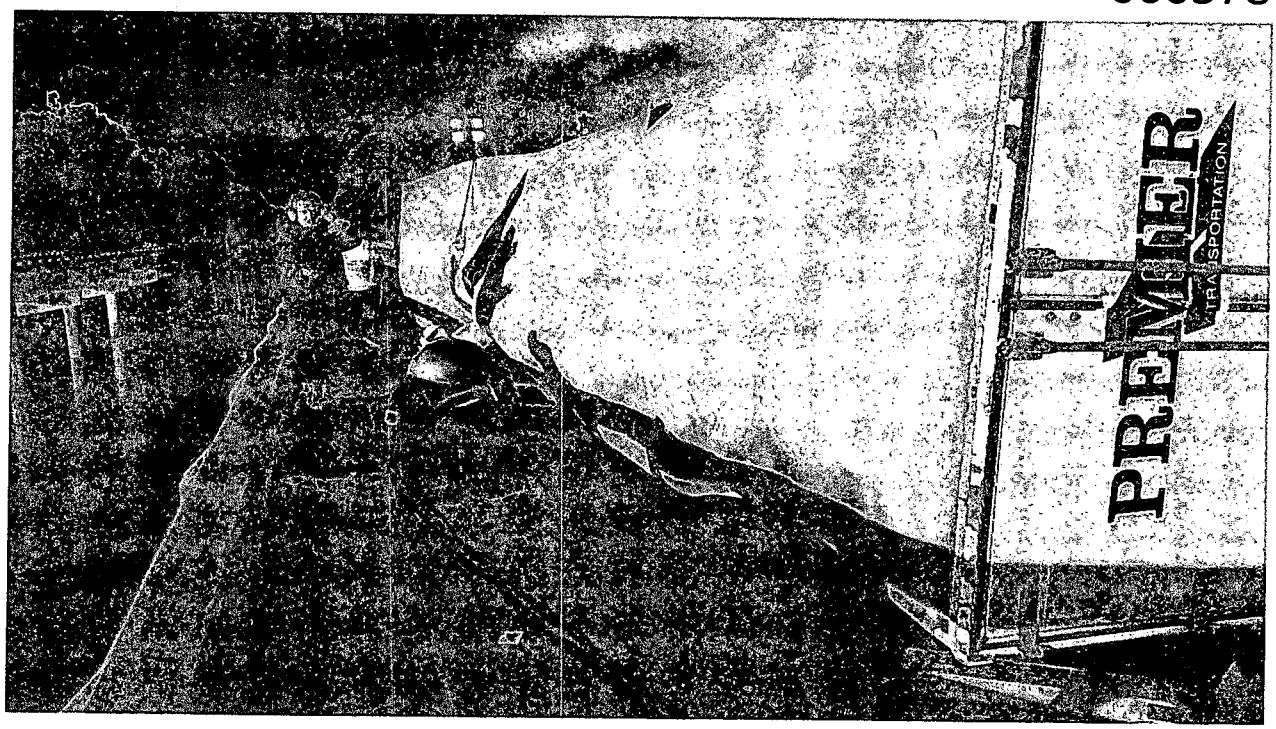

AYNE'S
L
MC 538513
USDOT 432323
WAYNE'S
NG & RECOVERY
1-855-4 WAYN
PREMIER



12






PREMIER
TRANSPORTATION

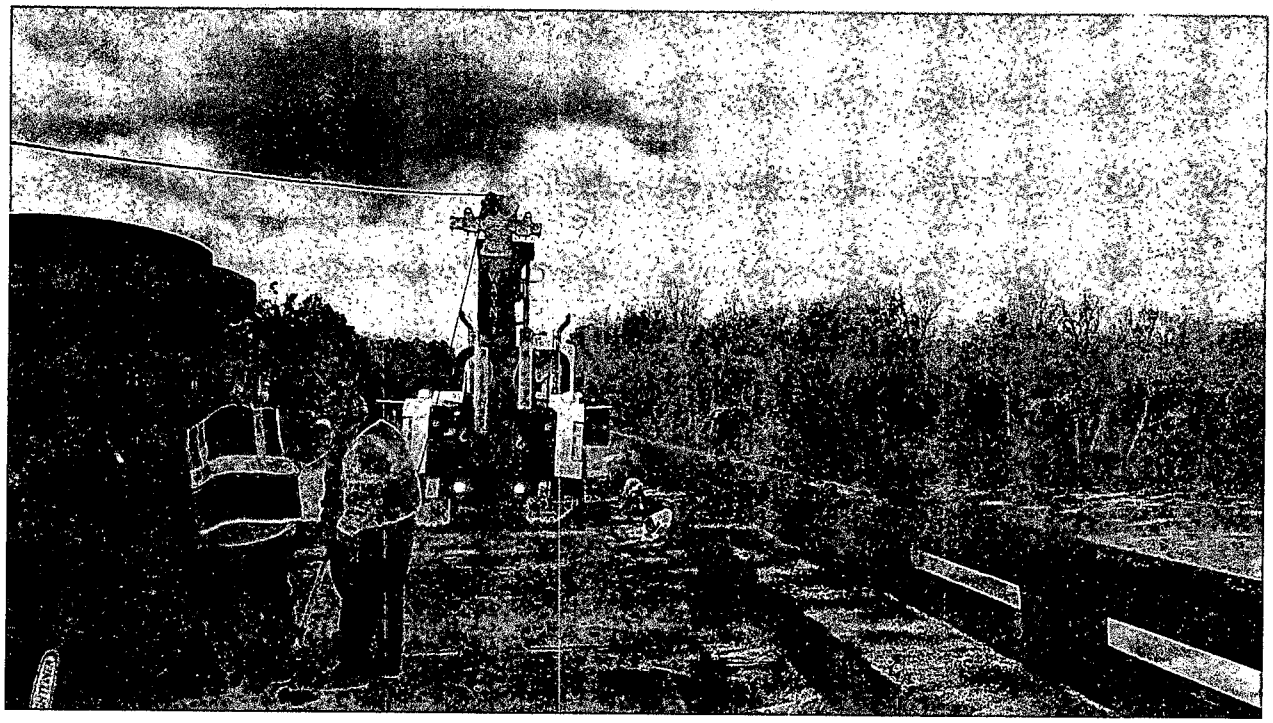
0645 8:06 AM

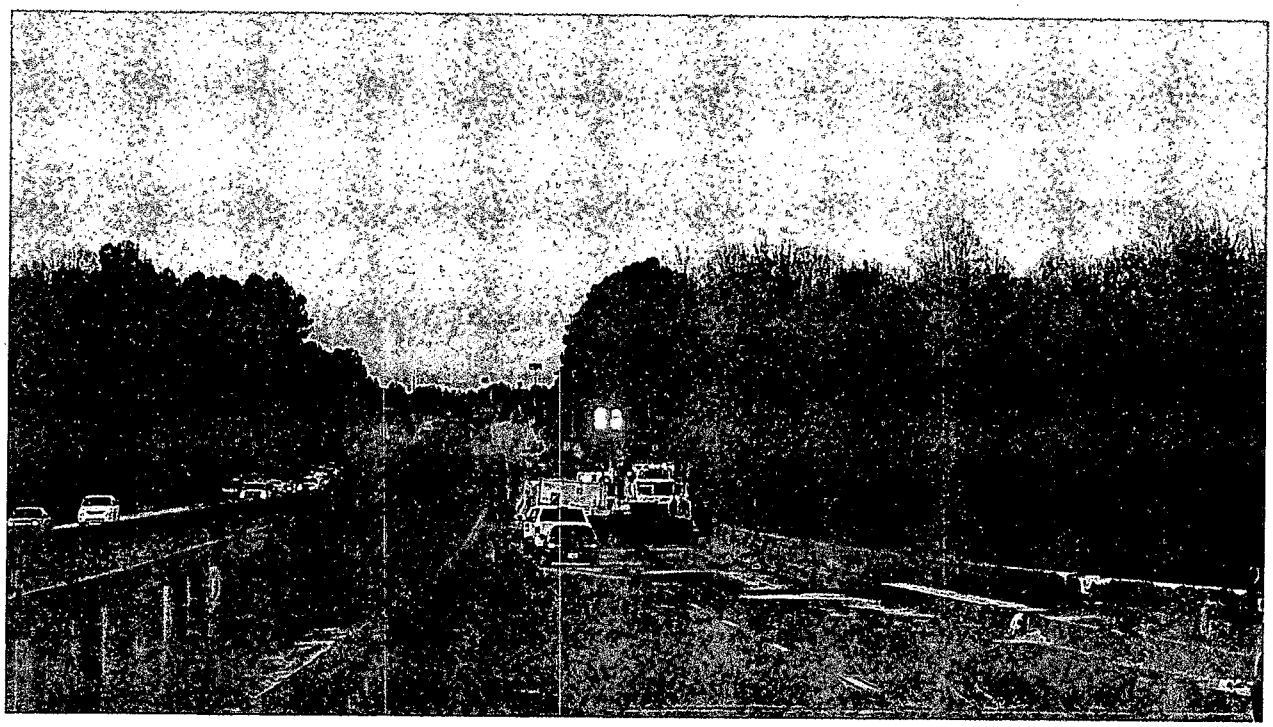
000579

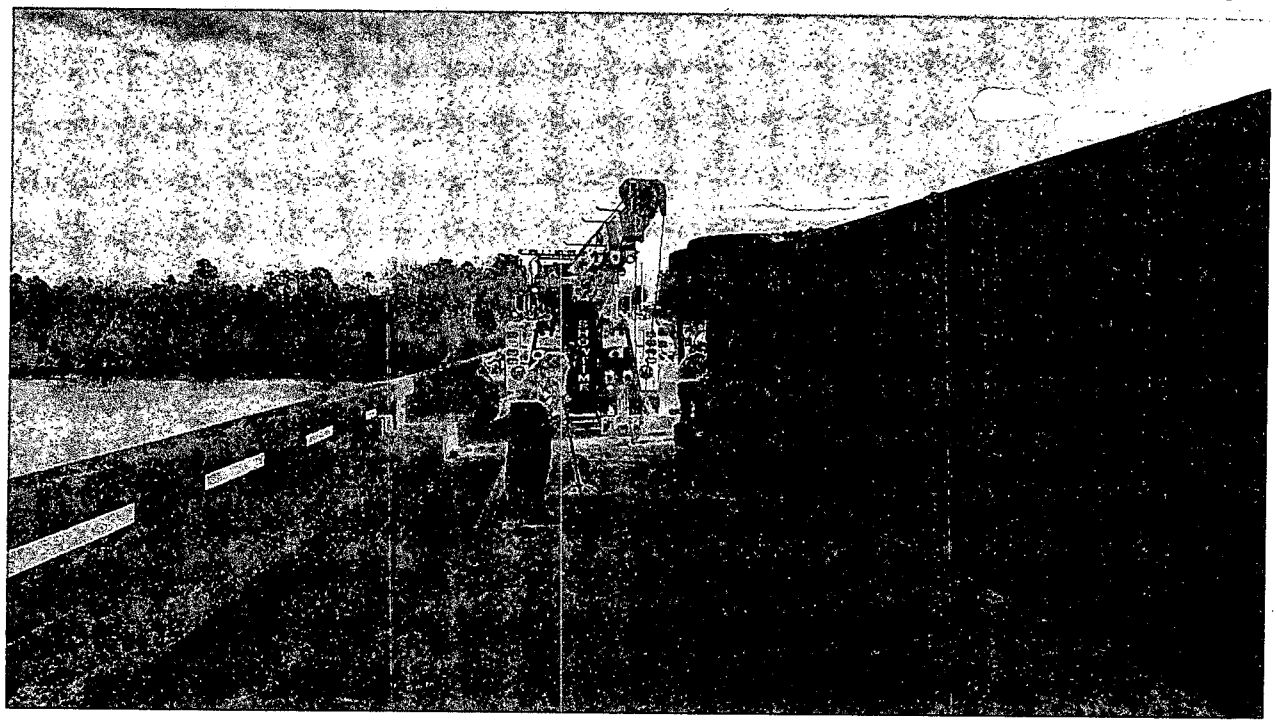


16

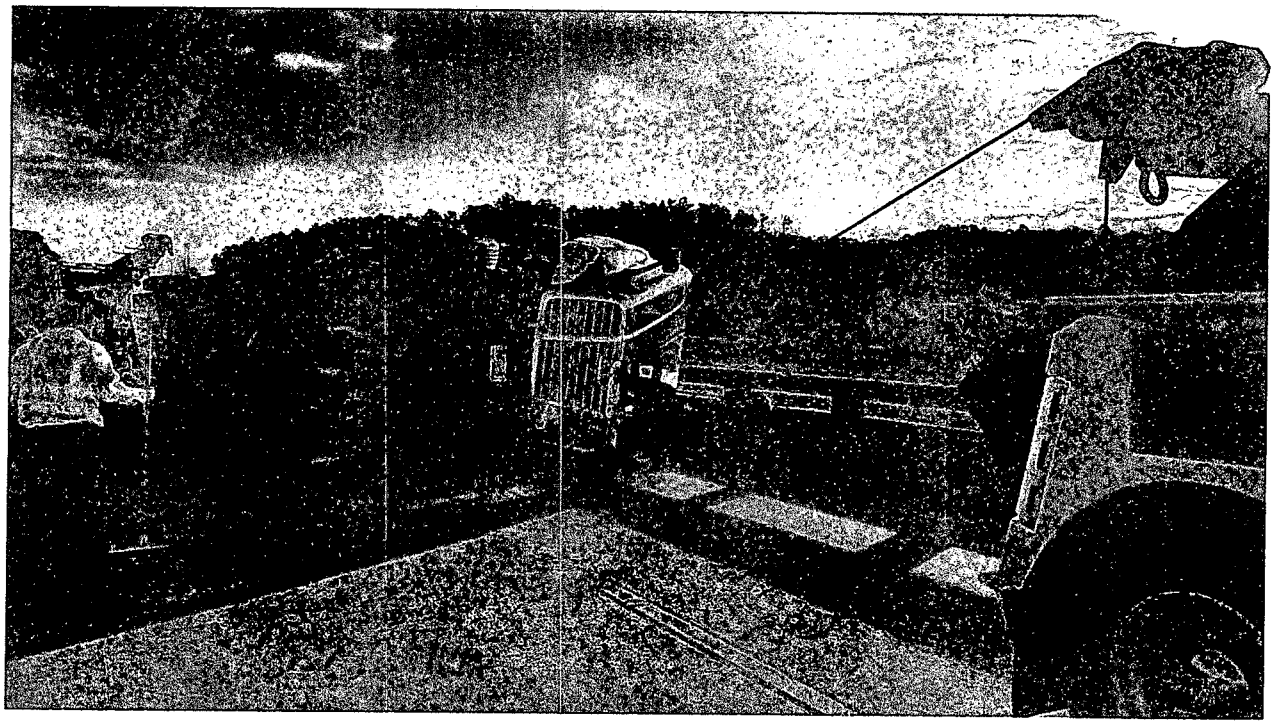
000983

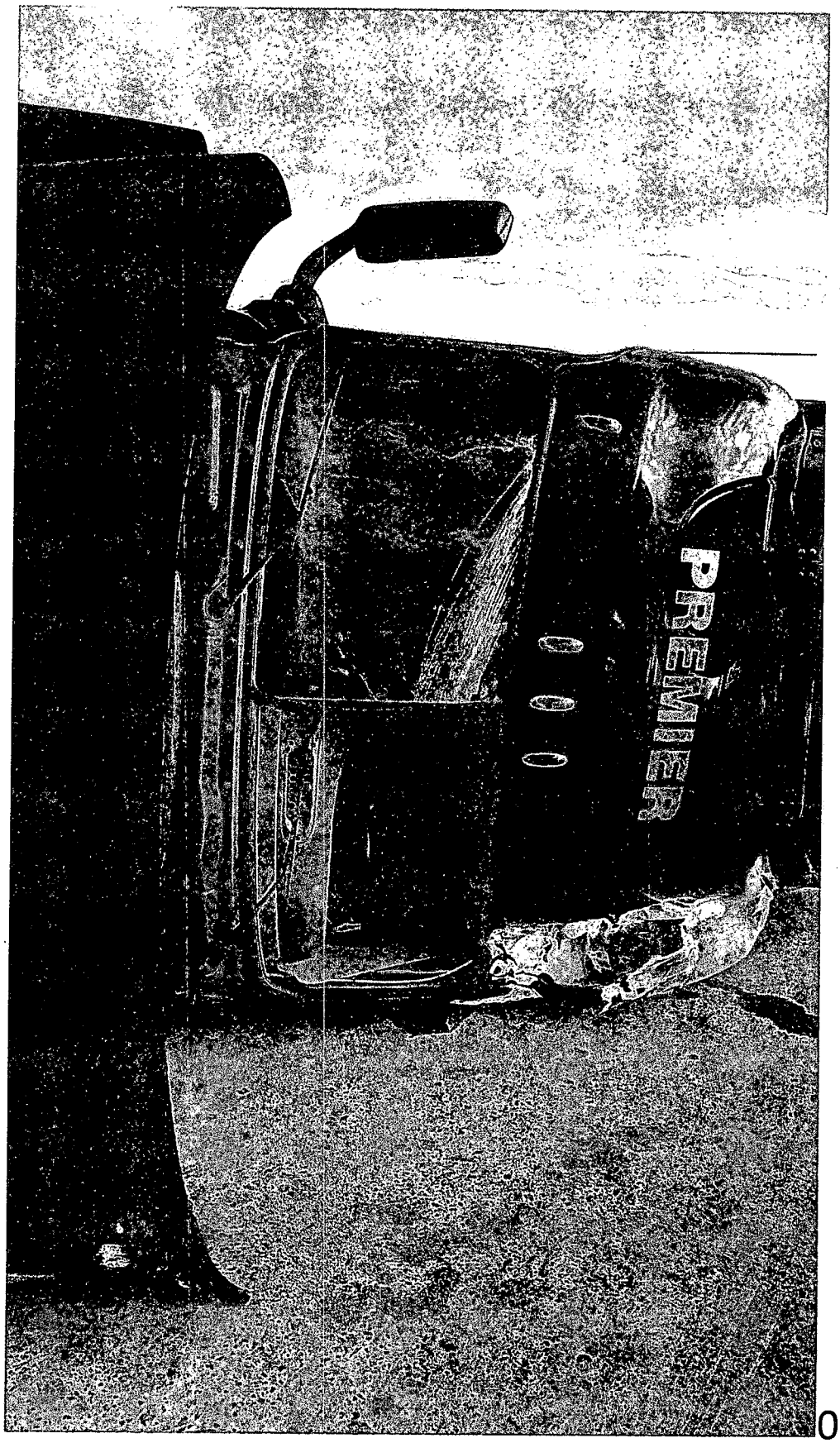


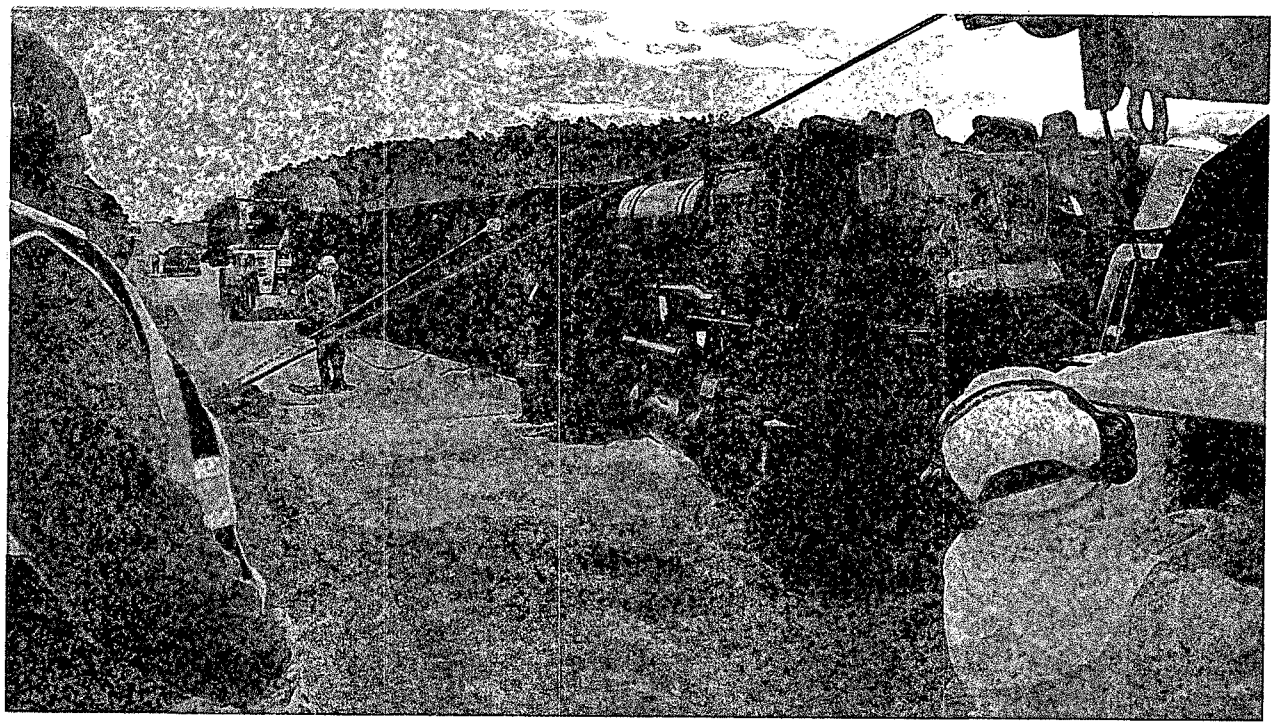




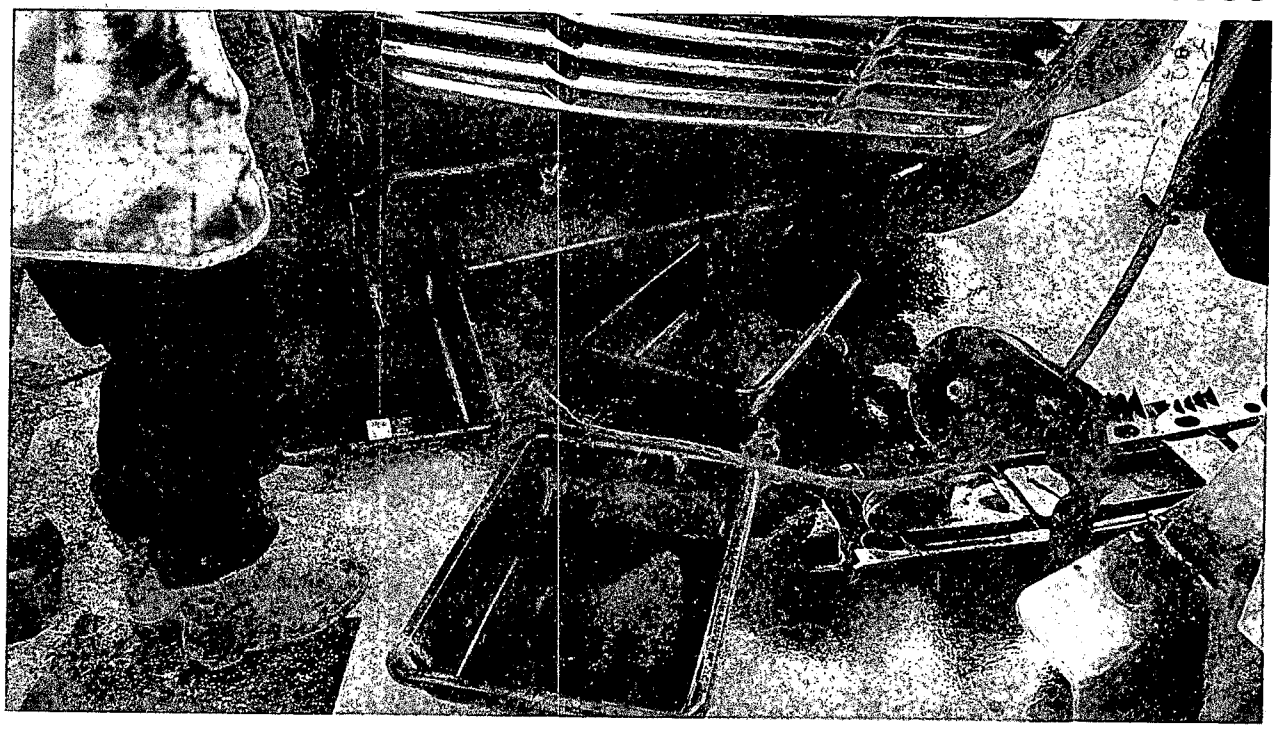


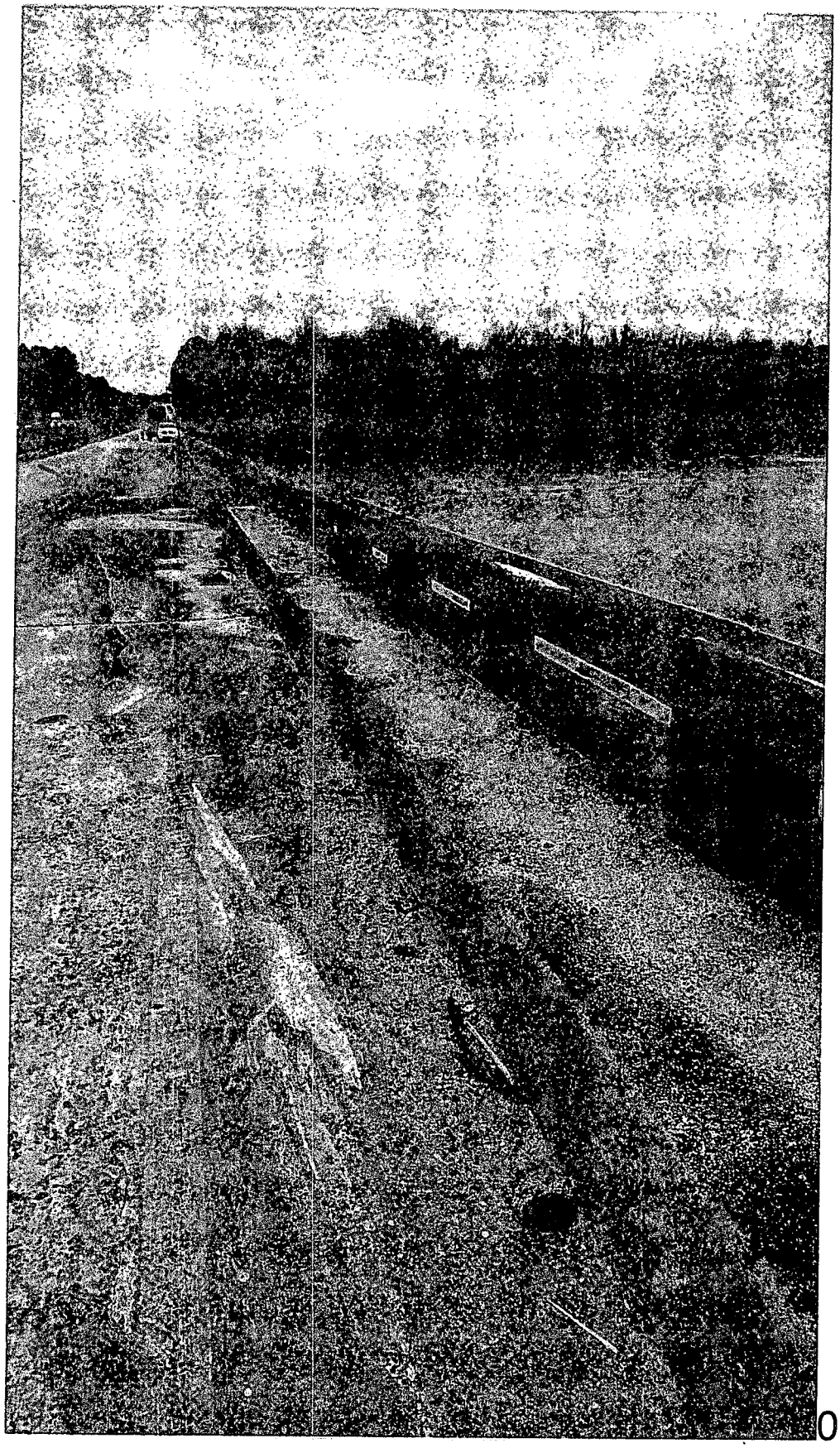



PREMIER

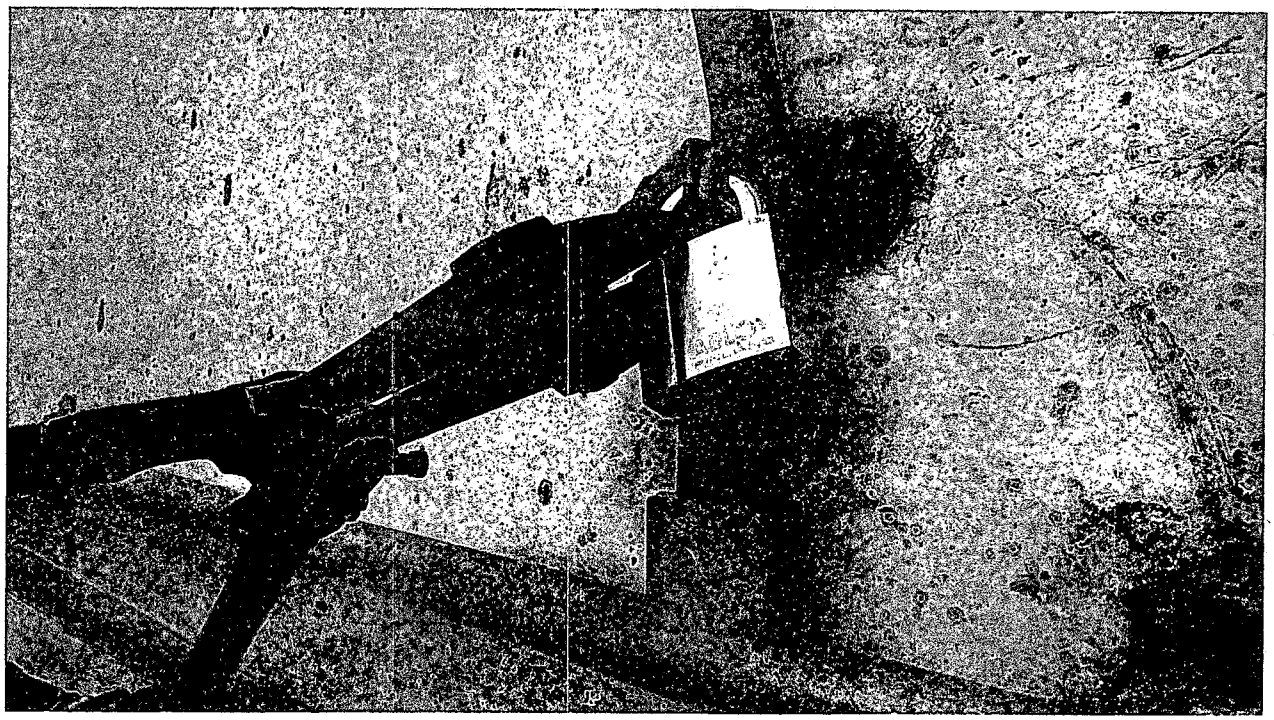


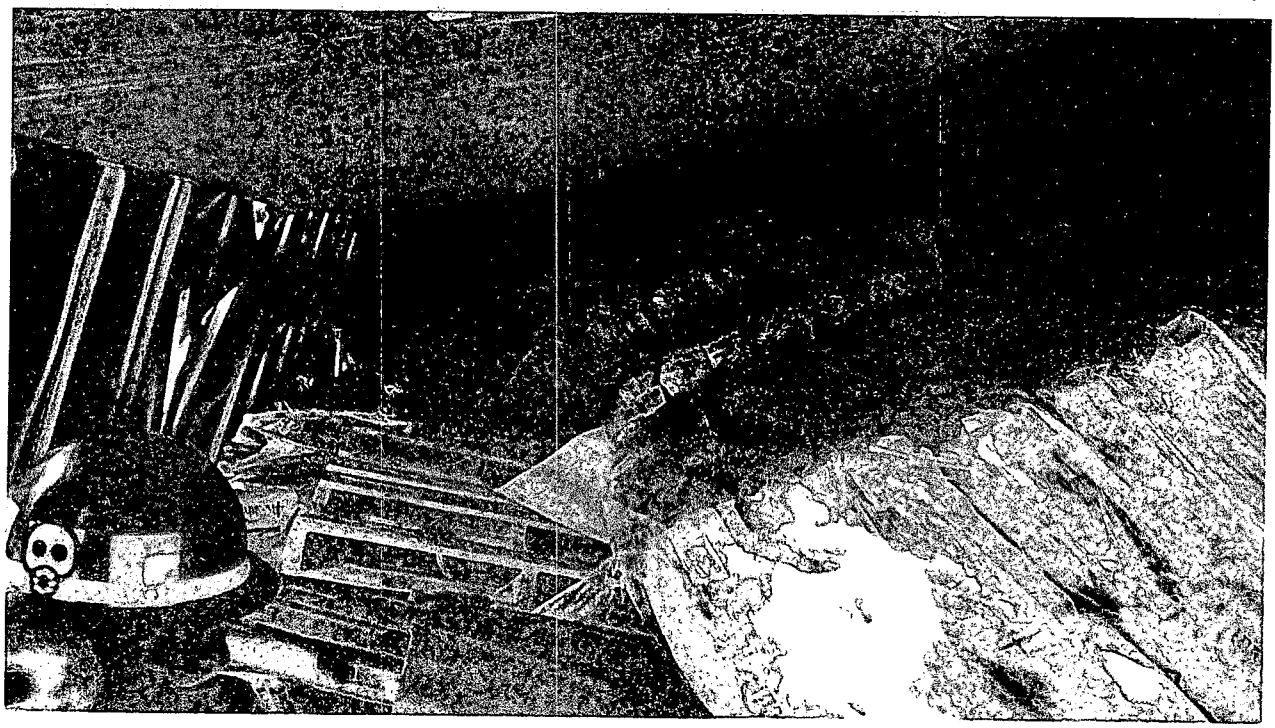




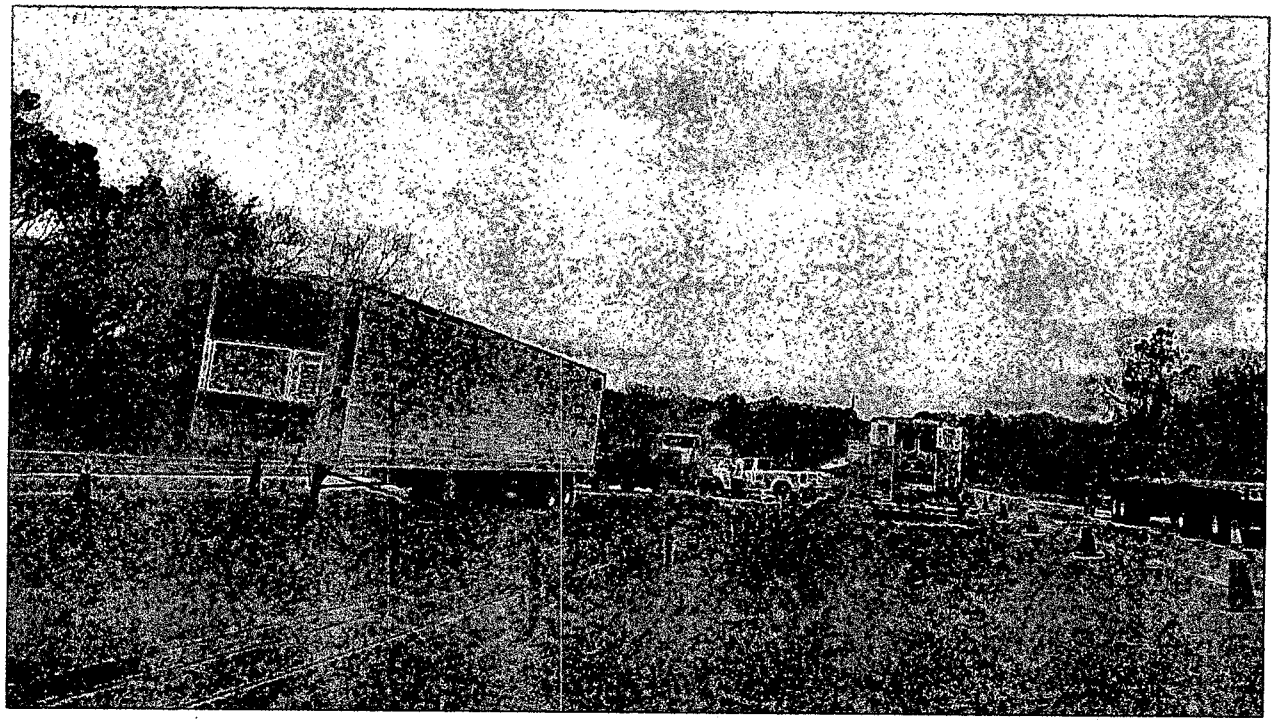


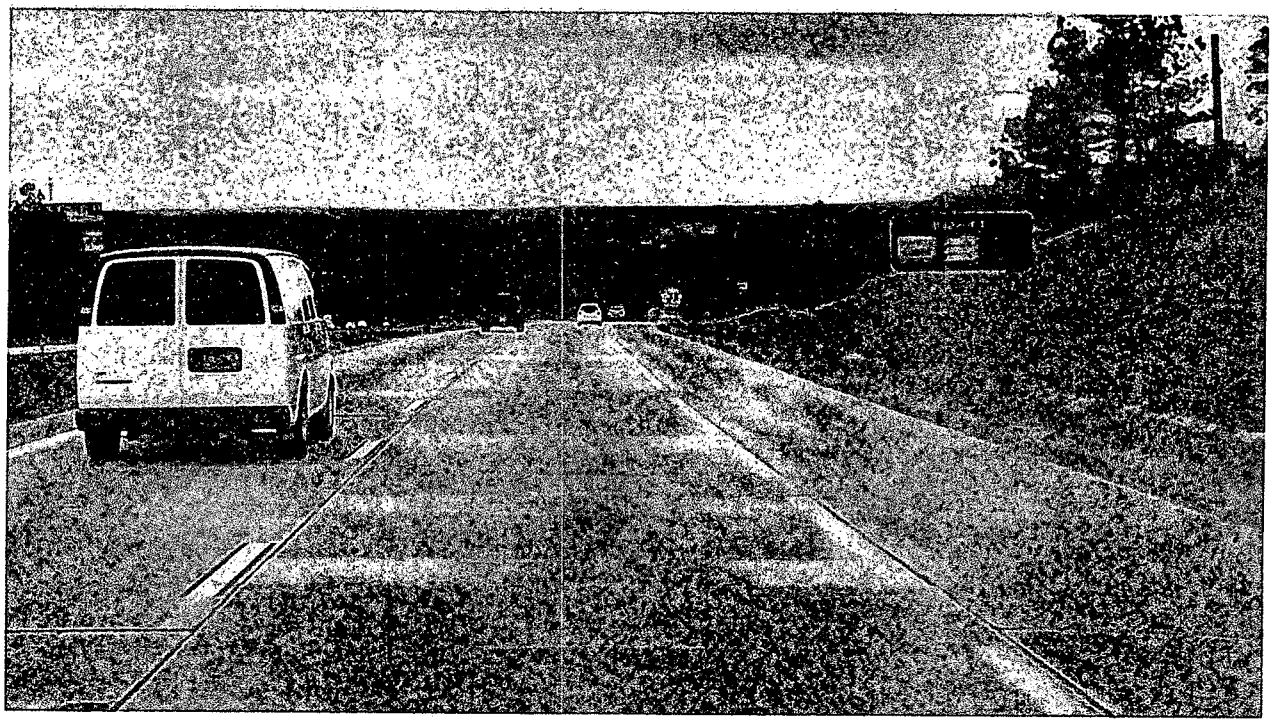

4712908





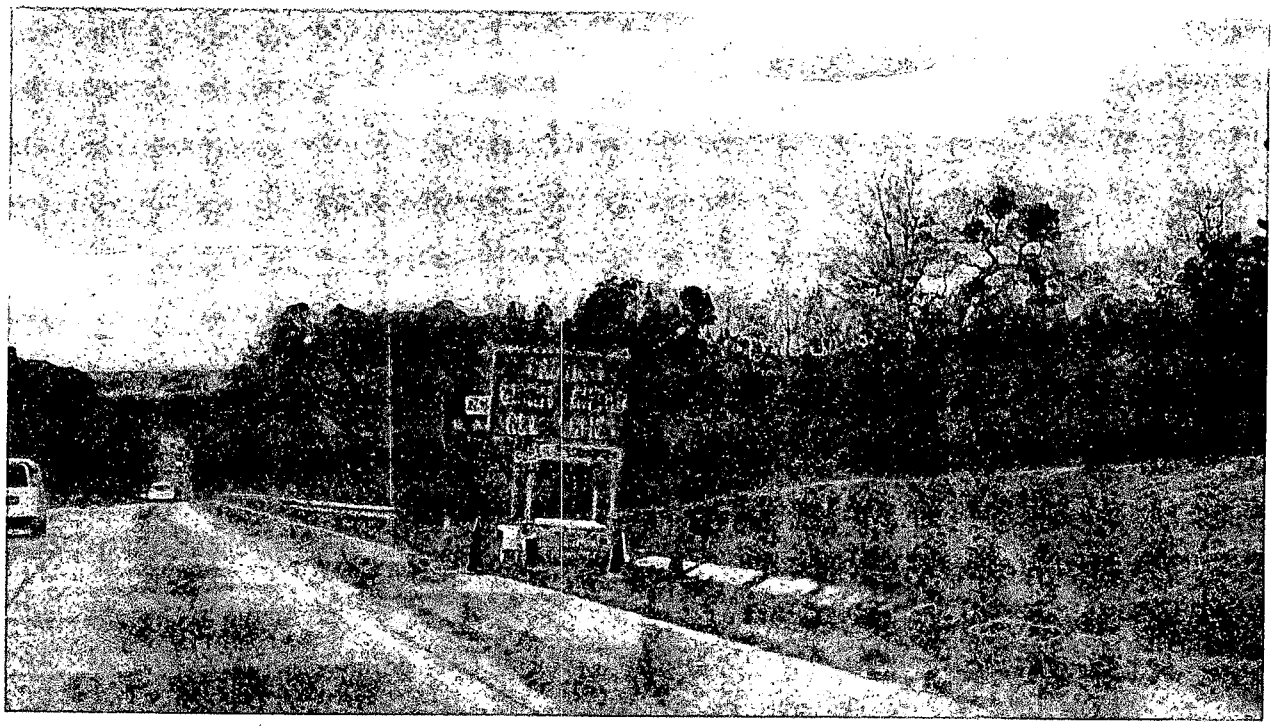


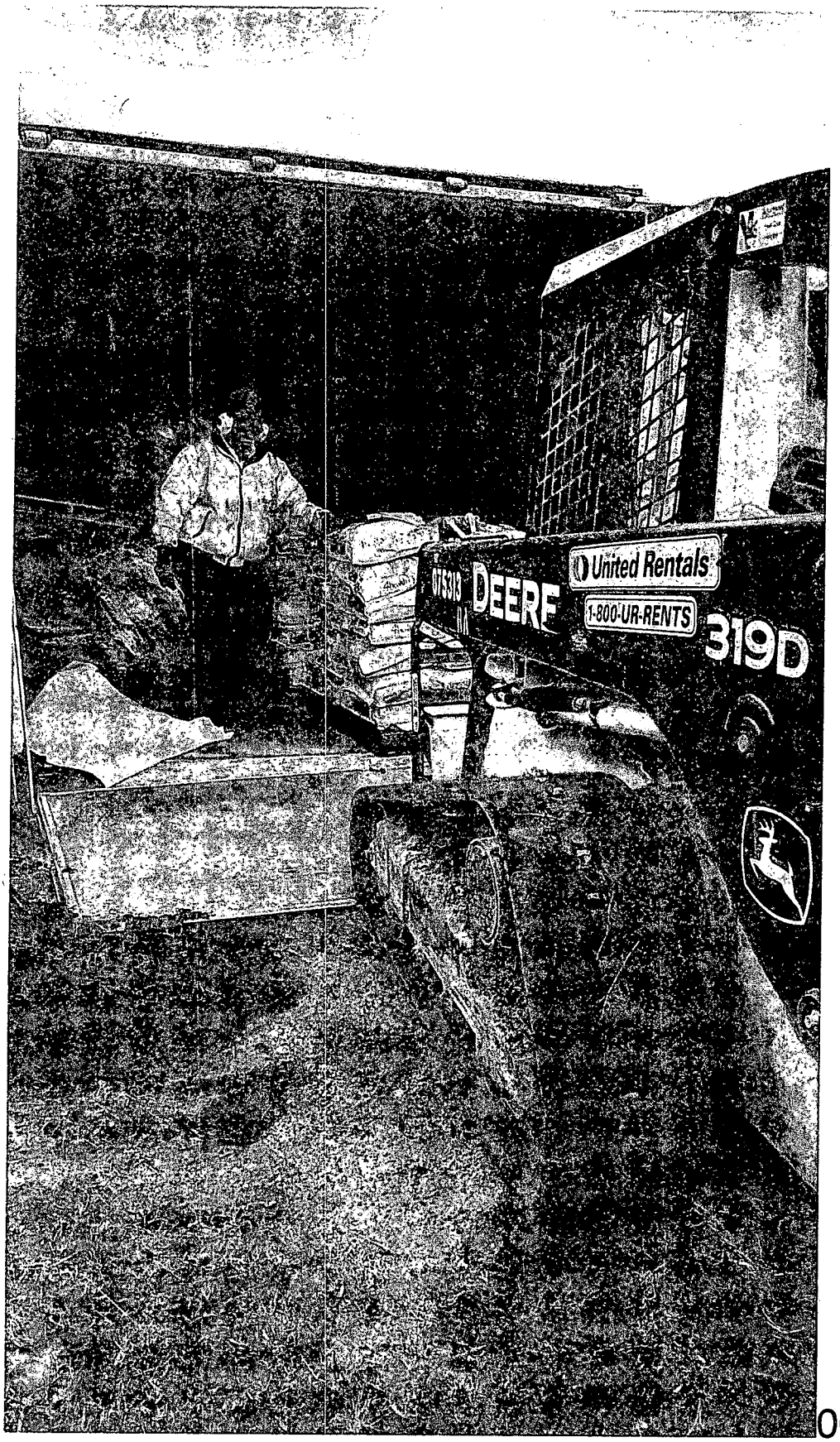


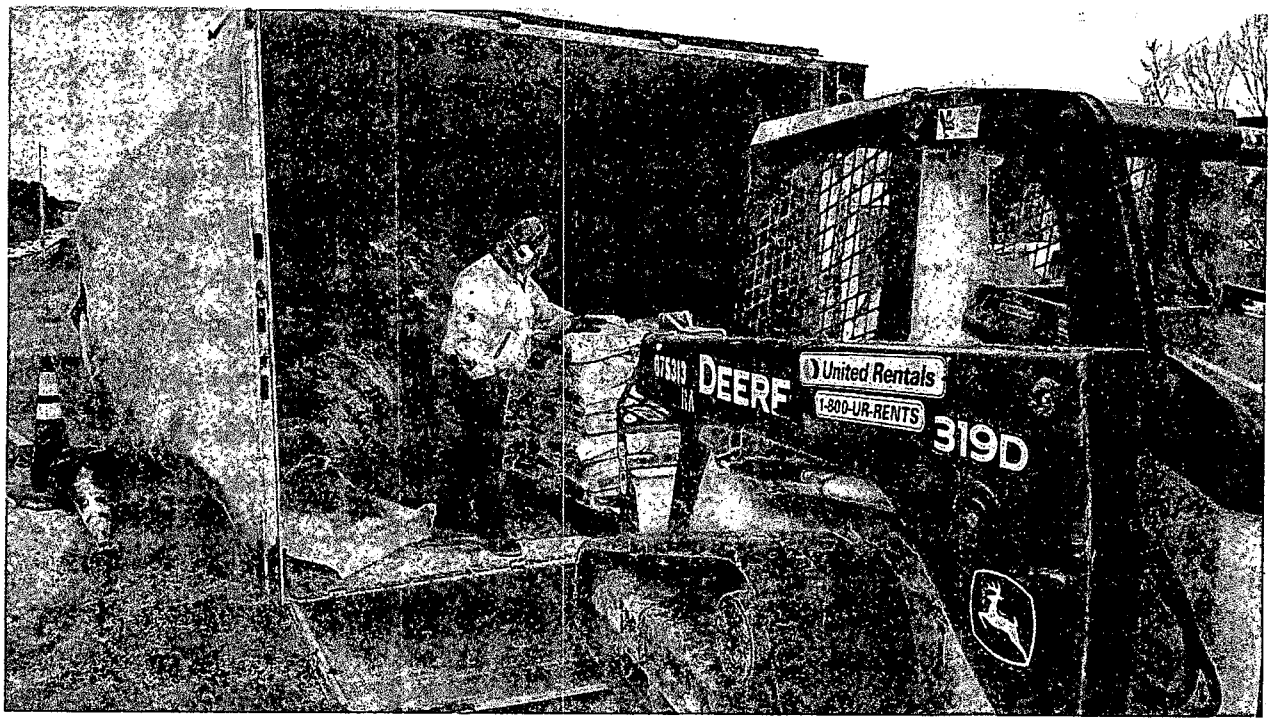


1005 1:48 PM

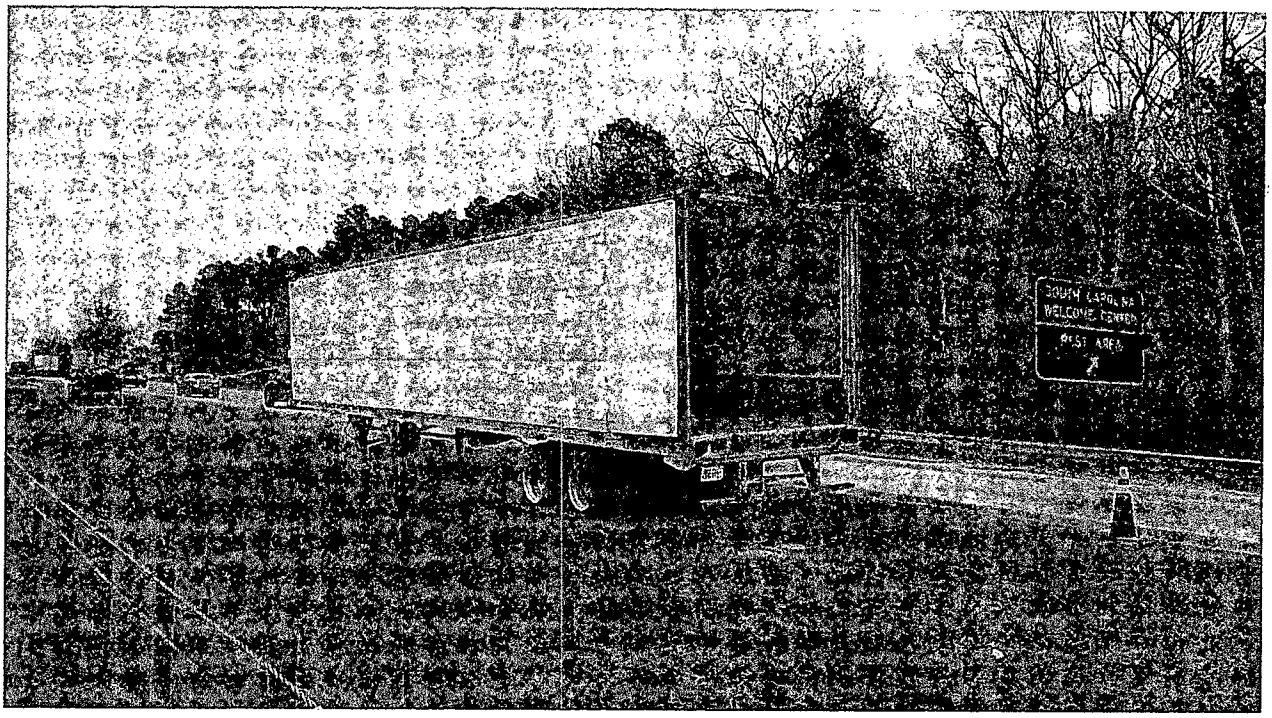
000599

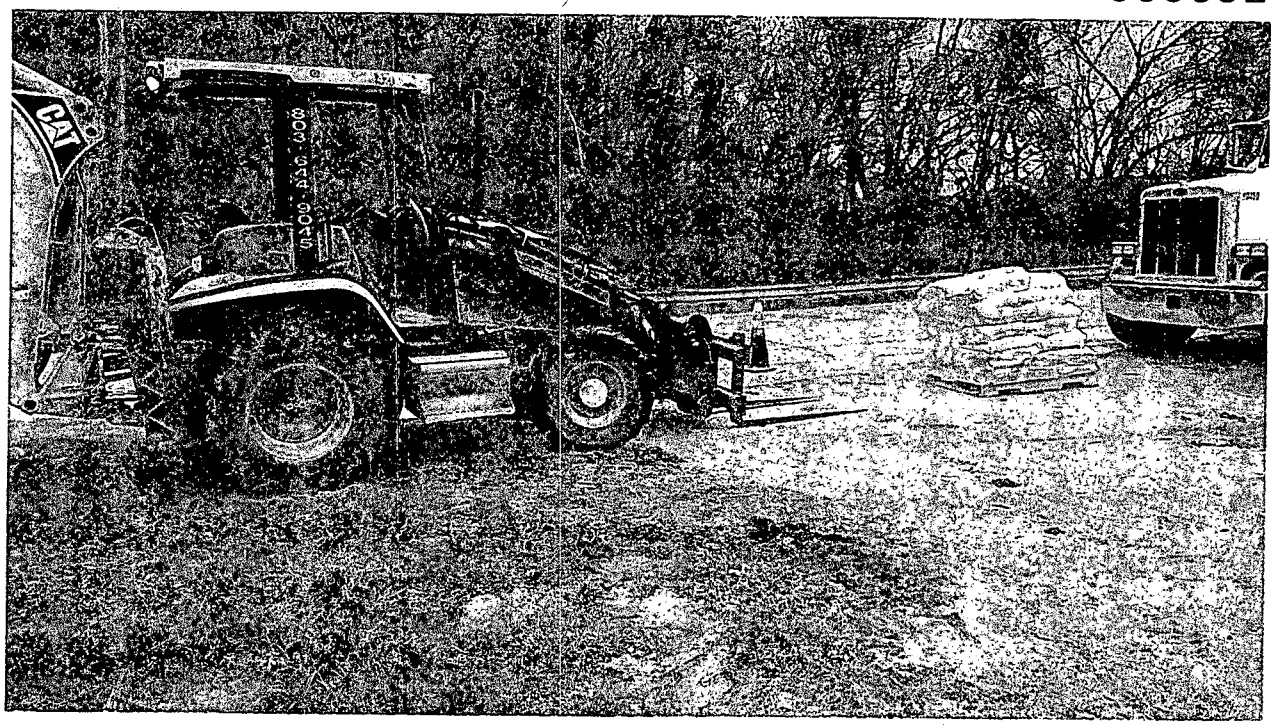


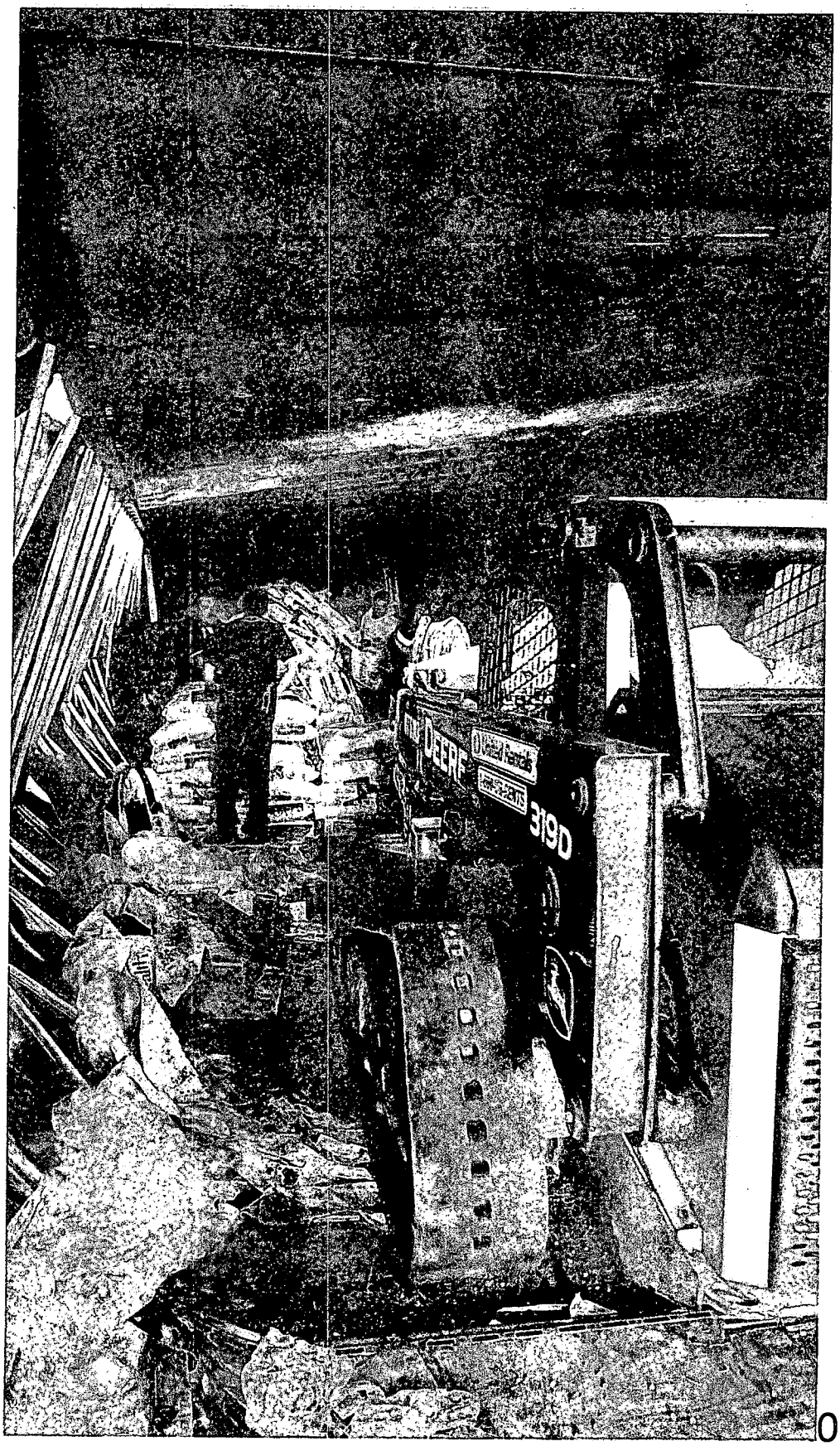

United Rentals
1-800-UR-RENTS
DEERE
319D

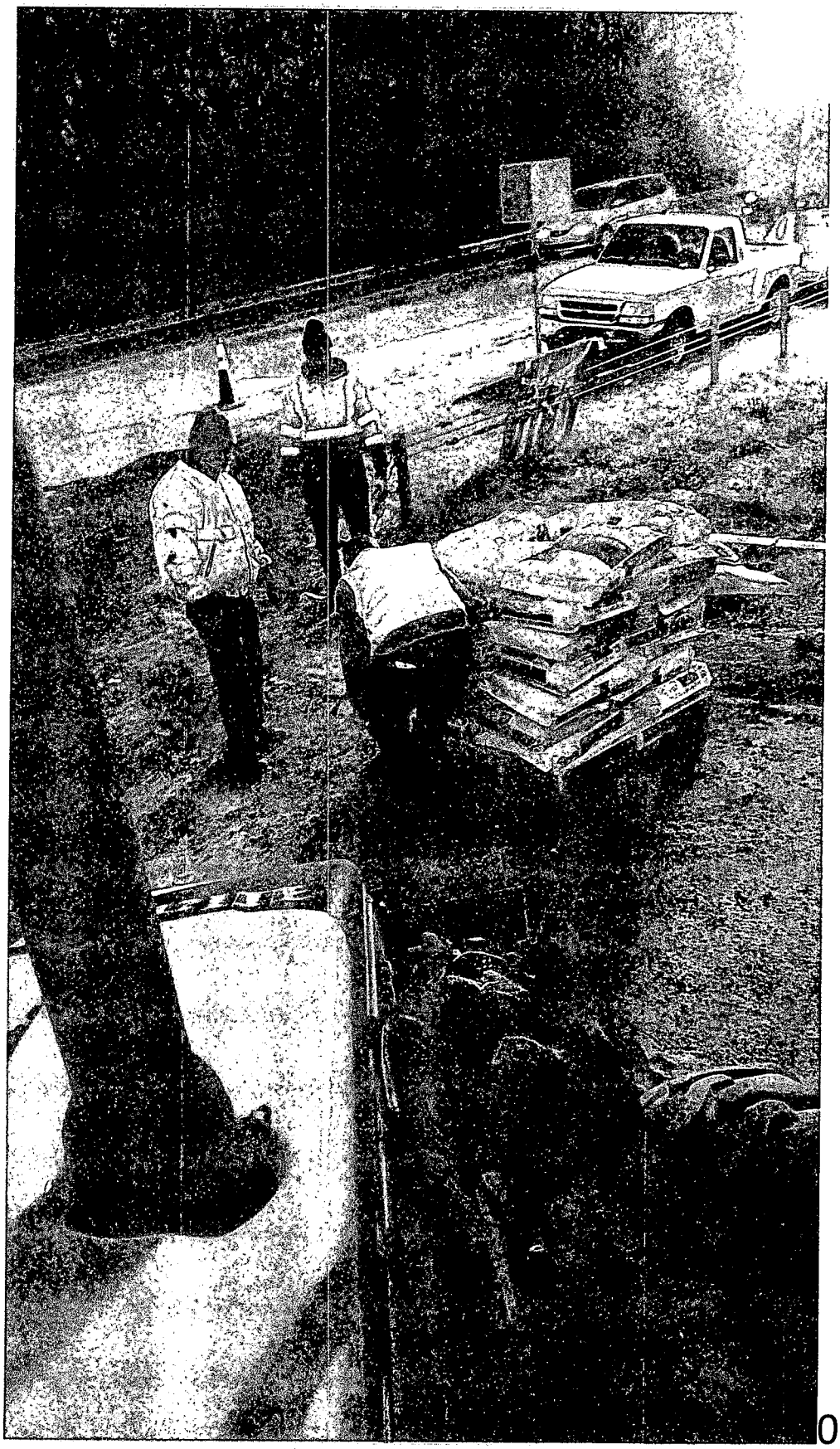

DEERE
United Rentals
1-800-UR-RENTS
319D

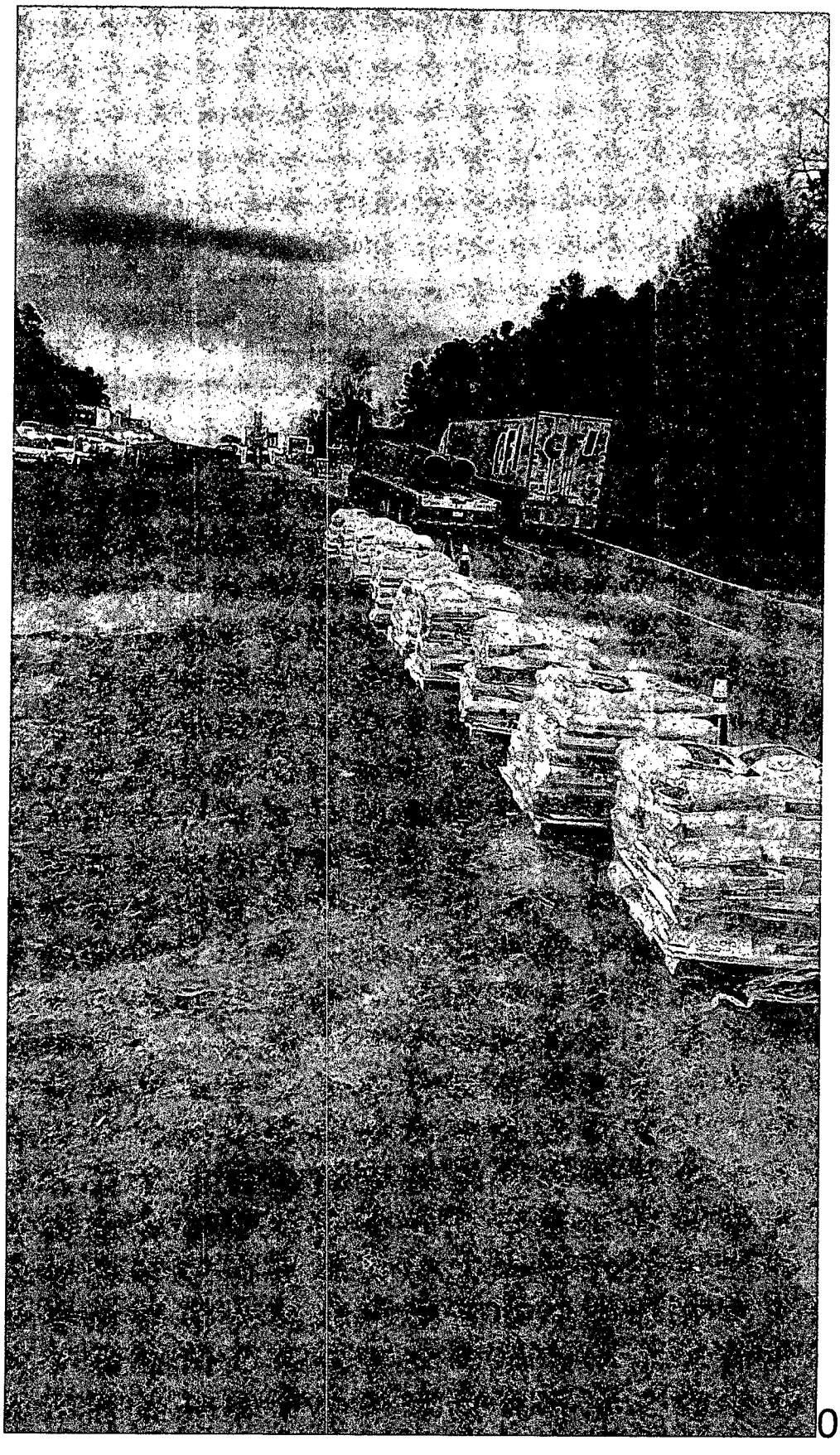

CAT


SOUTH CAROLINA
WELCOME CENTER
REST AREA

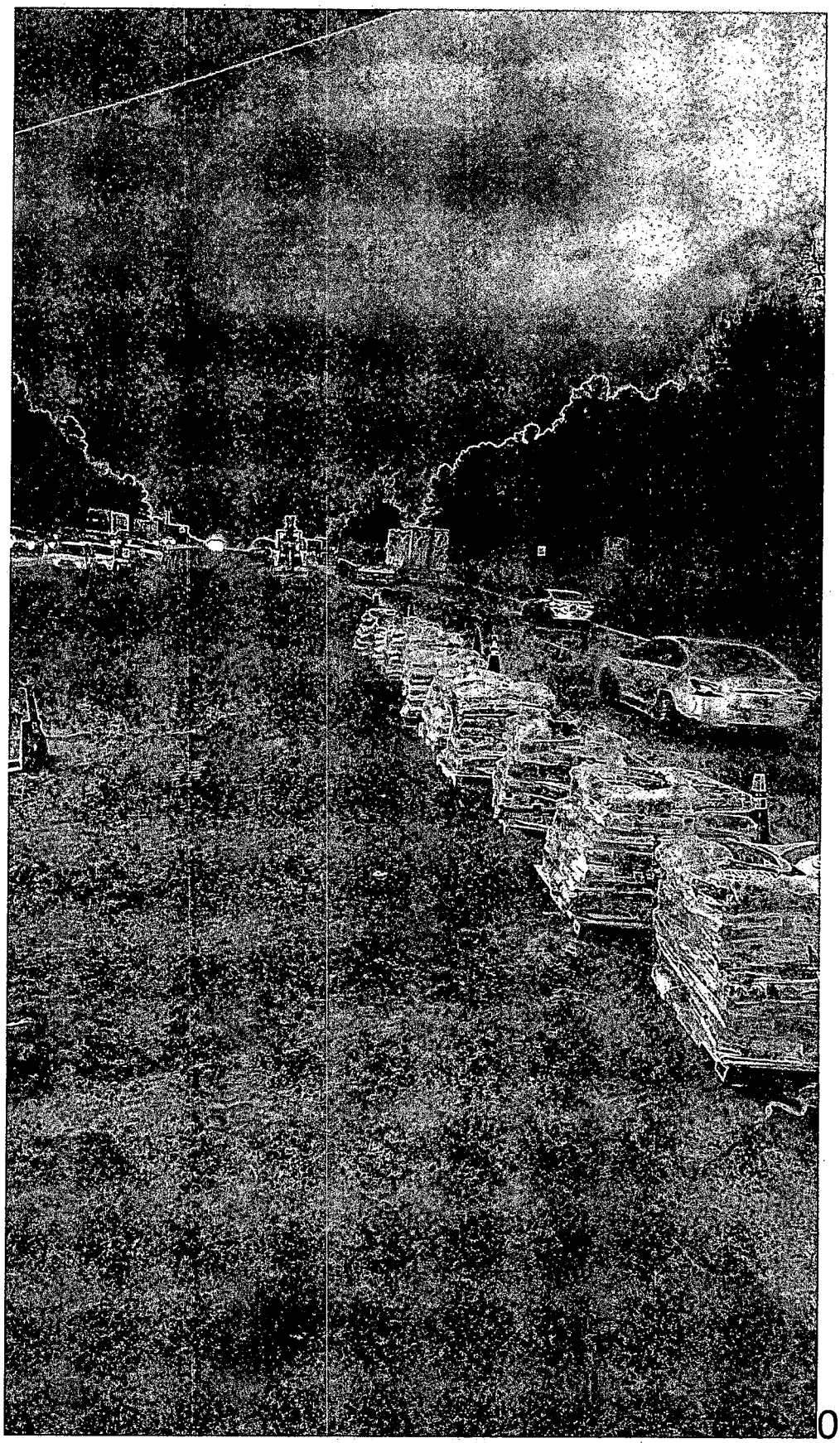

CAT
903 CAT 903


319D



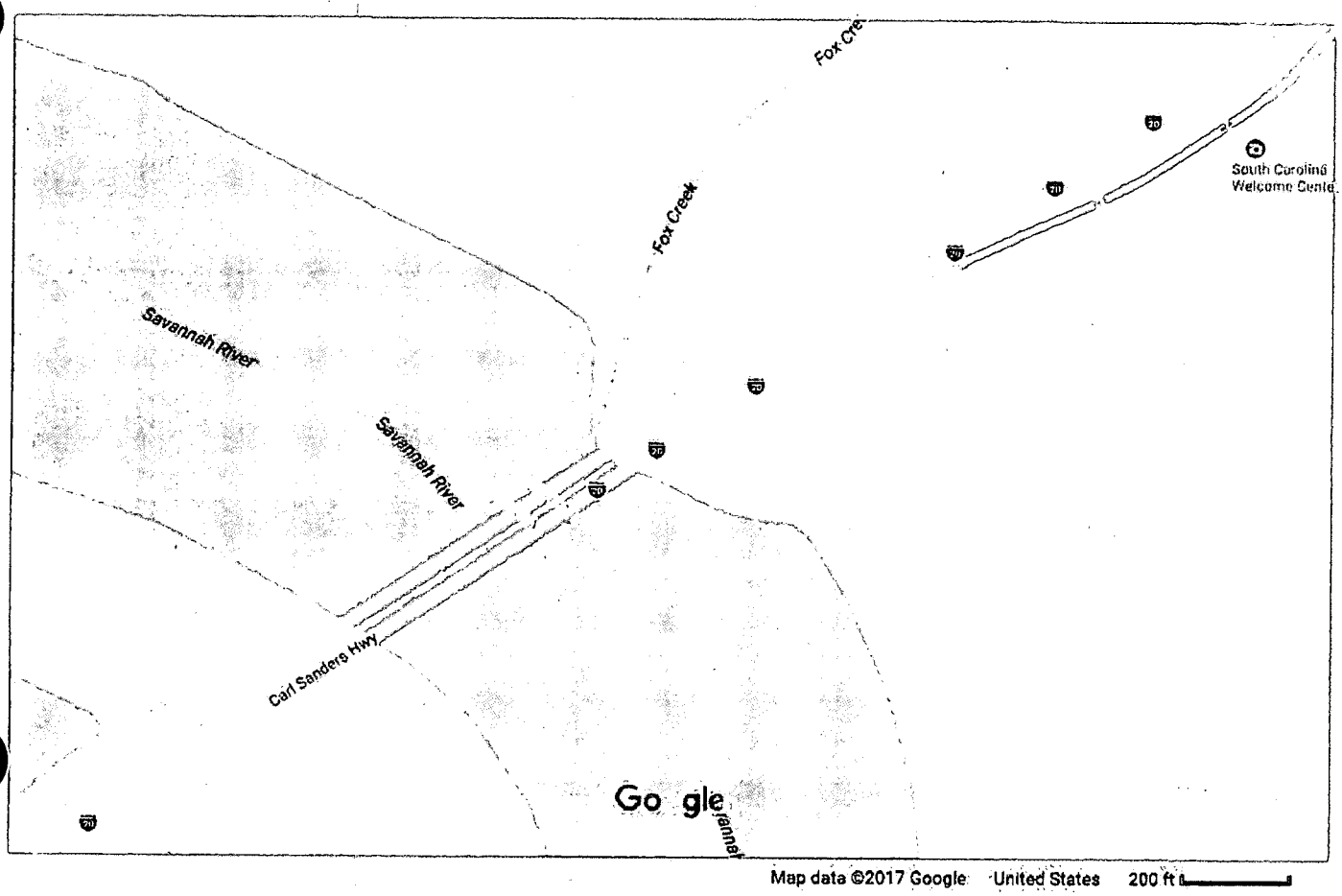






15
(not admitted)

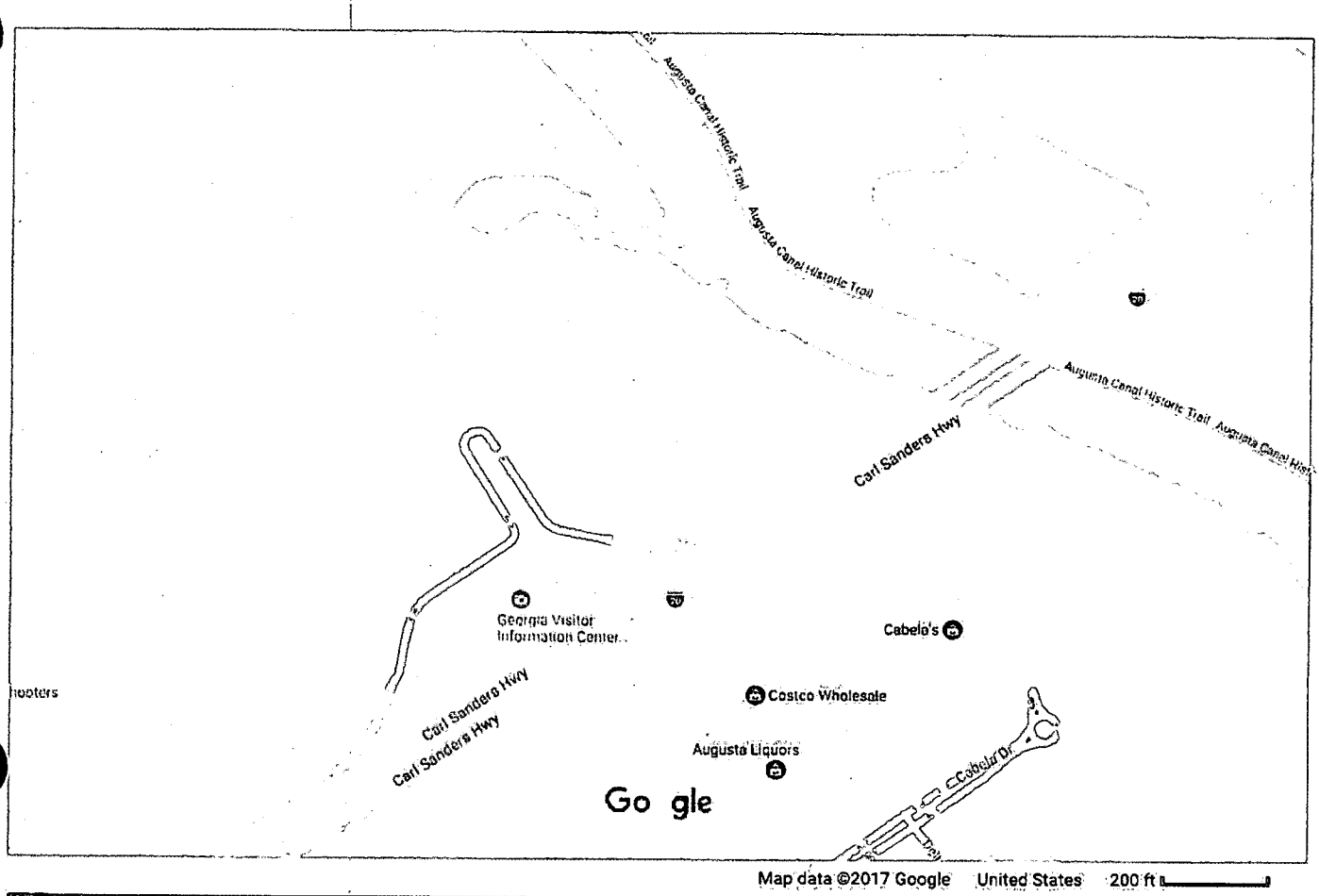
Google Maps I-20 Savannah River Bridge & Augusta Canal



000432

001011

Google Maps Augusta Canal





Augusta Canal

Georgia

4 reviews

Canal

000433

001012

Do you want me to forward a Release of All Claims for the tower to sign? Highly recommended.

Scott

From: Tim Pilato [mailto:tpilato@premiertransportation.com]
Sent: Monday, March 07, 2016 11:18 AM
To: 'Kozelek Tammy'; 'Insurance Group'; Scott Zottneck
Cc: 'Karen Coppolino'; 'Thomas Curran'; 'Bartelt Lucas'; 'Dailey Krisann'
Subject: RE: Question - SC

To All:
I have paid a reduced wrecker bill of $48,000 in order to get our customers freight released and picked up. I will get everyone copies of the detailed invoices. I will notify everyone once we get the cargo out.

Thanks
Tim

(THU)FEB 28 2013 15:43/ST. 15:43/No. 3300666695 P 1

2012 FOR 2013

South Carolina Department of Public Safety
S.C. Highway Patrol

TO: Troop Seven
Rotation Wrecker Services

FROM: Captain C. T. Stephens
Troop Seven Commander

DATE: October 17, 2012

SUBJECT: Article 7 Highway Patrol
Sub-article 1 Wrecker Regulations
Text section F

In accordance with Article 7 Highway Patrol, sub-article 1 Wrecker regulations, Text section F, 2(2) b. The Troop Commander will determine the reasonableness of the fees based upon the average of the proposed fees submitted and a comparison of that Highway Patrol Troop's standards, by wrecker zone, for similar operations.

Maximum Allowable Fees

	Violations	Collisions	Storage	After-Hours Fees
Class A	$150.00	$175.00	$25.00	$175.00
Class B	$200.00	$250.00	$30.00	$250.00
Class C	$350 / hour----------		$40.00	$400.00 / hour

The Troop Commander recognizes that not all collision scene recoveries are the same. When circumstances dictate the use of procedures beyond a standard recovery additional fees are expected. However, the validity of any wrecker fee in excess of those previously presented will require written documentation on an itemized bill. Any additional fees must also be reasonable.

This is to acknowledge that I have received the approved fees for the calendar year 2013. It will be kept in the wrecker at all times and will be presented upon request to the person whom the tow services were provided, their agent, and any DPS officer.

_____ _____
Signature of Owner or Representative *Date*

Please Print Name of Wrecker Service: _____

Courtesy - Efficiency - Service

POST OFFICE BOX 1993, 10311 WILSON BLVD., BLYTHEWOOD, SOUTH CAROLINA 29016

PETITIONER'S EXHIBIT 28 8/4/17 MW

PENDAD 800-631-6989

001014

2014

South Carolina Department of Public Safety

S.C. Highway Patrol

Aiken / NA - HP

TO: Troop Seven
Rotation Wrecker Services

FROM: Captain A. K. Grice
Troop Seven Commander

DATE: November 13, 2013 For 2014

SUBJECT: Article 7 Highway Patrol
Sub-article 1 Wrecker Regulations
Text section F

In accordance with Article 7 Highway Patrol, sub-article 1 Wrecker regulations, Text section F, 2(2) b: The Troop Commander will determine the reasonableness of the fees based upon the average of the proposed fees submitted and a comparison of that Highway Patrol Troop's standards, by wrecker zone, for similar operations.

Maximum Allowable Fees

	Standard Tow	Special Operations	Storage
Class A	$185.00	$100 / hour	$25.00 / day
Class B	$225.00	$100 / hour	$30.00 / day
Class C	$350 / hour	No fee will be set	$40.00 / day

(1) A standard tow is defined as responding to the scene, hooking up the vehicle, performing a general clean up if the call involves responding to a collision scene and providing responsible assistance to the owner to get to a safe location.
(2) Special operations are operations involving the process of up righting an overturned vehicle or returning a vehicle to a normal position on the roadway which requires the use of auxiliary equipment due to the size or location of the vehicle and/or the recovery of a load which has spilled, or the off-loading and reloading of a load from an overturned vehicle performed to right the vehicle.

The validity of any wrecker fee in excess of those previously presented will require written documentation on an itemized bill. Any additional fees must also be reasonable.

This is to acknowledge that I have received the approved fees for the calendar year 2014. It will be kept in the wrecker at all times and will be presented upon request to the person whom the tow services were provided, their agent, and any DPS officer.

_____ _____
Signature of Owner or Representative *Date*

Please Print Name of Wrecker Service: _____

Courtesy - Efficiency - Service

POST OFFICE BOX 1993, 10311 WILSON BLVD., BLYTHEWOOD, SOUTH CAROLINA 29016

EXHIBIT F

South Carolina Department of Public Safety
S.C. Highway Patrol

South Carolina Highway Patrol
2015 Wrecker Rotation Fee Schedule

In accordance with Section 38-600 of the South Carolina Code of State Regulations, the Department of Public Safety publishes a yearly Fee Schedule outlining the maximum allowable fees for each class of wrecker on the SCHP Wrecker Rotation List. The reasonableness of fees on the Fee Schedule is determined by the Highway Patrol on a comparative basis. The fees permitted for calendar year 2015 are listed below:

2015 MAXIMUM ALLOWABLE FEES FOR ROTATION LIST CALLS

CLASS	STANDARD TOW	SPECIAL OPERATIONS	STORAGE
A	$200.00 flat rate	$105.00 per hour	$29.00 per day
B	$262.00 flat rate	$164.00 per hour	$36.00 per day
C	$412.00 per hour	* no fee will be set	$49.00 per day

Standard Tow: Includes all associated costs such as responding to the scene, hooking up the vehicle, performing general clean up at the collision site, and providing responsible assistance to the vehicle occupants to get to a safe location. In the absence of special operations as defined below, the maximum fee for a Class A or B tow is the flat rate listed above. Fees for Class C tows are billed at an hourly rate.

Special Operations: Include up-righting an overturned vehicle or returning a vehicle to a normal position on the roadway when the use of auxiliary equipment is needed due to the vehicle's size and/or location, or where the recovery of or off-loading and reloading of cargo is required in order to right the vehicle. All Special Operations fees must be approved on-scene at the time of the tow by the investigating Trooper or an SCHP Supervisor.

* Although no Special Operations fee is set for Class C tows, a wrecker service may recover the actual cost of rental or subcontract equipment or labor, or an out-of-pocket incidental expense, that is necessary to accomplish the job. Proof of these actual costs in the form of an invoice or receipt must accompany the tow bill.

Storage: Fees begin 12 hours after a vehicle is secured on the wrecker service premises and terminate when the vehicle owner or owner's designee offers to pick up the vehicle and pay the legitimate accrued charges.

A COPY OF THIS FEE SCHEDULE SHALL BE KEPT IN EACH WRECKER AT ALL TIMES AND MUST BE PRESENTED UPON REQUEST TO ANY PERSON FOR WHOM TOW SERVICES ARE PROVIDED, THEIR AGENT, OR ANY DEPARTMENT OF PUBLIC SAFETY EMPLOYEE. ANY COMPLAINTS MUST BE IN WRITING AND FORWARDED TO THE SCHP TROOP COMMANDER.

NOTE: This fee schedule lists the maximum fee that may be charged for each class of wrecker. A lesser fee may be charged at any time in the wrecker service's discretion.

I have received and agree to the South Carolina Highway Patrol Fee Schedule for the year 2015:

Sherry Corbett — Print Owner/Representative Name
[signature] — Owner/Representative Signature
1-28-2015 — Date

Wayne's Towing (Name of Wrecker Service)

Courtesy - Efficiency - Service

POST OFFICE BOX 1993, 10311 WILSON BLVD., BLYTHEWOOD, SOUTH CAROLINA 29016

EXHIBIT

tabbies

E

South Carolina Department of Public Safety

S.C. Highway Patrol

2017 Wrecker Rotation Fee Schedule

In accordance with Section 38-600 of the South Carolina Code of State Regulations, the Department of Public Safety publishes a yearly Fee Schedule outlining the maximum allowable fees for each class of wrecker on the SCHP Wrecker Rotation List. The reasonableness of fees on the Fee Schedule is determined by the Highway Patrol on a comparative basis. The fees permitted for calendar year 2017 are listed below:

2017 MAXIMUM ALLOWABLE FEES FOR ROTATION LIST CALLS

Rates / Fees		
Class A Wrecker		
Standard Towing Charge	***Special Operations**	**Storage**
$ 214.00 Flat Fee	$ 126.00 Per Hour	$ 32.00 Per Day
**Special Operations are billed at a per hour rate in ½ hour increments.*		
Class B Wrecker		
Standard Towing Charge	***Special Operations**	**Storage**
$ 313.00 Flat Fee	$ 200.00 Per Hour	$ 41.00 Per Day
**Special Operations are billed at a per hour rate in ½ hour increments.*		
Class C Wrecker		
***Standard Towing Charge**	**Special Operations**	**Storage**
$ 474.00 Per Hour	****See below**	$ 56.00 Per Day
**Standard Towing is billed at a per hour rate in ½ hour increments.* ***Although no Special Operations fee is set for Class C tows, a wrecker service may recover the actual cost of rented/subcontracted equipment or labor necessary to accomplish the job. Proof of these actual costs in the form of an itemized invoice or receipt from each third party providing such equipment or labor must accompany the tow bill.*		

Class C services only.		
Description of Service, Labor or Equipment	**Rate / Fee**	
Additional Wrecker	$ 464.00	Per hour
Dump Truck, Dump Trailer or Drop Dumpster	$ 223.00	Per hour
Rotator/Crane or equivalent	$ 662.00	Per hour
Truck Tractor with Box Trailer or equivalent	$ 260.00	Per hour
Truck Tractor with Flat Trailer or equivalent	$ 267.00	Per hour
Truck Tractor with Landoll/Lowboy/Tilt Trailer or equivalent	$ 300.00	Per hour
Skid Steer or equivalent	$ 212.00	Per hour
Forklift or equivalent	$ 209.00	Per hour
Backhoe or equivalent	$ 241.00	Per hour
Service Truck (includes all tools and equipment on board)	$ 175.00	Per hour
Tower Light System	$ 148.00	Per hour
Complete Air Bag Unit	$ 712.00	Per hour
Additional Labor (General)	$ 79.00	Per person/per hour
Additional Labor (Specialized)	$ 109.00	Per person/per hour

South Carolina Highway Patrol

Wrecker Rotation Inspection

Inspector's Comments:

After my inspection, I find this service to be:

☒ **Approved** – Business is in compliance with Wrecker Regulations and is being **recommended** for the rotation list.

☐ **Not Approved** – Business is not in compliance with Wrecker Regulations and is **NOT recommended** for the rotation list. Service was notified in writing as to what deficiencies were identified.

Inspector's Signature: SGT MA Applin Date: 11-30-2016

Wrecker Owner's Acknowledgment of Receipt and Compliance if approved:

I do hereby affirm that I have a copy of South Carolina Code of Regulations 38-600 governing rotation list wreckers. I am familiar with its contents and do hereby agree to fully comply with it in order to remain on the rotation list. I understand that any violation of the Wrecker Regulations may result in disciplinary action pursuant to S.C. Code of Regulations 38-600(D) and SCDPS Policy 200.19 Wrecker Rotation Disciplinary Policy. I further agree that if I relocate or change equipment, insurance carriers, telephone numbers or employees, or for any reason become unavailable for service for an extended period of time, I will notify the appropriate Troop Commander in writing. The information I have furnished is true and correct to the best of my knowledge. My business has been inspected and approved this 30 day of November 20 16.

Print Name: Sherry Corbett Signature:

Key to Inspection Codes:

C = Compliant **NC = Not in Compliance** **NA = Not Applicable**

Form SCHP-A-007 revised September 2016

NOTICE:
Rates for all equipment usage should include the cost of an operator, operating expenses, and the cost to transport the equipment to and from the scene.

Standard Tow: A standard tow is defined as responding to the scene, hooking up the vehicle, performing a general clean up if the call involves responding to a collision scene and providing responsible assistance to the vehicle occupants. In the absence of special operations as defined below, the maximum fee for a Class A or B tow is the flat rate listed above. Fees for Class C tows are billed at an hourly rate.

Special Operations: Special operations are operations involving the process of uprighting an overturned vehicle or returning a vehicle to a normal position on the roadway which requires the use of auxiliary equipment due to the size or location of the vehicle and/or the recovery of a load which has spilled, or the off-loading and reloading of a load from an overturned vehicle performed to right the vehicle. A wrecker service must receive confirmation on-scene at the time of the tow from the investigating Trooper or an SCHP supervisor that special operations are required to perform the tow in order to recover such fees.

* Although no Special Operations fee is set for Class C tows, a wrecker service may recover the actual cost of rented/subcontracted equipment or labor necessary to accomplish the job. Proof of these actual costs in the form of an itemized invoice or receipt from the third party providing such equipment or labor must accompany the tow bill.

If services beyond those for which the wrecker was dispatched are performed (e.g., hazardous waste cleanup; transportation of vehicle, cargo, or occupants(s) to an agreed upon location other than the one required by the Regulation), those services must be billed on a separate invoice.

Storage: Fees begin 12 hours after a vehicle is secured on the wrecker service premises and terminate when the vehicle owner or owner's designee offers to pick up the vehicle and pay the legitimate accrued charges.

A COPY OF THIS FEE SCHEDULE SHALL BE KEPT IN EACH WRECKER AT ALL TIMES AND MUST BE PRESENTED UPON REQUEST TO ANY PERSON FOR WHOM TOW SERVICES ARE PROVIDED, HIS OR HER AGENT, OR ANY DEPARTMENT OF PUBLIC SAFETY EMPLOYEE. ANY COMPLAINTS MUST BE IN WRITING AND FORWARDED TO THE SCHP TROOP COMMANDER.

NOTE: This fee schedule lists the maximum fee that may be charged for each class of wrecker. A lesser fee may be charged at any time in the wrecker service's discretion.

On behalf of the wrecker service named below, I acknowledge that I have received and agree to be bound by the South Carolina Highway Patrol 2017 Wrecker Rotation Fee Schedule and the Department of Public Safety's Wrecker Rotation Disciplinary Policy. Further, I certify that I am authorized to bind the wrecker service named below to the terms of this Fee Schedule and the Department of Public Safety's Wrecker Rotation Disciplinary Policy.

Sherry Corbett — Owner/Representative Name (Printed)

[signature] — Owner/Representative Signature

11-30-2016 — Date

Wayne's Automotive Center — Name of Wrecker Service

Admitted
R1

South Carolina Department of Public Safety

S.C. Highway Patrol

To: Captain A. K. Grice

From: Lieutenant N. W. King

Date: March 4, 2016

Re: Wrecker Complaint – Wayne's Automotive and Towing Center

On February 16, 2016, I received an email from you to make contact with a Mr. Bob Watson. Mr. Watson represents the insurance company who insures the trucking company Premier Transportation. Premier Transportation vehicle was involved in an accident on February 9, 2016 at approximately 0105 hours on I-20 in Aiken County. This collision occurred on top of the South Carolina/Georgia State Line Bridge. After speaking with Mr. Watson, he had concerns about fees charged by Wayne's Automotive and Wayne's refusal to release cargo. Mr. Watson sent me a copy of the bill which was a total of $69,017.19. After reviewing the bill, I did discover numerous unreasonable fees. Some of the fees listed on the invoice were charges of $12,295 for equipment Wayne's Automotive said he used other than wreckers. Also listed on the invoice that concerned me were 3 technicians being paid $175.00 an hour and 3 more technicians being paid $150.00 an hour, all for a total of $17, 450. On February 19, 2016 I made a phone call to Waynes Automotive to hopefully mediate the fees with the owner, Jeff Corbett, and Mr. Watson. I also advise Mr. Corbett to release the cargo to Premier Transportation. During my conversation with Mr. Corbett, I explained how I felt the fees seemed unreasonable and should be looked at more closely by him. I advised Mr. Corbett the fees of $12, 295 for the equipment he used could not be charged because he owned the equipment. This is explained in the South Carolina Highway Patrol 2016 Wrecker Rotation Fee Schedule stating in the Special Operations section "Although no special Operation fee is set for Class C tows, a wrecker service may recover the actual cost of rented/subcontracted equipment or labor necessary to accomplish the job." Mr. Corbett then explained to me that he has 3 companies, 1 in which his wife Sherry Corbett owns. Mr. Corbett stated that all 3 companies were on scene and working during this collision. Mr. Corbett stated he rented the listed equipment on his invoice for a total of $12, 295 from his wife company. I advised Mr. Corbett that a separate bill needed to be done by his wife's company showing her billing him for the equipment. I then advised Mr. Corbett after carefully reviewing his invoice of his fees such as the labor charges of $175.00 an hour, to resubmit his new bill along with the bill from his wife's company for the rental equipment to Mr. Bob Watson. Mr. Corbett agreed, along with agreeing to release the cargo to Premier Transportation. I contacted Mr. Watson and advised him that Mr. Corbett would be releasing the cargo and Mr. Corbett is reviewing the bill to make corrections to the fees along with submitting a separate bill from his wife's company for renting the equipment.

On February 19, 2016, I received a phone call from Mr. Watson. Mr. Watson stated that he was having issues with Mr. Corbett releasing the cargo. I immediately called Mr. Corbett to ask what the issue was with releasing the cargo. Mr. Corbett stated that he was not releasing the cargo nor was he resubmitting a bill. I explained to Mr. Corbett that he had to release the cargo and he stated he would not. Mr. Corbett stated he spoke to several people who told him that his charges on his invoice were fair and also that he did not have to release the cargo. I explained to Mr. Corbett that the unreasonable fees that he listed on the invoice and not releasing the cargo like he is required to could cause him to be reprimanded

P5

suspended or even removed off rotation. Mr. Corbett stated that he guessed he will just have to take the risk of being kicked off rotation because he was not releasing the cargo or lowering his prices. I ended my conversation with Mr. Corbett and called Mr. Watson to advise him of the situation. On February 19, 2016, Mr. Watson emailed me an official complaint on Waynes Automotive Center INC.

As of February 29, 2016, the insurance company that Mr. Watson represents is in civil court with Mr. Corbett for the release of cargo and fees. Mr. Corbett has also not submitted a separate bill from his wife's company for the equipment that he supposedly rented from her for the cleanup of this accident.

I found that Waynes Automotive Center INC violated South Carolina Wrecker Regulations and South Carolina Code of Law. The findings are supported by the followings facts:

- I spoke with Cpl Deering who was the investigating Trooper for this collision and L/CPL Rucker who also assisted with the collision. Both Troopers stated that Waynes Automotive took too much unnecessary time to clean and clear this collision. Both Troopers suggested that it took Waynes Automotive 21 hours; the amount he billed for, because it seemed he did not know what he was doing and it should not have taken that long to clean and clear that collision.

- Mr. Corbett charge $12,295 for equipment (see attached invoice) that he never submitted a separate bill for as I instructed him that he is required to per the South Carolina Highway Patrol 2016 Wrecker Rotation Fee Schedule. A representative from his business signed this fee schedule November 25, 2015. In the fee schedule it states **"Although no Special Operation fee is set for Class C tows, a wrecker service may recover the actual cost of rented/subcontracted equipment or labor necessary to accomplish the job."** This South Carolina Highway Patrol 2016 Wrecker Rotation Fee Schedule acknowledges that Waynes Automotive INC agreed to this and all other rules when becoming a wrecker on the South Carolina Highway Patrol rotation. (see attached fee schedule). As of February 29, 2016, Mr. Corbett has still not submitted a bill from his wife showing he was billed for the equipment he is charging Premier Transportation.

- Mr. Corbett's very unreasonable fees for many things listed on his invoice such as:

  1. Three recovery technicians were paid $175.00 an hour for a grand total of $10,850. A reasonable rate should have been $50.00 for grand total of $3,100.

  2. Three recovery technicians were paid $150.00 an hour for a grand total of $6,600. A reasonable rate should have been $50.00 for grand total of $2,200

  3. One recovery technician was paid $85.00 an hour. A reasonable rate should have been $35.00 an hour.

  4. One labor worker was paid $90 an hour for a grand total of $810.00 and six other labor workers were paid $50.00 hour for a grand total of $1,475. A reasonable rate should have been $25.00 an hour for a grand total of $962.50 for all.

5. Three workers were paid an hour of work to transfer and repack for a total of $1000.00. A reasonable rate should have been $25.00 an hour for a grand total of $75.00.

6. Charging for duplicate services. ($750.00 for repacking and reloading).

7. Mr. Corbett failed to release the cargo as I instructed him to on two different occasions. This is in direct violation of South Carolina Law 56-5-5635 section F which clearly states in it **"The proprietor, owner, or operator of the towing company, storage facility, garage or repair shop must release any personal property that does not belong to the owner of the vehicle to the owner of the personal property.**

In conclusion, Mr. Corbett failed to do the things that I asked him to do which were required by law and South Carolina Wrecker Regulations, **it my recommendation that Waynes Automotive Center INC be permanently removed from South Carolina wrecker rotation list.**

001022

Admitted R2

King, Nicklous W.

From: Bob Watson [towinsurance@gmail.com]
Sent: Friday, February 19, 2016 11:33 AM
To: King, Nicklous W.; Karen Coppolino; Lucas Sentry; Haz Mat; Hughes, Clifton B.
Subject: Official complaint on Waynes towing Claim 61a169404 Premier Transporation

Officer King, I have called the tow company for 2 days and the owner (Jeff is the only one that is to talk with me) has not called me back.
I cannot get an answer on the cargo trying to get it pickup today.

After reviewing the tow bill I have several problems.

1. The tractor trailer recovery 21 hours. After the units where up righted it appears the HD recovery trucks just sat. Why where the units not towed to the yard. Waynes won't answer the question but states 21 hours.
2. I was told a lot of the equipment was sub contracted so they can charge extra money. Need a list of sub contracted equipment.
3. Air bags for $8,000.00. The tow company did not know how to use air bags, straps, angle iron to protect the corners which tore the trailer into 3 pieces. I have done over 150 air bag recoveries and was a trainer in CA and I have NEVER destroyed a trailer. I sent to other tow companies and they all agree with my assessment of the recovery. The tow company destroyed the trailer and wasted a lot of time.
4. Labor rates $150.00 per hour is about double the going rate. Then they lower the rate to $50.00 which is about correct.
5. Transfer cargo $750.00. They are already charging labor. What the $750.00 for? Then on page 2 there is another $750.00 charge.
6. Need a copy of the sublet bill for $1,000.00 additional labor 7. Tract hoe can be rented for about $350.00 a day.
8. Why did the tow co bring all the signs and cones out. Doesn't DOT or the state police cover this?
9. Cones $50.00 each. They cost between $13.00 and $19.00.
10. OSHA Certifies radio equipment. $1795.00 11. Called yesterday and today to get the cargo and I have to talk with Jeff only. No return call.

I have transportation spill solution working with me on the haz mat portion of the bill with I have concerns with. .

--
Robert Watson
President, Recovery Resolution Specialists

704-807-1733 www.recoveryresolutionspecialists.com

This email is confidential. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this email in error, please reply immediately and inform the sender that you have received it in error. Recovery Resolution Specialists disclaims any and all liability for unauthorized used of this email or the information contained herein. Recovery Resolution Specialists recommends you scan all attachments with antivirus software, as we accept no responsibility for damages caused by viruses or malware that may be transmitted with this email.

1B

EXHIBIT 3

001023

R2

Admitted R3

J.H.O.C., INC.
D/B/A PREMIER TRANSPORTATION

5224302

504464 03/04/16 Invoice 504462 48633.19

PREMIER TRANSPORTATION

J.H.O.C., INC. D/B/A
PREMIER TRANSPORTATION
P.O. BOX 865
FOREST PARK, GA 30298

BB&T

5224302

DATE
03/04/16

AMOUNT
48,633.19

PAY Forty-Eight Thousand Six Hundred Thirty-three and 19/100

TO THE ORDER OF
Wayne's Automotive Towing Etc
1981 Richland Ave East
Aiken, SC 29801

AUTHORIZED SIGNATURE

⑈5224302⑈

ID

EXHIBIT
4

001024

R3

Adm R5

Hughes, Clifton B.

From: Bob Watson <towinsurance@gmail.com>
Sent: Monday, February 15, 2016 3:19 PM
To: Hughes, Clifton B.
Subject: Re: Claim# 61A169404

Is the office closed today?

On 2/15/16, 2:38 PM 2:38 PM, Hughes, Clifton B. wrote:
> This is in Aiken County which is Troop7.
>
> Captain Grice is the Commander and Lt. King is the Wrecker Coordinator for Troop7. Below is their contact numbers. They will not be in the office until tomorrow with today being a holiday.
>
>
>
> TROOP SEVEN COUNTIES: Aiken, Allendale, Bamberg, Barnwell, Calhoun, Hampton, Orangeburg
>
>
>
>
> PATROL TROOP SEVEN HEADQUARTERS
> Street Address: 1391 Middleton St.,
> Mailing Address: 1391 Middleton St., Orangeburg, SC 29115
> Voice: 803-531-6844
> Fax: 803-531-6820
> troop7@scdps.gov<mailto:troop7@scdps.gov>
>
> http://www.scdps.gov/schp/troop7.asp
>
>
>
> Sent from Mail<https://go.microsoft.com/fwlink/?LinkId=550986> for Windows 10
>
> From: Bob Watson<mailto:towinsurance@gmail.com>
> Sent: Monday, February 15, 2016 1:39 PM
> To: Hughes, Clifton B.<mailto:CliftonHughes@SCDPS.GOV>
> Subject: Fwd: RE: Claim# 61A169404
>
> The world gone nuts. Waynes auto, North Augusta SC. $76,000.00
>
> I have called all day trying to get the cargo and they keeps saying they will call me back but I have not received a return call.
>
> Who is the watch commander for this area?
>
> Thanks Bob Watson
>
>

001025

R5

> -------- Forwarded Message --------
> Subject: RE: Claim# 61A169404
> Date: Mon, 15 Feb 2016 16:28:03 +0000
> From: Dailey Krisann <Krisann.Dailey@sentry.com><mailto:Krisann.Dailey@sentry.com>
> To: Bob Watson <towinsurance@gmail.com><mailto:towinsurance@gmail.com>
> CC: Tom Curran <tcurran@premiertransportation.com><mailto:tcurran@premiertransportation.com>
>
>
> I have copied in the insured -- Tom Curran on this email so you have his email address if you need it.
>
> Custard Adjuster was on the scene right away. They took very good photos. Report is attached above.
> The tow invoice came in 3 chunks – invoices attached.
>
> Insured is JHOC Premier Transportation. The contact is: Tom Curran at 470-289-9832 (this is his mobile as he is out of town on business this week, but you can email him or call his cell and leave him a voicemail if you need to get a hold of him).
>
> Thank you,
> Krisann L. Dailey
> Transportation Claims Representative II
> Sentry Select Insurance Company
> PO Box 8026
> Stevens Point, WI 54481
> Email: krisann.dailey@sentry.com<mailto:krisann.dailey@sentry.com>
> Phone: 1-800-558-9257 x 3469616
> Direct: 1-715-346-9616
> Fax: 1-800-999-4642
>
>

--
Robert Watson
President, Recovery Resolution Specialists

704-807-1733 www.recoveryresolutionspecialists.com

This email is confidential. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this email in error, please reply immediately and inform the sender that you have received it in error. Recovery Resolution Specialists disclaims any and all liability for unauthorized used of this email or the information contained herein. Recovery Resolution Specialists recommends you scan all attachments with antivirus software, as we accept no responsibility for damages caused by viruses or malware that may be transmitted with this email.

Rb Admitted 6

King, Nicklous W.

From: Bob Watson [towinsurance@gmail.com]
Sent: Wednesday, February 17, 2016 11:30 AM
To: King, Nicklous W.
Subject: Wayne towing.
Attachments: img20160217_11293354.pdf

--
Robert Watson
President, Recovery Resolution Specialists

704-807-1733 www.recoveryresolutionspecialists.com

This email is confidential. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this email in error, please reply immediately and inform the sender that you have received it in error. Recovery Resolution Specialists disclaims any and all liability for unauthorized used of this email or the information contained herein. Recovery Resolution Specialists recommends you scan all attachments with antivirus software, as we accept no responsibiity for damages caused by viruses or malware that may be transmitted with this email.

001027

R6

Wayne's Automotive and Towing Center

SCIM
Spill Containment Incident Management
1997 Richland Avenue East
Aiken, SC 29801

Invoice

Date	Invoice #
2/10/2016	504462

Bill To
J. H. O. C., INC. Premier Transportation 323 CASH MEMORIAL BOULEVARD FOREST PARK GA 30297 282577

P.O. No.	Terms	Project
	Due Upon Receipt	

Description	Qty	Rate	Amount
Repacking Fee and Reloading from Loading Dock onto Trailer 2nd Load	1	750.00	750.00
Backhoe 420D and Transport and Heavy Operator	11.5	350.00	4,025.00
Skid Steer Track Loader and Transport	1	600.00	600.00
Back Deck Blower used for cleaning highway on bridge	1	275.00	275.00
Restocking and Reload Cargo	1	500.00	500.00
OSHA Certified Incident Communication Equipment	1	1,795.00	1,795.00
Emergency Digital Signage I-20 W Message Board exit 6 Detour Traffic with Cones	20	75.00	1,500.00
Emergency Digital Signage I-20 E Digital Arrow Board	20	75.00	1,500.00
Light Tower	8	75.00	600.00
Traffic Control High Intensity Sign 36x36 used a total of 4 on both East and West lanes	20	50.00	1,000.00
26 In. Traffic Cones total of 48	20	50.00	1,000.00
Pallats for Restocking	3	22.95	68.85
PIG MAT240	25	7.50	187.50
Containment Booms used for containment preventing release into Savannah River below site	1	85.00	85.00
Containment Liner	1	175.00	175.00
	1	210.84	210.84
Storage Per Unit as of 02/15/2016	6	50.00	300.00
Storage Per Unit as of 02/15/2016	6	50.00	300.00

5% Interest Accrual for non payment in 5 days.

Total	$69,017.19
Payments/Credits	$0.00
Balance Due	$69,017.19

Phone #	E-mail
803-226-0025	sherry@waynesautomotivecenter.com

001028

Wayne's Automotive and Towing Center

SCIM
Spill Containment Incident Management
1997 Richland Avenue East
Aiken. SC 29801

Invoice

Date	Invoice #
2/10/2016	504462

Bill To
J. H. O. C., INC. Premier Transportation 323 CASH MEMORIAL BOULEVARD FOREST PARK GA 30297 282577

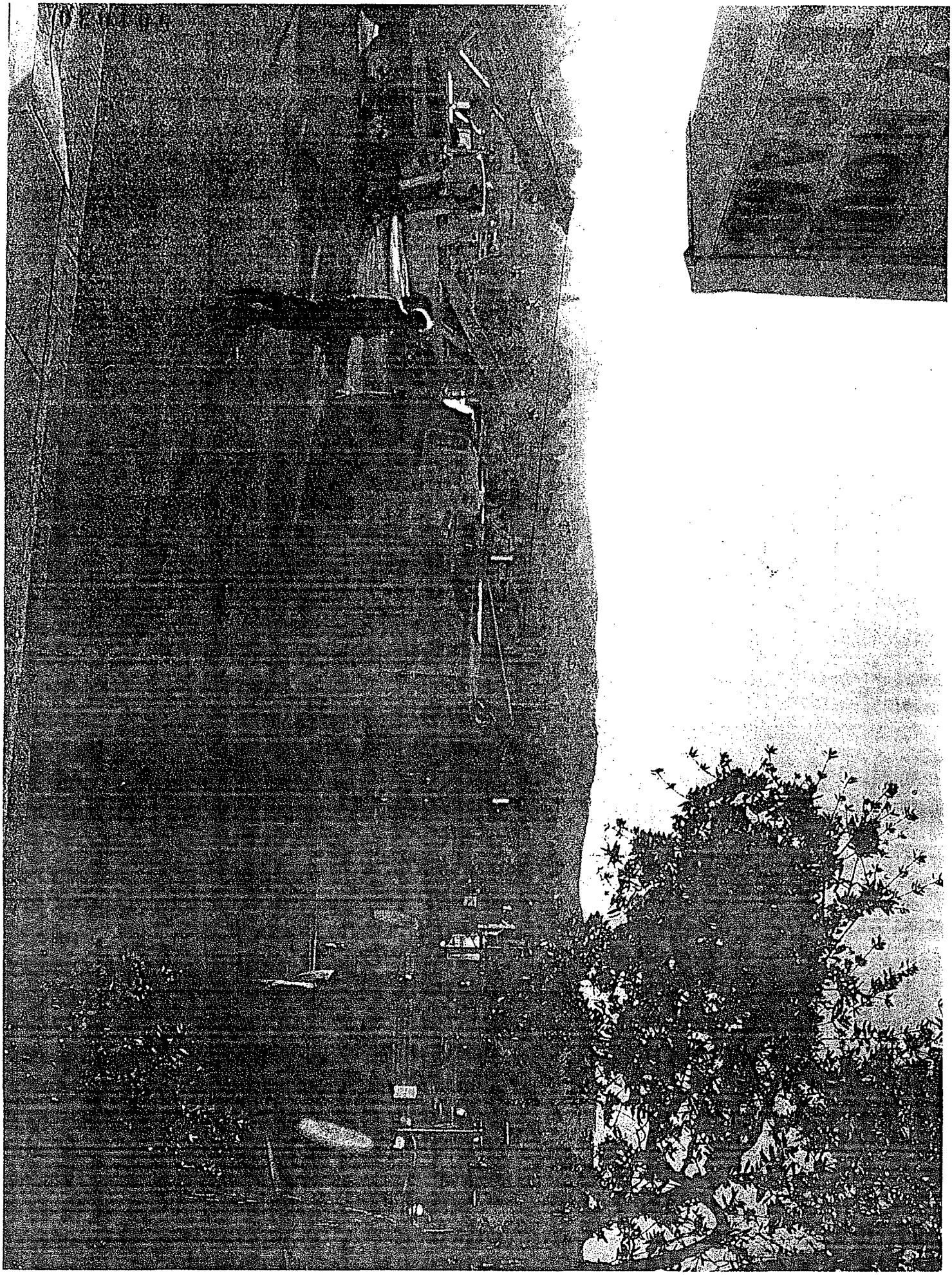
P.O. No.	Terms	Project
	Due Upon Receipt	

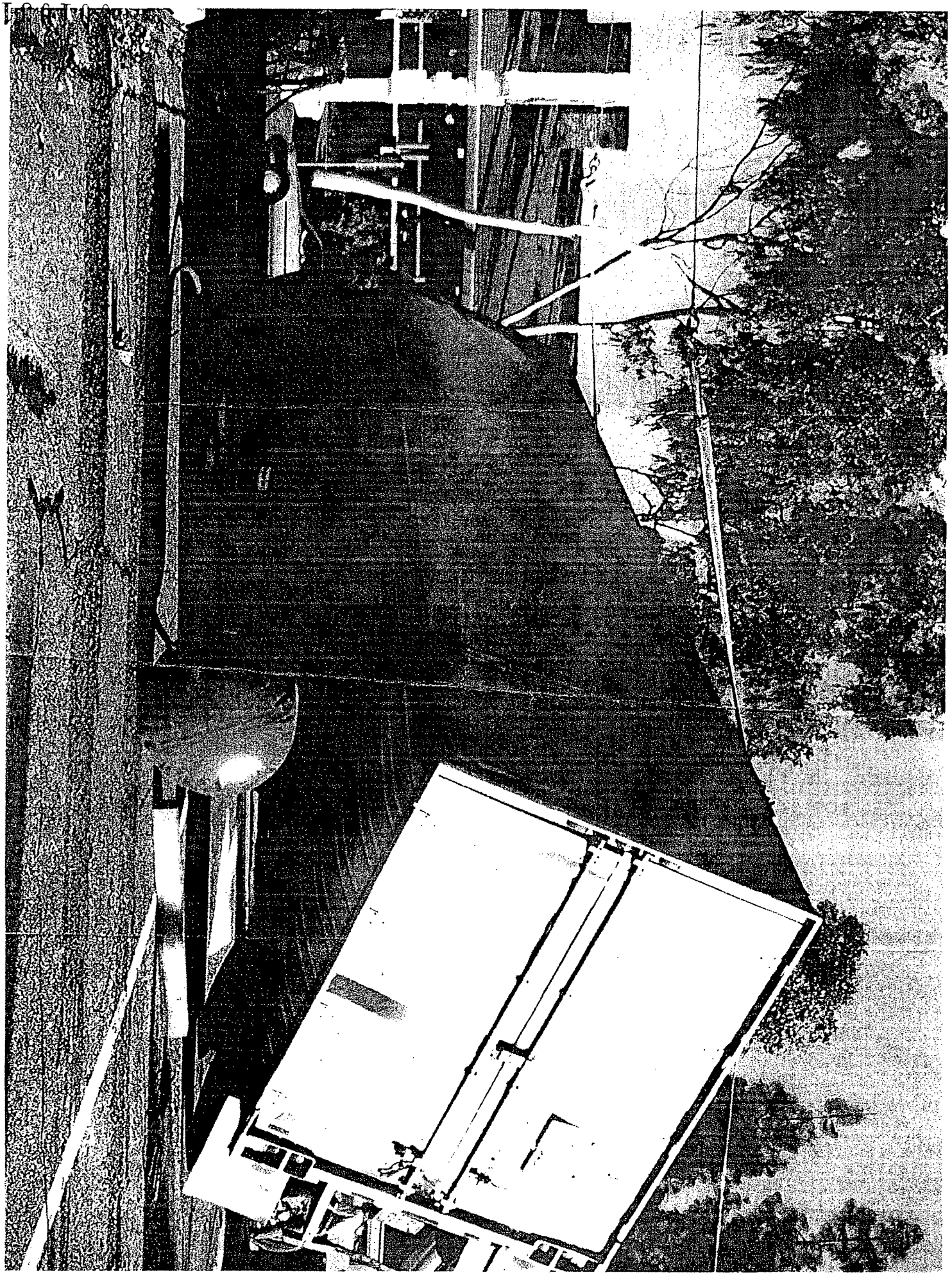
Description	Qty	Rate	Amount
60 Ton Rotator HD4 used for upright winching both tractor and trailer	21	436.00	9,156.00
Class C Heavy Duty Truck HD5 used for upright winching both tractor and trailer	21	436.00	9,156.00
Class C Heavy Duty Tractor with Trailer used for Transfering Cargo and storing HD3/RECOVERY TRAILER	13	436.00	5,668.00
Recovery Supervisor JC	21	175.00	3,675.00
Recovery Technician BH	21	175.00	3,675.00
Recovery Technician KJ	21	150.00	3,150.00
Recovery Technician JH	13	150.00	1,950.00
Recovery Technician BR	8	85.00	680.00
Recovery Technician WB	10	150.00	1,500.00
Response Unit used for transporting supplies, snatch blocks, oil dry, absorbents, booms, back deck blower, brooms, shovels, etc.	20	175.00	3,500.00
Air Cushion Recovery	2	4,000.00	8,000.00
Transfer Cargo from scene to loading dock Containment Unit (this includes reloading an offsite facility)	1	750.00	750.00
Labor Hours for transferring from the scene and repackaging WB	9	90.00	810.00
Labor Hours for transferring from the scene and repackaging JH	7	50.00	350.00
Labor Hours for transferring from the scene and repackaging WRH	1.5	50.00	75.00
Labor Hours for transferring from the scene and repackaging JS	7	50.00	350.00
Labor Hours for transferring from the scene and repackaging PW	3.5	50.00	175.00
Labor Hours for transferring from the scene and repackaging MR	7	50.00	350.00
Labor Hours for transferring from the scene and repackaging KS	3.5	50.00	175.00
Labor Sublet from Verns (3 Guys used for transferring and repacking)	1	1,000.00	1,000.00

5% Interest Accrual for non payment in 5 days.	**Total**
	Payments/Credits
	Balance Due

Phone #	E-mail
803-226-0025	sherry@waynesautomotivecenter.com

001029





King, Nicklous W.

From: Bob Watson [towinsurance@gmail.com]
Sent: Wednesday, February 17, 2016 4:12 PM
To: King, Nicklous W.
Subject: Air bag recovery
Attachments: Air bag 1.jpg; Air bag 2.jpg

2 more pictures coming

--
Robert Watson
President, Recovery Resolution Specialists

704-807-1733 www.recoveryresolutionspecialists.com

This email is confidential. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this email in error, please reply immediately and inform the sender that you have received it in error. Recovery Resolution Specialists disclaims any and all liability for unauthorized used of this email or the information contained herein. Recovery Resolution Specialists recommends you scan all attachments with antivirus software, as we accept no responsibiity for damages caused by viruses or malware that may be transmitted with this email.

King, Nicklous W.

From: Bob Watson [towinsurance@gmail.com]
Sent: Wednesday, February 17, 2016 4:36 PM
To: tcurran@premiertransportation.com; Dailey Krisann; Lucas Sentry; King, Nicklous W.
Subject: Re: Claim# 61A169404

Tom, Did you get the cargo out?

All, besides getting the cargo out please let me handle the tow bill and dividing it up. The tow co is getting numerous calls for with different requests.

Tom I was told Travelers is involved in the cargo. Please give the claim number and contact person on that.

Officer King who is on this email ask me to get one point of contact.

Thanks Bob

On 2/15/16, 11:49 AM 11:49 AM, tcurran@premiertransportation.com wrote:
> I

--
Robert Watson
President, Recovery Resolution Specialists

704-807-1733 www.recoveryresolutionspecialists.com

This email is confidential. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this email in error, please reply immediately and inform the sender that you have received it in error. Recovery Resolution Specialists disclaims any and all liability for unauthorized used of this email or the information contained herein. Recovery Resolution Specialists recommends you scan all attachments with antivirus software, as we accept no responsibiity for damages caused by viruses or malware that may be transmitted with this email.

Admitted 8

King, Nicklous W.

From: Bob Watson [towinsurance@gmail.com]
Sent: Monday, March 07, 2016 2:50 PM
To: King, Nicklous W.; Hughes, Clifton B.
Subject: Wayne's towing

We where forced to pay $48,000.00 to get the cargo today.

Complaint is still on.

Bob

--
Robert Watson
President, Recovery Resolution Specialists

704-807-1733 www.recoveryresolutionspecialists.com

This email is confidential. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this email in error, please reply immediately and inform the sender that you have received it in error. Recovery Resolution Specialists disclaims any and all liability for unauthorized used of this email or the information contained herein. Recovery Resolution Specialists recommends you scan all attachments with antivirus software, as we accept no responsibility for damages caused by viruses or malware that may be transmitted with this email.

001034

R8

Admitted

TROOPER RUCKER REQUESTED TRAFFIC Control Talked TO JEFF in person

Wayne's Towing
1997 Richland Ave e
Aiken, SC 29801

Call # 59752

N Augusta Division- Waynes Automotive Center

Status: Finished

Scheduled: 2/9/2016 5:11:00 AM

REQUESTOR

Requested By:	HP- Rotation		
Contact:			
Owner:	xxxxxx	() -	
Loc. Landmark:	SAVANNAH RIVER BRIDGE		
Loc.Address:	I20 WEST BOUND AT #1		
	North Augusta, SC		
Loc. Zone:			

VEHICLE

Make & Model:			
Vehicle #:		VIN:	
Tag:		Tag State:	
Key Location:		Odometer:	
Reason:	OVERTURNED TRACTOR TRAILER		
Req. Truck:			

Notes: SENDING MR JOHN TO PUT UP MSG BOARD AND ARROWS BETWEEN MM 7-8 ASKING ALL TRAFFIC TO USE EXIT 6 ARROWS NEED TO BE FLASHING TO THE RIGHT ROAD BLOCK HIGHWAY PATROLMAN IS HAVING PROBLEMS GETTING TRAFFIC TO STOP FOR HIM
2/9/16 2.12AM TSB THIS IS AN OVERTURNED TRACTOR TRAILER ON I20 WEST BOUND AT #1 ON TOP OF THE SAVANNAH RIVER BRIDGE IT IS BLOCKING TRAFFIC 70,000LBS BOX TRAILER LOADED WITH DOG FOOD CALLED BILLY, JEFF, KEVIN, CHRISTY, TRISH SENDING KEVIN TO GET HD5
JEFF IS GOING TO CALL WILLIAM
BILLY IS GETTING ROTATOR....BRYAN IS ON WAY TO RESPOND
BRYAN CALLED IN TO LET ME KNOW THERE IS A BIG DIESEL SPILL.... HAVE ALREADY LET WILLIAM KNOW

TASK(S)

Dest/Impound:		PO #:			
Dest. Address:		Pay Method:	Account		
		Member No.:			
Dest. Zone:		Member Limit:		Mileage Limit:	
Bill To:	HP- Rotation	Co-Pay:			
Ticket #:		Quoted Price:		**Actual Price:**	**$0.00**
Remarks:	THIS WILL BE FOR THE LOAD PROTOION OF THE ROLLOVER ..				

SERVICE(S)

Miscellaneous	$0.00

ASSIGNED TO

Driver:	John Herring
Vehicle:	

USERS INVOLVED

Call Taker:	Toni Birmingham
Dispatcher:	Toni Birmingham
Cancelled By:	
Cancel Reason:	

TIME STAMPS

Received:	2/9/2016 4:29 AM
Dispatched:	2/9/2016 4:29 AM
Assigned:	2/9/2016 4:29 AM
Confirmed:	2/9/2016 4:30 AM
Arrived:	2/9/2016 6:00 AM
Left Scene:	
Dest. Arrived:	
Finished:	2/9/2016 11:38 PM

000001

001035

R9

Admitted RD

Sherry Corbett

From: John Sweezy Jr <matjack@sprynet.com>
Sent: Wednesday, February 10, 2016 5:03 PM
To: Sherry Corbett
Subject: RE: Sent from Snipping Tool
Attachments: Jumbo Turbo cushionJPG

Sherry,

I know we talked yesterday, any news on the replacement cushions I priced to you at $3350? We might be able to repair them if you want us to look them over, let me know, thank you again.

Best regards,
John Sweezy Jr
CEO/ Matjack
800-827-3755
317-359-3078
317-359-3079 Fx
www.matjack.com

told me to charge 4000.00 apiece to insurance per industry standard.

From: Sherry Corbett [mailto:sherry@waynesautomotivecenter.com]
Sent: Tuesday, February 09, 2016 11:15 AM
To: matjack@sprynet.com
Subject: Sent from Snipping Tool

We have busted two air bags this morning on a rollover loaded with 70,000 lbs of dog food. I need a price of this bag I have attached off of your site as soon as possible. Thanks

Sherry Corbett
Wayne's Automotive and Towing Center
South Carolina Incident Management

http://www.linkedin.com/in/sherrycorbett
http://www.waynesautomotivecenter.com
http://waynes-towing.com
https://www.facebook.com/WaynesAutomotiveCenterInc
https://www.facebook.com/WaynesTowingRecoveryHauling

Total Control Panel Login

To: sherry@waynesautomotivecenter.com
From: matjack@sprynet.com

Message Score: 50
My Spam Blocking Level: Medium

Block this sender
Block sprynet.com

High (60): Pass
Medium (75): Pass
Low (90): Pass

This message was delivered because the content filter score did not exceed your filter level.

000005

001036
RD

Adm Ex 111

Sherry Corbett

From:	Insurance Group <towinsurance@gmail.com>
Sent:	Tuesday, February 16, 2016 7:31 AM
To:	Sherry Corbett
Cc:	rswords@premiertransportation.com; Trish Felix
Subject:	Re: Emailing - scan0053.pdf

I will review the billing but the cargo needs to be released today. This is my 4 the request
Bob Watson

Sent from my iPhone

On Feb 15, 2016, at 7:05 PM, Sherry Corbett <sherry@waynesautomotivecenter.com> wrote:

> Due to your questions and concerns the items are now broken out by hours, equipment, supplies etc. no items are lumped sum which has clearly increased the total price. We generally provide the companies with detailed information to prevent miscommunication of the assumption of overcharges in the beginning. We were informed that the insurance was split therefore proceeded to break it out for their convenience.
> The company also has an additional trailer on our property being stored at no additional cost at the moment. If you have additional questions I will be happy to discuss them with you or the insurance representative that was on site the entire time that didn't seem to have any concerns then.
>
> Questions regarding the air cushion recovery, the air cushions were initially used as an attempt to preserve your trailer and your load of cargo after the trailer blew our bags out we then attempted to only try and preserve your whole load of cargo with minimal waste of cargo. Your trailer also had received some previous repair work in various places that would contribute to its separation.
>
> A discount was also offered for last week ONLY due to the insistency on picking the cargo immediately which is now not available.
>
> You will also take note that there is NO ADMIN FEE that would have consisted of covering:
>
> 1. Digital Photography of accident scene.
> 2. Downloading photos on hard drive
> 3. Preparing detailed narrative invoice TWICE from information gathered from supervisor and recovery crew on scene.
> 4. Itemizing all equipment used on accident scene.
> 5. Preparing all information for billing agent.
> 6. Interact with operator of vehicle or owner at the storage yard. Escort person or persons to inspect vehicle, trailer, and cargo.
> 7. Interact with Insurance appraiser with numerous phone calls
> 8. Faxing/emailing recovery invoices and pictures to adjusters and company.
> 9. Assist in releasing of the tractor, trailer and cargo.
>
> The following is a link that has been setup for pictures, it is being updated daily by different technicians and safety advisor.
> https://www.dropbox.com/sh/uhvt43l8nifn5qf/AABq6ZAI9B7TdIPCNORDcjGDa?dl=0

000009

001037

RII

Sherry Corbett
Wayne's Automotive and Towing Center
South Carolina Incident Management

http://www.linkedin.com/in/sherrycorbett
http://www.waynesautomotivecenter.com
http://waynes-towing.com
https://www.facebook.com/WaynesAutomotiveCenterInc
https://www.facebook.com/WaynesTowingRecoveryHauling

<scan0053.pdf>

Total Control Panel Login

To: sherry@waynesautomotivecenter.com
From: towinsurance@gmail.com

Message Score: 50
My Spam Blocking Level: Medium

Block this sender
Block gmail.com

High (60): Pass
Medium (75): Pass
Low (90): Pass

This message was delivered because the content filter score did not exceed your filter level.

R Ex 12

Sherry Corbett

From:	Bob Watson <towinsurance@gmail.com>
Sent:	Tuesday, February 16, 2016 9:57 AM
To:	Sherry Corbett
Cc:	rswords@premiertransportation.com; Trish Felix; Dailey Krisann; Lucas Sentry
Subject:	Re: Emailing - scan0053.pdf Sentry Claim# 61A169464
Attachments:	Air bag 1.jpg; Air bag 2.jpg; Air bag 3.jpg; Air bag 4.jpg

Sherry,

Thank you for your response, however there still are several issues that require answers.

1. The cargo needs to be released today.
2. Looking at the air bag recovery, I can see why one of your bags got ruined due to the improper method the air bags were used. There were no straps, no angle iron and due to the improper installation, ripped a damaged trailer that was repairable into pieces, resulting in it being totaled. This effort was a waste of time due to the improper use. Please refer to the attached photo illustrating how to do an air bag job that took about 1 hour with no loss to the trailer or cargo and no air bag damage.
3. After the tractor trailer was up righted, why did the the HD stay for hours for no apparent reason for a total of 21 hours?
4. I have a major problem with all the hours, labor rates, OSHA certified radio equipment and other miscellaneous charges. You charged $50.00 each for cones which typically cost about $25.00 each.

I await your response.

Bob Watson

On 2/15/16, 7:05 PM 7:05 PM, Sherry Corbett wrote:

> Due to your questions and concerns the items are now broken out by hours, equipment, supplies etc. no items are lumped sum which has clearly increased the total price. We generally provide the companies with detailed information to prevent miscommunication of the assumption of overcharges in the beginning. We were informed that the insurance was split therefore proceeded to break it out for their convenience.
> The company also has an additional trailer on our property being stored at no additional cost at the moment. If you have additional questions I will be happy to discuss them with you or the insurance representative that was on site the entire time that didn't seem to have any concerns then.
>
> Questions regarding the air cushion recovery, the air cushions were initially used as an attempt to preserve your trailer and your load of cargo after the trailer blew our bags out we then attempted to only try and preserve your whole load of cargo with minimal waste of cargo. Your trailer also had received some previous repair work in various places that would contribute to its separation.
>
> A discount was also offered for last week ONLY due to the insistency on picking the cargo immediately which is now not available.
>
> You will also take note that there is NO ADMIN FEE that would have consisted of covering:
>
> 1. Digital Photography of accident scene.
> 2. Downloading photos on hard drive

000011

001039 R12

3. Preparing detailed narrative invoice TWICE from information gathered from supervisor and recovery crew on scene.
4. Itemizing all equipment used on accident scene.
5. Preparing all information for billing agent.
6. Interact with operator of vehicle or owner at the storage yard. Escort person or persons to inspect vehicle, trailer, and cargo.
7. Interact with Insurance appraiser with numerous phone calls
8. Faxing/emailing recovery invoices and pictures to adjusters and company.
9. Assist in releasing of the tractor, trailer and cargo.

The following is a link that has been setup for pictures, it is being updated daily by different technicians and safety advisor.
https://www.dropbox.com/sh/uhvt43l8nifn5qf/AABq6ZAI9B7TdIPCNORDcjGDa?dl=0

Sherry Corbett
Wayne's Automotive and Towing Center
South Carolina Incident Management

http://www.linkedin.com/in/sherrycorbett
http://www.waynesautomotivecenter.com
http://waynes-towing.com
https://www.facebook.com/WaynesAutomotiveCenterInc
https://www.facebook.com/WaynesTowingRecoveryHauling

--
Robert Watson
President, Recovery Resolution Specialists

704-807-1733 www.recoveryresolutionspecialists.com

This email is confidential. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this email in error, please reply immediately and inform the sender that you have received it in error. Recovery Resolution Specialists disclaims any and all liability for unauthorized used of this email or the information contained herein. Recovery Resolution Specialists recommends you scan all attachments with antivirus software, as we accept no responsibiity for damages caused by viruses or malware that may be transmitted with this email.

Total Control Panel Login

To: sherry@waynesautomotivecenter.com Message Score: 50
From: towinsurance@gmail.com My Spam Blocking Level: Medium

High (60): Pass
Medium (75): Pass
Low (90): Pass

000012

001040

Admtd R Exh 3

Sherry Corbett

From:	Bob Watson <towinsurance@gmail.com>
Sent:	Tuesday, February 16, 2016 3:34 PM
To:	Sherry Corbett
Cc:	rswords@premiertransportation.com; Trish Felix
Subject:	Re: Emailing - scan0053.pdf
Attachments:	Big Wheel tower of the year..pdf

One of your people stated I get paid for what I save. This is what tower are trailed. Read the lines in yellow. (Bring the most expensive equipment out so you can and charger $5000.000 for a $200.00 tow). This is why I am in business is because of articles and training like these across the US.

Send your people to school on how to use air bags. I will send your picture to 5 tow companies and get there opinion on your air bag recovery. You can do the same.

Bob Watson

On 2/16/16, 9:52 AM 9:52 AM, Sherry Corbett wrote:

> The cargo, trailer, and tractor will be released when monies are paid for services already rendered as previously stated to the company representative and the insured on site the day of casualty.

Sherry Corbett

Wayne's Automotive and Towing Center

South Carolina Incident Management

http://www.linkedin.com/in/sherrycorbett

http://www.waynesautomotivecenter.com

http://waynes-towing.com

https://www.facebook.com/WaynesAutomotiveCenterInc

https://www.facebook.com/WaynesTowingRecoveryHauling

000013

001041

R13

January 2010 dec17 09_January 2010 4/29/10 4:56 PM Page 26



Eric, Bob, Hudo, and Crystal Fouquette

"Our company was called and asked to respond with our rotator to remove a car from a deep hole on I-80. The car had damaged the fuel tank and oil pan, causing a mess in the median. Another company was called first and said they could not get the car out and that we should be called with our rotator. The first piece of junk that we were called for was a 1980 Cadillac. In my opinion, if it were a 2009 Lincoln Navigator they would have pulled that out. It was not to get it out, but when they saw it was an 80 with no collision they knew it was for me. Upon arrival I made my first important phone call. I called Eric from Big Wheel and he helped me through some of the procedures to help in getting paid for a job like this. Now the police requested that we come with our rotator. I did what was asked and our roll back operator Jim cut some trees out of the way and cleaned up the oil and gas that was spilled in the road and we removed the car. Thanks to the things I've learned from Eric, a week later I received a check paying me for the use of my rotator and the clean up of the road. I was very satisfied and so was the owner of our company," Richard Guttman, Schiller's Towing, servicing northeastern Pennsylvania from nine locations, as quoted in Town 411.

"I was absolutely impressed by the class. The first piece of advice that I took away how the class is something that Bob said that has stuck in my mind — Treat every call as if you're not going to get paid." That we and when I get back to the office I set with my office staff and managers and I picked out for them. Get rates, have invoices signed and get as much information as you can. We were doing these things but you become complacent and it's all in the hands, so we are doing more than before." Donal Updike, Updike Towing & Transport in Pittsburgh, Calif.

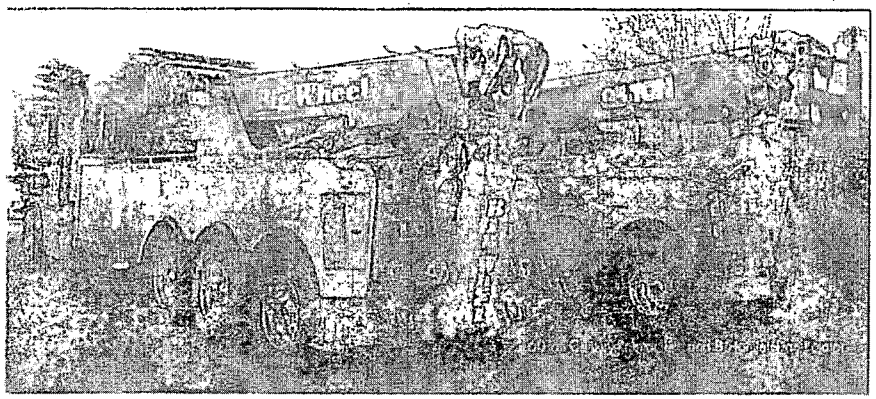
Bob is a classic car collector and his shop and home are museums of show quality collectable classic cars and hot rods. Being a collector as such is in keeping with a businessman who places a premium value on his company's services.

On Tow 411.net, Richard Guttman, manager of Schiller's Towing Service in eastern Pennsylvania, went to the heart of the matter. "Thanks to Big Wheels I have learned some new ways to achieve the most important part of any recovery, no matter how big or small. No recovery is of any value unless you can get paid for it."

The towing industry has long suffered from an uneducated public, and a misunderstanding trucking industry. Getting paid by the unhappy motorist, trucking concerns with tight cash flow, and by insurance companies who insist on stringent documentation has been a challenge for the average tow boss.

To the boys at Big Wheel, keep those classes going! The industry is all the better for them. American Towmen salutes Bob and Eric Fouquette, 2010 Towmen of the Year.

Note: The next class on billing and collection is scheduled for Jan. 9, 2010. Class runs 9am – 6pm, with a one-hour lunch break. If you are interested in attending call 508-763-5474 for reservations and ask for Bob or Eric.



Q&A With Big Wheel On Getting Paid

AT: What are some of the itemizations you suggest including in a bill?

Bob: Besides your wreckers, equipment, operators, time, and mileage, we teach to include clean up and administration costs. Generating revenue from the jobs you are already doing but not billing properly for.

Eric: Charge for the tow: the tow is from the scene to the yard.

Bob: We also discuss turning non-consent into consensual tows. We explain in detail in the class.

Eric: Charge for the recovery: Recovery is getting it out of the woods, etc...

A big focus is put on doing a complete clean up. The importance of being thorough and removing all debris.

Example: A piece of metal left on site can be picked up by a mower and sent heading into traffic, either doing property damage, injuring or even killing a motorist. This can be traced back to the accident scene. Insurance companies go after who has the money. Cover yourself, clean up is essential to the job and the image of professionalism. Don't leave a mess behind.

AT: Name a few specifics that tow owners and their bookkeeping/office managers find most valuable?

Bob: Get as much information as you can. It's all in the details and proper, complete documentation with photos. Being thorough and consistent will get you paid.

AT: What are the determining factors in formulating the fee for a tow and for a recovery?

Bob: We recommend doing a business analysis of your company to know what you need to charge to be profitable. This differs from company to company and location.

Set a minimum for what you do. Know your prices, don't vary from customer to customer and be consistent in your billing.

Look for liability issues on the scene, things to do on the scene to gain additional revenue. Get a percentage of the job for clean up. Think outside the box and look for additional revenue opportunities.

AT: How much instruction is about dealing with the insurance company involved?

Bob: A good part of the class is focused on this. We have guest speakers from insurance companies that talk to the class as well as attorneys.

Eric: A key point is to write a clear, legible detailed bill using consistent language.

AT: Through the grapevine we have heard great things about Big Wheel, but also rumors that Big Wheel either overcharges, pads the bill, or simply sets fees unreasonably high. How do you respond to such accusations?

Bob: We are an emergency service response company and can justify our fees based on the rates that we have set for the job we do. We base it on the situation and are consistent for similar jobs. Our rates are not any different than what most companies charge. The difference is that we charge what we are worth based on equipment and personnel used and the additional: like the costs of doing a proper clean up of the scene. We have all of the necessary equipment to do any and all clean ups without having to outsource this part of the job.

Eric: We have two rotators, our 2009 KW with an 85-ton Jerr-Dan and our 2008 Pete with a 60-ton Century. We charge $5000 for recovering an automobile because we use our rotators. With it we work safer, quicker, and damage free. We get the job done in 1/3 of the time without any additional damage to the vehicle or the scene that usually occurs with a conventional wrecker.

Bob: Look at the big picture. There are no residual accidents or traffic because of blocked lanes. Because we work from the break-down lane and have the vehicle recovered in less time. We are within the fees of any bill. Some tow companies do not have similar equipment as us. Our rotators have opened doors. The quality of the work is so much better. Police requests have grown. We invest back into our company in training and equipment regularly to stay up to date and modern.

Eric: We charge for the specialized equipment we use. We have Landolls, loaders, refer trucks, rescue divers, and even do underwater recoveries.

AT: How do competitors view your rate structure?

Bob: We are the same or cheaper than our competition.

AT: The American Towing Alliance offers arbitration services and tries to reduce fees of a given bill on behalf of the trucking company and or insurance company. How do you instruct tow business owners taking your class to deal with the ATA?

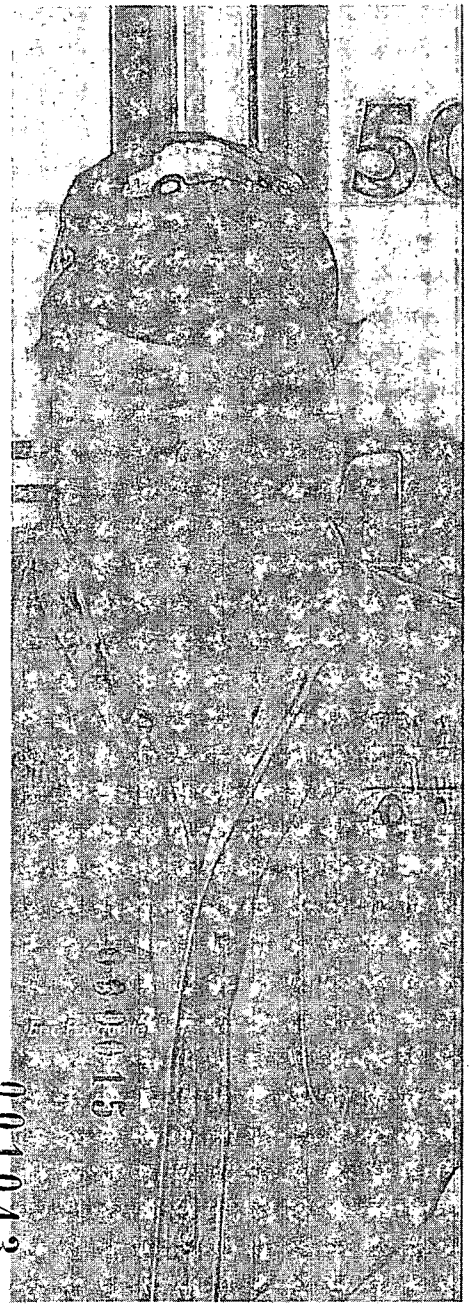
Bob: We personally don't talk with them. It's not necessary. We don't change our bills because we are professionals and our rates are fair. We are not dishonest, our bills are correct and we can justify and backup any and all charges. We set our rates and don't sway. Doing so would be akin to saying you were wrong in your billing process. We are consistent and have all of the bills from every job we have ever done.

Eric: We don't work for free. We have set our rate structure and stick to it.

AT: How does your rate structure and business success translate into opportunity for your operators? Are they paid a percentage or hourly?

Bob: Our operators are paid hourly and are paid very well. We have profit sharing, full medical, and bonuses. Expense paid vacations. Our operators stay and are family. Many have been with us for years, and others are looking to work here.

0001042



TOWMEN OF THE YEAR

Two Big Wheels Teach Towers The Game Of Getting Paid

Big Wheel Towing and Recovery of East Freetown, Mass. has built a reputation for setting profitable rates and getting paid for the work they perform. In an industry notorious for undervaluing its services and being lax in its billing practices, Big Wheel stands out like a diamond in the rough. Lately its reputation has been spreading like wild fire through the internet and on popular message boards like Tow411.net – word of mouth fueled by tow bosses who have signed on for full-day seminar sessions that the company owners have conducted since the summer of 2009.

"The inspiration for these classes came from the numerous calls and e-mails we received and from responding to questions we fielded on the Tow411 message board," said Bob Fouquette, the family patriarch and owner of Big Wheel. "Seeing both the interest and the need, and at the urging of my son, Eric, we started doing classes teaching billing techniques."

Both Bob and Eric team up to instruct each class. They teach remediation of the accident scene, the proper way of writing a recovery invoice, billing liability insurance, billing for vehicles that only have property damage coverage, and obtaining payment from insurance companies. Through it all, tow business owners taking the class are encouraged to place a value on every aspect of the work being done.

The response to what the Fouquettes have to offer has been strong enough to inspire them to start a new company altogether that offers billing services to the towing industry, employing the very methods and tactics they preach in their class. Recovery Billing Unlimited Inc. was created to be the billing arm for any given towing company, and particularly for those who have experienced difficulties in billing and collecting on recovery jobs. The service may well be an industry first.

For their efforts to reach out and share their successful practices in a way that is having a significant impact on tow businesses across America, Bob and Eric Fouquette are being recognized by American Towman Magazine as Towmen of the Year.

The choice of this selection will no doubt be controversial to some. The Big Wheel boys have garnered a reputation of being shrewd businessmen. Administration fees and accident cleanup are customarily itemized on their bills. They know how to turn a nonconsent call into a consent tow and to get assent for bringing the most efficient machinery to the job, which is usually the most expensive unit, the rotator.

Big Wheel is commonly recovering automobiles with its rotators and billing out a minimum of $5000 for work by one tow operator that might take under an hour to perform. To towers who shoot from the hip when setting rates, who send out sketchy invoices that the receiver questions, and who do not own a rotator, Big Wheel may appear to be operated by masked men. To other towers who have set high standards and who understand they are in business to turn a profit, the folks at Big Wheel are heroes.

Tow business owners learn their first lesson about why Big Wheel is successful when signing up for one of the billing classes. The fee is $1500 for the eight hour session. A steep price in many circles. Yet no one is twisting the arms of class participants who pay the fee just as a trucking company or insurance company pays a recovery bill after reading over a meticulously itemized invoice that justifies every expense.

Still, $1500? A towing and recovery training weekend class is less then half that amount. Is the tuition justified by any measure?

"Any other training institute, such as WreckMaster, TRAA, or TowMaster, does not teach these classes," explained Eric. "They teach you how to tow and recover the proper way. This is a business course and we teach you how to make money."

"The fee is recouped with your first job…once you learn how to properly write a bill and charge what your services are worth. We show you how to earn more money."

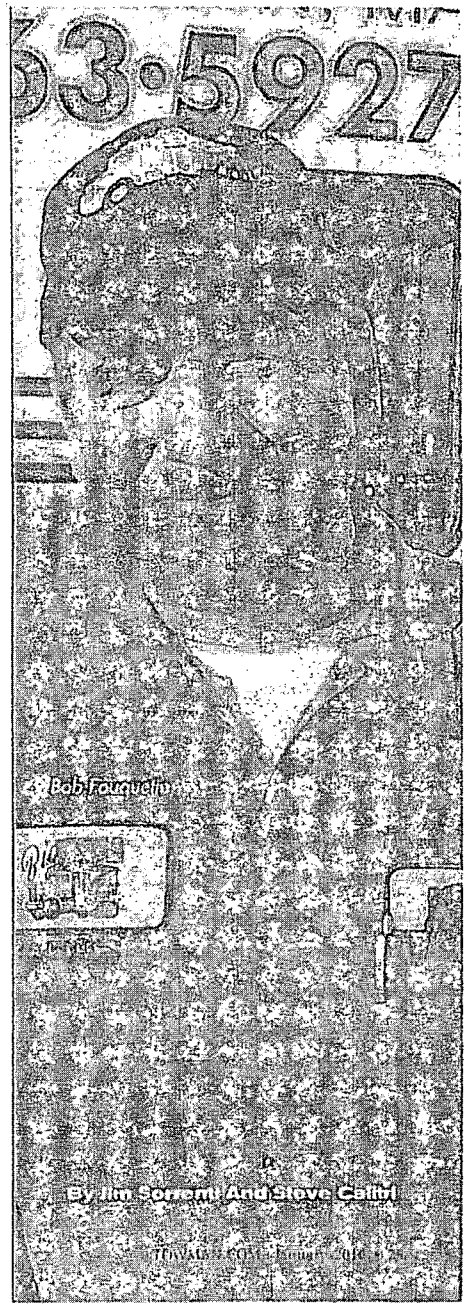
"In discussing the class fee," said Bob Fouquette, "other items should be mentioned. The $1500 tuition covers the company owner who may also bring a guest, which is usually the accountant, bookkeeper, manager, or a partner. The full day class starts at 8:30am and runs all day, roughly eight hours. The classes are catered and include special guest speakers from insurance companies and attorneys who field legal and liability questions. We are on call 24/7 to answer any questions that class participants may have afterwards and we offer two make-up/refresher classes for free to the two people from each company that attended the first paid class. No additional charge whatsoever."

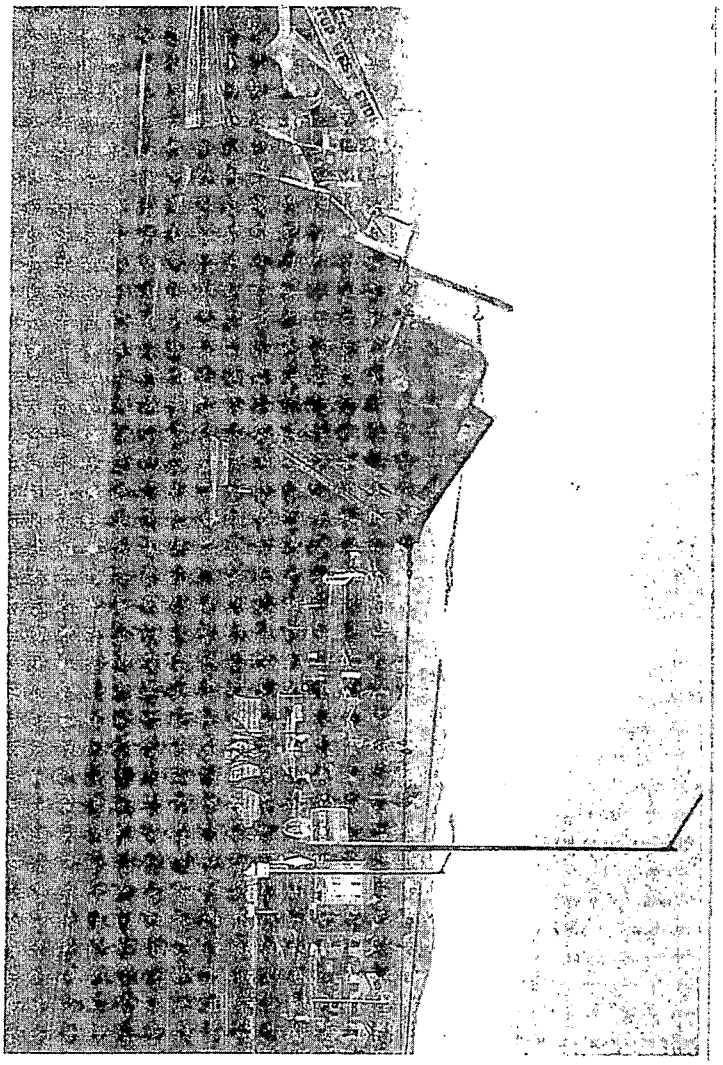
About half of each class focuses on billing techniques with the other half talking about the value of services offered.

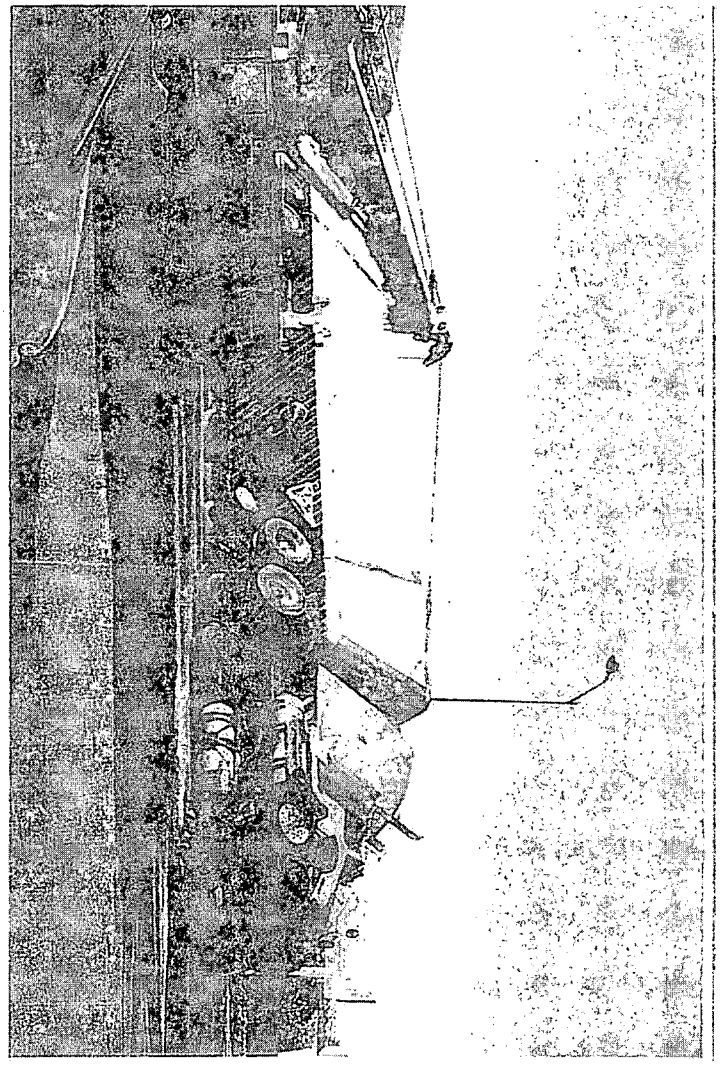
"These classes are essential for anyone interested in building a successful towing company and to remain in business," said Bob. "The tower's bottom line will double. They will be totally blown away at how much money they have left on the table."

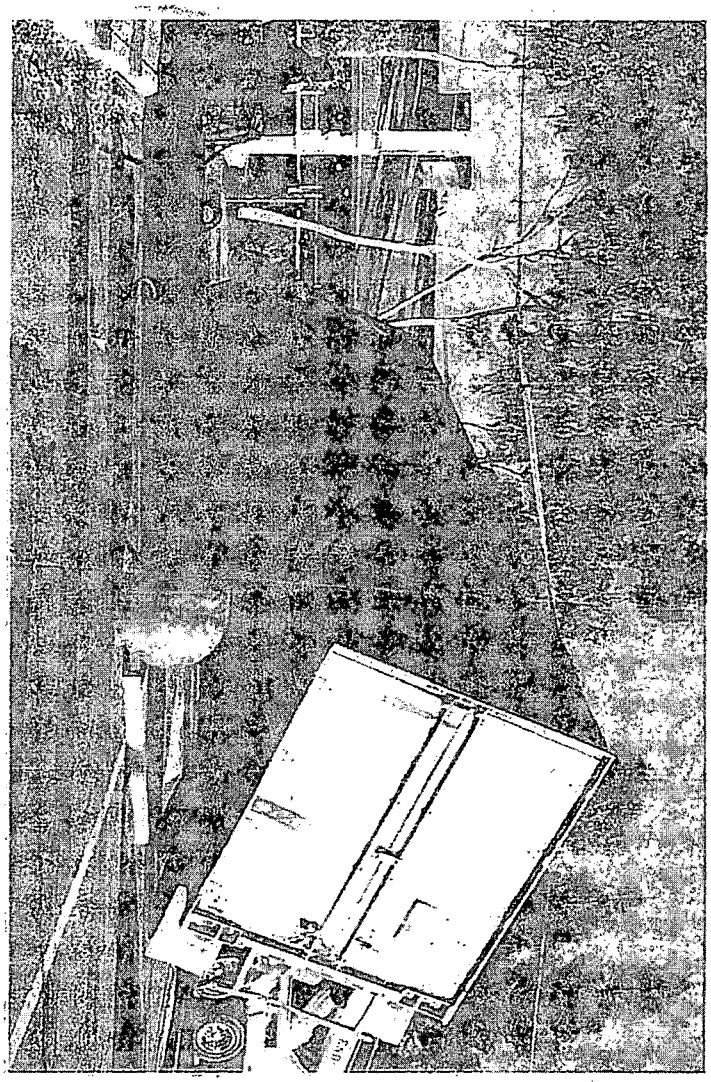
Bob Fouquette, a Vietnam vet and now 63, started Big Wheel Towing & Recovery in 1980 with a 1953 Ford setup with a Holmes 525 split-boom. The company now has 30 pieces of modern equipment and numerous other units from skid steers to boats and construction equipment. He, his sons Eric and David, and grandson Jordan, are certified WreckMaster 6/7. Bob and Eric started up Recovery Billing Unlimited, Inc. David, a welder and fabricator, runs the company's body shop. Jordan, 18 years old, handles the computer systems for the business.

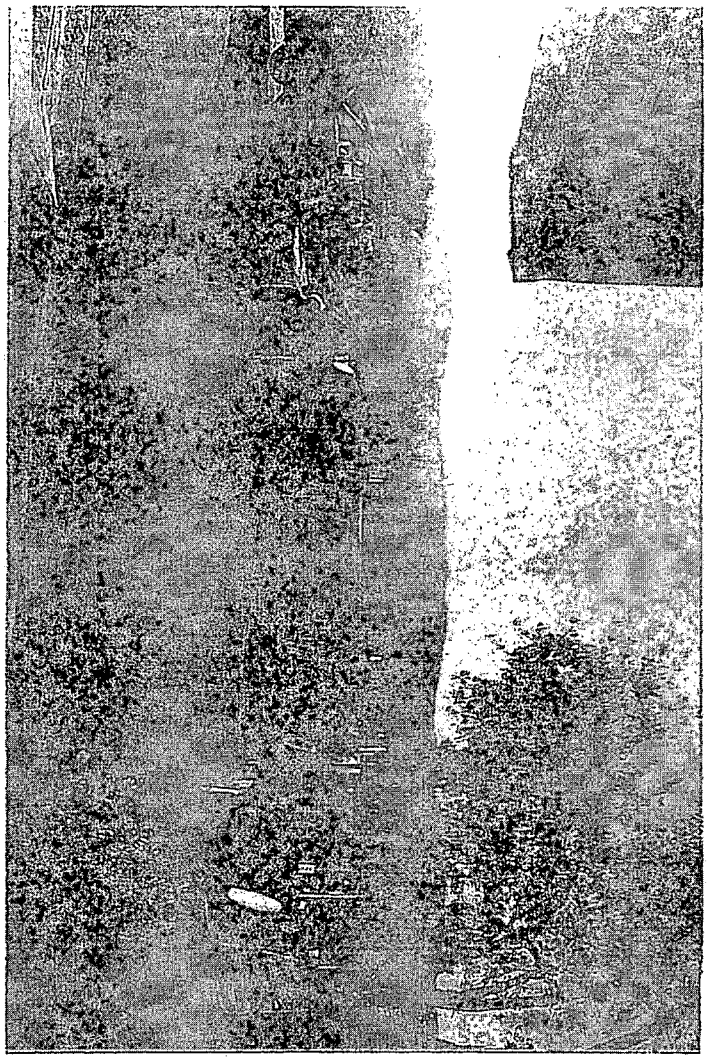
This family run company has three generations actively working. "My wife Rosaline is the runner," said Bob. "She runs errands and handles tasks that free us up to do what we need to. She also runs a few daycare centers in town and we are in the process of building a new facility for this. My daughter, Linda, is the office manager/administrator and her sister-in-law Alice also handles the office work."











Admitted R14

Sherry Corbett

From: Karen Coppolino <kcoppolino@premiertransportation.com>
Sent: Thursday, February 18, 2016 10:52 AM
To: Gostl Jr,Robert G; Sherry Corbett; Krisann.Dailey@sentry.com; Lucas Sentry
Cc: Randy Swords
Subject: Re: E0F8542

Sherry - I do need our trailer number for the trailer we dropped off to be used for the transload.

From: Gostl Jr,Robert G <RGOSTLJR@travelers.com>
Sent: Thursday, February 18, 2016 10:36 AM
To: Sherry Corbett; Krisann.Dailey@sentry.com; Lucas Sentry
Cc: Randy Swords; Karen Coppolino
Subject: RE: E0F8542

In the interest of ease and making this a one stop shop, please take this as notice to deal with Mr. Watson. Mr. Watson will be the contact to confirm and discuss resolution of tow bill.

Robert G. Gostl, Jr. | Claim Professional | Inland Marine
Travelers
3900 N. Causeway Blvd. | STE 950
Metairie, LA 70002
W: 504.832.7451 F: 888.490.7784

From: Sherry Corbett [mailto:sherry@waynesautomotivecenter.com]
Sent: Thursday, February 18, 2016 9:35 AM
To: Gostl Jr,Robert G; Krisann.Dailey@sentry.com; Lucas Sentry
Cc: rswords@premiertransportation.com; kcoppolino@premiertransportation.com
Subject: RE: E0F8542

I have been advised this morning from our companies legal counsel that I do have the ability and liberty to speak and discuss the matters of this situation with your company or your insurance representatives if you can send us a letter from your company giving us permission to discuss this with you. We are definitely willing to work with your company as much as we can. Our counsel has advised us that we are NOT to deal with Mr. Watson as a representative of your company as we have never received notification from your company to deal with him directly. Please advise how you would like to proceed as we would like to proceed in a professional manner that we normally do, and assist your company and get your load and casualty taken care of to ensure your company is profitable realizing your cargo does have an expiration. Thank you for your time.

Sherry Corbett
Wayne's Automotive and Towing Center
South Carolina Incident Management

http://www.linkedin.com/in/sherrycorbett
http://www.waynesautomotivecenter.com
http://waynes-towing.com

000031

001048
R14

Admitted R20

Sherry Corbett

From:	Trish Felix
Sent:	Thursday, February 11, 2016 6:51 PM
To:	rswords@premiertransportation.com
Cc:	Sherry Corbett
Subject:	Trailer portion
Attachments:	17598184348.PDF

Randy ,

Please see the attached invoice for the trailer portion of the rollover - Please note --the storage fees are $50.00 per day on the trailer as well as $50.00 per day on the tractor.

Thank you ,

Trish Felix
Waynes Towing & Recovery
803-644-9045
706-736-4600
trish@waynes-towing.com
fx 803-667-3514

Totaling 67,912.09

000119

001049

R20

2

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

	Date	Invoice #
	2/9/2016	59748-3
P.O. Number	**Terms (Net)**	**Due Date**
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 1:07 PM
Owner: premiere transportation

To: Storage Lot- HD
1997 Richland Ave E, Aiken, SC

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 52

Vehicle	VIN	Veh #	Tag	State	Odometer
2012 Freightliner Freightliner N/A Truck ()	1FUJGLDR6CLAY44852		2049550	IN	0000

Qty	Service	Rate	Adjustment	Tax	Amount
8.00	Recovery Heavy HD5-50 ton wrecker for winching & uprighting tractor	$436.00	$0.00	$0.00	$3,488.00
8.00	Recovery Heavy HD450-60 ton Mobile Crane - for winching and uprighting tractor	$436.00	$0.00	$0.00	$3,488.00
8.00	Recovery Heavy RU1-for recovery supplies during wreck	$436.00	$0.00	$0.00	$3,488.00
0.50	Miscellaneous Air Cushion / needed for recovery & securing load	$8,000.00	$0.00	$0.00	$4,000.00
8.00	Recovery Heavy HD2- tractor w/ trailer - Reocvery equipment transporter	$436.00	$0.00	$0.00	$3,488.00
20.00	Oil Dry	$25.00	$0.00	$0.00	$500.00
0.50	Miscellaneous OSHA- Certified Incident Communication Equipment	$1,750.00	$0.00	$0.00	$875.00

Received By: **Print Name:** 2/11/2016

000120

001050

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

	Date	Invoice #
	2/9/2016	59748-3
P.O. Number	**Terms (Net)**	**Due Date**
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 1:07 PM
Owner: premiere transportation

To: Storage Lot- HD
1997 Richland Ave E, Aiken, SC

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 52

Vehicle	VIN	Veh #	Tag	State	Odometer
2012 Freightliner Freightliner N/A Truck ()	1FUJGLDR6CLAY44852		2049550	IN	0000

1.00	Miscellaneous Hazmat certified containment liner for spill & cargo waste	$175.00	$0.00	$0.00	$175.00
1.00	Miscellaneous 2 x 3 oil absorbant sock	$85.00	$0.00	$0.00	$85.00
25.00	Miscellaneous 2 x 2 grey pigg oil/fuel absorbant pads	$7.50	$0.00	$0.00	$187.50
20.00	Labor WB- Hazmat Rercovery Supervisor	$150.00	$0.00	$0.00	$3,000.00
20.00	Clean Up Fee Hazmat First Responder Spill Containment Unit - for items used during recovery/clean-up	$150.00	$0.00	$0.00	$3,000.00
8.00	Labor BH- Recovery Supervisor	$175.00	$0.00	$0.00	$1,400.00
8.00	Labor JC- Recovery Supervisor	$175.00	$0.00	$0.00	$1,400.00
8.00	Labor KJ- Recovery Technician	$150.00	$0.00	$0.00	$1,200.00

Received By: **Print Name:** 2/11/2016

000121

001051

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

	Date	Invoice #
	2/9/2016	59748-3
P.O. Number	**Terms (Net)**	**Due Date**
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 1:07 PM
Owner: premiere transportation

To: Storage Lot- HD
1997 Richland Ave E, Aiken, SC

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 52

Vehicle	VIN	Veh #	Tag	State	Odometer
2012 Freightliner Freightliner N/A Truck ()	1FUJGLDR6CLAY44852		2049550	IN	0000

8.00	Labor JH- Recovery Technician	$150.00	$0.00	$0.00	$1,200.00
1.00	Miscellaneous Emergency Spill Kit --	$125.00	$0.00	$0.00	$125.00

TOTAL AMOUNT DUE
$31,099.50

Received By: **Print Name:** 2/11/2016

000122

001052

Sherry Corbett

From:	Trish Felix
Sent:	Thursday, February 11, 2016 6:57 PM
To:	rswords@premiertransportation.com
Cc:	Sherry Corbett
Subject:	Load Portion
Attachments:	17598185247.PDF

Randy ,

Please see attached invoice for load portion of the rollover on 1-20 - *** My system has a glitch as to where the invoice will sometimes break into several pages** there are three pages to this invoice.

Thank you ,

Trish Felix
Waynes Towing & Recovery
803-644-9045
706-736-4600
trish@waynes-towing.com
fx 803-667-3514

From: pamela@waynes-towing.com <pamela@waynes-towing.com>
Sent: Thursday, February 11, 2016 6:52 PM
To: Trish Felix
Subject: Report:

000123

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59749-1

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 10:43 PM
Owner: premier

To:

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 48

Vehicle	VIN	Veh #	Tag	State	Odometer
()					

Qty	Service	Rate	Adjustment	Tax	Amount
1.00	Miscellaneous Cargo Wrap	$85.84	$0.00	$0.00	$85.84

TOTAL AMOUNT DUE
$85.84

Received By: **Print Name:** 2/11/2016

000124

001054

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

	Date	Invoice #
	2/9/2016	59749-2
P.O. Number	**Terms (Net)**	**Due Date**
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 10:43 PM
Owner: premier

To:

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 48

Vehicle	VIN	Veh #	Tag	State	Odometer
()					

Qty	Service	Rate	Adjustment	Tax	Amount
3.00	Miscellaneous Palletts	$22.95	$0.00	$0.00	$68.85
1.00	Miscellaneous Pallat Jack	$500.00	$0.00	$0.00	$500.00
7.00	Labor JC- Reocvery Supervisor/load transfer -Load transer	$100.00	$0.00	$0.00	$700.00
7.00	Labor BH/Recovery - load transfer	$100.00	$0.00	$0.00	$700.00
7.00	Labor Mike - load transfer	$50.00	$0.00	$0.00	$350.00
3.50	Labor Preston -load transfer	$50.00	$0.00	$0.00	$175.00
3.50	Labor Kenny- load transfer	$50.00	$0.00	$0.00	$175.00

Received By: **Print Name:** 2/11/2016

000125

001055

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59749-2

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 10:43 PM
Owner: premier

To:

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 48

Vehicle	VIN	Veh #	Tag	State	Odometer
()					

1.50	Labor Wesley/ RH- load transfer	$50.00	$0.00	$0.00	$75.00
2.00	Labor SC- Safety Supervisor	$95.00	$0.00	$0.00	$190.00
7.00	Labor JH- load transfer	$50.00	$0.00	$0.00	$350.00
7.00	Labor JS- load transfer	$50.00	$0.00	$0.00	$350.00
1.00	Miscellaneous	$125.00	$0.00	$0.00	$125.00
1.00	Miscellaneous Verns/additonal labor & 3- road signs	$1,000.00	$0.00	$0.00	$1,000.00

TOTAL AMOUNT DUE
$4,758.85

Received By: **Print Name:** 2/11/2016

000128

001056

Sherry Corbett

From: Trish Felix
Sent: Thursday, February 11, 2016 6:59 PM
To: rswords@premiertransportation.com
Cc: Sherry Corbett
Subject: Trailer portion
Attachments: 17598185424.PDF

Please see attached invoice again note there is a $50.00 per

Trish Felix
Waynes Towing & Recovery
803-644-9045
706-736-4600
trish@waynes-towing.com
fx 803-667-3514

From: pamela@waynes-towing.com <pamela@waynes-towing.com>
Sent: Thursday, February 11, 2016 6:54 PM
To: Trish Felix
Subject: Report:

000127

001057

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59747-2

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 10:33 PM
Owner: premier transportation

To: Storage Lot- HD
1997 Richland Ave E, Aiken, SC

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 08

Vehicle	VIN	Veh #	Tag	State	Odometer
0 Trailer Trailer N/A Trailer ()	UNK	TRL# 288	U496466	TN	0000

Qty	Service	Rate	Adjustment	Tax	Amount
0.50	Miscellaneous Air Cushion- - needed for recovery-uprighting and securing load	$8,000.00	$0.00	$0.00	$4,000.00
12.00	Recovery Heavy HD450- HD60 Ton Mobile Crane-- used for uprighting & winching trailer	$436.00	$0.00	$0.00	$5,232.00
12.00	Recovery Heavy RU1- Recovery truck/trailer - used for supplies and transporting of debris during wreck	$436.00	$0.00	$0.00	$5,232.00
12.00	Recovery Heavy HD3- Tractor w/ trailer for load transfer	$436.00	$0.00	$0.00	$5,232.00
8.00	Labor BH- Recovery Supervisor	$175.00	$0.00	$0.00	$1,400.00
8.00	Labor JC- Recovery Supervisor	$175.00	$0.00	$0.00	$1,400.00

Received By: **Print Name:** 2/11/2016

000128

001058

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59747-2

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 10:33 PM
Owner: premier transportation

To: Storage Lot- HD
1997 Richland Ave E, Aiken, SC

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 08

Vehicle	VIN	Veh #	Tag	State	Odometer
0 Trailer Trailer N/A Trailer ()	UNK	TRL# 288	U496466	TN	0000

8.00	Labor KJ- Recovery Technician / HD Equipment operator	$175.00	$0.00	$0.00	$1,400.00
8.00	Labor JH-Recovery Technician	$150.00	$0.00	$0.00	$1,200.00
1.00	Miscellaneous UR- Skid Steer	$425.00	$0.00	$0.00	$425.00
1.00	Miscellaneous MD1- Transport Cargo	$175.00	$0.00	$0.00	$175.00
15.00	Miscellaneous Backhoe - per hour-	$125.00	$0.00	$0.00	$1,875.00
0.50	Recovery OSHA- Certified Incident Communication Equipment	$1,795.00	$0.00	$0.00	$897.50
20.00	Miscellaneous Recovery Safety Package- light tower/digital traffic signs/cones	$175.00	$0.00	$0.00	$3,500.00

Received By: **Print Name:** 2/11/2016

000129

001059

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road

Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59747-2

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From:

To:

Service Date: 2/9/2016 10:33 PM
Owner: premier transportation

Reason for Service: OVERTURNED TRACTOR TRAILER
Driver: 08

Vehicle	VIN	Veh #	Tag	State	Odometer
()	UNK	TRL# 288	U496466	TN	0000

TOTAL AMOUNT DUE
$31,968.50

Received By: **Print Name:** 2/11/2016

060130

Admitted R21

From: Trish Felix
Sent: Monday, February 15, 2016 11:56 AM
To: Sherry Corbett <sherry@waynesautomotivecenter.com>
Subject: Rolover -

Recvd a call thru Century Insurance adjuster name :
Bob-704-892-7712
claim # 618169404

Ok just got off the phone with this guy - stated he is the adjuster on the entire recovery including the load .. When i advised him the load can not be released w/o payment on the equip .. he stated " You cannot hold the load in SC for payment on the recovery" – advised i needed to get with my superior on that and get back with him ..

He also had question in reference to the Air Bags .. as he stated- he has pictures of the trailer in tact /. and then pictures of the trailer split open .. Therefore why were air bags needed .. I assured him they were used -

FYI.. I may need some direction on this ..

Trish Felix
Waynes Towing & Recovery
803-644-9045
706-736-4600
trish@waynes-towing.com
fx 803-667-3514

Email recieved before Sherry spoke w/ Bob Watson on 2/15 @ 15:30

Admitted
R22

From: Trish Felix
Sent: Monday, February 15, 2016 1:50 PM
To: Sherry Corbett <sherry@waynesautomotivecenter.com>
Subject: Re: Rolover -

Ok Cool .. I did quote him approx 250.0 to assist w/ the reload as I am sure its all pelleted and assumed we could get it done fairly quickly-

He was adamant that we can not hold the load on the tractor/trailer payment ..

Trish Felix
Waynes Towing & Recovery
803-644-9045
706-736-4600
trish@waynes-towing.com
fx 803-667-3514

From: Sherry Corbett
Sent: Monday, February 15, 2016 1:46 PM
To: Trish Felix
Subject: RE: Rolover -

10/4. There are pictures of the bags under the trailer maybe those were not forwarded to you but are in the drop box I will have Jeff to call him at this point and discuss specifics as the air bags were originally used to "recover the whole load of cargo and TRAILER intact and after the bags busted we then used other measures to proceed with at least trying to recover the load aside from the trailer.

Sherry Corbett
Wayne's Automotive and Towing Center
South Carolina Incident Management

http://www.linkedin.com/in/sherrycorbett
Sherry Corbett | LinkedIn

www.linkedin.com

View Sherry Corbett's professional profile on LinkedIn. LinkedIn is the world's largest business network, helping professionals like Sherry Corbett discover inside connections to recommended job candidates, industry experts, and business partners.

http://www.waynesautomotivecenter.com
http://waynes-towing.com
https://www.facebook.com/WaynesAutomotiveCenterInc
https://www.facebook.com/WaynesTowingRecoveryHauling

000140

R22

001062

Sent 2/15 19:05

1st Invoice Sent to Bob Watson

Revised from the 3 broken out bills per Bobs request.

Admitted

Wayne's Automotive and Towing Center

SCIM
Spill Containment Incident Management
1997 Richland Avenue East
Aiken, SC 29801

Invoice

Date	Invoice #
2/10/2016	504462

Bill To
J. H. O. C., INC. Premier Transportation 323 CASH MEMORIAL BOULEVARD FOREST PARK GA 30297 282577

P.O. No.	Terms	Project
	Due Upon Receipt	

Description	Qty	Rate	Amount
60 Ton Rotator HD4 used for upright winching both tractor and trailer	21	436.00	9,156.00
Class C Heavy Duty Truck HD5 used for upright winching both tractor and trailer	21	436.00	9,156.00
Class C Heavy Duty Tractor with Trailer used for Transfering Cargo and storing HD3/RECOVERY TRAILER	13	436.00	5,668.00
Recovery Supervisor JC	21	175.00	3,675.00
Recovery Technician BH	21	175.00	3,675.00
Recovery Technician KJ	21	150.00	3,150.00
Recovery Technician JH	13	150.00	1,950.00
Recovery Technician BR	8	85.00	680.00
Recovery Technician WB	10	150.00	1,500.00
Response Unit used for transporting supplies, snatch blocks, oil dry, absorbents, booms, back deck blower, brooms, shovels, etc.	20	175.00	3,500.00
Air Cushion Recovery	2	4,000.00	8,000.00
Transfer Cargo from scene to loading dock Containment Unit (this includes reloading an offsite facility)	1	750.00	750.00
Labor Hours for transferring from the scene and repackaging WB	9	90.00	810.00
Labor Hours for transferring from the scene and repackaging JH	7	50.00	350.00
Labor Hours for transferring from the scene and repackaging WRH	1.5	50.00	75.00
Labor Hours for transferring from the scene and repackaging JS	7	50.00	350.00
Labor Hours for transferring from the scene and repackaging PW	3.5	50.00	175.00
Labor Hours for transferring from the scene and repackaging MR	7	50.00	350.00
Labor Hours for transferring from the scene and repackaging KS	3.5	50.00	175.00
Labor Sublet from Verns (3 Guys used for transferring and repacking)	1	1,000.00	1,000.00

	Total
	Payments/Credits
	Balance Due

Phone #	E-mail
803-226-6025	sherry@waynesautomotivecenter.com

000144

R23

001063

1st Invoice sent to Bob Watson (2)

Wayne's Automotive and Towing Center

SCIM
Spill Containment Incident Management
1997 Richland Avenue East
Aiken, SC 29801

Invoice

Date	Invoice #
2/10/2016	504462

Bill To
J. H. O. C., INC. Premier Transportation 323 CASH MEMORIAL BOULEVARD FOREST PARK GA 30297 282577

P.O. No.	Terms	Project
	Due Upon Receipt	

Description	Qty	Rate	Amount
Repacking Fee and Reloading from Loading Dock onto Trailer 2nd Load	1	750.00	750.00
Backhoe 420D and Transport and Heavy Operator	11.5	350.00	4,025.00
Skid Steer Track Loader and Transport	1	600.00	600.00
Back Deck Blower used for cleaning highway on bridge	1	275.00	275.00
Restocking and Reload Cargo	1	500.00	500.00
OSHA Certified Incident Communication Equipment	1	1,795.00	1,795.00
Emergency Digital Signage I-20 W Message Board exit 6 Detour Traffic with Cones	20	75.00	1,500.00
Emergency Digital Signage I-20 E Digital Arrow Board	20	75.00	1,500.00
Light Tower	8	75.00	600.00
Traffic Control High Intensity Sign 36x36 used a total of 4 on both East and West lanes	20	50.00	1,000.00
26 in. Traffic Cones total of 48	20	50.00	1,000.00
Pallats for Restocking	3	22.95	68.85
PIG MAT240	25	7.50	187.50
Containment Booms used for containment preventing release into Savannah River below site	1	85.00	85.00
Containment Liner	1	175.00	175.00
	1	210.84	210.84
Storage Per Unit as of 02/15/2016	6	50.00	300.00
Storage Per Unit as of 02/15/2016	6	50.00	300.00

Total	$69,017.19
Payments/Credits	$0.00
Balance Due	$69,017.19

Phone #	E-mail
803-226-0025	sherry@waynesautomotivecenter.com

000145

001064

Admitted R24

Final

Wayne's Automotive and Towing Center

SCIM
Spill Containment Incident Management
1997 Richland Avenue East
Aiken, SC 29801

Invoice

Date	Invoice #
2/10/2016	504462

Bill To
J. H. O. C., INC. Premier Transportation 323 CASH MEMORIAL BOULEVARD FOREST PARK GA 30297 282577

P.O. No.	Terms	Project
	Due Upon Receipt	

Description	Qty	Rate	Amount
Recovery			
60 Ton Rotator HD4 used for upright winching both tractor during first part of recovery and trailer last part of recovery and towing damaged trailer to storage yard 2:00 am-23:00 Per GPS Tracking Report	21	436.00	9,156.00
Class C Heavy Duty Truck HD5 used for upright winching both tractor and trailer and towing of the tractor to the yard for storage	12	436.00	5,232.00
Labor and Equipment			
Tractor Trailer 53ft used for transferring the cargo [redacted]	13	436.00	5,668.00
Recovery Supervisor JC	21	175.00	3,675.00
Recovery Technician BH	21	150.00	3,150.00
Recovery Technician KJ	21	85.00	1,785.00
Recovery Technician JH	21	85.00	1,785.00
Recovery Technician BR	8	85.00	680.00
Recovery Technician WB	19	85.00	1,615.00
Response Unit used for transporting supplies, snatch blocks, oil dry, absorbents, booms, back deck blower, brooms, shovels, etc.	20	175.00	3,500.00
Labor Hours for WRH	1.5	50.00	75.00
Labor Hours JS	7	50.00	350.00
Labor Hours PW	3.5	50.00	175.00
Labor Hours MR	7	50.00	350.00
Labor Hours KS	3.5	50.00	175.00
Labor Sublet from Vums Towing	1	1,000.00	1,000.00
Loading Dock Rental	1	750.00	750.00
Backhoe 420D and Transport and Heavy Operator	1	600.00	600.00
Skid Steer Track Loader and Transport	1	600.00	600.00

All QTY is per hours of usage.

Total	
Payments/Credits	
Balance Due	

Phone #	E-mail
803-226-0025	sherry@waynesautomotivecenter.com

000163

R24

Wayne's Automotive and Towing Center

SCIM
Spill Containment Incident Management
1997 Richland Avenue East
Aiken, SC 29801

Invoice

Date	Invoice #
2/10/2016	504462

Bill To
J. H. O. C., INC. Premier Transportation 323 CASH MEMORIAL BOULEVARD FOREST PARK GA 30297 282577

P.O. No.	Terms	Project
	Due Upon Receipt	

Description	Qty	Rate	Amount
2 trips to the loading dock with cargo	2	250.00	500.00
OSHA Certified Incident Communication Equipment charge hourly	21	85.00	1,785.00
Emergency Digital Signage I-20 W Message Board exit 6 Detour Traffic with Cones	20	75.00	1,500.00
Emergency Digital Signage I-20 E Digital Arrow Board	20	75.00	1,500.00
Light Tower	8	75.00	600.00
Traffic Control High Intensity Sign 36x36 used a total of 4 on both East and West lanes for recovery and cargo and recovery	20	50.00	1,000.00
26 In. Traffic Cones total of 48 cones for recovery and cargo and recovery per hour	20	35.00	700.00
Pallets for Restocking the cargo	3	22.95	68.85
PIG MAT240 used to clean waste of fluids on the bridge	25	7.50	187.50
Containment Booms used for containment preventing release of chemicals and fluids into Savannah River below site	1	85.00	85.00
Containment Liner for storage of waste oil dry	1	175.00	175.00
Cargo Wrap	1	210.84	210.84

This price is with A lot of Item used Not Charged Out Forward This price is only IF we Agree To Settlement

All QTY is per hours of usage.
OR I will Give the Total price Of all Equipment, Manpower, Ect. For The Insurance Company To Review

Total	$48,633.19
Payments/Credits	$0.00
Balance Due	$48,633.19

Phone #	E-mail
803-226-0025	sherry@waynesautomotivecenter.com

000164

001066

Invoice

Date	Invoice #
2/10/2016	504462

SCIM
Spill Containment Incident Management
1997 Richland Avenue East
Aiken, SC 29801

According to GPS reports to show actual on scene time.

(2) This invoice also included storage

Admitted R 25

Bill To
J. H. O. C., INC. Premier Transportation 323 CASH MEMORIAL BOULEVARD FOREST PARK GA 30297 282577

(3) This invoice also included $8000.00 for air cushions

P.O. No.	Terms	Project
	Due Upon Receipt	

Description	Qty	Rate	Amount
Recovery 60 Ton Rotator HD4 used for upright winching both tractor during first part of recovery and trailer last part of recovery and towing damaged trailer to storage yard 2:00 am-23:00 Per GPS Tracking Report	21	436.00	9,156.00
Class C Heavy Duty Truck HD5 used for upright winching both tractor and trailer and towing of the tractor to the yard for storage 2:00 am-14:00 Per GPS Tracking Report	12	436.00	5,232.00
Labor and Equipment Tractor with Trailer that we supplied used for Transfering the Cargo and storing double stacked and loaded due to damaged tractor and trailer (HD3/RECOVERY TRAILER) 1:00 pm- 23:00	13	436.00	5,668.00
Recovery Supervisor JC used for rigging and setup and winching both the tractor in the first part of recovery and trailer at night during the second part 2:00 am - 23:00	21	175.00	3,675.00
Recovery Technician BH used for rigging and setup and winching both the tractor in the first part of recovery and trailer at night during the second part 2:00 am - 23:00	21	175.00	3,675.00
Recovery Technician KJ used for rigging and setup and winching both the tractor in the first part of recovery and trailer at night during the second part 2:00 am - 23:00	21	150.00	3,150.00
Recovery Technician JH used for rigging and setup and winching 10:00-23:00	13	150.00	1,950.00
Recovery Technician BR used for rigging and setup and winching and airbags 2:00 am-10:00 am	8	85.00	680.00

All QTY is per hours of usage.

	Total
	Payments/Credits
	Balance Due

Phone #	E-mail
803-226-0025	sherry@waynesautomotivecenter.com

(1)

000150

001067 R25

Wayne's Automotive and Towing Center

SCIM
Spill Containment Incident Management
1997 Richland Avenue East
Aiken, SC 29801

Invoice

Date	Invoice #
2/10/2016	504462

Bill To
J. H. O. C., INC. Premier Transportation 323 CASH MEMORIAL BOULEVARD FOREST PARK GA 30297 282577

P.O. No.	Terms	Project
	Due Upon Receipt	

Description	Qty	Rate	Amount
Recovery Technician WB used for rigging and setup and winching and airbags 2:00 am-12:00 pm	10	150.00	1,500.00
Response Unit used for transporting supplies, snatch blocks, oil dry, absorbents, booms, back deck blower, brooms, shovels, etc.	20	175.00	3,500.00
Air Cushion Recovery used to attempt to preserve trailer and cargo	2	4,000.00	8,000.00
Transfer Cargo and load from scene and transport to loading dock Containment Unit (this includes reloading to an offsite facility loading dock rental) 14:00-18:00	1	750.00	750.00
Labor Hours for transferring from the scene for cargo and repackaging and reloading onto trailer WB 11:00-20:00	9	90.00	810.00
Labor Hours for transferring from the scene for cargo and repackaging and reloading onto trailer JP 15:00-22:00	7	50.00	350.00
Labor Hours for transferring from the scene for cargo and repackaging and reloading onto trailer WRH 17:00-18:50	1.5	50.00	75.00
Labor Hours for transferring from the scene for cargo and repackaging and reloading onto trailer JS 8:00-15:00	7	50.00	350.00
Labor Hours for transferring from the scene for cargo and repackaging and reloading onto trailer PW 17:00-20:30	3.5	50.00	175.00
Labor Hours for transferring from the scene for cargo and repackaging and reloading onto trailer MR 16:00-21:00	7	50.00	350.00
Labor Hours for transferring from the scene for cargo and repackaging and reloading onto trailer KS 16:00-19:30	3.5	50.00	175.00
Labor Sublet from Verns Towing (3 Guys used for transferring and repacking cargo and reloading onto trailer)	1	1,000.00	1,000.00

All QTY is per hours of usage.

	Total
	Payments/Credits
	Balance Due

Phone #	E-mail
803-226-0025	sherry@waynesautomotivecenter.com

000152

2

001069

Wayne's Automotive and Towing Center

SCIM
Spill Containment Incident Management
1997 Richland Avenue East
Aiken, SC 29801

Invoice

Date	Invoice #
2/10/2016	504462

Bill To
J. H. O. C., INC. Premier Transportation 323 CASH MEMORIAL BOULEVARD FOREST PARK GA 30297 282577

P.O. No.	Terms	Project
	Due Upon Receipt	

Description	Qty	Rate	Amount
Repacking Fee and Reloading from Loading Dock onto Trailer 2nd Load use another business off site loading dock rental fee 19:00-23:00	1	750.00	750.00
Backhoe 420D and Transport and Heavy Operator	11.5	350.00	4,025.00
Skid Steer Track Loader and Transport	1	600.00	600.00
Back Deck Blower used for cleaning highway on bridge and picking up oil absorbent (which was not charged out for)	1	275.00	275.00
Restocking and Reload Cargo vehicles to transport to the rented loading dock for repacking and reloading to again reload onto trailer on the side of the interstate	2	250.00	500.00
OSHA Certified Incident Communication Equipment charge hourly	21	85.00	1,785.00
Emergency Digital Signage I-20 W Message Board exit 6 Detour Traffic with Cones	20	75.00	1,500.00
Emergency Digital Signage I-20 E Digital Arrow Board	20	75.00	1,500.00
Light Tower during cargo	8	75.00	600.00
Traffic Control High Intensity Sign 36x36 used a total of 4 on both East and West lanes for recovery and cargo and recovery	20	50.00	1,000.00
26 In. Traffic Cones total of 48 cones for recovery and cargo and recovery per hour	20	35.00	700.00
Pallats for Restocking the cargo	3	22.95	68.85
PIG MAT240 used to clean waste of fluids on the bridge	25	7.50	187.50
Containment Booms used for containment preventing release of chemicals and fluids into Savannah River below site	1	85.00	85.00
Containment Liner for storage of waste oil dry	1	175.00	175.00
	1	210.84	210.84

All QTY is per hours of usage.

	Total
	Payments/Credits
	Balance Due

Phone #	E-mail
803-226-0025	sherry@waynesautomotivecenter.com

000153

(3)

001070

Wayne's Automotive and Towing Center

SCIM
Spill Containment Incident Management
1997 Richland Avenue East
Aiken, SC 29801

Invoice

Date	Invoice #
2/10/2016	504462

Bill To
J. H. O. C., INC. Premier Transportation 323 CASH MEMORIAL BOULEVARD FOREST PARK GA 30297 282577

P.O. No.	Terms	Project
	Due Upon Receipt	

Description	Qty	Rate	Amount
Back Deck Blower used for cleaning highway on bridge and picking up oil absorbent (which was not charged out for)	1	275.00	275.00
Restocking and Reload Cargo vehicles to transport to the rented loading dock for repacking and reloading to again reload onto trailer	1	500.00	500.00
OSHA Certified Incident Communication Equipment charge hourly	21	85.00	1,785.00
Emergency Digital Signage I-20 W Message Board exit 6 Detour Traffic with Cones	20	75.00	1,500.00
Emergency Digital Signage I-20 E Digital Arrow Board	20	75.00	1,500.00
Light Tower during cargo	8	75.00	600.00
Traffic Control High Intensity Sign 36x36 used a total of 4 on both East and West lanes for recovery and cargo and recovery	20	50.00	1,000.00
26 In. Traffic Cones total of 48 cones for recovery and cargo and recovery per hour	20	35.00	700.00
Pallats for Restocking the cargo	3	22.95	68.85
PIG MAT240 used to clean waste of fluids on the bridge	25	7.50	187.50
Containment Booms used for containment preventing release of chemicals and fluids into Savannah River below site	1	85.00	85.00
Containment Liner for storage of waste oil dry	1	175.00	175.00
	1	210.84	210.84
Storage Per Unit as of 02/15/2016	6	50.00	300.00
Storage Per Unit as of 02/15/2016	6	50.00	300.00

All QTY is per hours of usage.

Total	$64,783.19
Payments/Credits	$0.00
Balance Due	$64,783.19

Phone #	E-mail
803-226-0025	sherry@waynesautomotivecenter.com

000154

4

001071

Accident occured @ 2/9 @ 3:00 am
Heavy Duty "Next on List"

Admitted w/132 (132-136)

Tuesday
2/9 11:35 a.m.:
(404 675 1950) 11:25 Randy calls for Pictures advised we could not tow together to Atlanta we were still working.

Wednesday
2/10 404 8247658 @9:00 am. Randy cell#

We called phone call pertaining at out Insurance reasons. Gave us DOT # 2825977 Break it down: Safety department worry about that

Spent the day revising bills

000132

001072 w/R26

Admitted
w/ obj of additions
p. 132

Thursday

2/11 803 438 0465 ⇒ Vivian

10:19 Supervisor, Where in the load acknowledged the Vice President didn't even know about the accident gave address for load.
VVandet@premiertransportation.com

15:26 Emailed Randy all 3 invoices as requested & emails: tickets.
Totaling 67,912.09 including cushions BUT NO STORAGE

2/12 Email was sent to Premier Supervisor, Randy from internal regarding fleetnet pricing he inquired if that was all in writing from us.

1/13-2/14 Weekend

Trish

2/15 704-892-0742 Bob Watson ⇒ 618 1st request for load
1:43 asking for the load price + how long? States in SC can not hold load
Calling for Century Insurance + Premier Identifies
Did not have complete totals when he states he is handling, rattles off 65,000"
Questions the whole billing

15:02 Calls back and we request paperwork regarding "state law"
Now states 76,000 the bill is 76,000." and has issues w/it.
Dump Fees ?? no dump fees asks for cargo again

2/15 15:30 17048927712
Sherry spoke w/ split up per tractor, trailer, per cargo
3a.m. 10:30 or 11pm.
goes over a bill
figure, 20 hrs. up the, spill. hazmat 20 bags of oil

000133

R26 001073

2/15 spent 2.5 hours revising bill and his concerns sent over Bill with email 19:05 with more specifics and an Recovery Intake form advising what we did and why.

14:33 2/16 704807 1733 w/ Bob Watson Jeff had phone conversation regarding the pricing.

15:39 2/16 Bob Watson sends over information questioning our training with pictures

12/15 9:57 We responds to Sherry New Invoice with cushions omit and revised indicating 20 hours

2/17 Lt. King questioning the title and pricing must drop prices in half or be kicked off list. Advised us we could split bills but could not work them up.

2/18 704807 1733 We called Mr Watson to advise of good unit # i we could load unit today if bill was paid. (this unit was Premier we were storing for the time)

Bob 10:56am 2/19 Inquiring cargo got transferred he was transferred to Jeff's voicemail. He left message 704807 1733

P 10:59 Called back explained we could transfer him an. Advised Mr. Watson that had instructions that since HP was involved and so much confusion ONLY Jeff + Bob Watson discussed this transfer load.

Bob spoke with Jeff directly

000134

2/25 Scott Zottneck

Called twice regarding a trust agreement for escrow. This paper is attached & supposed to send agreement Today BUT DID NOT

Scott Ard agreement on 2/26 1425

Friday On 2/26 Spoke w/ Scott @ 8:36 regarding the air cargo ; we mailed them off a O they may not need replacing as we thought in the beginning may only repaired

15:20 Will release the cargo but not truck ; trailer 1/2 from Century ; 1/2 from Prencin. Also advised that we explained that we have contacted the insurance Commissioner.

2/26
15:49 Conference call Tim Pilato ; Scott informed him we have differences of will and we informed him what was happening that we still continously to go over the title and he will state it's just way out of line. Ask a reasonable amount of transferring the cargo
We did not want to quote a title for transferring the load because they didn't agree already with the quoted price.
Considered to do it on Monday morning. Overnight a price then overnight a check

000135

001075

2/26 later Friday night on cell phone
Tim Paladino Jeff spoke on the phone & Jeff
agreed to adjust some of the labor rates
from 175.00 to 150.00
150.00 to 95.00
Plus deduct cost of air bags @ 8000.00 &
no storage and to include cost of transfer
of cargo — on a normal business day
with an amount of
Once the bill was lowered w/ slightly lower
labor rates it was
58,233.19
Minus 8000.00
Minus Storage @ 1600.00 — 16 days 100.00 daily 50.00 per unit
$48,633.19
We agreed on 3/4 after w/ Premier went out of
town and did not return and give consent
to new amount until 3/4. Load was transferred
as agreed and picked up by Premier on
3/7, Monday.

* Please note we stored a good trailer for them
at no cost for 24 days.

* Premier called back on 3/14 to sign over the
trailer title to release them from any storage
on bad trailer.

000136

Admitted
R27



Vern's Wrecker & Recovery
3421 Milledgeville Rd
Augusta, GA 30909 please dial 1
706-790-1209 / FAX: 706-522-9230

INVOICE
27265

DATE: 02/10/16

BILL TO:
WAYNE'S AUTOMOTIVE CENTER
1997 RICHLAND AVE EAST
Aiken, SC 29801

CUSTOMER:

VEHICLE	TRAILER		
LICENSE	VIN	TRUCK - DRIVER	05 - VM
TOWED FROM	I-20 MM 1 SOUTH CAROLINA	START TIME	
TOWED TO	TRAFFIC CONTROL	END TIME	
POLICY NUMBER	ORDER #		

DATE	QTY	PRICE	DESCRIPTION	SUB-TOTAL
03/15/16	1.00	$720.00	TRAFFIC CONTROL	$720.00
			Payment $720.00 3/15/2016 Check 012955	

Sub-Total:	$720.00
Tax:	$0.00
Total:	$720.00
Payment:	- $720.00
Balance Due:	$0.00

000407

WE APPRECIATE YOUR BUSINESS!

TowTrack Software: inv5t.rpt 080812

Printed: 7/ 7/2017 - 1:15

001077

R27

DLSCN 07/19/17

Admitted 28

Hughes, Clifton B.

From:	Bob Watson <towinsurance@gmail.com>
Sent:	Monday, February 15, 2016 1:37 PM
To:	Hughes, Clifton B.
Subject:	Fwd: RE: Claim# 61A169404
Attachments:	17598185424.pdf; 17598184348.pdf; 17598185247.pdf; 61A169404 - Custard Report.pdf

The world gone nuts. Waynes auto, North Augusta SC. $76,000.00

I have called all day trying to get the cargo and they keeps saying they will call me back but I have not received a return call.

Who is the watch commander for this area?

Thanks Bob Watson

-------- Forwarded Message --------
Subject:RE: Claim# 61A169404
Date: Mon, 15 Feb 2016 16:28:03 +0000
From: Dailey Krisann <Krisann.Dailey@sentry.com>
To: Bob Watson <towinsurance@gmail.com>
CC: Tom Curran <tcurran@premiertransportation.com>

I have copied in the insured -- Tom Curran on this email so you have his email address if you need it.

Custard Adjuster was on the scene right away. They took very good photos. Report is attached above.
The tow invoice came in 3 chunks – invoices attached.

Insured is JHOC Premier Transportation. The contact is: Tom Curran at 470-289-9832 (this is his mobile as he is out of town on business this week, but you can email him or call his cell and leave him a voicemail if you need to get a hold of him).

Thank you,
Krisann L. Dailey
Transportation Claims Representative II
Sentry Select Insurance Company
PO Box 8026
Stevens Point, WI 54481
Email: krisann.dailey@sentry.com
Phone: 1-800-558-9257 x 3469616
Direct: 1-715-346-9616
Fax: 1-800-999-4642

001078

R-28

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59747-2

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 10:33 PM
Owner: premier transportation

To: Storage Lot- HD
1997 Richland Ave E, Aiken, SC

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 08

Vehicle	VIN	Veh #	Tag	State	Odometer
0 Trailer Trailer N/A Trailer ()	UNK	TRL# 288	U496466	TN	0000

Qty	Service	Rate	Adjustment	Tax	Amount
0.50	Miscellaneous Air Cushion- - needed for recovery-uprighting and securing load	$8,000.00	$0.00	$0.00	$4,000.00
12.00	Recovery Heavy HD450- HD60 Ton Mobile Crane--used for uprighting & winching trailer	$436.00	$0.00	$0.00	$5,232.00
12.00	Recovery Heavy RU1- Recovery truck/trailer - used for supplies and transporting of debris during wreck	$436.00	$0.00	$0.00	$5,232.00
12.00	Recovery Heavy HD3- Tractor w/ trailer for load transfer	$436.00	$0.00	$0.00	$5,232.00
8.00	Labor BH- Recovery Supervisor	$175.00	$0.00	$0.00	$1,400.00
8.00	Labor JC- Recovery Supervisor	$175.00	$0.00	$0.00	$1,400.00

Received By: **Print Name:** 2/11/2016

001079

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

	Date	Invoice #
	2/9/2016	59747-2
P.O. Number	**Terms (Net)**	**Due Date**
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 10:33 PM
Owner: premier transportation

To: Storage Lot- HD
1997 Richland Ave E, Aiken, SC

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 08

Vehicle	VIN	Veh #	Tag	State	Odometer
0 Trailer Trailer N/A Trailer ()	UNK	TRL# 288	U496466	TN	0000

8.00	Labor KJ- Recovery Technician / HD Equipment operator	$175.00	$0.00	$0.00	$1,400.00
8.00	Labor JH-Recovery Technician	$150.00	$0.00	$0.00	$1,200.00
1.00	Miscellaneous UR- Skid Steer	$425.00	$0.00	$0.00	$425.00
1.00	Miscellaneous MD1- Transport Cargo	$175.00	$0.00	$0.00	$175.00
15.00	Miscellaneous Backhoe - per hour-	$125.00	$0.00	$0.00	$1,875.00
0.50	Recovery OSHA- Certified Incident Communication Equipment	$1,795.00	$0.00	$0.00	$897.50
20.00	Miscellaneous Recovery Safety Package- light tower/digital traffic signs/cones	$175.00	$0.00	$0.00	$3,500.00

Received By: **Print Name:** 2/11/2016

001080

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road

Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59747-2

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From:

To:

Service Date: 2/9/2016 10:33 PM
Owner: premier transportation

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 08

Vehicle	VIN	Veh #	Tag	State	Odometer
()	UNK	TRL# 288	U496466	TN	0000

TOTAL AMOUNT DUE
$31,968.50

Received By: **Print Name:** 2/11/2016

001081

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59748-3

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP= Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 1:07 PM
Owner: premiere transportation

To: Storage Lot- HD
1997 Richland Ave E, Aiken, SC

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 52

Vehicle	VIN	Veh #	Tag	State	Odometer
2012 Freightliner Freightliner N/A Truck ()	1FUJGLDR6CLAY44852		2049550	IN	0000

Qty	Service	Rate	Adjustment	Tax	Amount
8.00	Recovery Heavy HD5-50 ton wrecker for winching & uprighting tractor	$436.00	$0.00	$0.00	$3,488.00
8.00	Recovery Heavy HD450-60 ton Mobile Crane - for winching and uprighting tractor	$436.00	$0.00	$0.00	$3,488.00
8.00	Recovery Heavy RU1-for recovery supplies during wreck	$436.00	$0.00	$0.00	$3,488.00
0.50	Miscellaneous Air Cushion / needed for recovery & securing load	$8,000.00	$0.00	$0.00	$4,000.00
8.00	Recovery Heavy HD2- tractor w/ trailer - Reocvery equipment transporter	$436.00	$0.00	$0.00	$3,488.00
20.00	Oil Dry	$25.00	$0.00	$0.00	$500.00
0.50	Miscellaneous OSHA- Certified Incident Communication Equipment	$1,750.00	$0.00	$0.00	$875.00

Received By: **Print Name:** 2/11/2016

001082

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59748-3

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 1:07 PM
Owner: premiere transportation

To: Storage Lot- HD
1997 Richland Ave E, Aiken, SC

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 52

Vehicle	VIN	Veh #	Tag	State	Odometer
2012 Freightliner Freightliner N/A Truck ()	1FUJGLDR6CLAY44852		2049550	IN	0000

1.00	Miscellaneous Hazmat certified containment liner for spill & cargo waste	$175.00	$0.00	$0.00	$175.00
1.00	Miscellaneous 2 x 3 oil absorbant sock	$85.00	$0.00	$0.00	$85.00
25.00	Miscellaneous 2 x 2 grey pigg oil/fuel absorbant pads	$7.50	$0.00	$0.00	$187.50
20.00	Labor WB- Hazmat Rercovery Supervisor	$150.00	$0.00	$0.00	$3,000.00
20.00	Clean Up Fee Hazmat First Responder Spill Containment Unit - for items used during recovery/clean-up	$150.00	$0.00	$0.00	$3,000.00
8.00	Labor BH- Recovery Supervisor	$175.00	$0.00	$0.00	$1,400.00
8.00	Labor JC- Recovery Supervisor	$175.00	$0.00	$0.00	$1,400.00
8.00	Labor KJ- Recovery Technician	$150.00	$0.00	$0.00	$1,200.00

Received By: **Print Name:** 2/11/2016

001083

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59748-3

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 1:07 PM
Owner: premiere transportation

To: Storage Lot- HD
1997 Richland Ave E, Aiken, SC

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 52

Vehicle	VIN	Veh #	Tag	State	Odometer
2012 Freightliner Freightliner N/A Truck ()	1FUJGLDR6CLAY44852		2049550	IN	0000

8.00	Labor JH- Recovery Technician	$150.00	$0.00	$0.00	$1,200.00
1.00	Miscellaneous Emergency Spill Kit --	$125.00	$0.00	$0.00	$125.00

TOTAL AMOUNT DUE
$31,099.50

Received By: **Print Name:** 2/11/2016

001084

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59749-1

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 10:43 PM
Owner: premier

To:

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 48

Vehicle	VIN	Veh #	Tag	State	Odometer
()					

Qty	Service	Rate	Adjustment	Tax	Amount
1.00	Miscellaneous Cargo Wrap	$85.84	$0.00	$0.00	$85.84

TOTAL AMOUNT DUE
$85.84

Received By: **Print Name:** 2/11/2016

001085

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59749-2

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 10:43 PM
Owner: premier

To:

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 48

Vehicle	VIN	Veh #	Tag	State	Odometer
()					

Qty	Service	Rate	Adjustment	Tax	Amount
3.00	Miscellaneous Palletts	$22.95	$0.00	$0.00	$68.85
1.00	Miscellaneous Pallat Jack	$500.00	$0.00	$0.00	$500.00
7.00	Labor JC- Reocvery Supervisor/load transfer -Load transer	$100.00	$0.00	$0.00	$700.00
7.00	Labor BH/Recovery - load transfer	$100.00	$0.00	$0.00	$700.00
7.00	Labor Mike - load transfer	$50.00	$0.00	$0.00	$350.00
3.50	Labor Preston -load transfer	$50.00	$0.00	$0.00	$175.00
3.50	Labor Kenny- load transfer	$50.00	$0.00	$0.00	$175.00

Received By: **Print Name:** 2/11/2016

001086

Invoice

N Augusta Division- Waynes Automotive

881 Edgefield Road
North Augusta, SC 29841
Ph: 1-855-492-9637 Fax: 803-667-3514

Date	Invoice #
2/9/2016	59749-2

P.O. Number	Terms (Net)	Due Date
	15	02/24/2016

HP- Rotation

Notes:

From: SAVANNAH RIVER BRIDGE
I20 WEST BOUND AT #1, North Augusta, SC

Service Date: 2/9/2016 10:43 PM
Owner: premier

To:

Reason for Service:
OVERTURNED TRACTOR TRAILER

Driver: 48

Vehicle	VIN	Veh #	Tag	State	Odometer
()					

1.50	Labor Wesley/ RH- load transfer	$50.00	$0.00	$0.00	$75.00
2.00	Labor SC- Safety Supervisor	$95.00	$0.00	$0.00	$190.00
7.00	Labor JH- load transfer	$50.00	$0.00	$0.00	$350.00
7.00	Labor JS- load transfer	$50.00	$0.00	$0.00	$350.00
1.00	Miscellaneous	$125.00	$0.00	$0.00	$125.00
1.00	Miscellaneous Verns/additonal labor & 3- road signs	$1,000.00	$0.00	$0.00	$1,000.00

TOTAL AMOUNT DUE
$4,758.85

Received By: **Print Name:** 2/11/2016

001087

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	**106-004327**	**Date of Loss:**	**02/09/2016**
Customer Claim #:	**61A169404**	**Adjuster:**	**John Habegger**
Insured/Owner:	**Premier Transportation**		

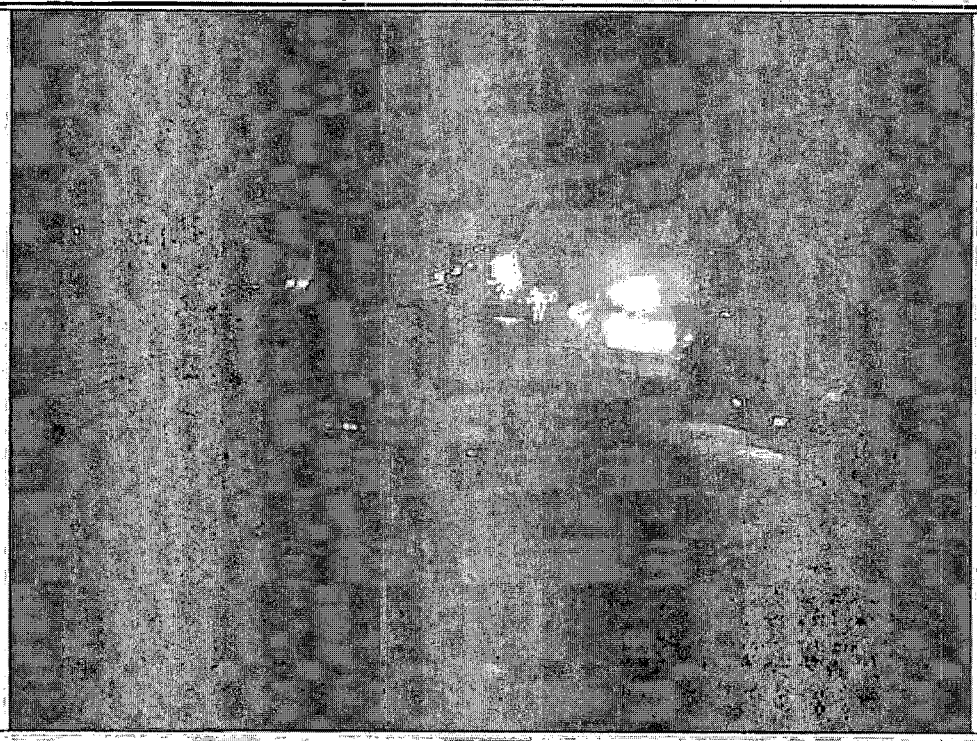


Photo #: 1

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
View of the scene after arrival. Insured Vehicle (IV) is on the right.

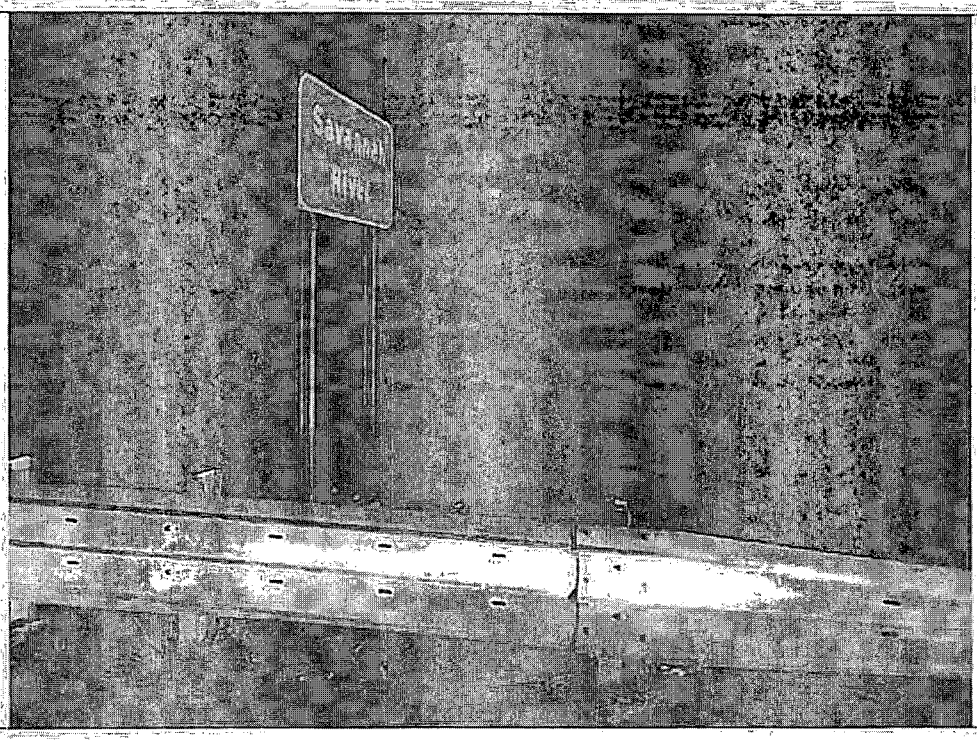


Photo #: 2

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
IV crashed on the Savannah River bridge that runs east and west between the states of South Carolina and Georgia.

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	**106-004327**	**Date of Loss:**	**02/09/2016**
Customer Claim #:	**61A169404**	**Adjuster:**	**John Habegger**
Insured/Owner:	**Premier Transportation**		

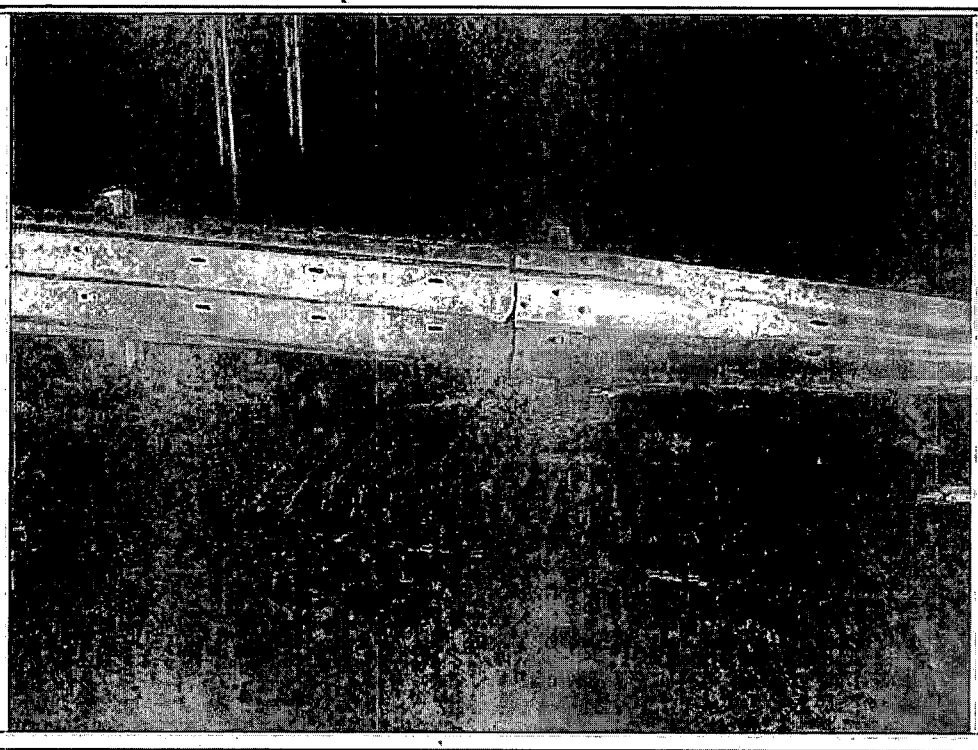


Photo #: 3

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Tire marks were noted at the beginning of the bridge on the right side going east.

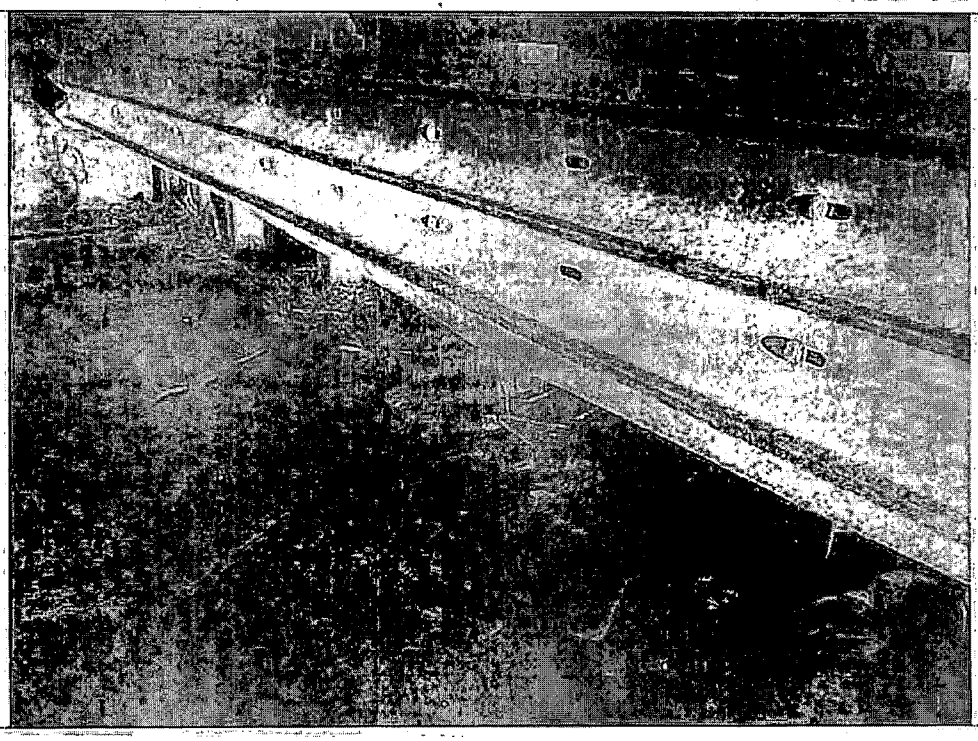


Photo #: 4

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Close-up of the tire marks.

001089

Claim Photo

CIA
CUSTARD
INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

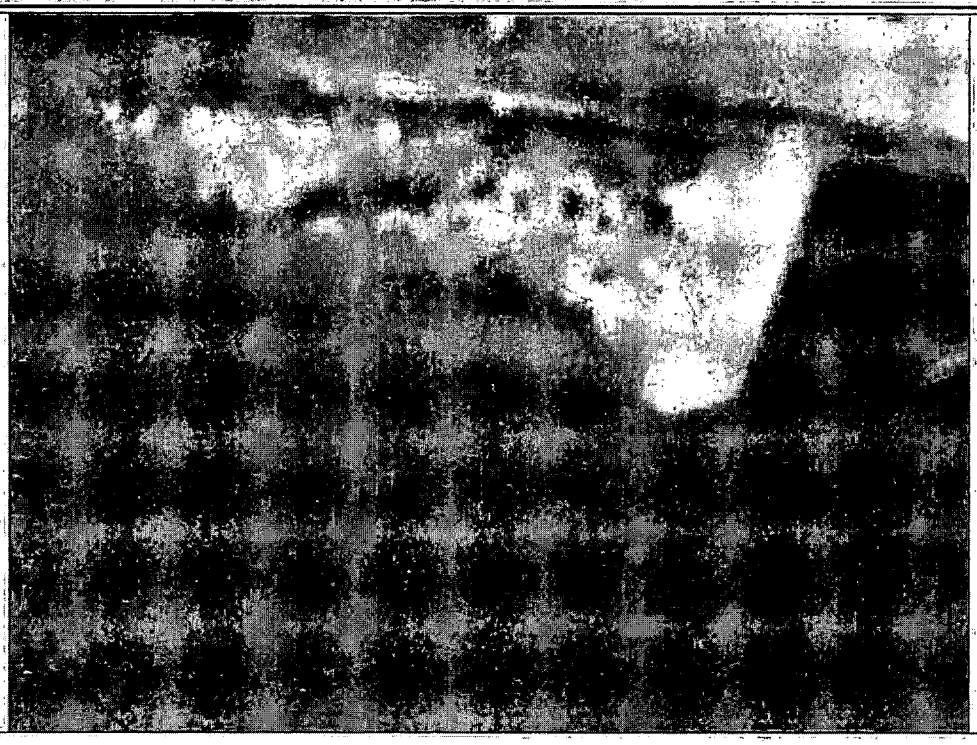


Photo #: 5

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Concrete damaged in this area.

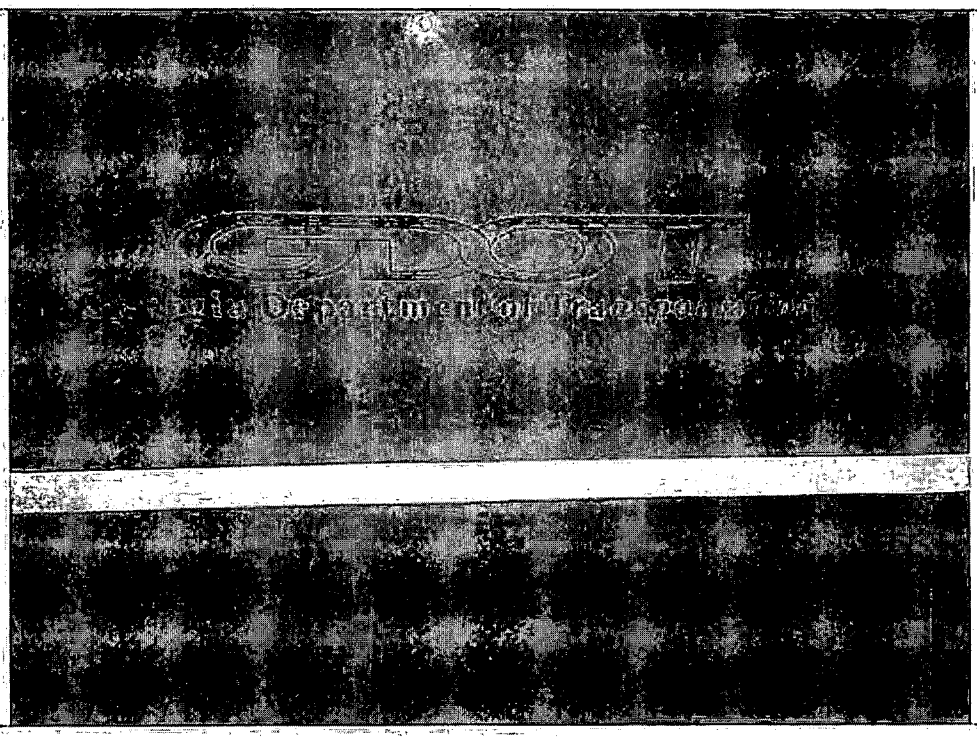


Photo #: 6

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
GDOT was also on-site in this incident. SCDOT was also on site.

001090

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #: 106-004327 **Date of Loss:** 02/09/2016
Customer Claim #: 61A169404 **Adjuster:** John Habegger
Insured/Owner: Premier Transportation

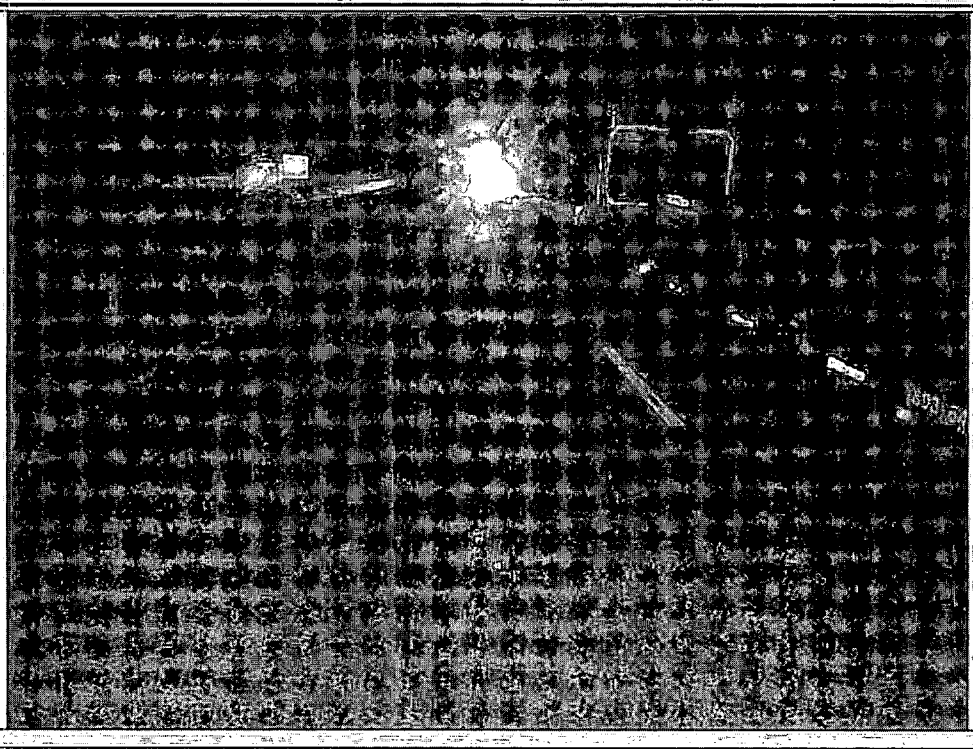


Photo #: 7

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview of the bridge looking west.

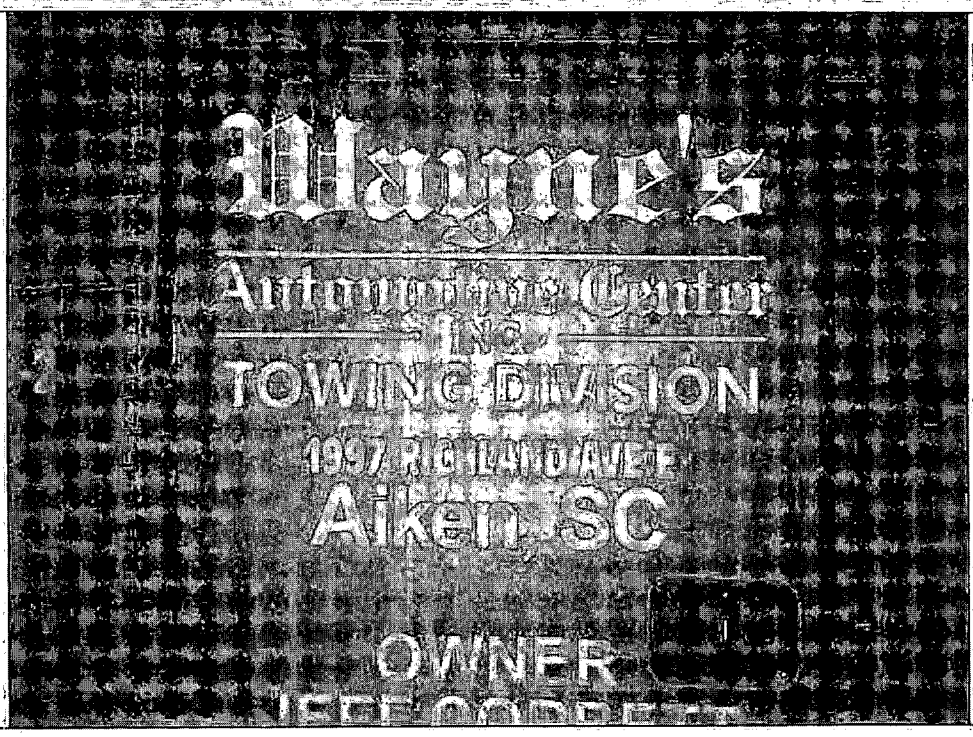


Photo #: 8

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Wayne's was on site and handled the oil spill, the tractor trailer, and the cargo.

001091

Claim Photo

CIA
CUSTARD
INSURANCE ADJUSTERS

CIA File #:	**106-004327**	**Date of Loss:**	**02/09/2016**
Customer Claim #:	**61A169404**	**Adjuster:**	**John Habegger**
Insured/Owner:	**Premier Transportation**		

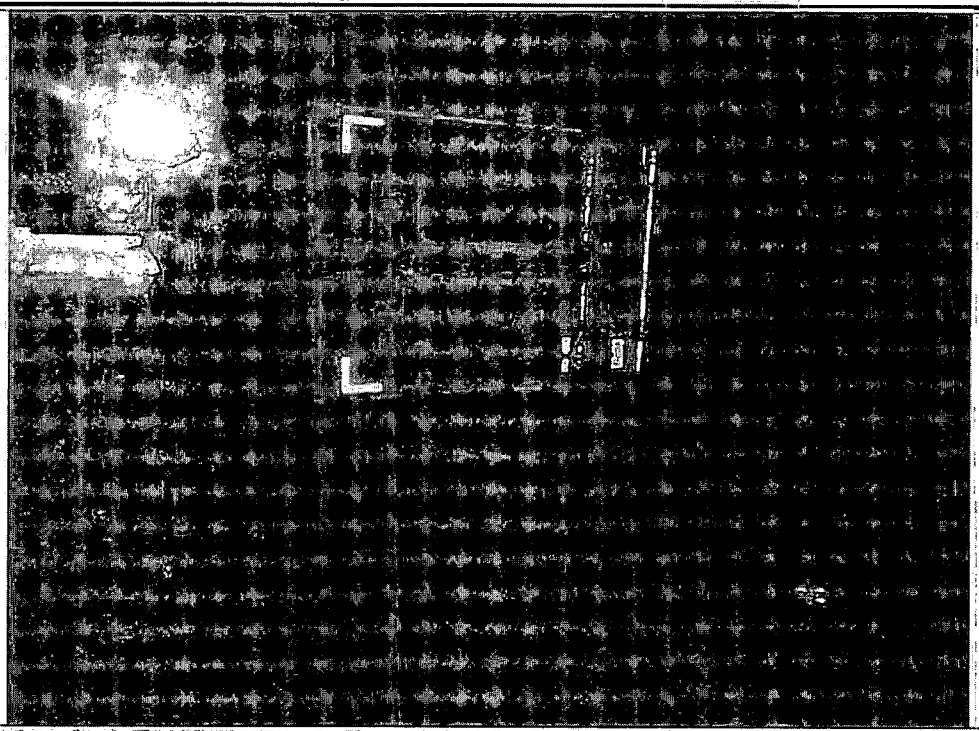


Photo #: 9

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Rear of the IV.



Photo #: 10

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Tag # of the trailer.

Claim Photo

CIA CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

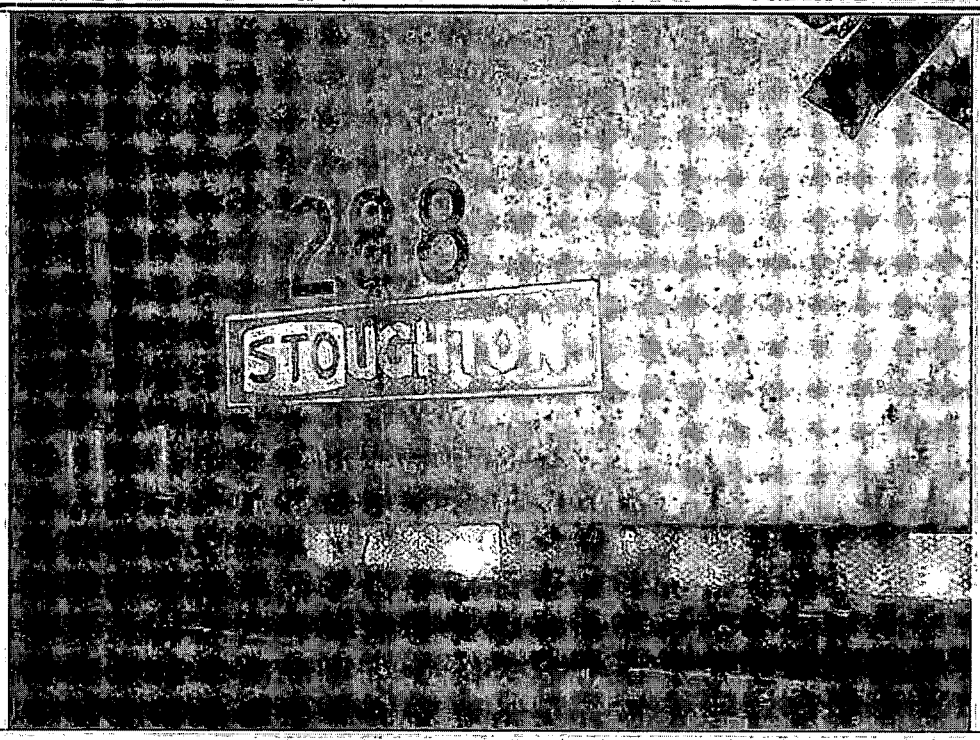


Photo #: 11

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Trailer make and unit number.

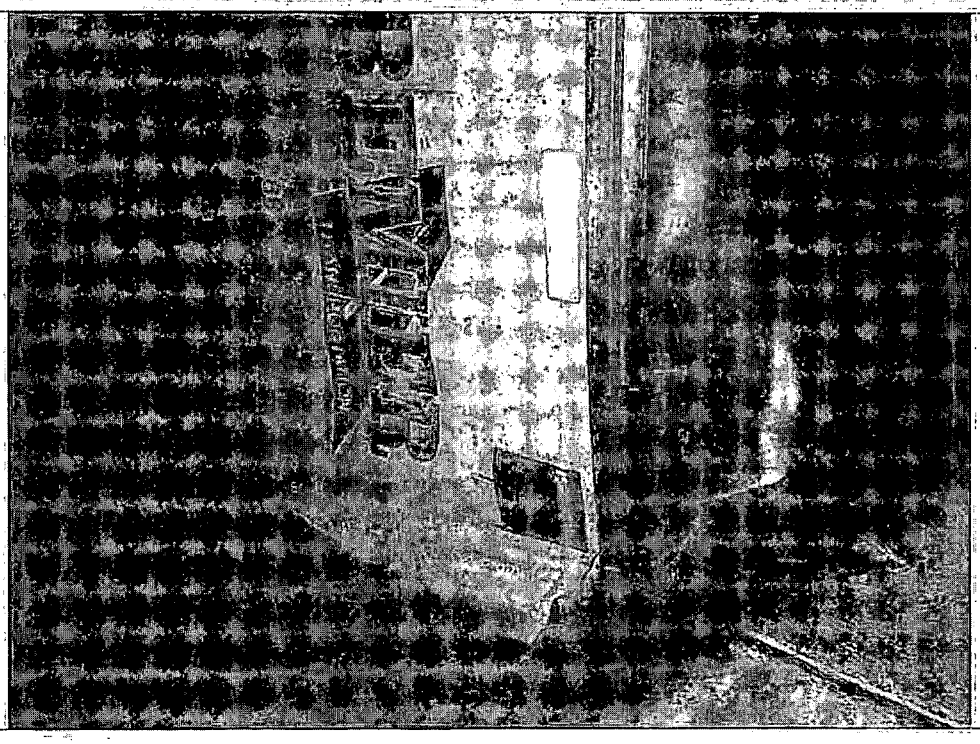


Photo #: 12

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Front top damage to the trailer.

001093

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #: 106-004327
Customer Claim #: 61A169404
Insured/Owner: Premier Transportation

Date of Loss: 02/09/2016
Adjuster: John Habegger

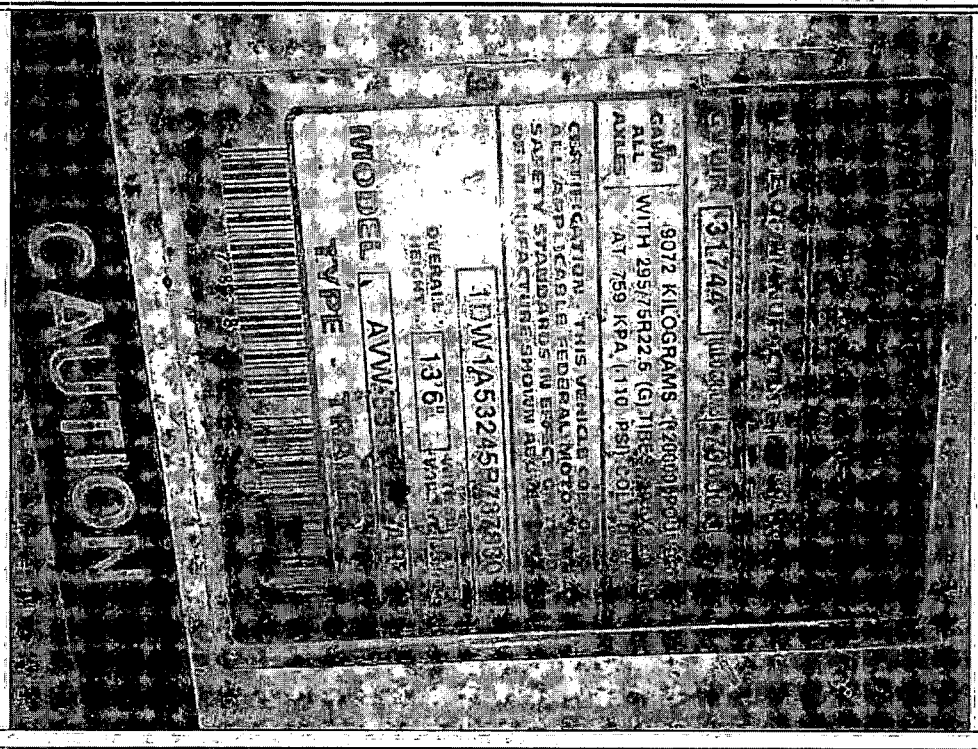


Photo #: 13
Date Taken: 02/09/2016
Taken By: John Habegger
Description: Trailer Vin tag.

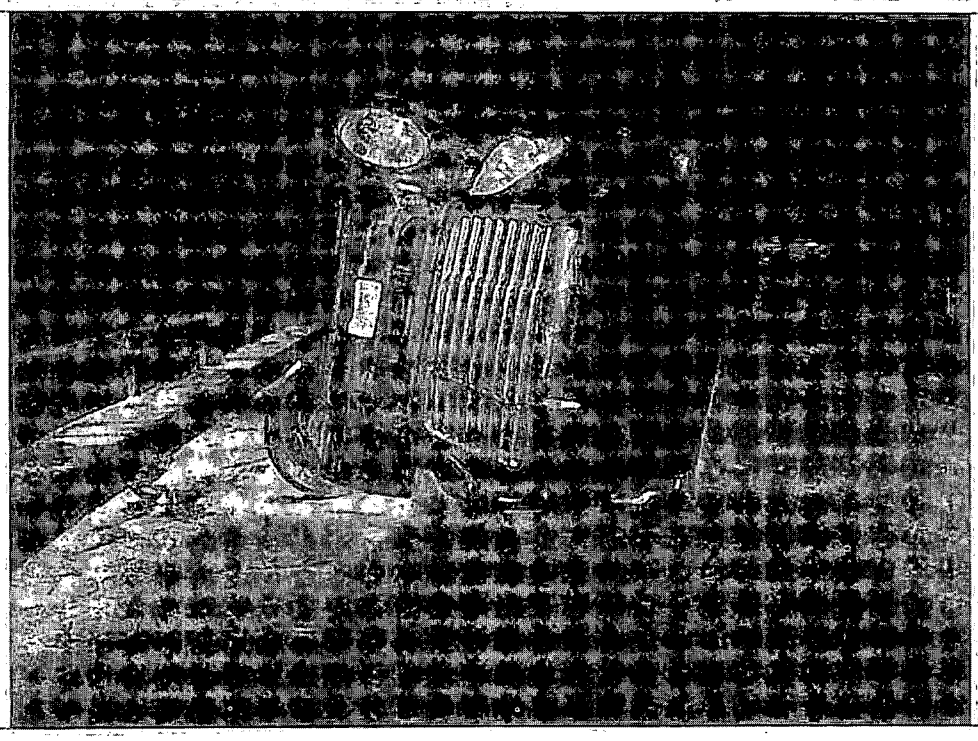


Photo #: 14
Date Taken: 02/09/2016
Taken By: John Habegger
Description: Front of the IV.

001094

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	Date of Loss:	02/09/2016
Customer Claim #:	61A169404	Adjuster:	John Habegger
Insured/Owner:	Premier Transportation		

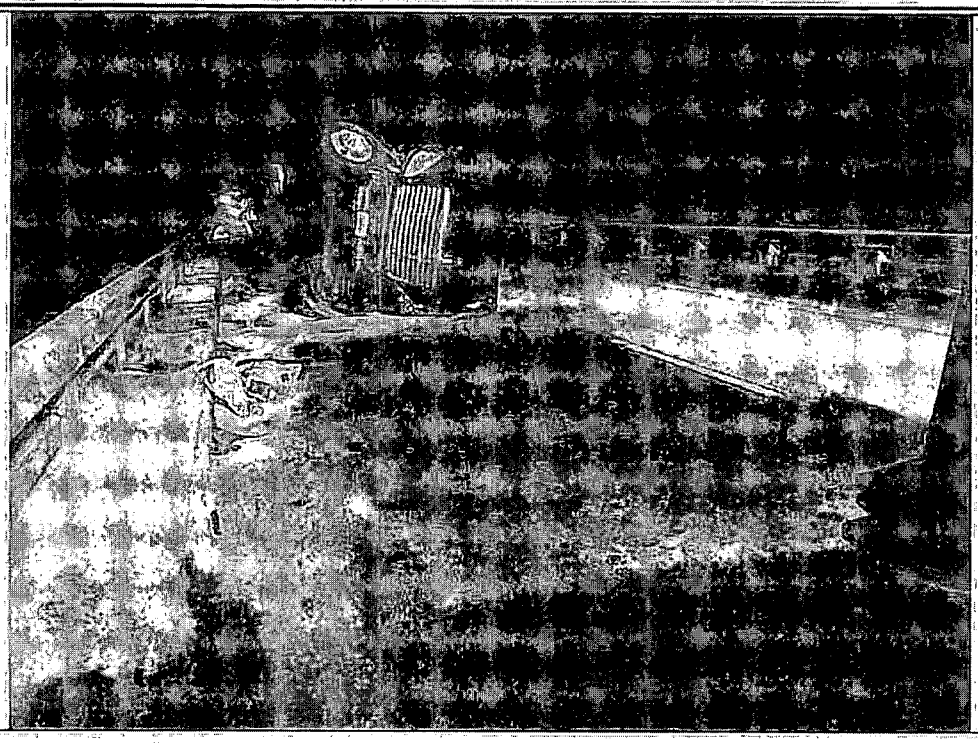


Photo #: 15

Date Taken: 02/09/2016

Taken By: John Habegger

Description: Overview of the front.

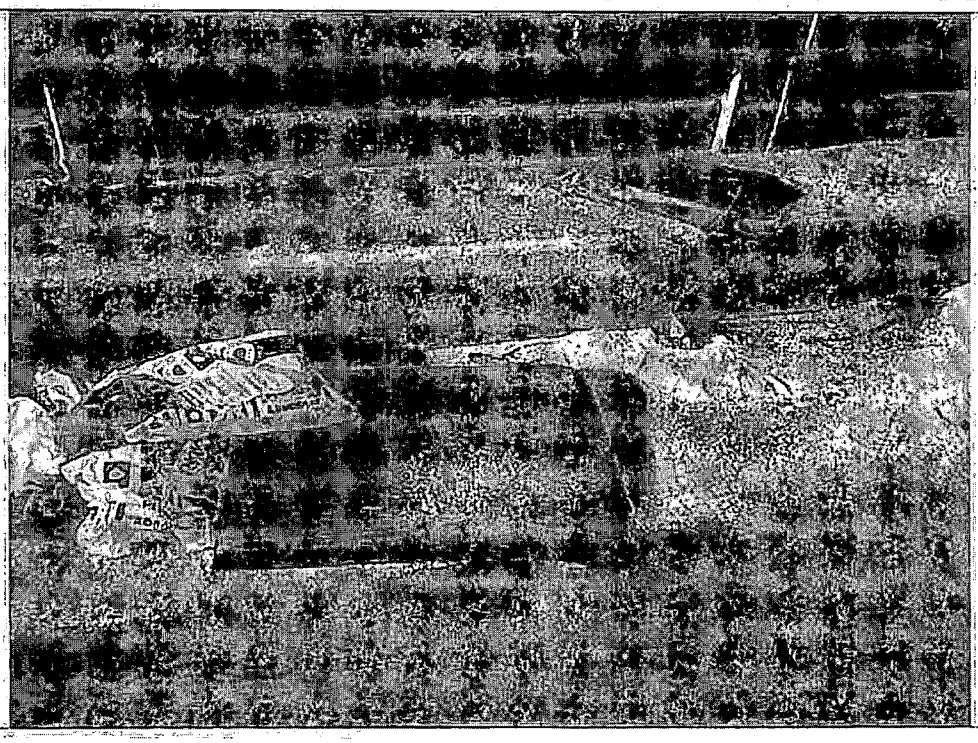


Photo #: 16

Date Taken: 02/09/2016

Taken By: John Habegger

Description: absorbent used for the oil spill. No contaminate was noted to enter the river.

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #: 106-004327
Customer Claim #: 61A169404
Insured/Owner: Premier Transportation

Date of Loss: 02/09/2016
Adjuster: John Habegger

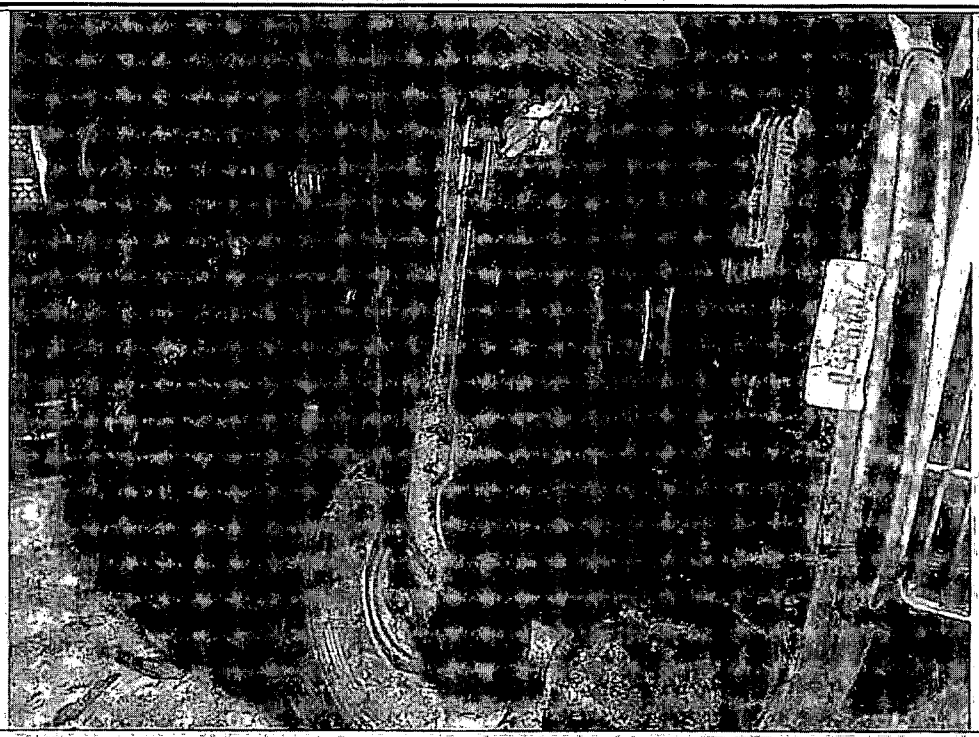


Photo #: 17
Date Taken: 02/09/2016
Taken By: John Habegger
Description: Front of the IV.

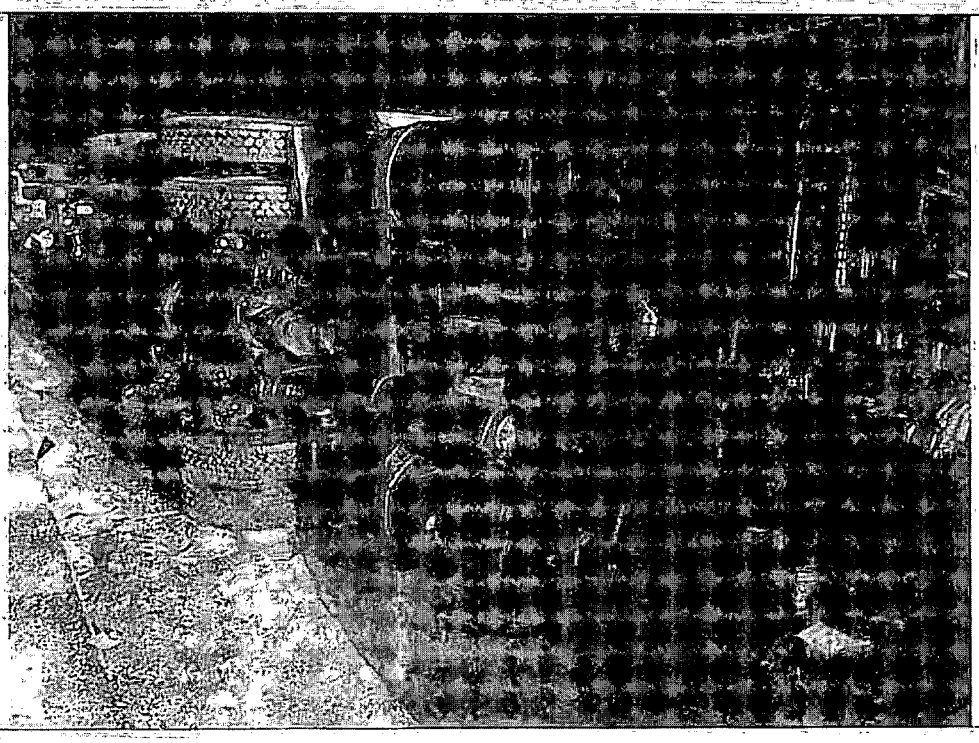


Photo #: 18
Date Taken: 02/09/2016
Taken By: John Habegger
Description: IV was flipped on its driver's side.

Claim Photo

CIA CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

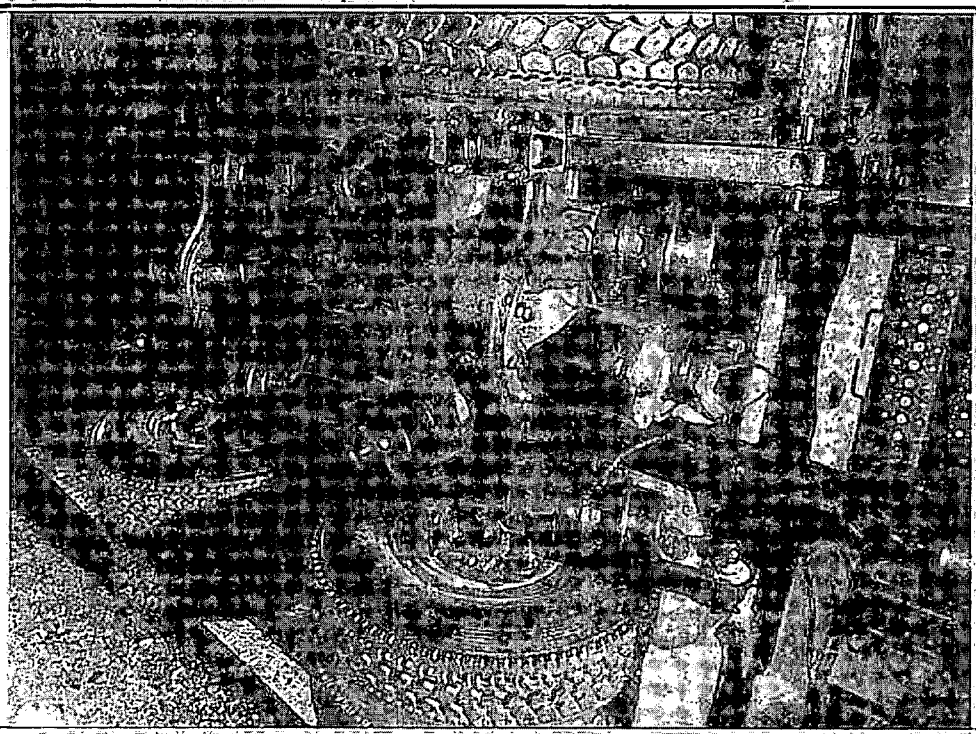


Photo #: 19

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Close-up of the underside.

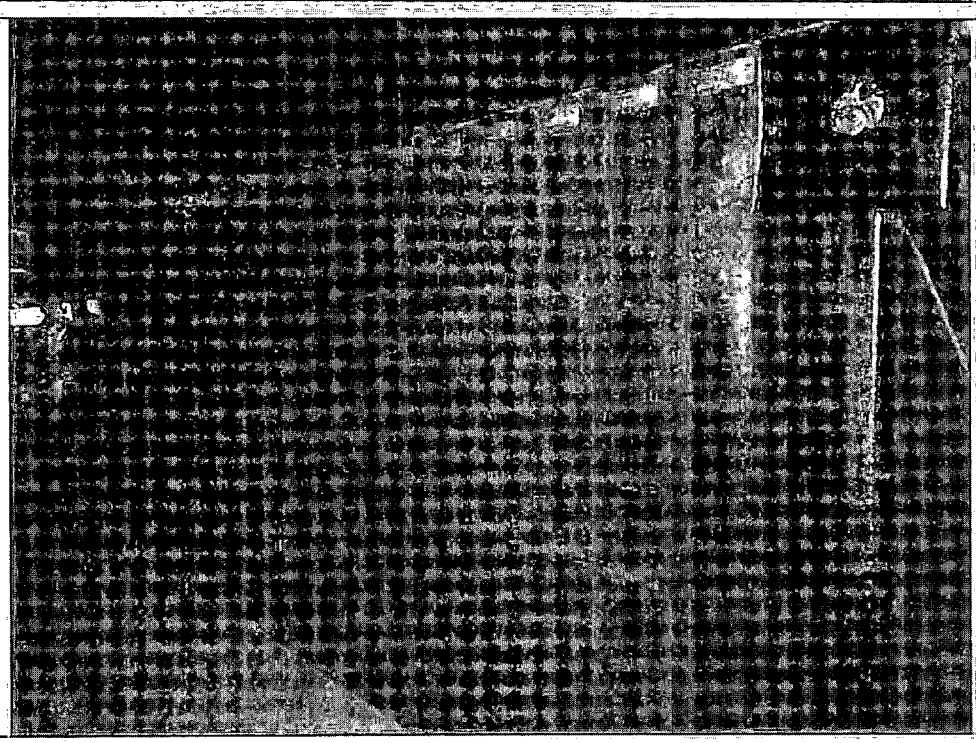


Photo #: 20

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Underside of the trailer.

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

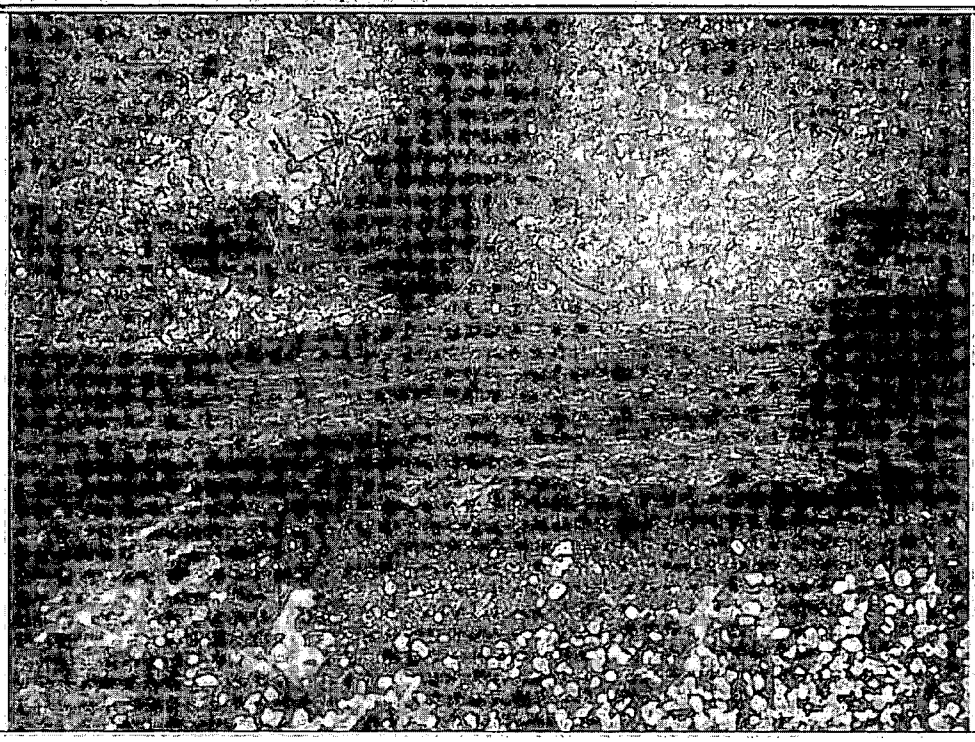


Photo #: 21

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Drains in the Bridge were plugged by Wayne's. The plug was removed for the photo.

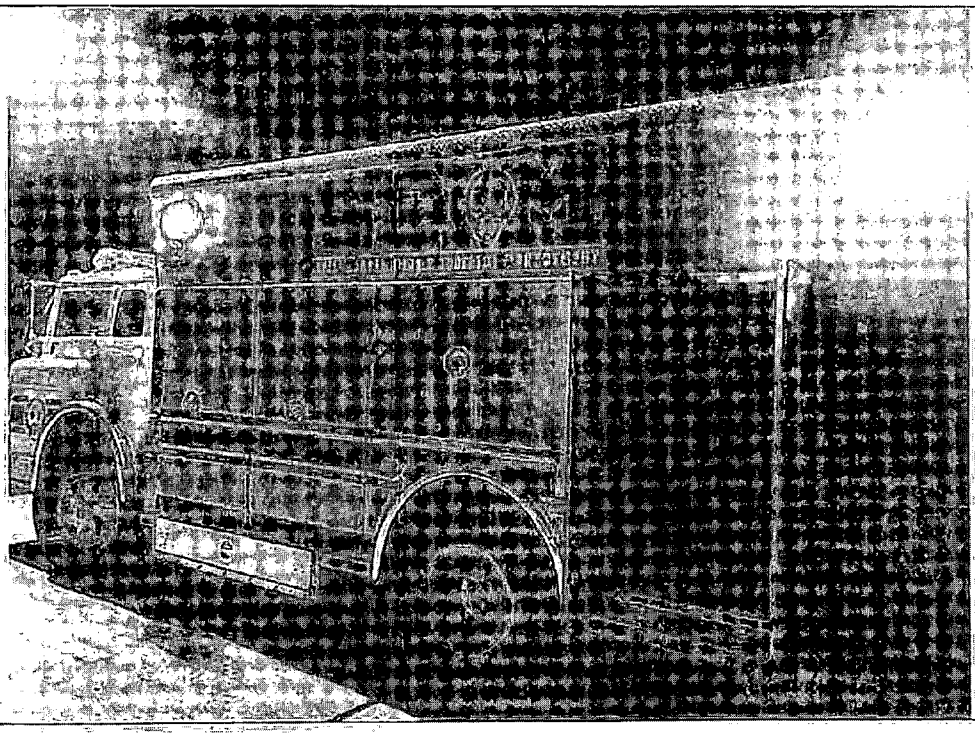


Photo #: 22

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Spill Containment and Incident Management belongs to Wayne's.

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

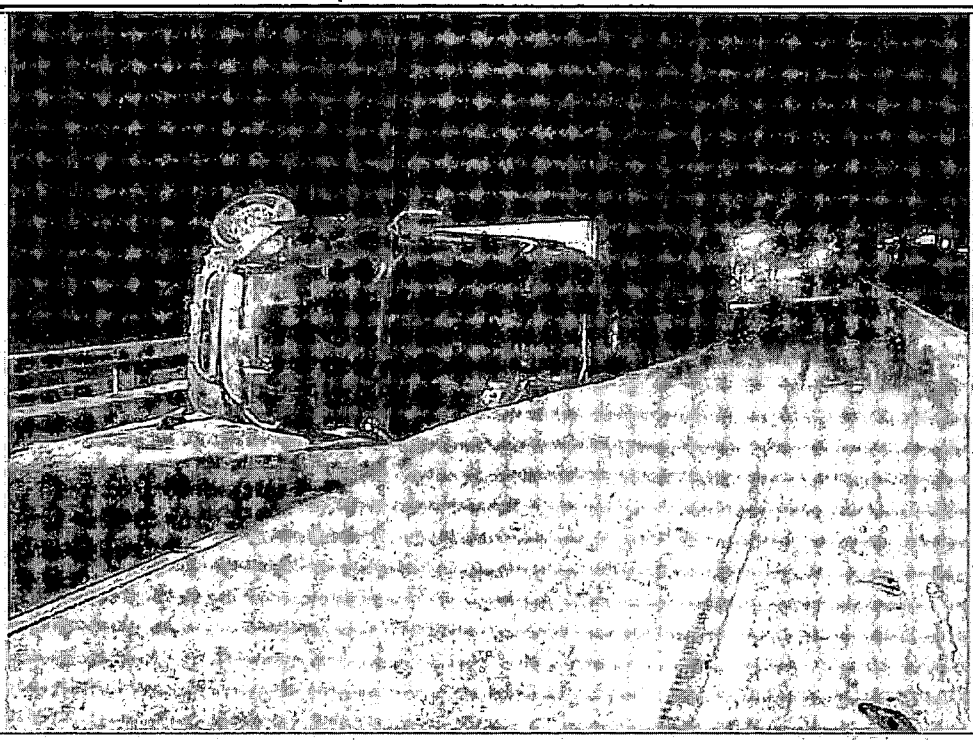


Photo #: 23

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview looking east.

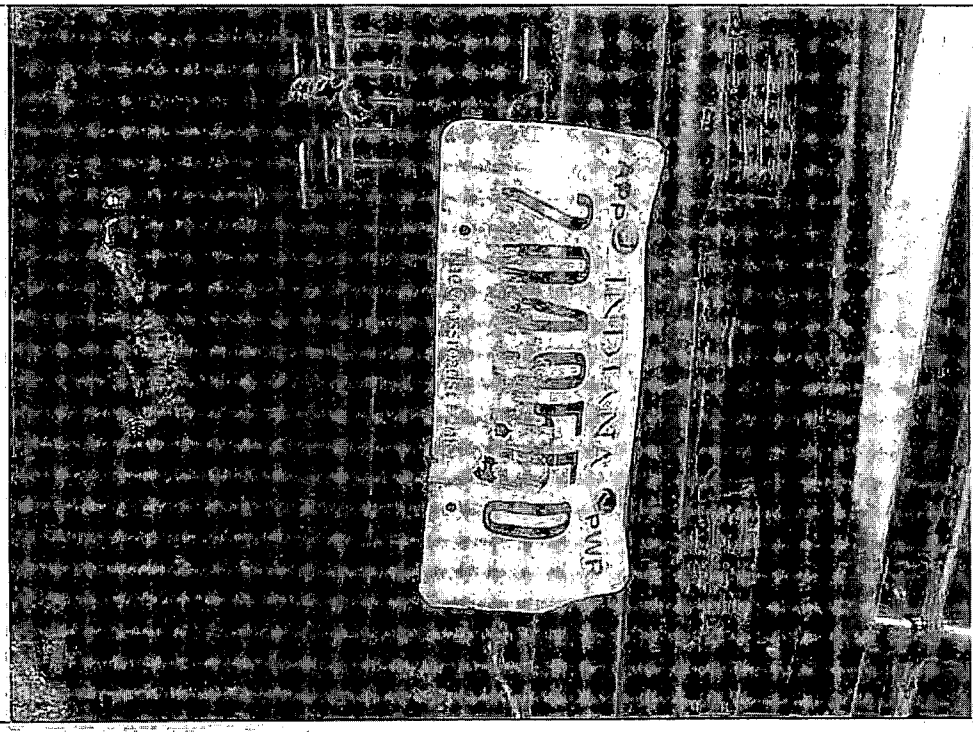


Photo #: 24

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Tag number for the IV (tractor).

001099

Claim Photo

CIA CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

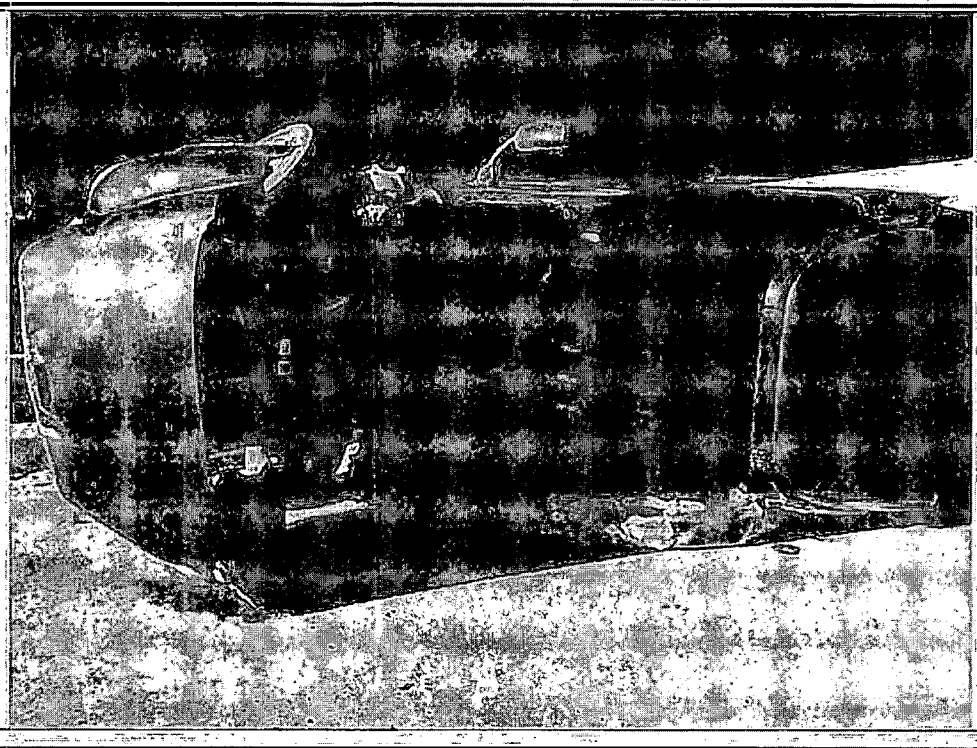


Photo #: 25

Date Taken: 02/09/2016

Taken By: John Habegger

Description: Top of the IV.

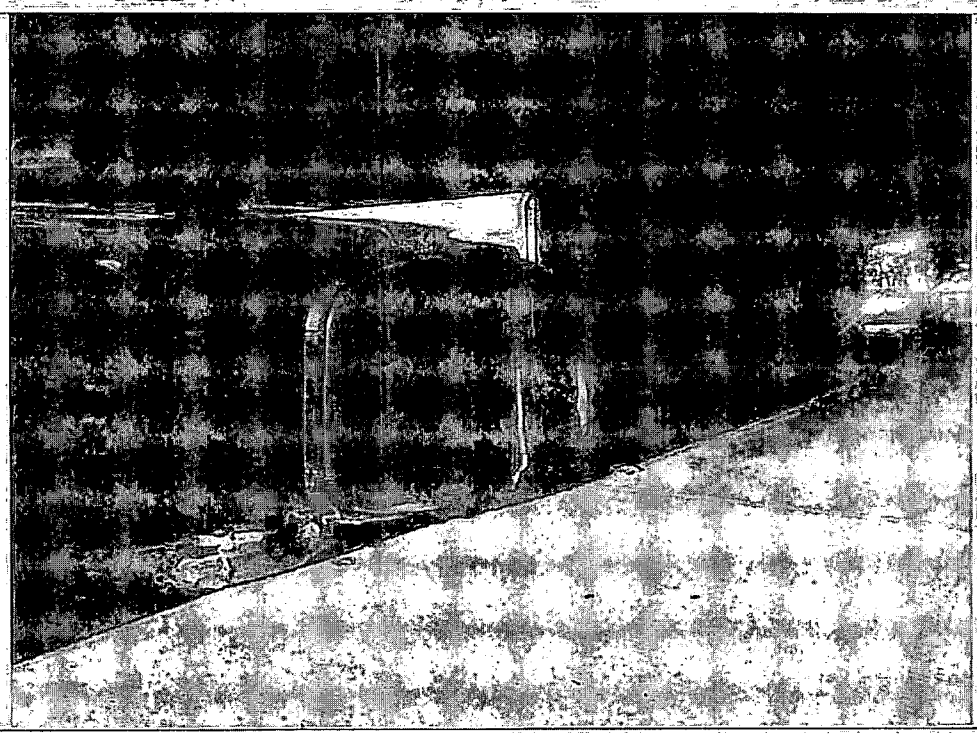


Photo #: 26

Date Taken: 02/09/2016

Taken By: John Habegger

Description: Overview looking east.

Claim Photo

CIA File #: 106-004327
Customer Claim #: 61A169404
Insured/Owner: Premier Transportation

Date of Loss: 02/09/2016
Adjuster: John Habegger

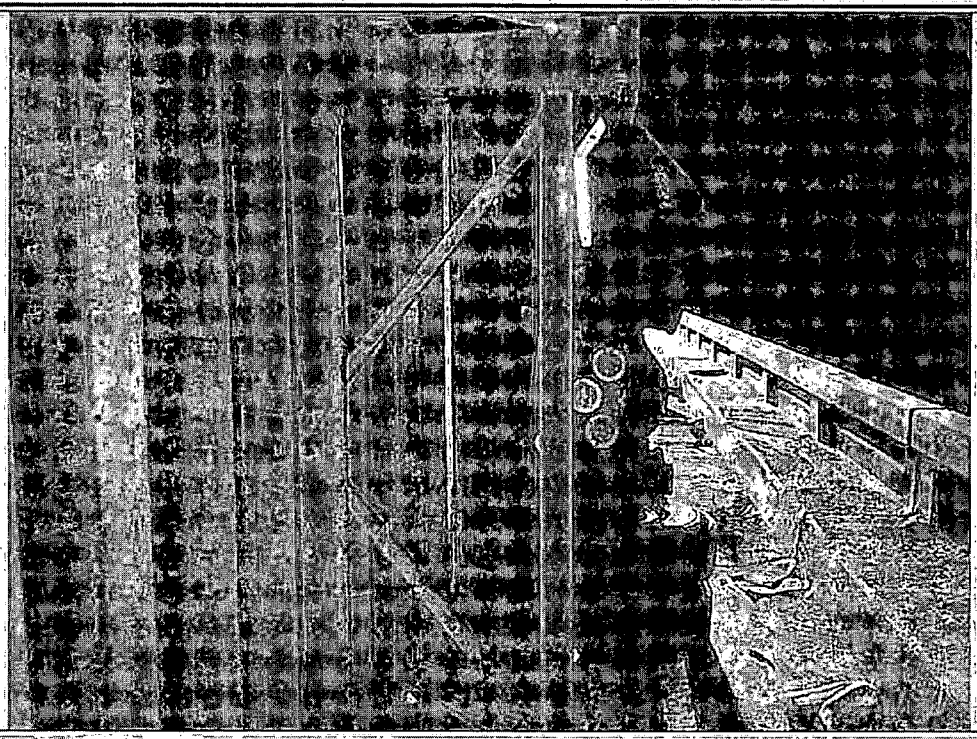


Photo #: 27

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Underside of the trailer looking west.

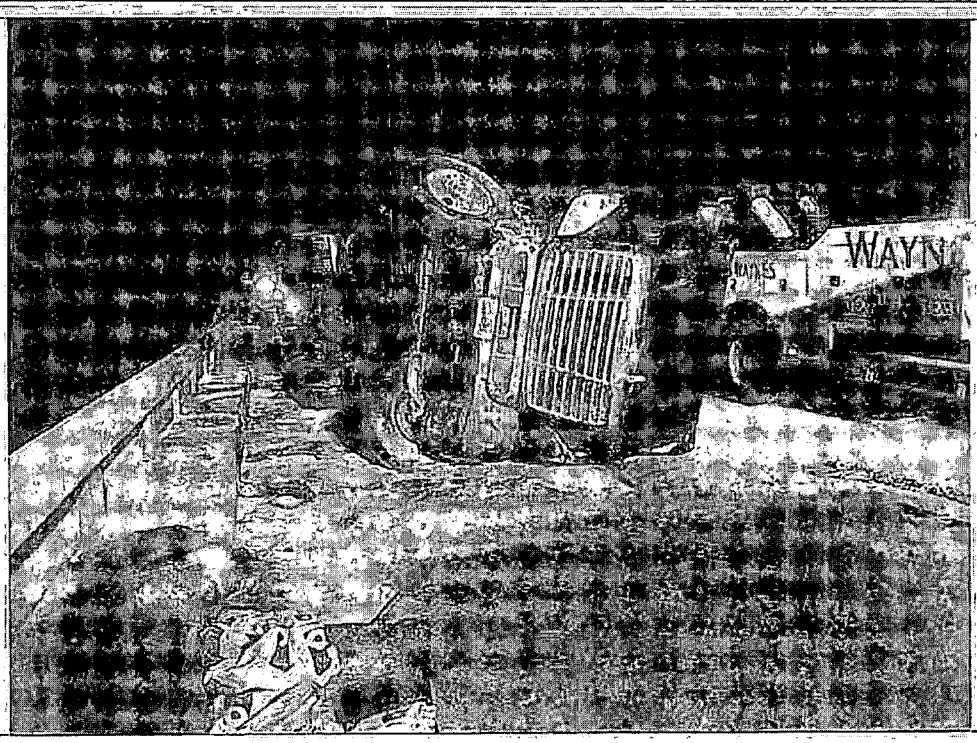


Photo #: 28

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview looking east from the south side of the bridge.

Claim Photo

CIA CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

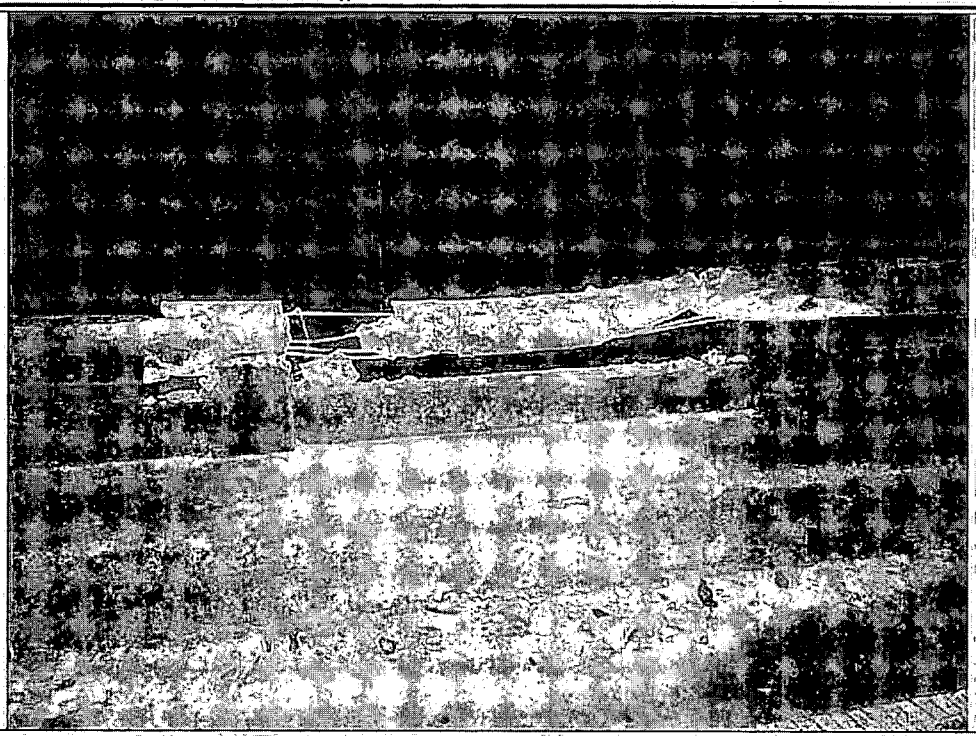


Photo #: 29

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Damage to the Bridge.

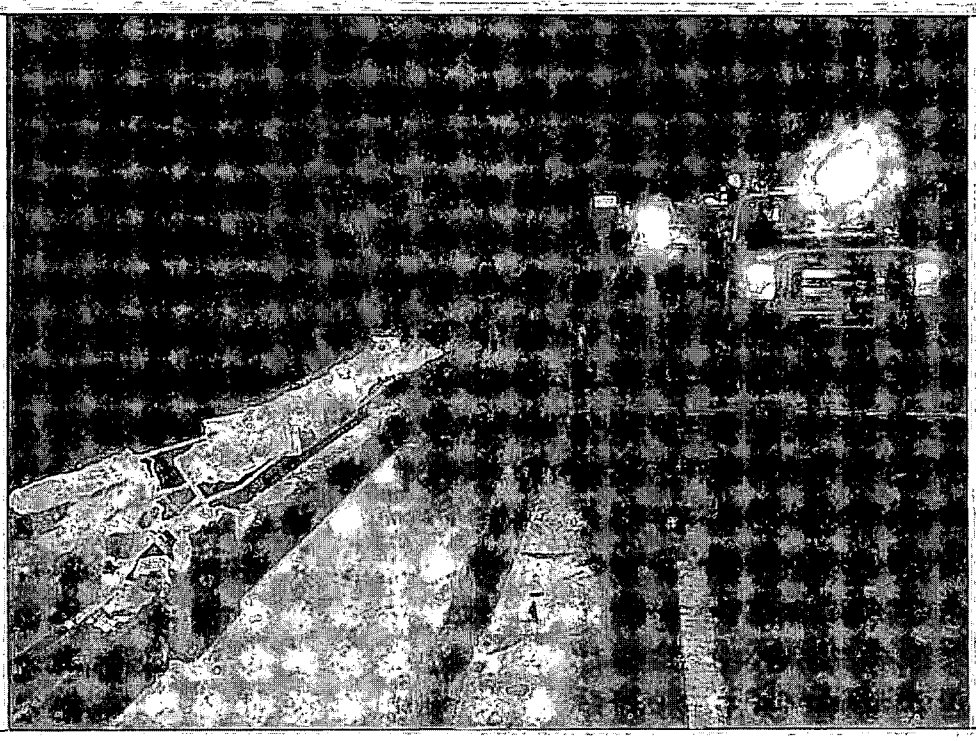


Photo #: 30

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview of some of the damage.

001102

Claim Photo

CIA
CUSTARD
INSURANCE ADJUSTERS

CIA File #:	106-004327	Date of Loss:	02/09/2016
Customer Claim #:	61A169404	Adjuster:	John Habegger
Insured/Owner:	Premier Transportation		

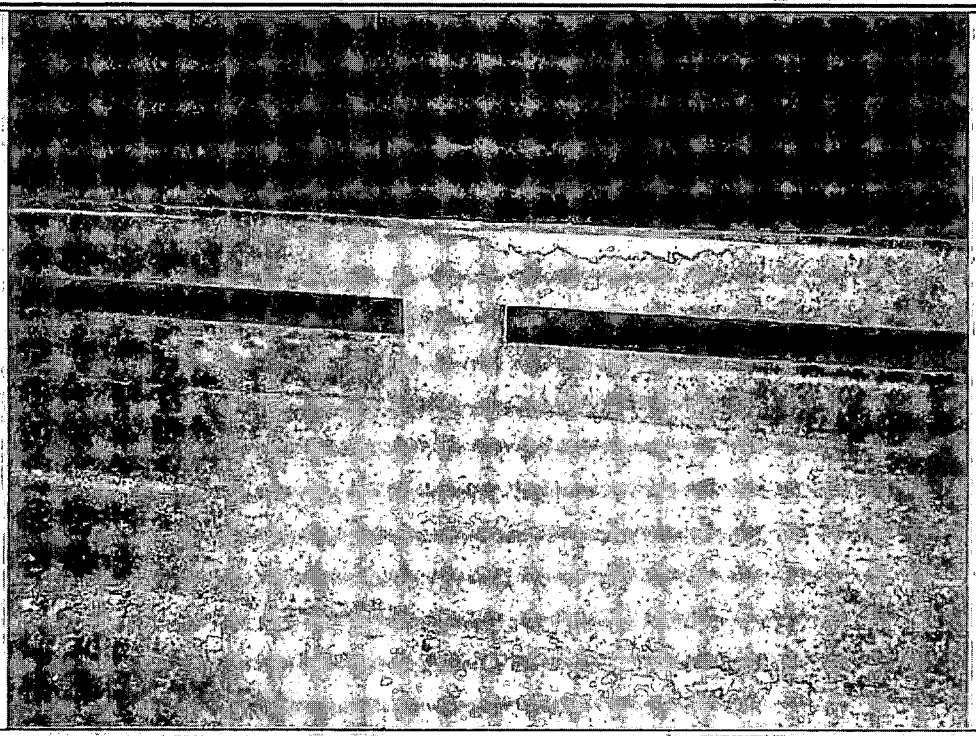


Photo #: 31

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Other damage on the bridge to the concrete rail.

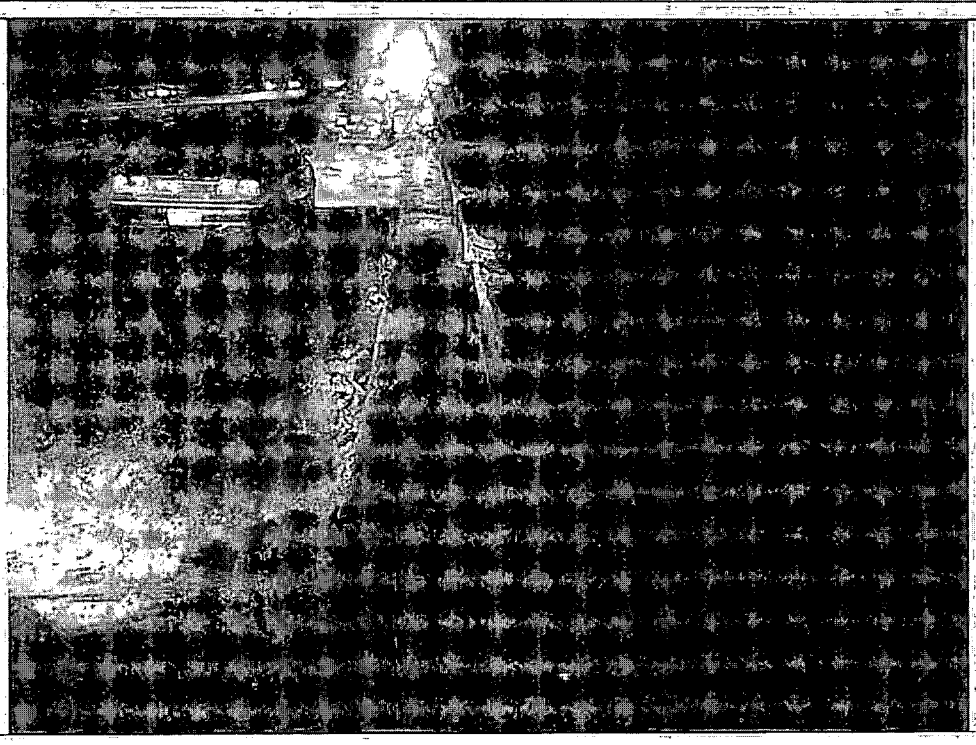


Photo #: 32

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Bridge overview.

Claim Photo

CIA File #: 106-004327
Customer Claim #: 61A169404
Insured/Owner: Premier Transportation

Date of Loss: 02/09/2016
Adjuster: John Habegger

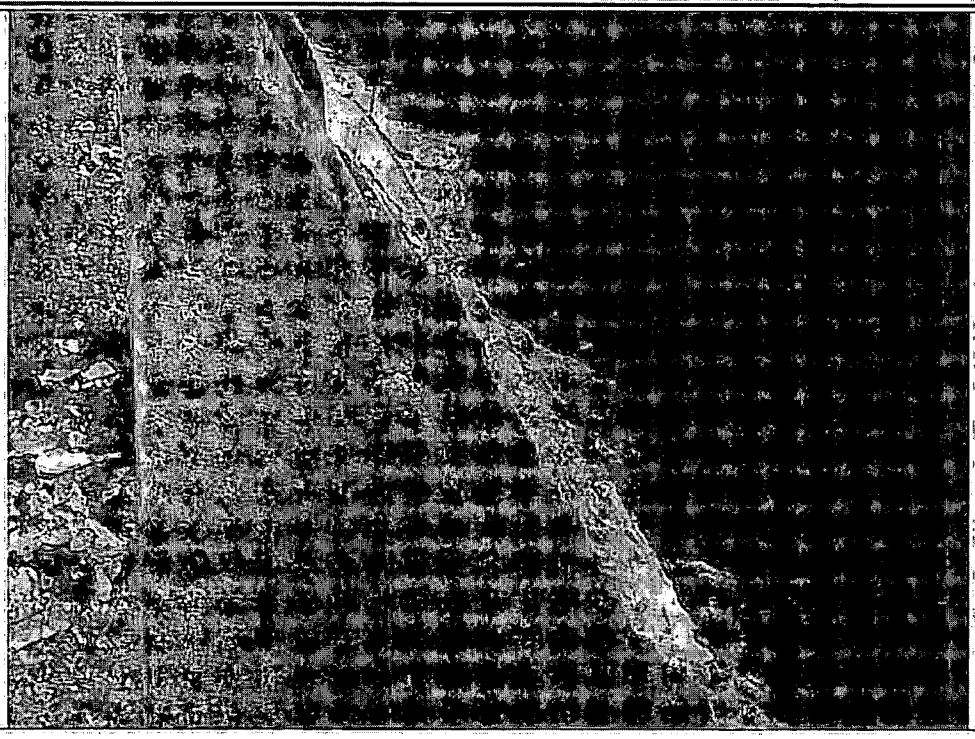


Photo #: 33

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
More bridge damage

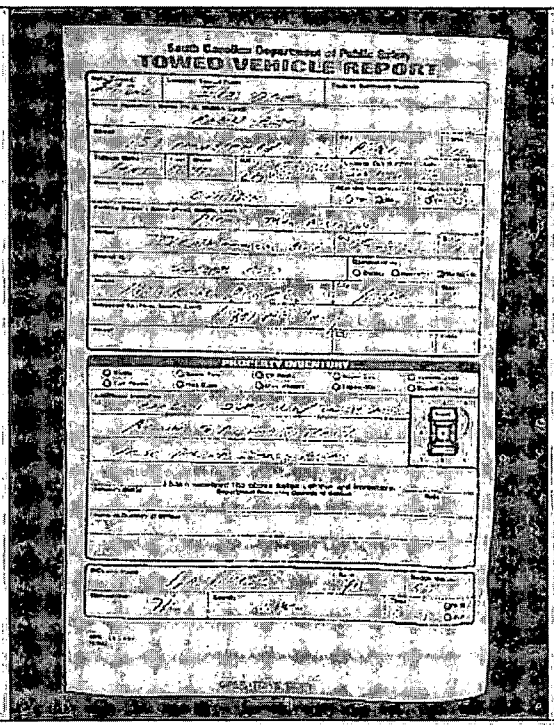


Photo #: 34

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Tow Report as provided by the SC Highway Patrol.

001104

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #: 106-004327 **Date of Loss:** 02/09/2016
Customer Claim #: 61A169404 **Adjuster:** John Habegger
Insured/Owner: Premier Transportation

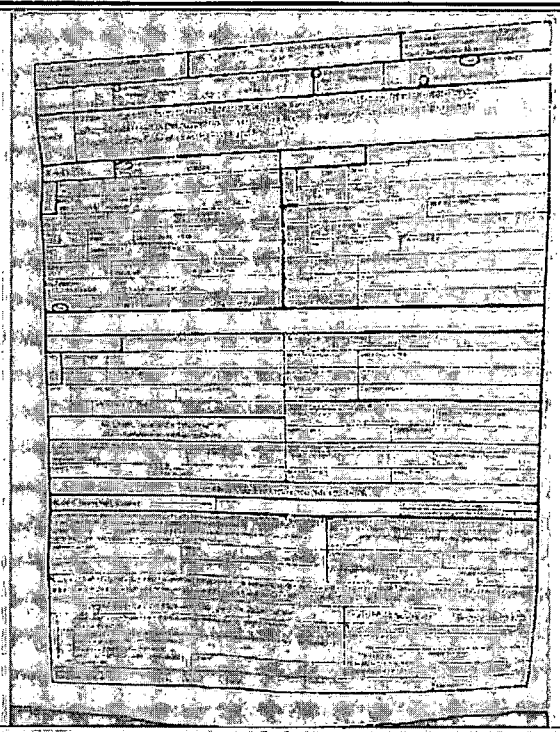


Photo #: 35

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
South Carolina FR-10

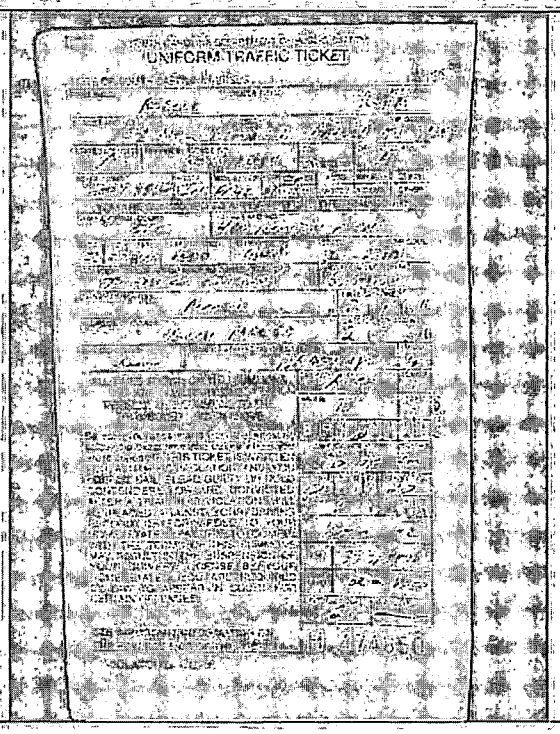


Photo #: 36

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Traffic Citation issued to the Insured Driver.

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

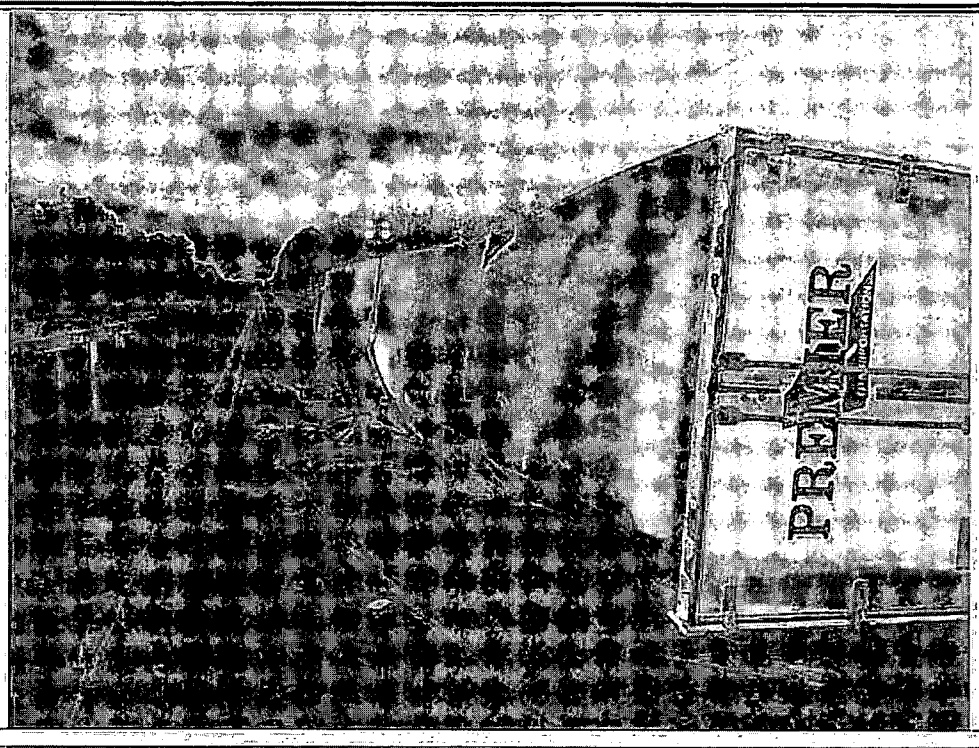


Photo #: 37

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview of during daylight hours.

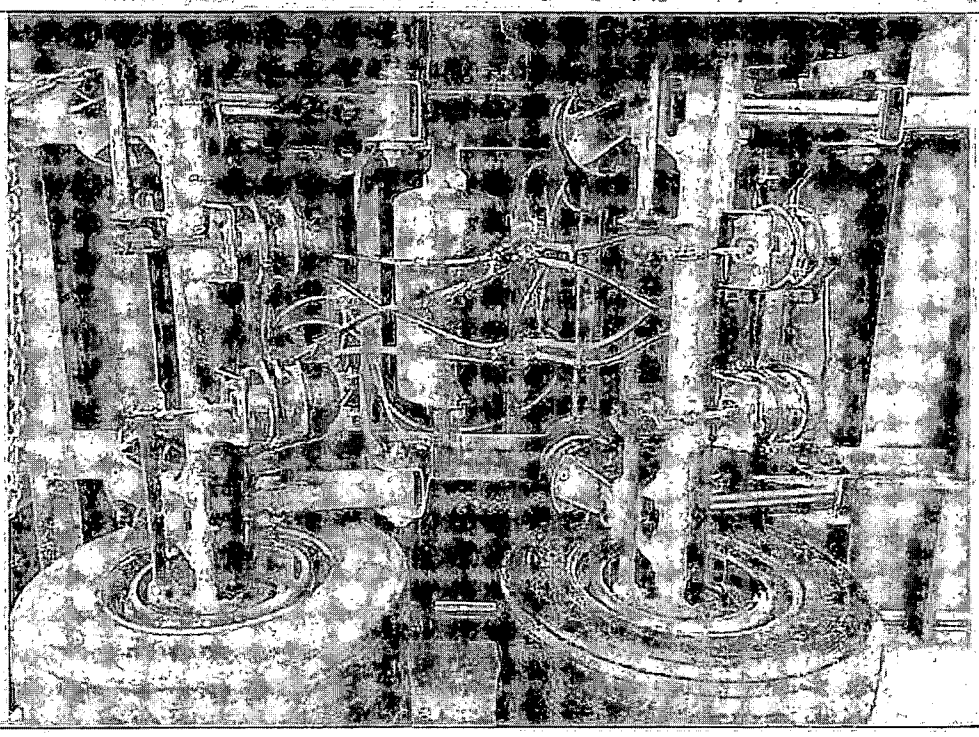


Photo #: 38

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Underside of the vehicle.

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	Date of Loss:	02/09/2016
Customer Claim #:	61A169404	Adjuster:	John Habegger
Insured/Owner:	Premier Transportation		

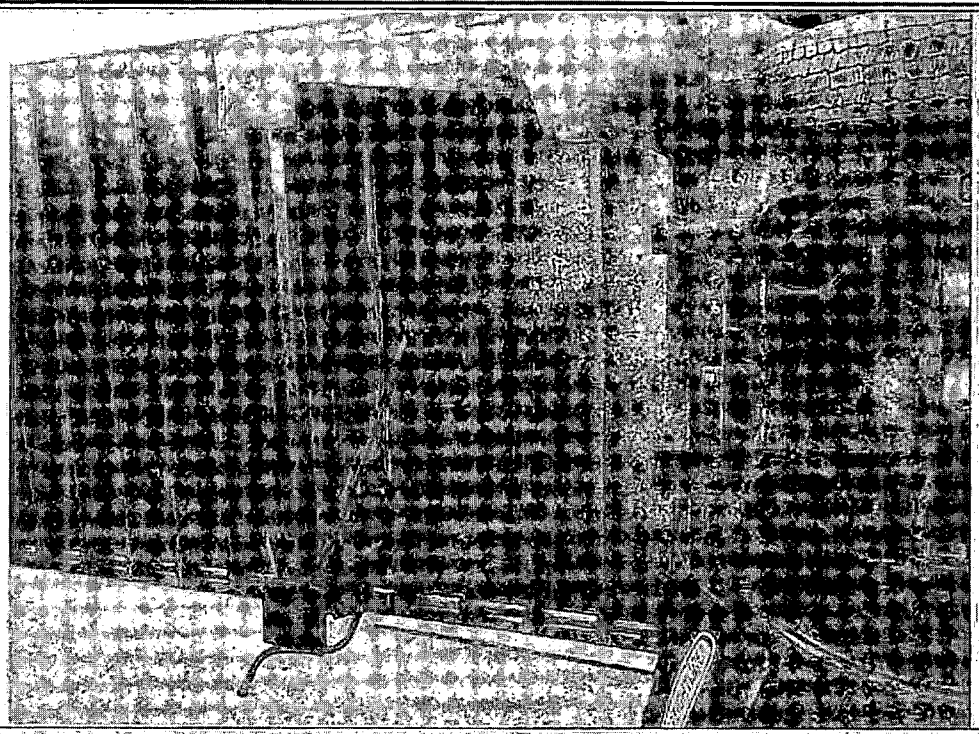


Photo #: 39

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Underside of the trailer.

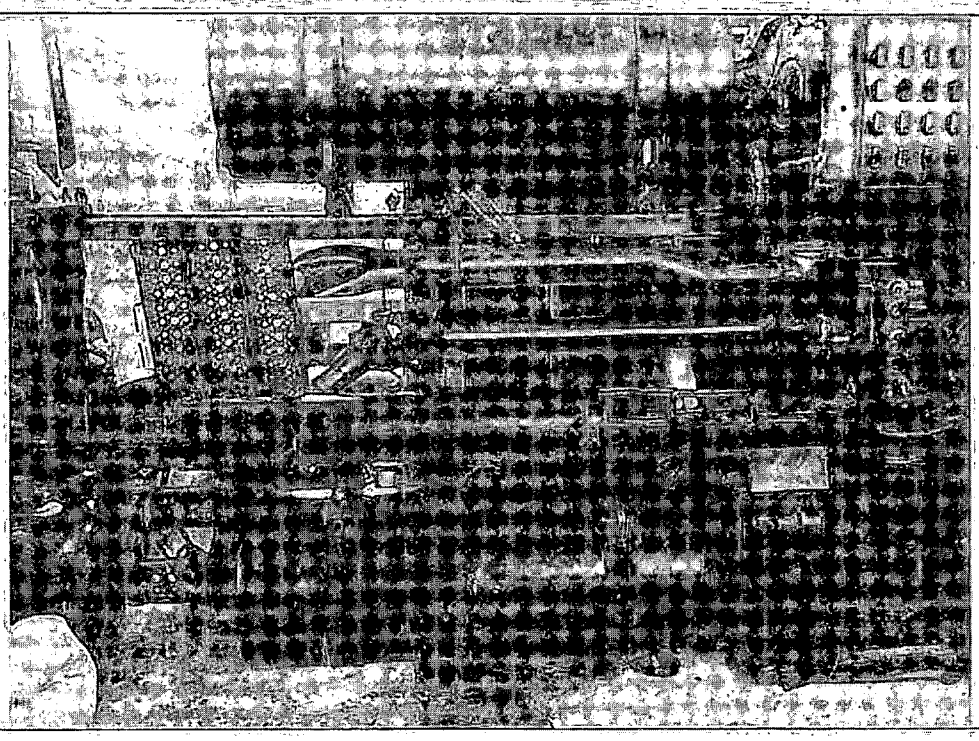


Photo #: 40

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Underside of the tractor. Wet with oil.

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	**106-004327**	**Date of Loss:**	**02/09/2016**
Customer Claim #:	**61A169404**	**Adjuster:**	**John Habegger**
Insured/Owner:	**Premier Transportation**		

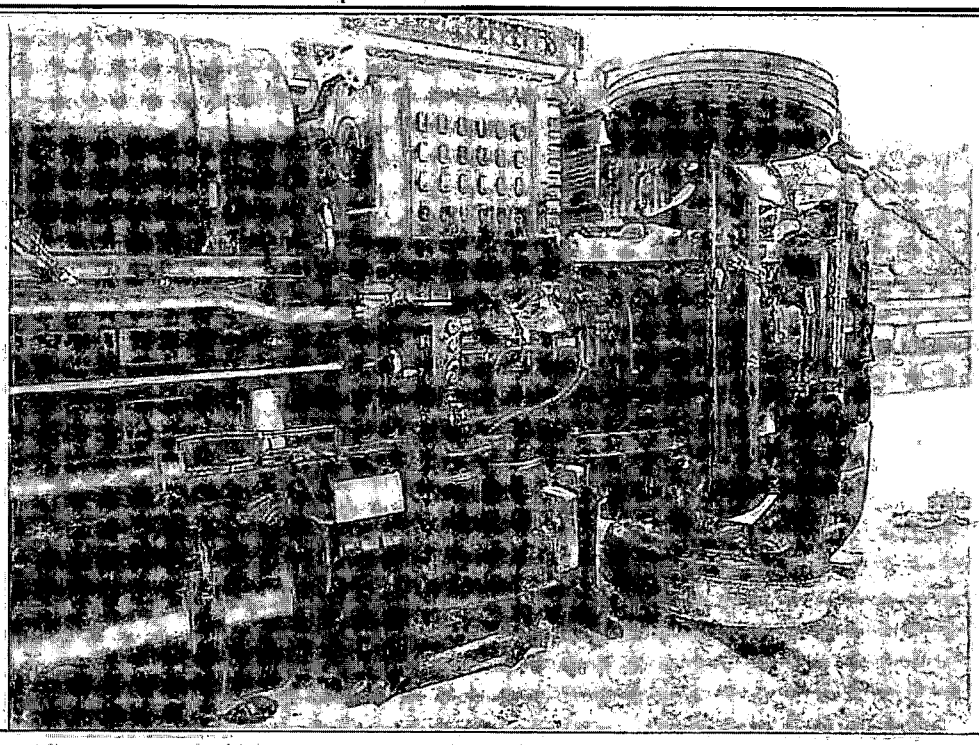


Photo #: 41

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview of the underside of the tractor.



Photo #: 42

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
South side of the westbound bridge looking east.

Claim Photo

CIA CUSTARD INSURANCE ADJUSTERS

CIA File #:	**106-004327**	**Date of Loss:**	**02/09/2016**
Customer Claim #:	**61A169404**	**Adjuster:**	**John Habegger**
Insured/Owner:	**Premier Transportation**		

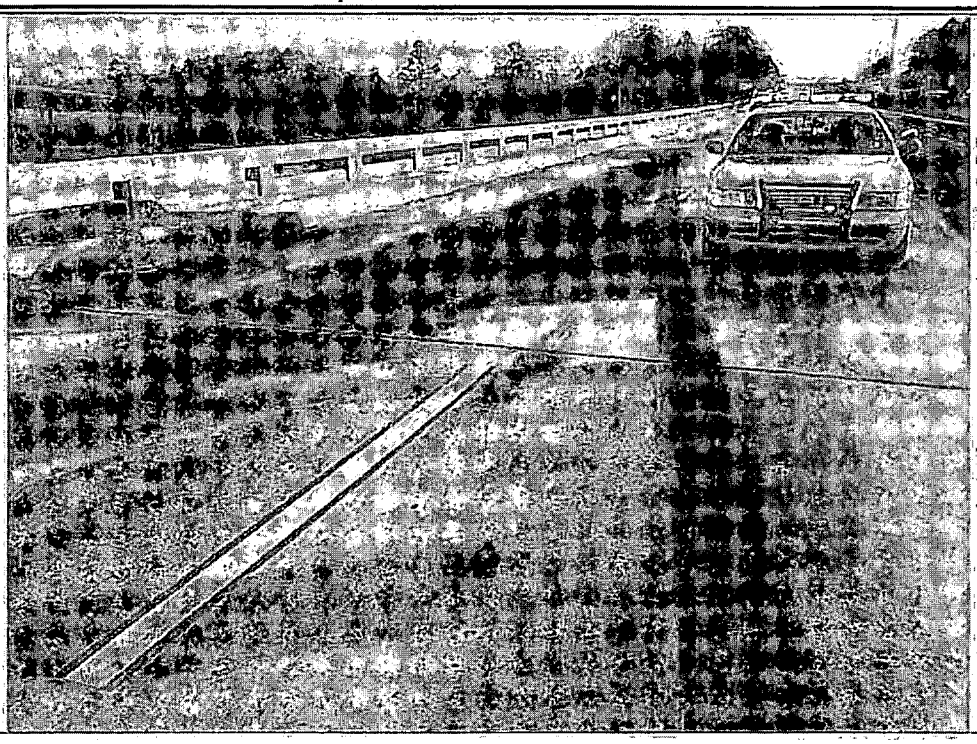


Photo #: 43

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Tire marks on the bridge left by the IV.

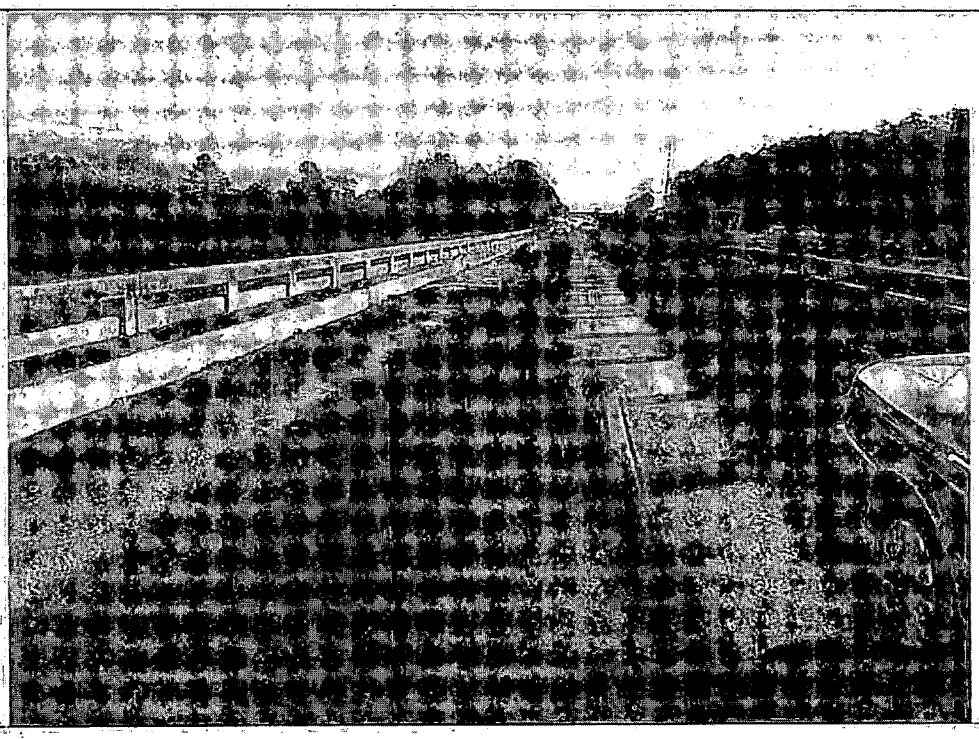


Photo #: 44

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview of the tire marks.

Claim Photo

CIA CUSTARD INSURANCE ADJUSTERS

CIA File #:	**106-004327**	**Date of Loss:**	**02/09/2016**
Customer Claim #:	**61A169404**	**Adjuster:**	**John Habegger**
Insured/Owner:	**Premier Transportation**		

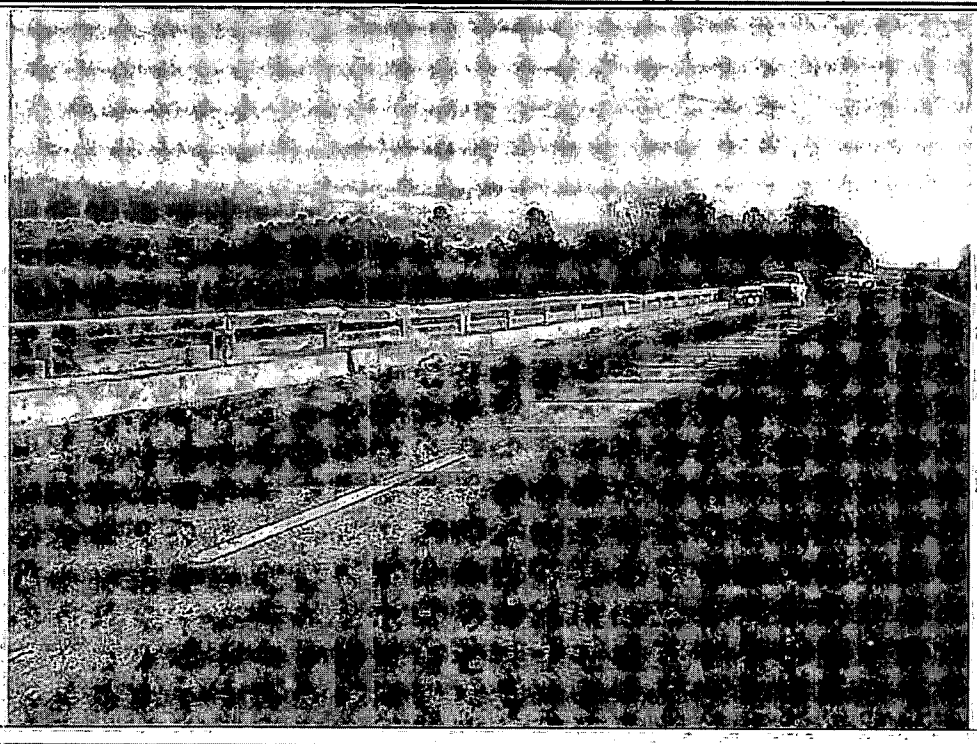


Photo #: 45

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview of the damage to the bridge.

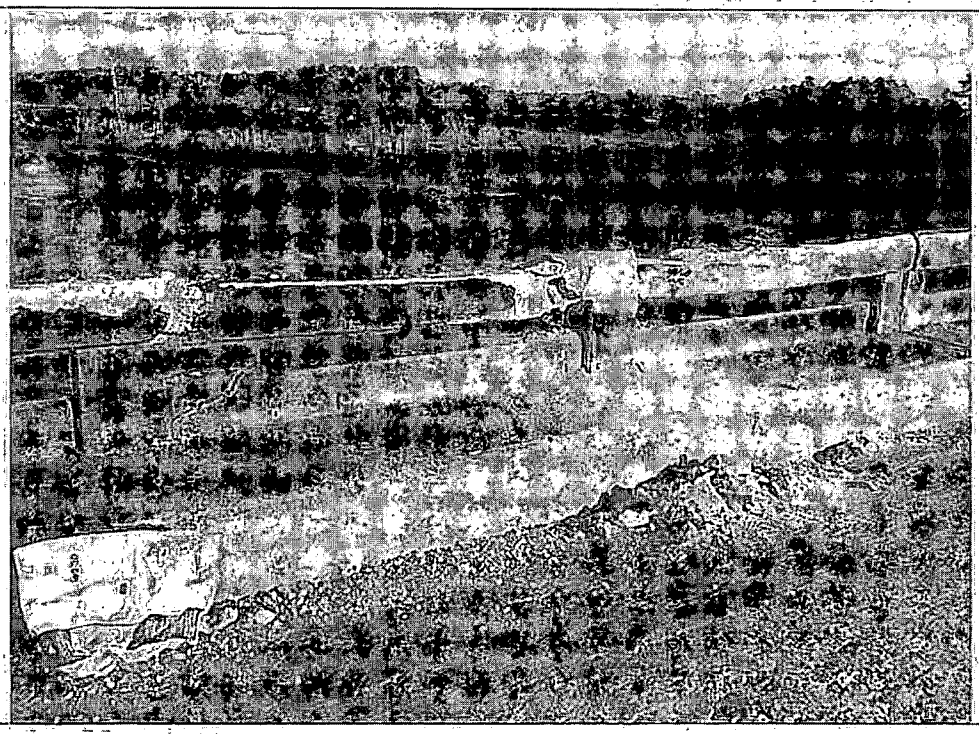


Photo #: 46

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Close-up of damage.

Claim Photo

CIA File #: 106-004327
Customer Claim #: 61A169404
Insured/Owner: Premier Transportation

Date of Loss: 02/09/2016
Adjuster: John Habegger

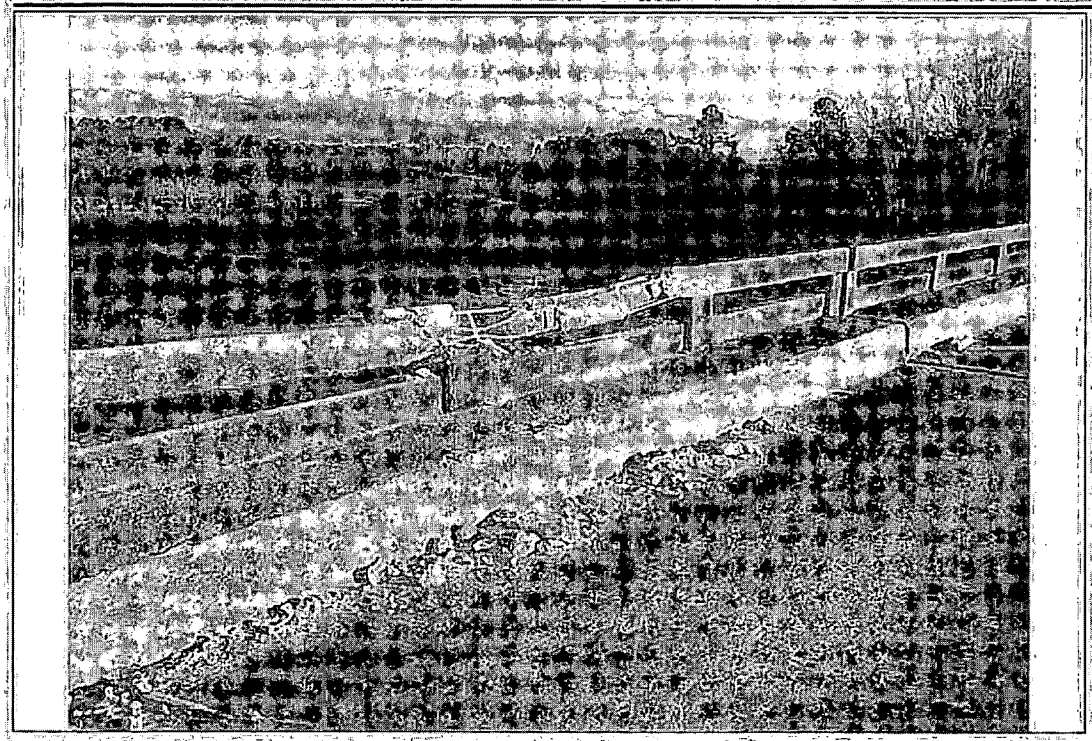


Photo #: 47

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
More damage.

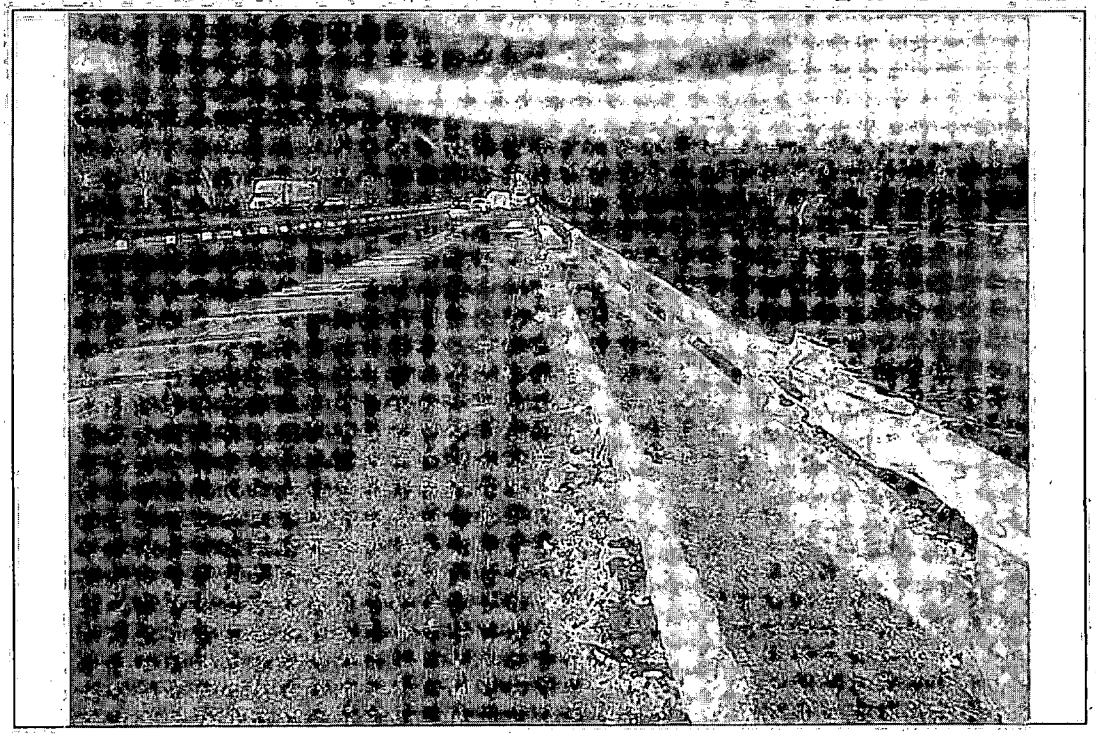


Photo #: 48

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview of damage looking west.

Claim Photo

CIA CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

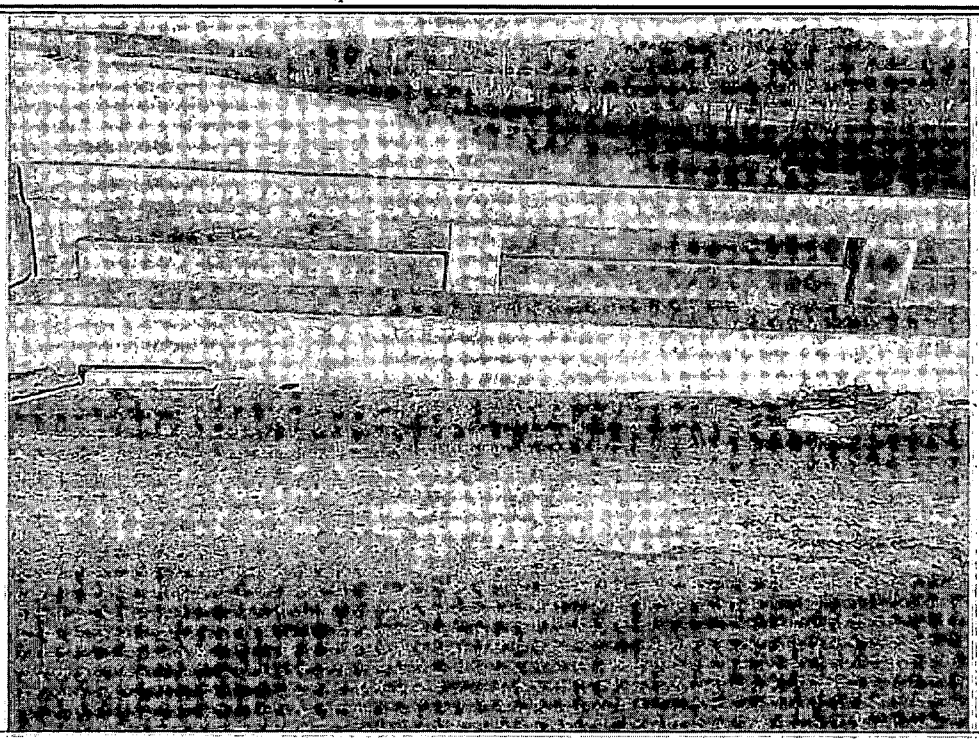


Photo #: 49

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Scrapes are noted along the south side of the westbound bridge.

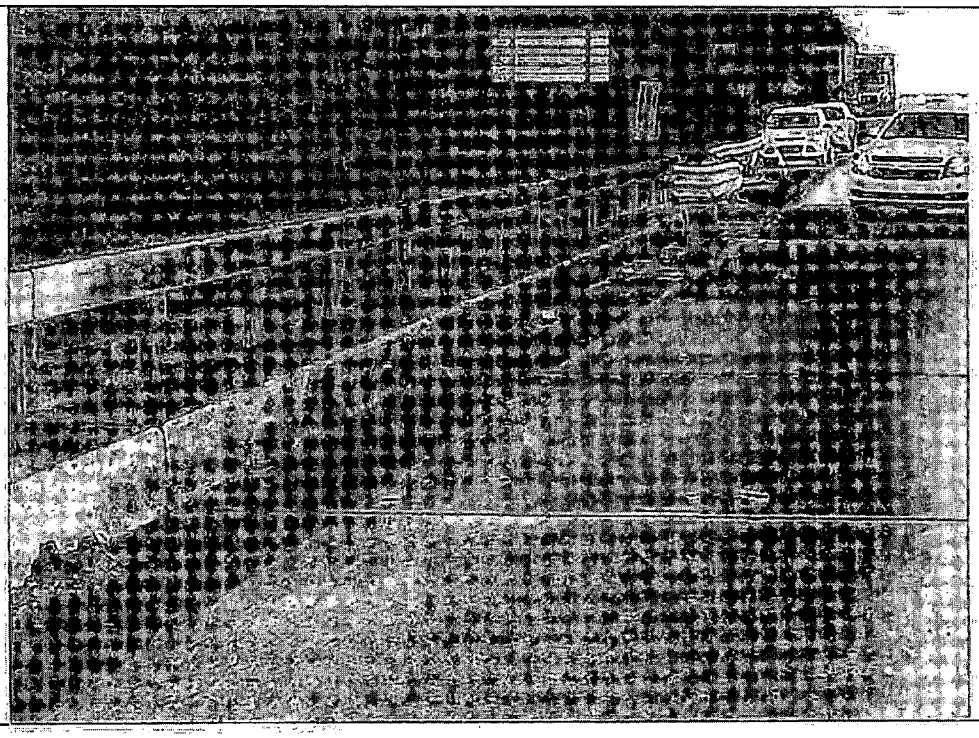


Photo #: 50

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Damage started where the metal rail is located.

001112

Claim Photo

CIA CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

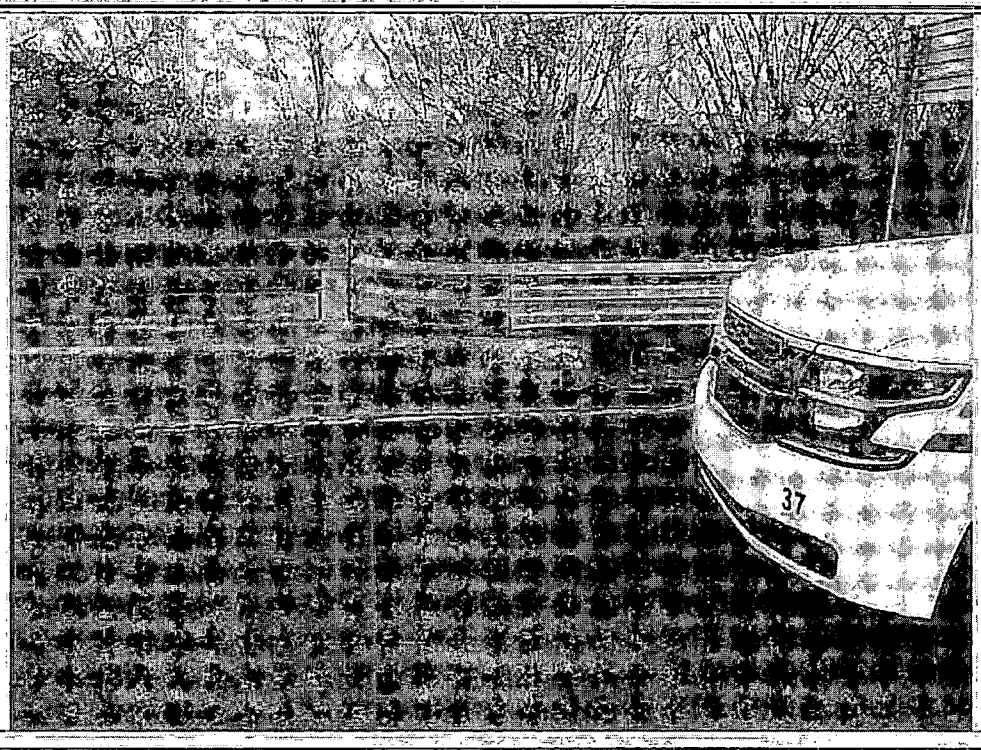


Photo #: 51

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Area of the beginning of where the IV first struck the rail.

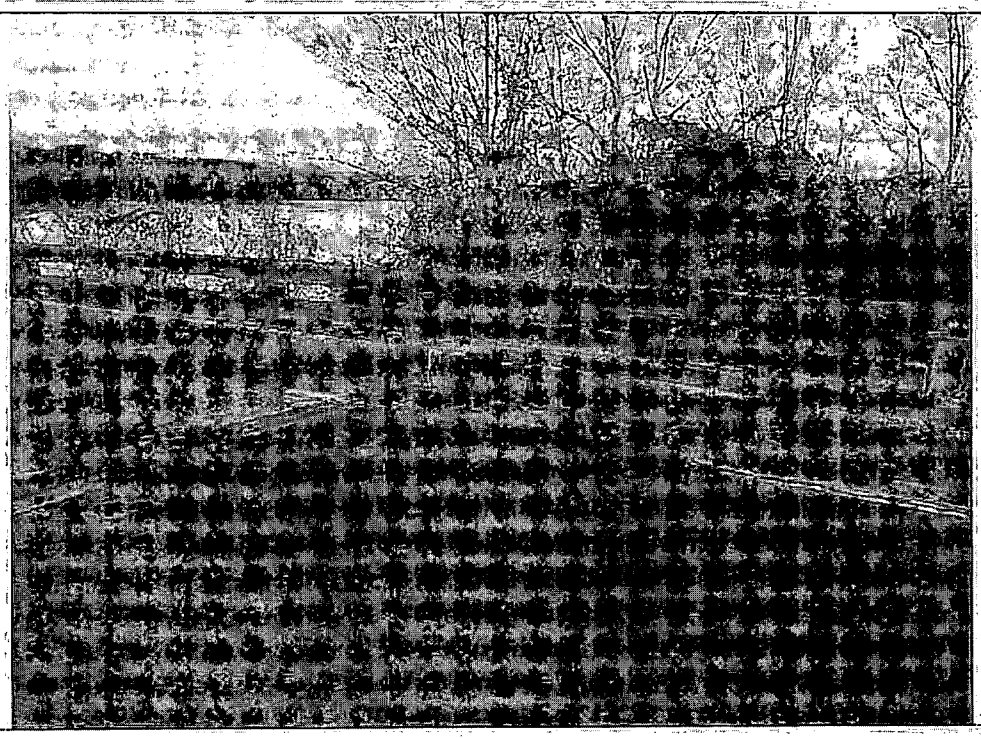


Photo #: 52

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Scrapes along the top side of the bottom portion of the concrete rail.

001113

Claim Photo

CIA CUSTARD INSURANCE ADJUSTERS

CIA File #: 106-004327
Customer Claim #: 61A169404
Insured/Owner: Premier Transportation
Date of Loss: 02/09/2016
Adjuster: John Habegger



Photo #: 53

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview of the westbound bridge looking west from the beginning of the bridge.

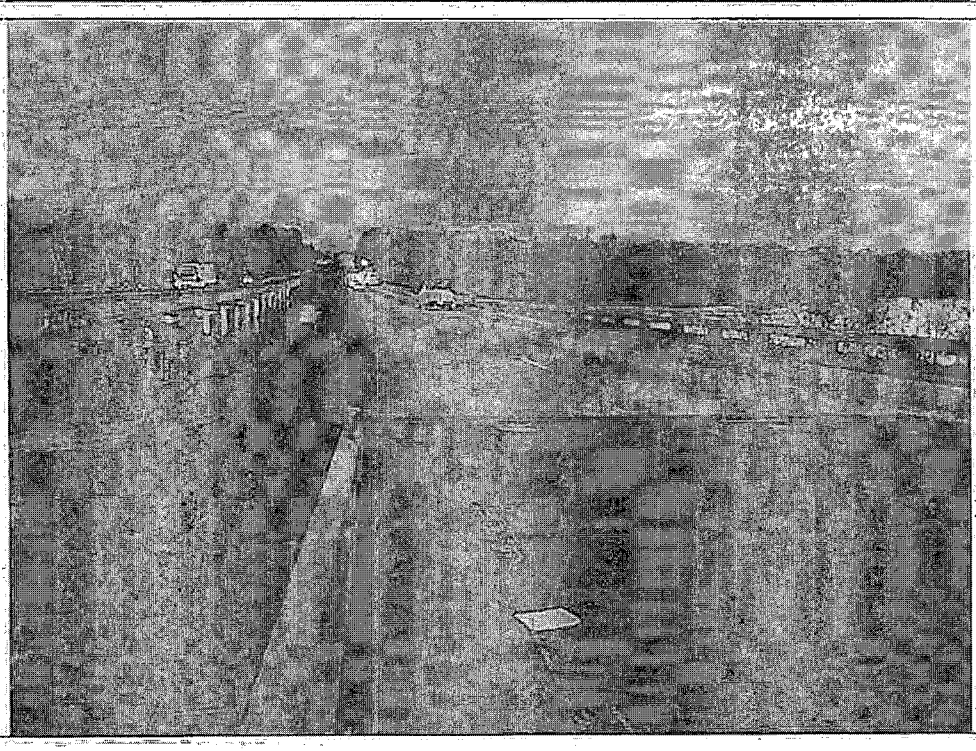


Photo #: 54

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
View looking west from the north side of the westbound bridge.

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	**106-004327**	**Date of Loss:**	**02/09/2016**
Customer Claim #:	**61A169404**	**Adjuster:**	**John Habegger**
Insured/Owner:	**Premier Transportation**		

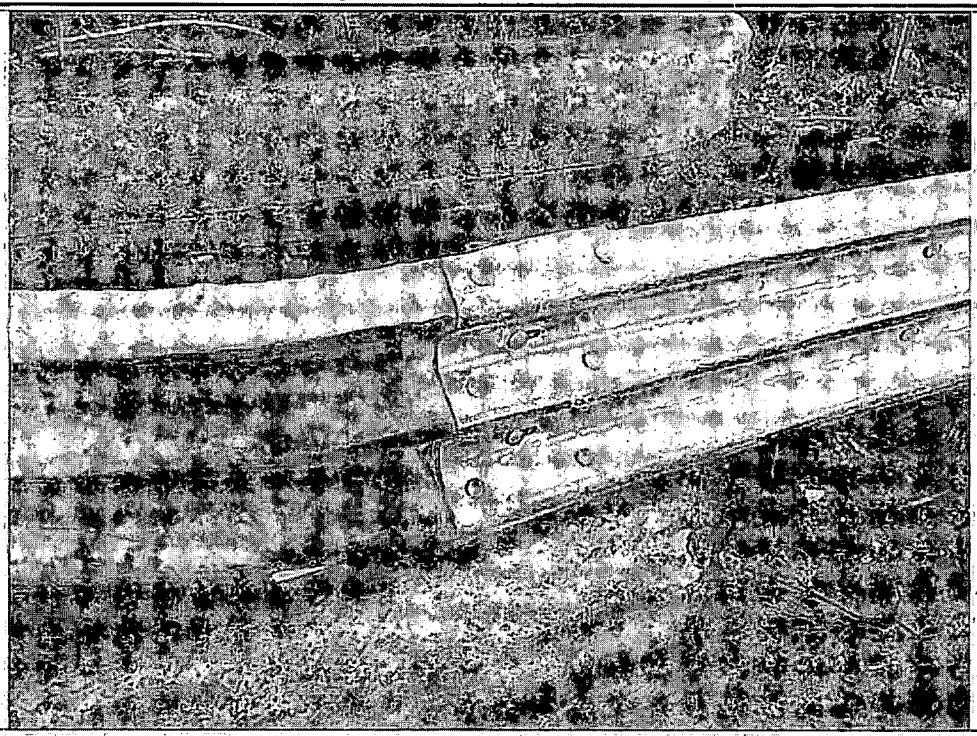


Photo #: 55

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Concrete damage at the beginning of the bridge.

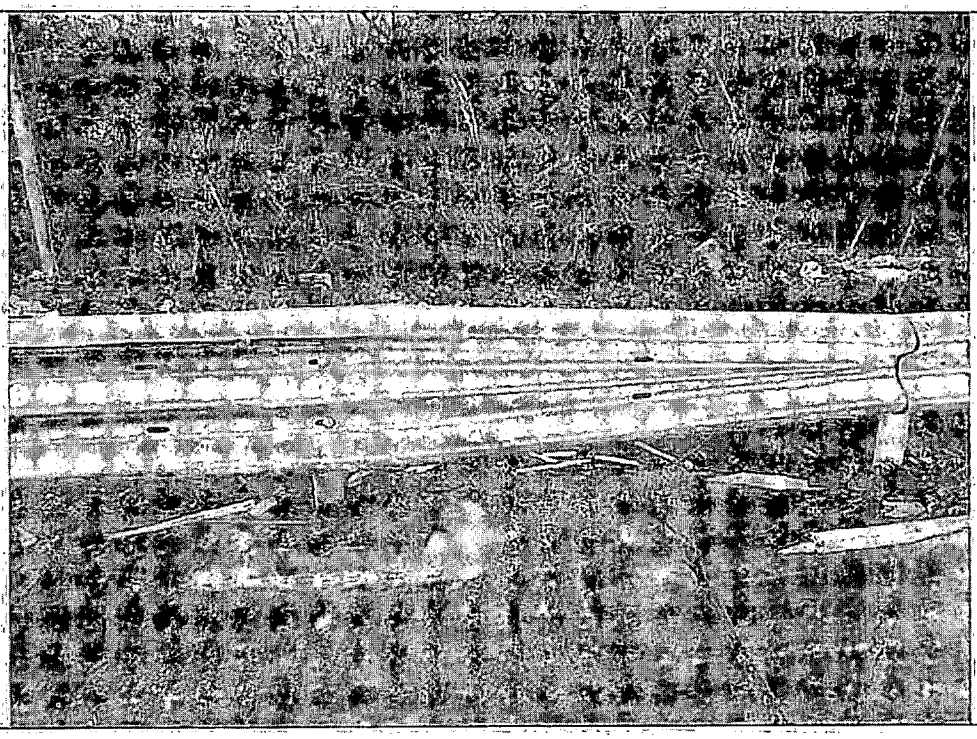


Photo #: 56

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview of the entrance of the bridge where the IV struck the left or south side.

Claim Photo

CIA File #: 106-004327
Customer Claim #: 61A169404
Insured/Owner: Premier Transportation

Date of Loss: 02/09/2016
Adjuster: John Habegger

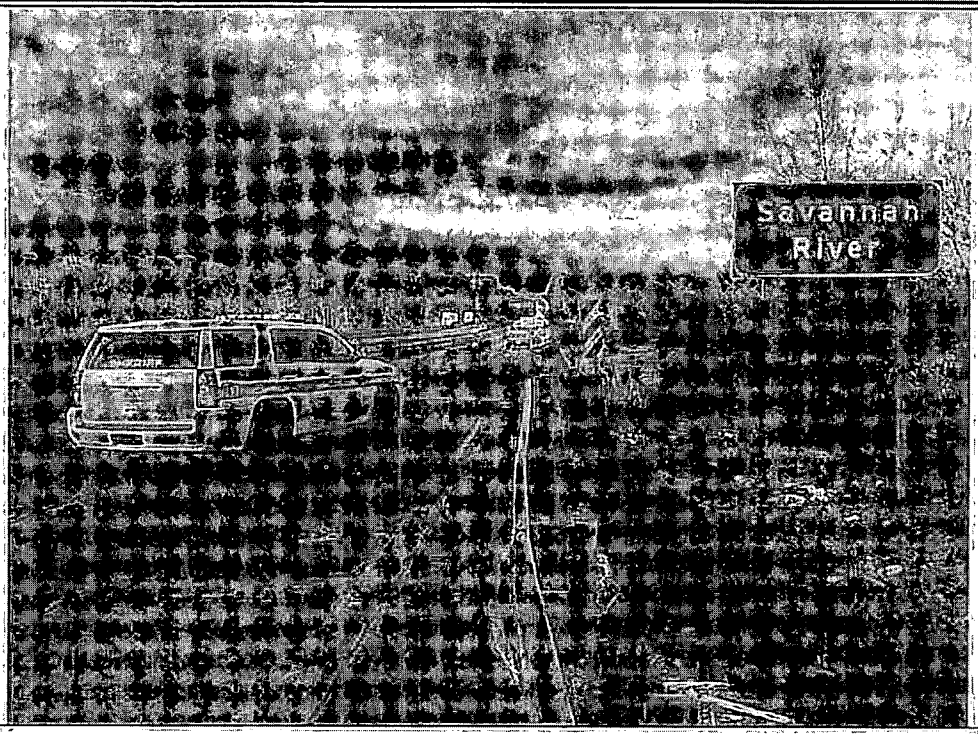


Photo #: 57

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Entrance to the bridge over the Savannah River.

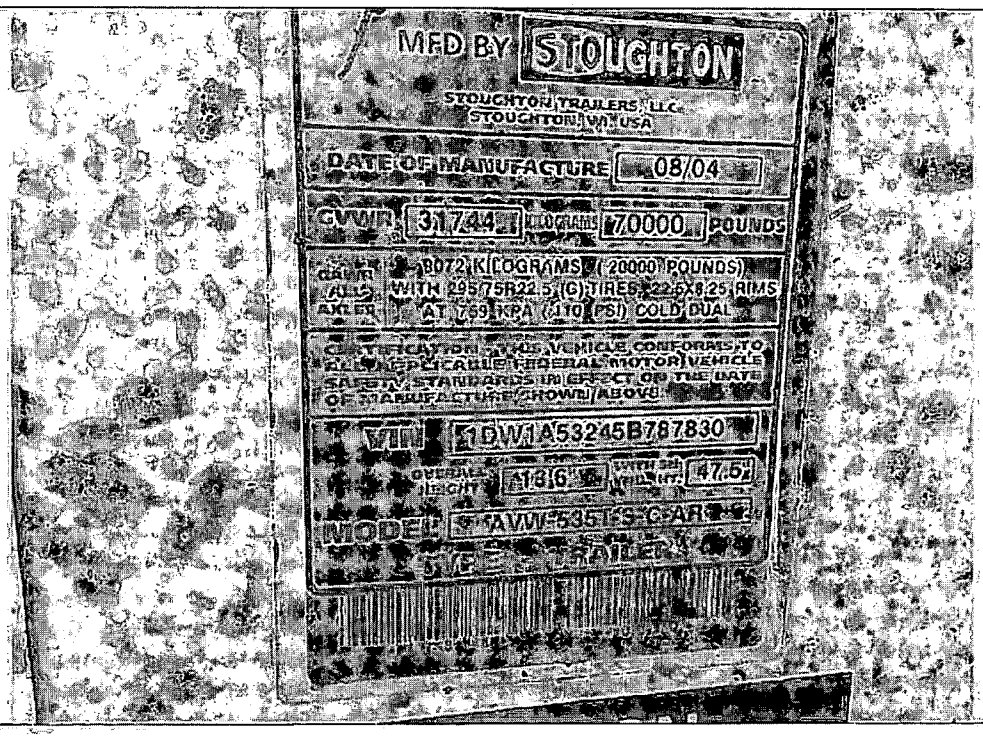


Photo #: 58

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Vin Tag for trailer.

001116

Claim Photo

CIA CUSTARD INSURANCE ADJUSTERS

CIA File #:	**106-004327**	**Date of Loss:**	**02/09/2016**
Customer Claim #:	**61A169404**	**Adjuster:**	**John Habegger**
Insured/Owner:	**Premier Transportation**		

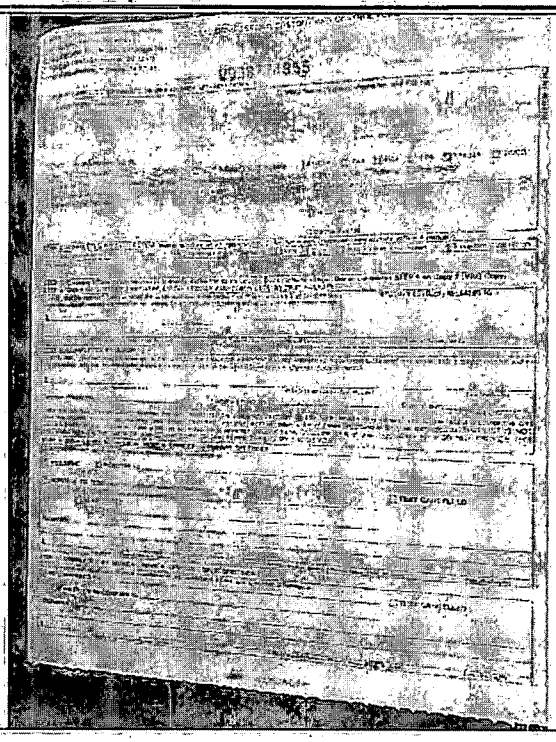


Photo #: 59

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Federal Chain of Custody form for the Insured Driver's DOT screening.

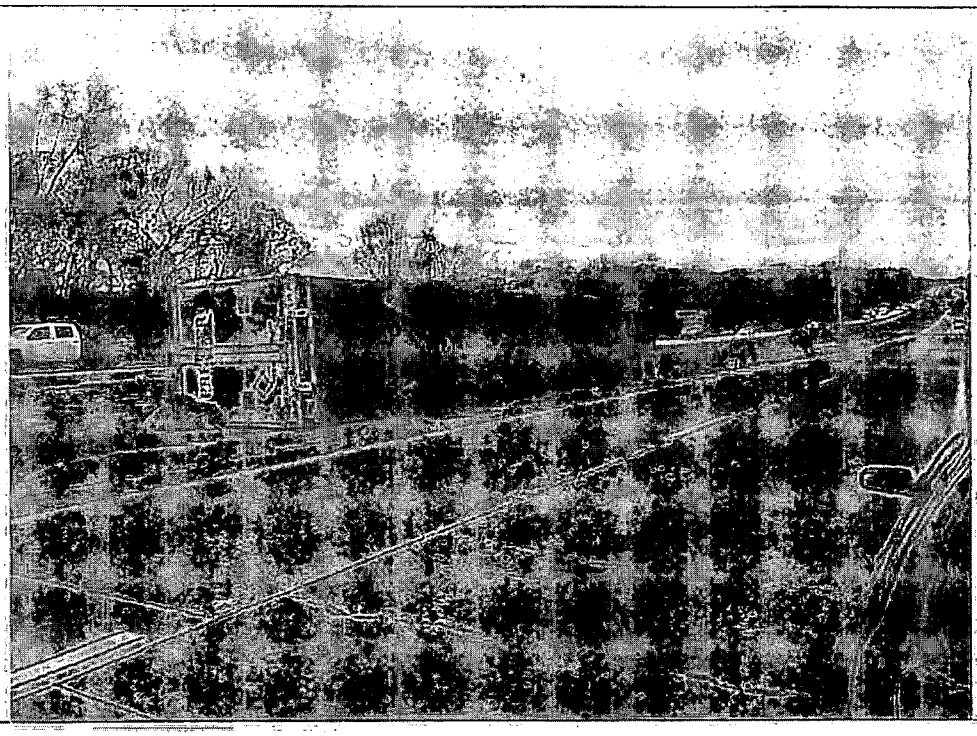


Photo #: 60

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Trailer had to be moved off the bridge in order to open up I-120. Trailer could not be uprighted on the bridge.

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

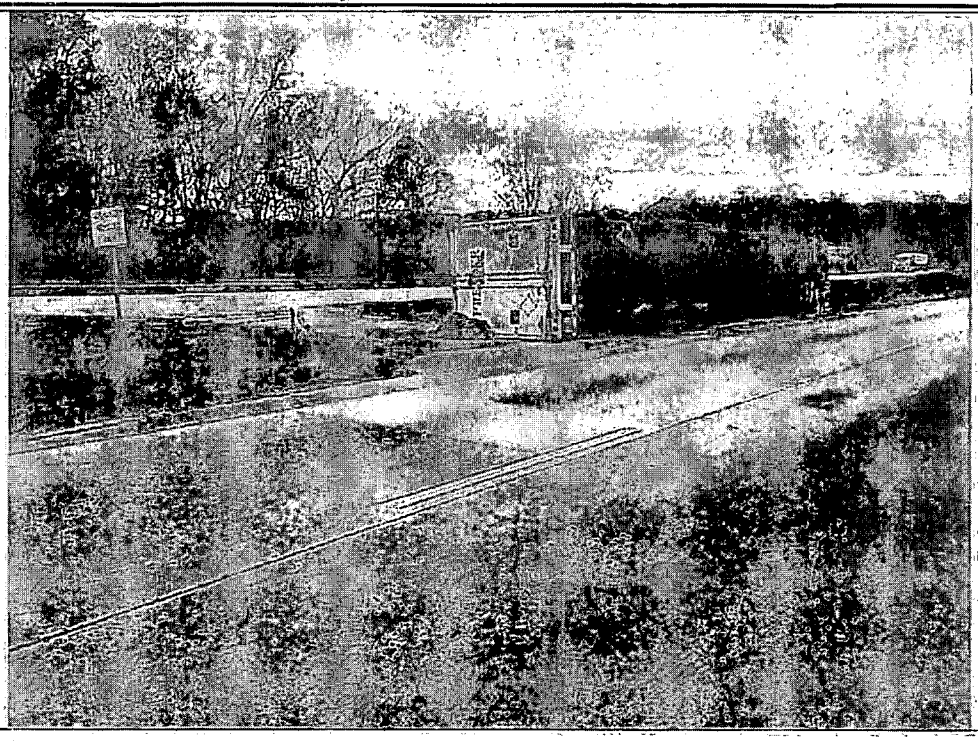


Photo #: 61

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview of where the trailer was placed.

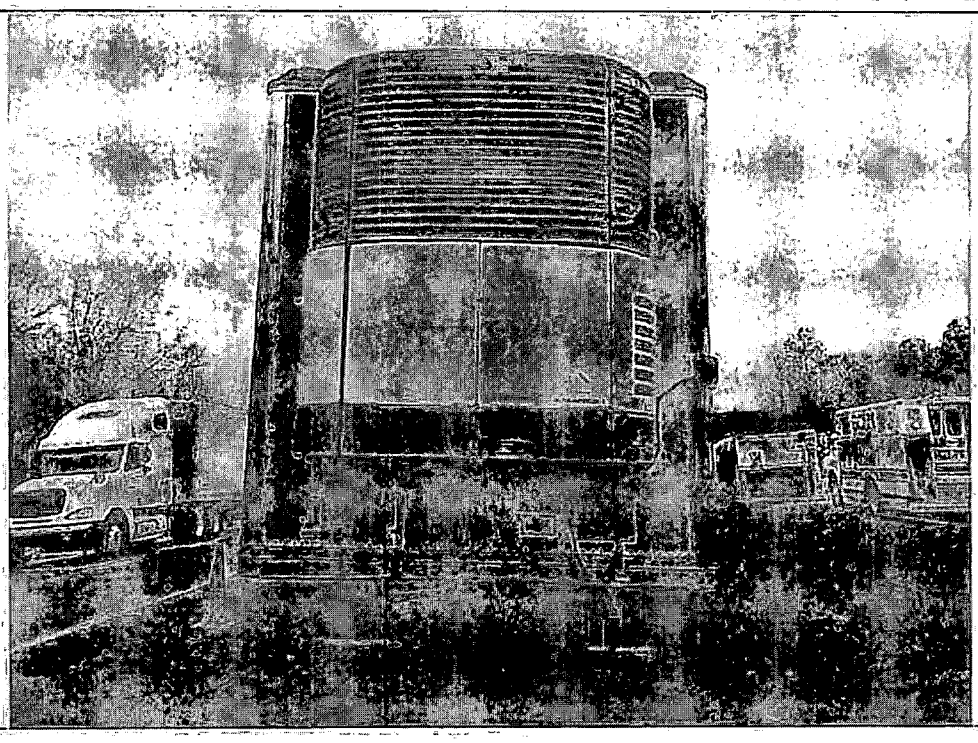


Photo #: 62

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Front of the trailer where the cargo from the damaged trailer is to be transferred to.

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

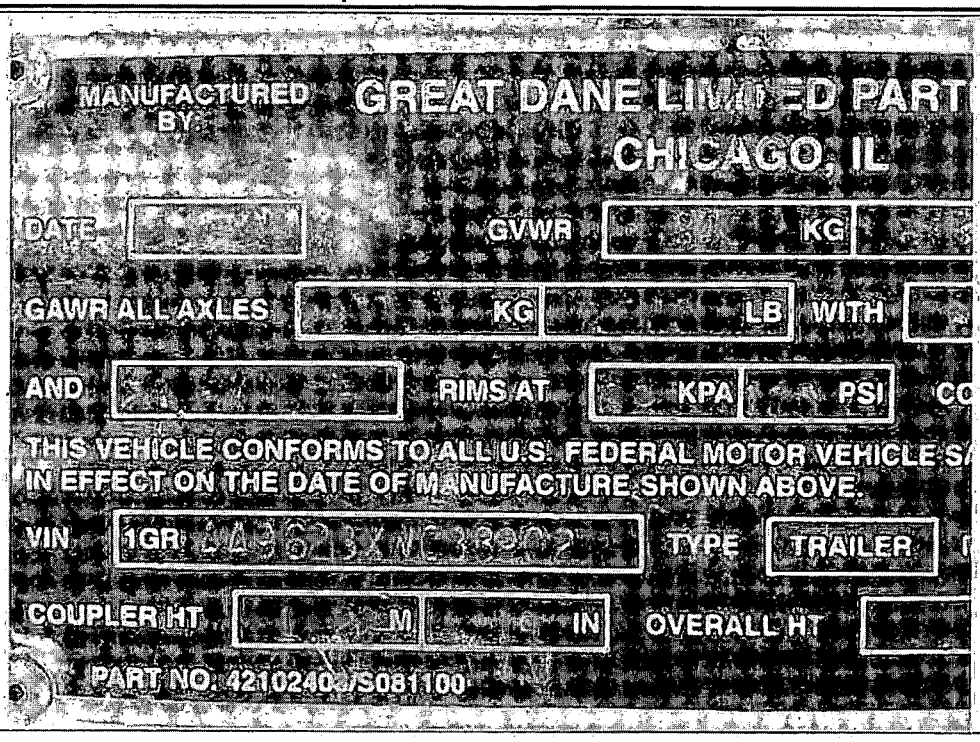


Photo #: 63

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
ID tag of the new Trailer that will have the transferred cargo.

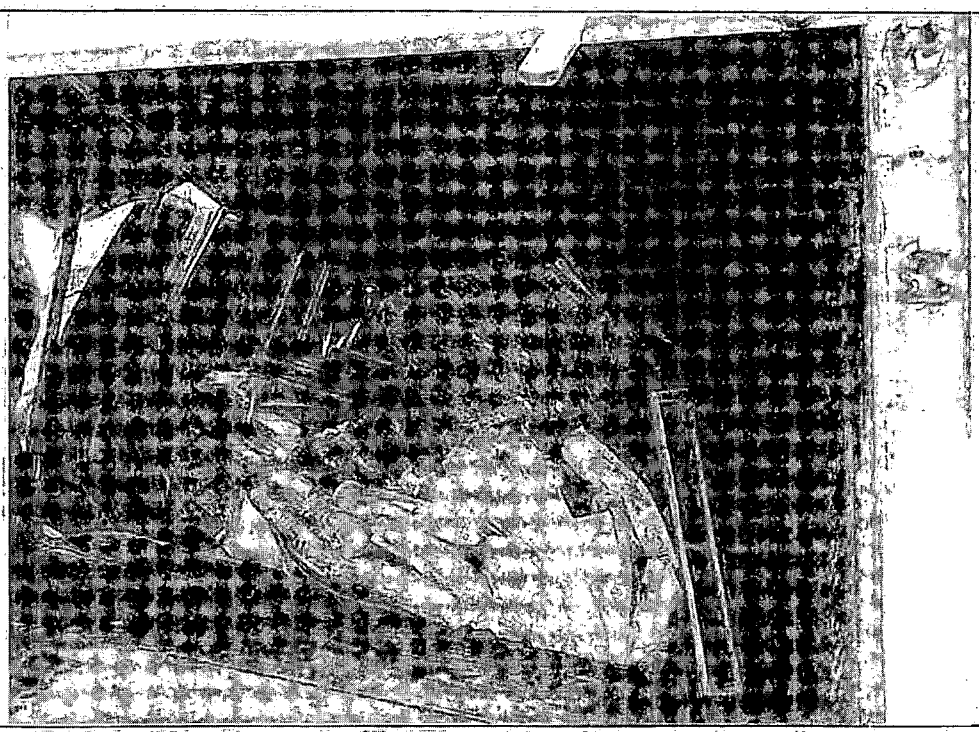


Photo #: 64

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Overview of the cargo. Cargo was 41,360lbs of dog food.

001119

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

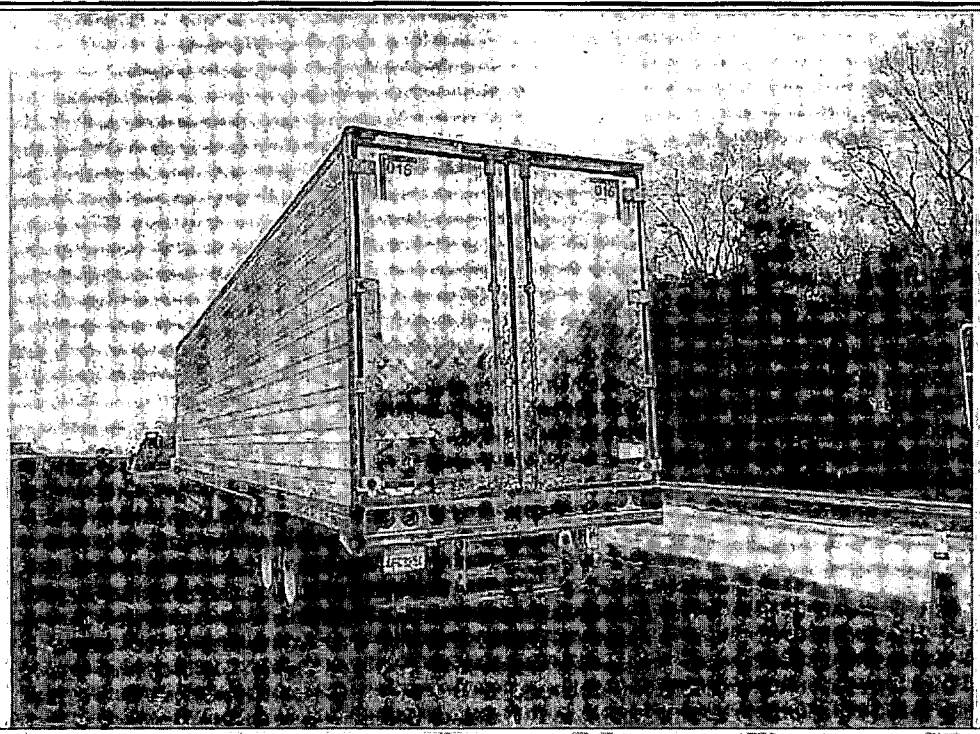


Photo #: 65

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Rear of new trailer that will have cargo transferred into it.

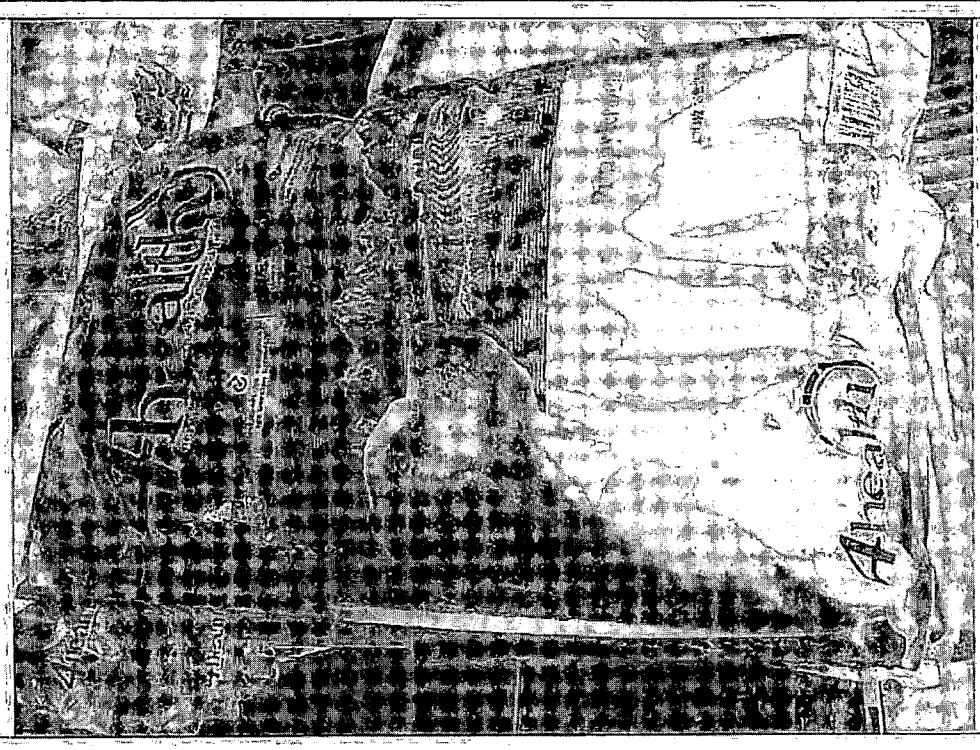


Photo #: 66

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
The trailer had this brand of dog food.

001120

Claim Photo

CUSTARD INSURANCE ADJUSTERS

CIA File #:	106-004327	**Date of Loss:**	02/09/2016
Customer Claim #:	61A169404	**Adjuster:**	John Habegger
Insured/Owner:	Premier Transportation		

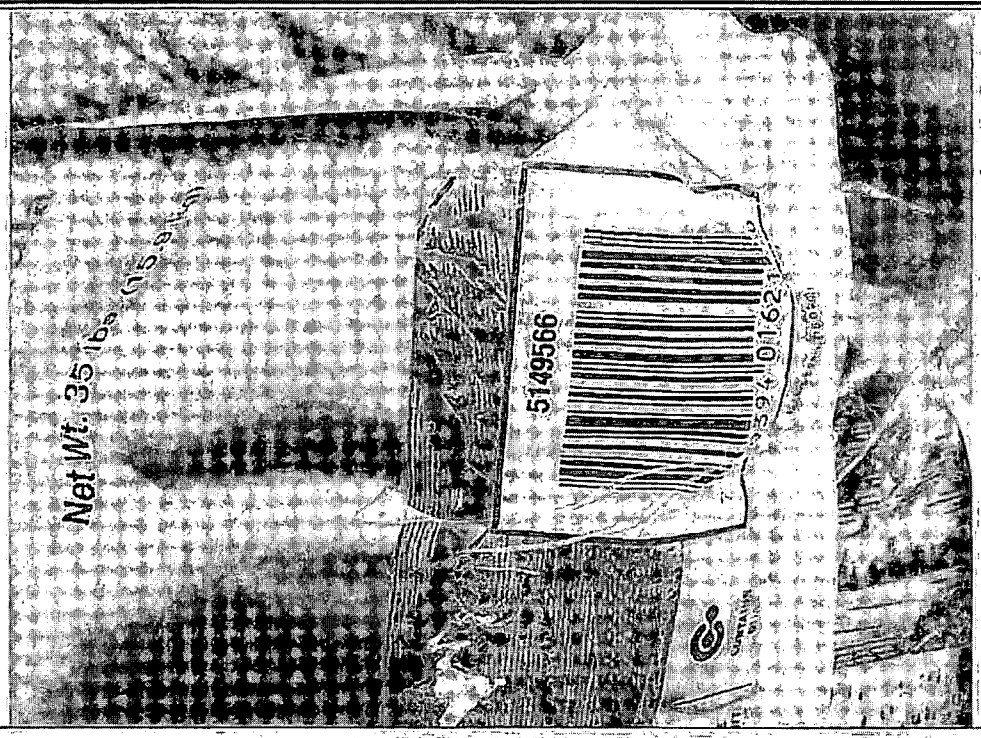


Photo #: 67

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
UPC label for the cargo.

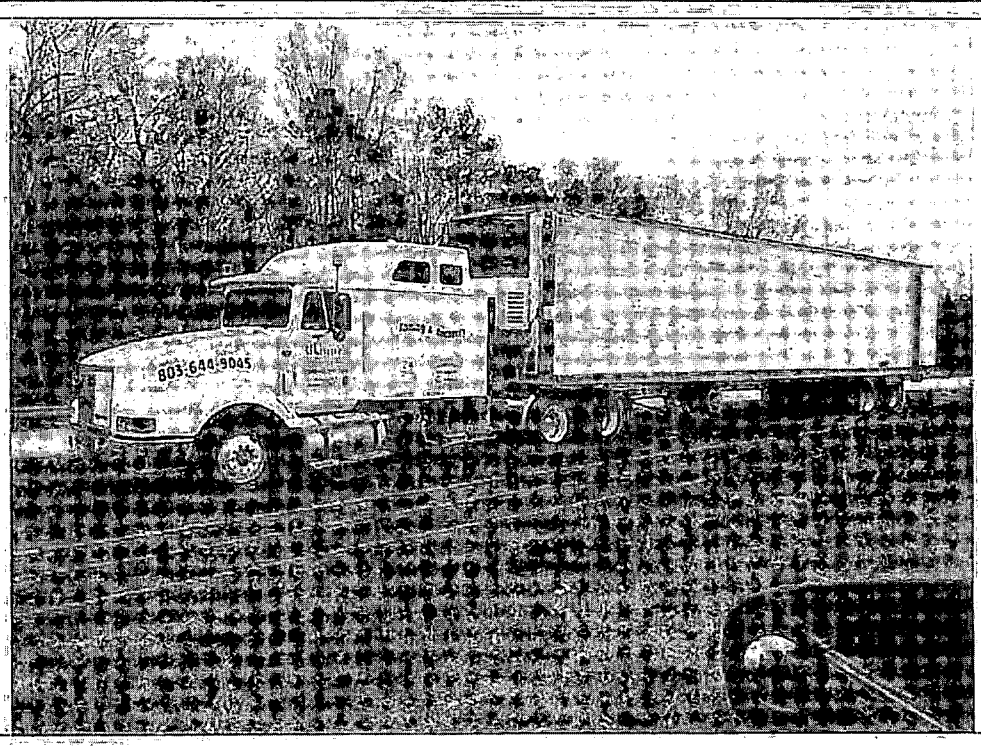


Photo #: 68

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Wayne's towed the trailer back to their location in Aiken, SC.

001121

Claim Photo

CIA
CUSTARD
INSURANCE ADJUSTERS

CIA File #:	**106-004327**	**Date of Loss:**	**02/09/2016**
Customer Claim #:	**61A169404**	**Adjuster:**	**John Habegger**
Insured/Owner:	**Premier Transportation**		

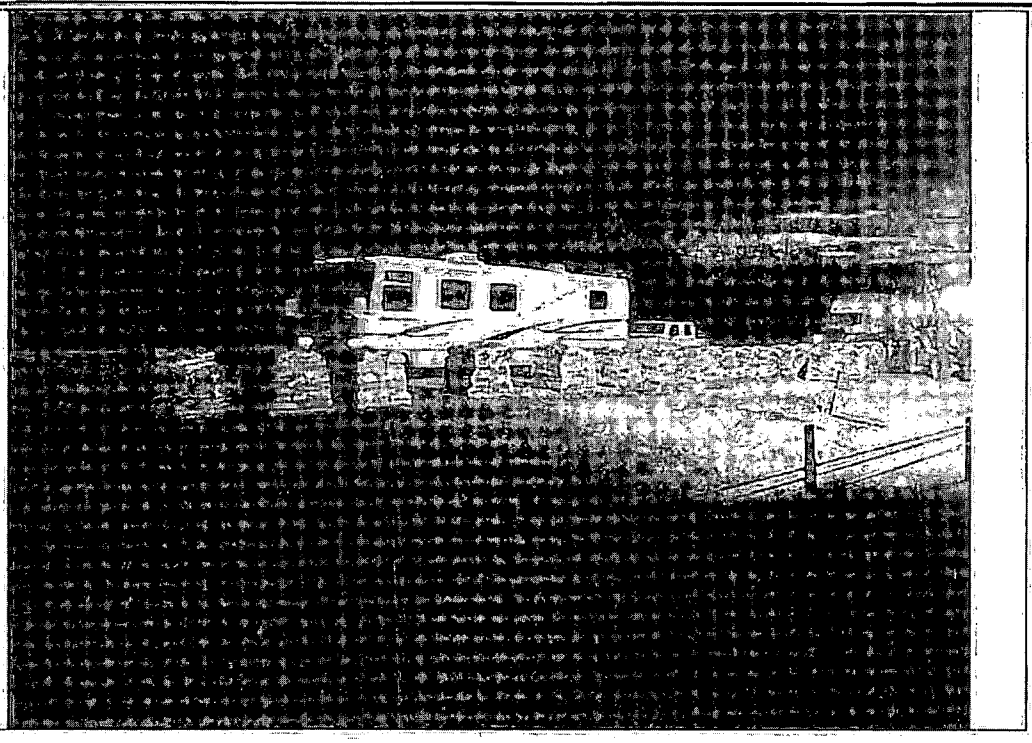


Photo #: 69

Date Taken:
02/09/2016

Taken By:
John Habegger

Description:
Wayne's made a couple of trips to transfer load.

001122

R 29
(w/objection)

Form No. 1

COMPLAINT
State of West Virginia
Public Service Commission
Charleston

RECEIVED
2010 JUL 9 PM 3 35
W VA PUBLIC SERVICE COMMISSION
SECRETARY'S OFFICE

W.VA PUBLIC SERVICE COMMISSION
SECRETARY'S OFFICE

TYPE OR PRINT CLEARLY USING BLACK INK

CASE NO. 10-1027-MC-FC (leave blank), Complainant

(Mr./Mrs./Ms.) Ms. M. Gaynell Rochester (your name)

PO Box 783 Statesville, NC 28687 (your full address)

Iredell, NC (your county)

Please provide email address so that we may keep you informed electronically of filings in your case. email: _____

vs.

Mitch's 24 Hour Towing & Storage (Bill Young & Mitch Young), Defendant

The petition of the above-named complainant, respectfully shows:

1. That the above-named Bill Young & Mitch Young (name of defendant), is a public utility engaged in the business of Mitch's 24 hour Towing & Recovery (state the public utility business of the defendant, i.e. gas, electric telephone, etc.] at 100 Frame Road Elkview, WV 25071 (their address), in the State of West Virginia, and as such is subject to the provisions of Chapter 24 (or 24A) of the Code of West Virginia, 1931, as amended, and the provisions thereof applicable to said class of public utilities.

2. That the said defendant has violated the laws of the State of West Virginia, governing said public utility business, in the following particulars, to-wit:

(a) [Here state concisely the matters complained of.] Elevated rates and hours to recover an overturn tractor/trailer/cargo. Excess personnel and equipment. Also did not dispose of cargo as instructed by insurance company. The tow company distributed the cargo to multiple parties and locations. This created additional cost and liability exposure for our clients Northland Insurance and Horton's Produce. Please see the attached letter and spreadsheet of reasonable charges proposed to tow company. Bill Young & Mitch Young have not been cooperative. DO NOT WRITE ON BACK OF PAGES - attach a sheet of paper

07/09/2010 15:35 FAX 8595252718 InterStar North America 002/010

WV PSC Form12
Revised 04-2010

Form No. 12

VERIFICATION

(To be added to all complaints, answers, applications and petitions.)

RECEIVED
2010 JUL 9 PM 3 35
W VA PUBLIC SERVICE
COMMISSION
SECRETARY'S OFFICE

State of North Carolina,

County of Iredell, ss.

M. Gaynell Rochester (Name) the Agent of record (Title, if applicable)

of Middle Ground Resolutions (Company/Utility, if applicable), the Complainant (Complainant/Defendant/Petitioner)

named in the foregoing Complaint (Complaint/Answer/Application/Petition), being duly sworn,

says that the facts and allegations therein contained are true, except as far as they are therein stated to be on information, and that, so far as they are therein stated to be on information, he/she believes them to be true.

M. Gaynell Rochester
(Signature of person named above)
Affiant

Taken, sworn to and subscribed before me this 7th day of July, 20 10.

Notary Public In and for said County.

My commission expires on the 5th day of May, 20 10.

07/09/2010 15:35 FAX 8595252716 InterState North America 003/010

001124

(b) Here state the remedy you seek

Reasonable charges for services rendered and reduced storage due to the time spent trying to get the tow company to work with us on a resolution. A spreadsheet is attached with adjusted numbers.

Action taken for uncooperative and rude behavior of Bill & Mitch Young.

Wherefore, the complainant prays that the said defendant Bill & Mitch Young (defendant's name) be required to answer the charges herein above set out, and that, after due investigation, an order may be made commanding the said defendant to cease and desist from the wrongful conduct aforesaid, and for such other and further order as the Public Service Commission of West Virginia may deem necessary, reasonable and just in the premises.

[Prayer may ask for the ascertainment of lawful rates of practices, and an order requiring the defendant to conform thereto.]

Dated this 7th day of July, 2010.

(Signed) [signature] Signature of Complainant

(Your Full Address) PO Box 783 Statesville, NC 28687

_____ (Phone) _____ (Fax) _____

(Email) _____

(If you have an attorney, his/her name) _____, Attorney, if applicable.

Attorney's Address: _____

THIS FORM MUST BE NOTARIZED

Subscribed and sworn before me this 7th day of July, 2010.

[signature] 419287

(Official signature and official seal of notary)

[If Complainant is signing out-of-state, please use verification Form No. 12]

PLEASE NOTE:

It is extremely important to notify the PSC of any changes to your contact information and to promptly retrieve Certified Mail upon notification of such.

RECEIVED
2010 JUL 9 PM 3 35
W VA PUBLIC SERVICE
COMMISSION
SECRETARY'S OFFICE

07/09/2010 15:35 FAX 8585252718 InterState North America 004/010

Middle Ground Resolutions, LLC

MGR

"Transportation Mediation Where Integrity, Knowledge and Balance Meet"

	Tractor	Trailer	Cargo	Total	Original
Abbott's Sublet					
1 HD wrecker 7 hrs/$150 per hr	$360.00	$240.00	$600.00	$1,200.00	$3,300.00
1 HD wrecker 3 hrs/$150 per hr	$225.00	$225.00		$450.00	Duplicate line
Rollback 7 hrs/$90 per hour			$630.00	$630.00	$990.00
Fuel surcharge	$111.00	$74.00	$185.00	$370.00	$370.00
Labor/3men/7 hours/$45.00 per hr			$1,890.00	$1,890.00	$2,970.00
2 Rollback/7 hrs/$90.00 per hr			$1,260.00	$1,260.00	$1,980.00
Mitch's equipment & labor					
Rollback - Dickie & Travis			$875.00	$875.00	$1,625.00
Rollback - Scott & Ira			$875.00	$875.00	$1,625.00
Mitch & Cody (duplicate)			$ ---	$ ---	$1,625.00
Keith & Les ($90 x 7)			$630.00	$630.00	$950.00
Donald & Jim ($90 x 7)			$630.00	$630.00	$950.00
Jason & trailer			$630.00	$630.00	$950.00
1 CV and WSC			$770.00	$770.00	$1,430.00
Pinch Wrecker RB & helper			$875.00	$875.00	$1,125.00
Absorbent	$100.00			$100.00	$280.00
WSC admin fee			$ ---	$ ---	$325.00
Follow up charge			$ ---	$ ---	$195.00
Total				$11,185.00	$20,700.00

RECEIVED
2010 JUL 9 PM 3 35
W VA PUBLIC SERVICE COMMISSION
SECRETARY'S OFFICE

Phone: 904-553-4804 • Phone: 704-902-0883 • Fax: 704-838-0399
P.O. Box 783 - Statesville, NC 28687
claims@middlegroundresolutions.com

07/09/2010 15:35 FAX 8595252718 Interstar North America 005/010

006/010
InterStar North America
07/08/2010 15:36 FAX 8595252716

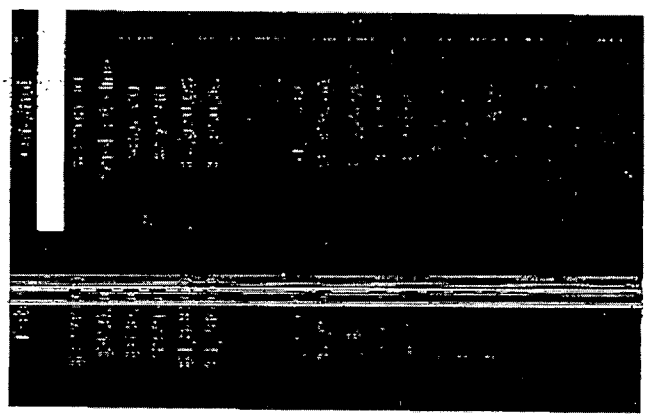
	Tractor	Trailer	Cargo
[redacted]			
1 HD wrecker 7 hrs/$150 per hr	$360.00	$240.00	$900.00
1 HD wrecker 3 hrs/$150 per hr	$225.00	$225.00	
Rollback 7 hrs/$90 per hour			$630.00
Fuel surcharge	$111.00	$74.00	$185.00
Labor/6men/7 hours/$45.00 per hr			$1,890.00
2 Rollback/7 hrs/$90.00 per hr			$1,260.00
[redacted]			
Rollback - Dickie & Travis			$875.00
Rollback - Scott & Ira			$875.00
[redacted]			$ —
Keith & Les ($90 x 7)			$630.00
Donald & Jim ($90 x 7)			$630.00
Jason & trailer			$630.00
[redacted]			$770.00
Pinch Wrecker RB & helper			$875.00
Absorbent	$100.00		
WSC admin fee			$ —
Follow up charge			$ —
Total			

[redacted]

RECEIVED
2010 JUL 9 PM 3 35
W VA PUBLIC SERVICE
COMMISSION
SECRETARY'S OFFICE

00112 8

RECEIVED
2010 JUL 9 PM 3 35
W VA PUBLIC SERVICE
COMMISSION
SECRETARY'S OFFICE

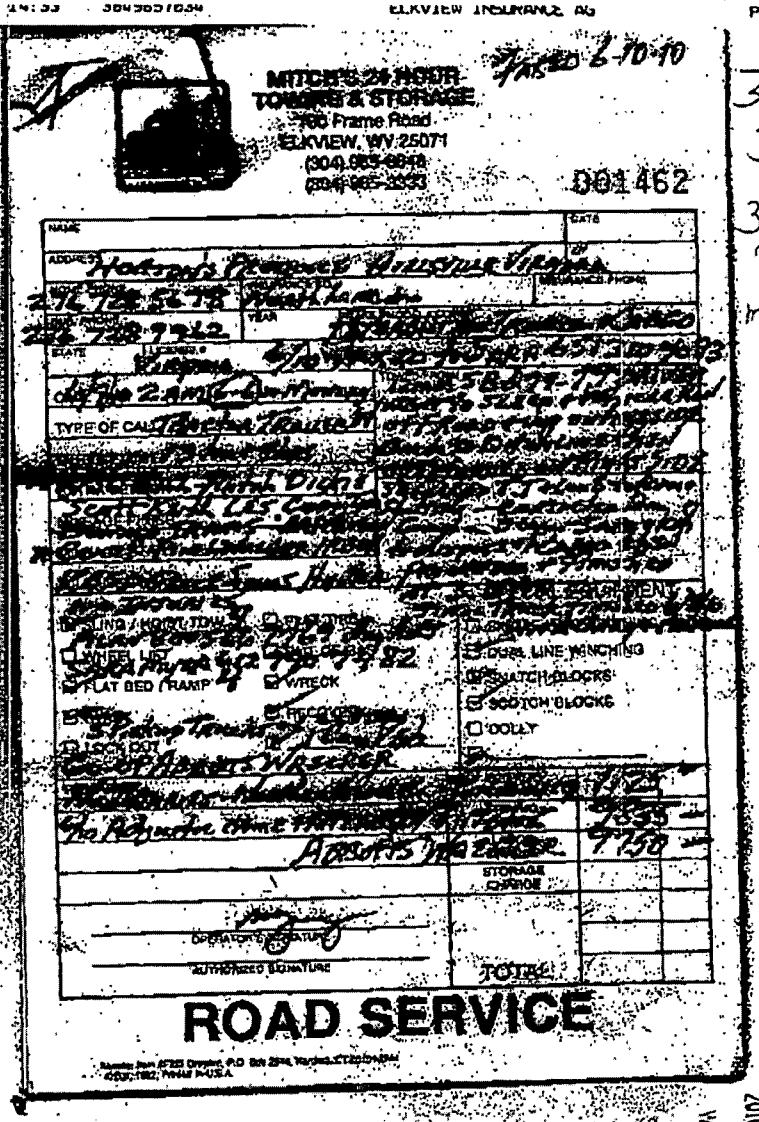


07/09/2010 15:38 FAX 8595252718 InterStar North America 007/010

	Tractor	Trailer	Cargo
[redacted]			
1 HD wrecker 7 hrs/$150 per hr	$360.00	$240.00	$600.00
1 HD wrecker 3 hrs/$150 per hr	$225.00	$225.00	
Rollback 7 hrs/$90 per hour			$630.00
Fuel surcharge	$111.00	$74.00	$185.00
Labor/6men/7 hours/$45.00 per hr			$1,890.00
2 Rollback/7 hrs/$90.00 per hr			$1,260.00
[redacted]			
Rollback - Dickie & Travis			$875.00
Rollback - Scott & Ira			$875.00
[redacted]			$ --
Keith & Les ($90 x 7)			$630.00
Donald & Jim ($90 x 7)			$630.00
Jason & trailer			$630.00
[redacted]			$770.00
Pinch Wrecker RB & helper			$875.00
Absorbent	$100.00		
WSC admin fee			$ --
Follow up charge			$ --
Total			

RECEIVED
2010 JUL 9 PM 3 35
W VA PUBLIC SERVICE
COMMISSION
SECRETARY'S OFFICE

07/09/2010 15:38 FAX 8585252716 InterStar North America 008/010



MITCH'S 24 HOUR
TOWING & STORAGE
766 Frame Road
ELKVIEW, WV 25071
(304) 965-6848
(304) 965-3333

FAXED 2-10-10

001462

NAME
DATE
ADDRESS
CITY
HOME PHONE
MAKE
YEAR
STATE
LICENSE #
TYPE OF CALL
FLAT BED / RAMP
WRECK
DOLLY
STORAGE CHARGE
OPERATOR'S SIGNATURE
AUTHORIZED SIGNATURE
TOTAL

ROAD SERVICE

mitch
304-
395 2577
304-
727-6087
mitch's
357
6169
2

RECEIVED
2010 JUL 9 PM 3 36
W VA PUBLIC SERVICE
COMMISSION
SECRETARY'S OFFICE

RECEIVED
2010 JUL 9 PM 3 36
W VA PUBLIC SERVICE
COMMISSION
SECRETARY'S OFFICE

05/14/2010 14:33 3049557834 ELKVIEW INSURANCE AG PAGE 03/03

2AM & 3PM = 13 hrs. + 4 hrs NS
2 R/B + 2 helpers = 125 x 2 x 13 = 3250
1 CV 45 + WSC 65 = 110 x 13 = 1430
5 R/V 45 + helpers = 95 x 10 x 5 = 4750
AWSC + 2 helper 65 + 70 = 135 x 3 = 405.
* Pinch Wrecker/RB = 1 hr = 125 x 9 hr = 1125.
* ABBOTTS WRECKER * 9750
2 Dump trk 300 ea 11 hrs 330
1 R/B + 2 hrs 98 ea 11 hrs 990
9835
1125
9750
FSC 370.
6 helpers @ 1/2 hr 290.
2 R/B + H 180 12 x 11
9610 =

In A Bind, Call Mitch
Need A Tow - Call The Pro
Mitch's Towing
100 Frame Rd.
Elkview, WV 25071
965-6646

Dicks + Travis R/B - 125 x 13 1625
Scott + Ira R/B - 125 x 13 1625
Mitch + Cody Cont. 125 x 13 1625
Heath + Les R/V - 95 x 10 - 950 285
Donald + Jim R/V - 95 x 10 950 285
Jason + Rivatel - 95 x 10 950 285
Pinch Wrecker + helper 125 x 9 hr = 1125
WSC Bill + CV 45 110 x 13 = 1430.
ABBOTTS WRECKER Co op 9750
Mitch + Dicks Labor 2 hr @ 6.90 = 290.
WSC Bill 65 x 5 = 325.
Jason + helper 65 x 3 = 195.
Tow Dolly
Tow Pictures
Storage 30 + 30 = 60 per day

Total Due Mitch's
20,710.-
Plus Storage from 6-7-10

4 way stop
Barry's Garage
Pinch
C1 — 5 Ct.
Give away. Contr. for this
Several ads
AB - No.
No pictures

Deputy Sims -
6 Hunter Dept.
11 AB.
8
19 -

Please forward the following documents to Sandra Squire. Please call Gaynell Rochester at 704-902-0883 if you need any further.

Thanks Gay

10 pages w/ cover

RECEIVED
2010 JUL 9 PM 3 35
W VA PUBLIC SERVICE
COMMISSION
SECRETARY'S OFFICE

07/09/2010 15:35 FAX 8595252716 InterStar North America 001/010

101027sec070910.wpd

PUBLIC SERVICE COMMISSION
OF WEST VIRGINIA
CHARLESTON

Entered by the PUBLIC SERVICE COMMISSION OF WEST VIRGINIA, in the City of Charleston on the 9th day of July 2010.

CASE NO. 10-1027-MC-FC

M. GAYNELL ROCHESTER,
Statesville, North Carolina,

Complainant,

v.

WILLIAM MITCHELL "MITCH" YOUNG,
dba MITCH'S 24 HOUR TOWING & STORAGE,
Elkview, Kanawha County,

Defendant.

COMMISSION ORDER

On July 9, 2010, M. Gaynell Rochester filed a formal complaint, duly-verified, against William Mitchell "Mitch" Young, dba Mitch's 24 Hour Towing & Storage.

IT IS THEREFORE ORDERED that the Defendant be, and hereby is, required to satisfy the formal complaint or make answer thereto, in writing, within ten days of the service upon them by certified mail of a copy of the formal complaint and a copy of this order in accordance with the provisions of Rule 7 of the Rules of Practice and Procedure before this Commission, and after receipt thereof or default therein, the Commission will proceed to investigate the matters set forth in the formal complaint in such manner and by such means as may be deemed proper. A mediation request by the Defendant will not be considered if an answer has not been filed.

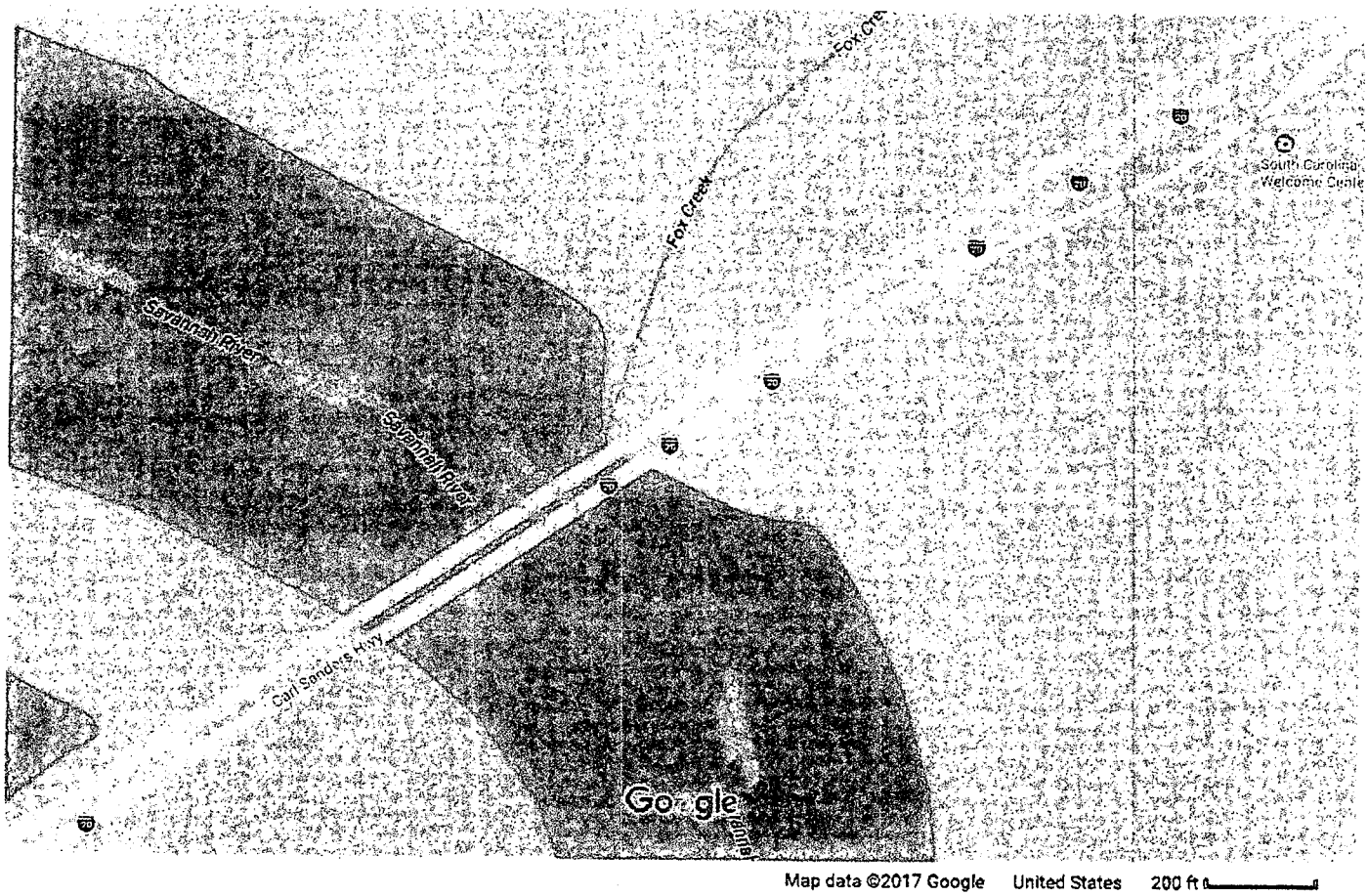
IT IS FURTHER ORDERED that the Executive Secretary of the Commission, be, and she hereby is, directed to serve a copy of the formal complaint upon the defendant, by delivering to them a copy of the formal complaint and a copy of this order by United States Certified Mail, return receipt requested.

A True Copy, Teste: Sandra Squire
Sandra Squire
Executive Secretary

SS/cg
101027s.wpd

15
(submitted
(GO) (proffered)

Google Maps I-20 Savannah River Bridge & Augusta Canal

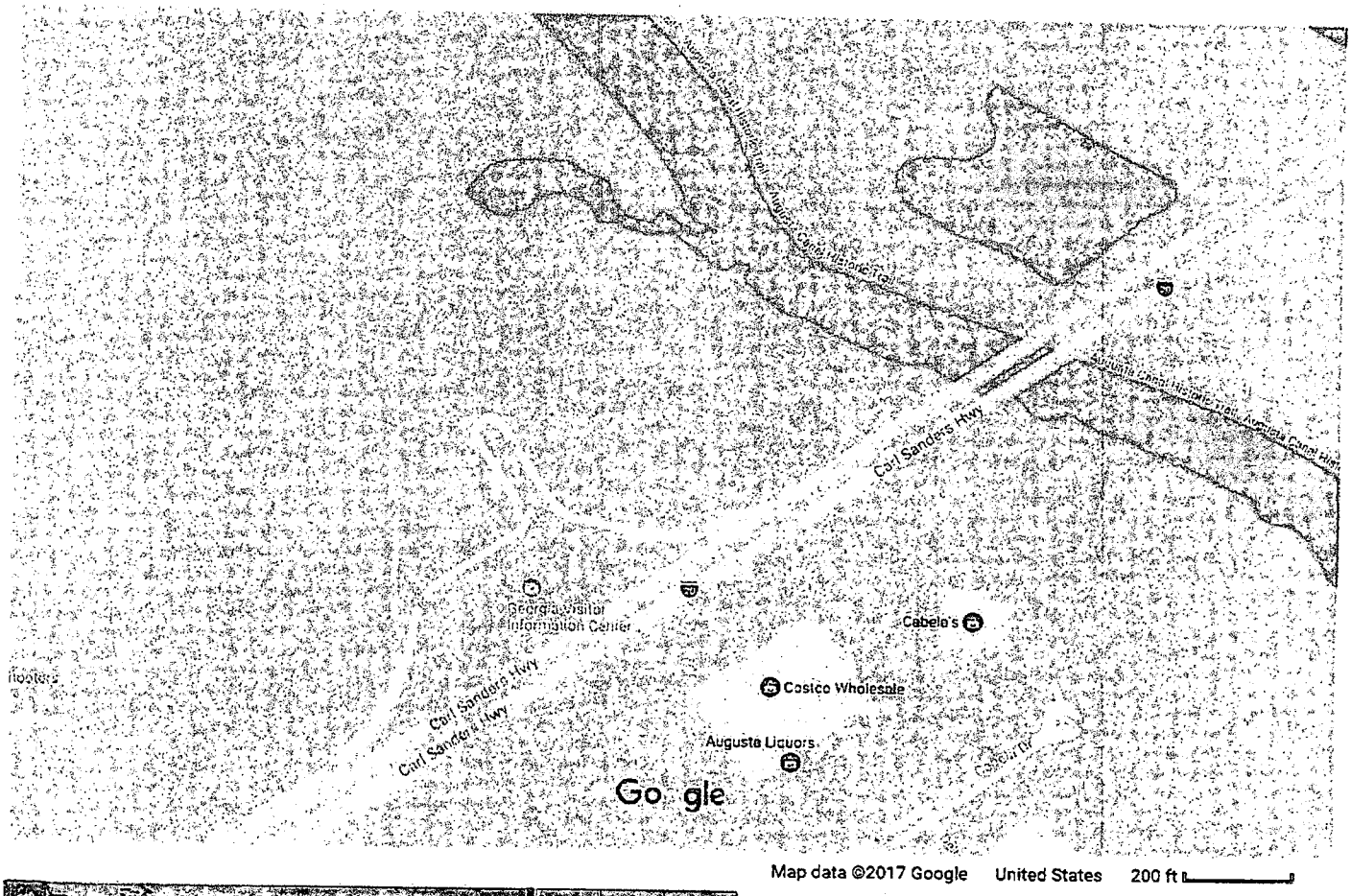


Map data ©2017 Google United States 200 ft

000432

001134

Google Maps Augusta Canal





Augusta Canal

Georgia

4 reviews

Canal

000433

001135

(THU) FEB 28 2013 15:43/ST. 15:43/No. 3303033305 P 1

2012 for 2013

South Carolina Department of Public Safety
S.C. Highway Patrol

TO: Troop Seven
Rotation Wrecker Services

FROM: Captain C. T. Stephens
Troop Seven Commander

DATE: October 17, 2012

SUBJECT: Article 7 Highway Patrol
Sub-article 1 Wrecker Regulations
Text section F

In accordance with Article 7 Highway Patrol, sub-article 1 Wrecker regulations, Text section F, 2(2) b: The Troop Commander will determine the reasonableness of the fees based upon the average of the proposed fees submitted and a comparison of that Highway Patrol Troop's standards, by wrecker zone, for similar operations.

Maximum Allowable Fees

	Violations	Collisions	Storage	After-Hours Fees
Class A	$150.00	$175.00	$25.00	$175.00
Class B	$200.00	$250.00	$30.00	$250.00
Class C	$350 / hour		$40.00	$400.00 / hour

The Troop Commander recognizes that not all collision scene recoveries are the same. When circumstances dictate the use of procedures beyond a standard recovery additional fees are expected. However, the validity of any wrecker fee in excess of those previously presented will require written documentation on an itemized bill. Any additional fees must also be reasonable.

This is to acknowledge that I have received the approved fees for the calendar year 2013. It will be kept in the wrecker at all times and will be presented upon request to the person whom the tow services were provided, their agent, and any DPS officer.

_____ _____
Signature of Owner or Representative *Date*

Please Print Name of Wrecker Service: _____

Courtesy - Efficiency - Service

POST OFFICE BOX 1093, 10311 WILSON BLVD., BLYTHEWOOD, SOUTH CAROLINA 29016

PETITIONER'S EXHIBIT 28 8:11-cv-01718-JMC
PENGAD 800-631-6989

(Penalty) (10)

001136

2014

South Carolina Department of Public Safety

S.C. Highway Patrol

Aiken / NA - HP.

TO: Troop Seven
Rotation Wrecker Services

FROM: Captain A. K. Grice
Troop Seven Commander

DATE: November 13, 2013 For 2014

SUBJECT: Article 7 Highway Patrol
Sub-article 1 Wrecker Regulations
Text section F

In accordance with Article 7 Highway Patrol, sub-article 1 Wrecker regulations, Text section F, 2(2) b: The Troop Commander will determine the reasonableness of the fees based upon the average of the proposed fees submitted and a comparison of that Highway Patrol Troop's standards, by wrecker zone, for similar operations.

Maximum Allowable Fees

	Standard Tow	Special Operations	Storage
Class A	$185.00	$100 / hour Turner	$25.00 / day
Class B	$225.00	$100 / hour	$30.00 / day
Class C	$350 / hour	No fee will be set	$40.00 / day

(1) A standard tow is defined as responding to the scene, hooking up the vehicle, performing a general clean up if the call involves responding to a collision scene and providing responsible assistance to the owner to get to a safe location.
(2) Special operations are operations involving the process of up righting an overturned vehicle or returning a vehicle to a normal position on the roadway which requires the use of auxiliary equipment due to the size or location of the vehicle and/or the recovery of a load which has spilled, or the off-loading and reloading of a load from an overturned vehicle performed to right the vehicle.

The validity of any wrecker fee in excess of those previously presented will require written documentation on an itemized bill. Any additional fees must also be reasonable.

This is to acknowledge that I have received the approved fees for the calendar year 2014. It will be kept in the wrecker at all times and will be presented upon request to the person whom the tow services were provided, their agent, and any DPS officer.

_____ _____
Signature of Owner or Representative *Date*

Please Print Name of Wrecker Service: _____

Courtesy - Efficiency - Service

POST OFFICE BOX 1993, 10311 WILSON BLVD., BLYTHEWOOD, SOUTH CAROLINA 29016

001137

EXHIBIT
F

South Carolina Department of Public Safety
S.C. Highway Patrol

South Carolina Highway Patrol
2015 Wrecker Rotation Fee Schedule

In accordance with Section 38-600 of the South Carolina Code of State Regulations, the Department of Public Safety publishes a yearly Fee Schedule outlining the maximum allowable fees for each class of wrecker on the SCHP Wrecker Rotation List. The reasonableness of fees on the Fee Schedule is determined by the Highway Patrol on a comparative basis. The fees permitted for calendar year 2015 are listed below:

2015 MAXIMUM ALLOWABLE FEES FOR ROTATION LIST CALLS

CLASS	STANDARD TOW	SPECIAL OPERATIONS	STORAGE
A	$200.00 flat rate	$105.00 per hour	$29.00 per day
B	$262.00 flat rate	$164.00 per hour	$36.00 per day
C	$412.00 per hour	* no fee will be set	$49.00 per day

Standard Tow: Includes all associated costs such as responding to the scene, hooking up the vehicle, performing general clean up at the collision site, and providing responsible assistance to the vehicle occupants to get to a safe location. In the absence of special operations as defined below, the maximum fee for a Class A or B tow is the flat rate listed above. Fees for Class C tows are billed at an hourly rate.

Special Operations: Include up-righting an overturned vehicle or returning a vehicle to a normal position on the roadway when the use of auxiliary equipment is needed due to the vehicle's size and/or location, or where the recovery of or off-loading and reloading of cargo is required in order to right the vehicle. All Special Operations fees must be approved on-scene at the time of the tow by the investigating Trooper or an SCHP Supervisor.

* Although no Special Operations fee is set for Class C tows, a wrecker service may recover the actual cost of rental or subcontract equipment or labor, or an out-of-pocket incidental expense, that is necessary to accomplish the job. Proof of these actual costs in the form of an invoice or receipt must accompany the tow bill.

Storage: Fees begin 12 hours after a vehicle is secured on the wrecker service premises and terminate when the vehicle owner or owner's designee offers to pick up the vehicle and pay the legitimate accrued charges.

A COPY OF THIS FEE SCHEDULE SHALL BE KEPT IN EACH WRECKER AT ALL TIMES AND MUST BE PRESENTED UPON REQUEST TO ANY PERSON FOR WHOM TOW SERVICES ARE PROVIDED, THEIR AGENT, OR ANY DEPARTMENT OF PUBLIC SAFETY EMPLOYEE. ANY COMPLAINTS MUST BE IN WRITING AND FORWARDED TO THE SCHP TROOP COMMANDER.

NOTE: This fee schedule lists the maximum fee that may be charged for each class of wrecker. A lesser fee may be charged at any time in the wrecker service's discretion.

I have received and agree to the South Carolina Highway Patrol Fee Schedule for the year 2015:

Sherry Corbett — Print Owner/Representative Name
[signature] — Owner/Representative Signature
1-28-2015 — Date

Wayne's Towing — (Name of Wrecker Service)

Courtesy - Efficiency - Service

EXHIBIT

tabbies

E

South Carolina Department of Public Safety

S.C. Highway Patrol

2017 Wrecker Rotation Fee Schedule

In accordance with Section 38-600 of the South Carolina Code of State Regulations, the Department of Public Safety publishes a yearly Fee Schedule outlining the maximum allowable fees for each class of wrecker on the SCHP Wrecker Rotation List. The reasonableness of fees on the Fee Schedule is determined by the Highway Patrol on a comparative basis. The fees permitted for calendar year 2017 are listed below:

2017 MAXIMUM ALLOWABLE FEES FOR ROTATION LIST CALLS

Rates / Fees		
Class A Wrecker		
Standard Towing Charge	***Special Operations**	**Storage**
$ 214.00 Flat Fee	$ 126.00 Per Hour	$ 32.00 Per Day
**Special Operations are billed at a per hour rate in ½ hour increments.*		
Class B Wrecker		
Standard Towing Charge	***Special Operations**	**Storage**
$ 313.00 Flat Fee	$ 200.00 Per Hour	$ 41.00 Per Day
**Special Operations are billed at a per hour rate in ½ hour increments.*		
Class C Wrecker		
***Standard Towing Charge**	**Special Operations**	**Storage**
$ 474.00 Per Hour	****See below**	$ 56.00 Per Day
**Standard Towing is billed at a per hour rate in ½ hour increments.*		
***Although no Special Operations fee is set for Class C tows, a wrecker service may recover the actual cost of rented/subcontracted equipment or labor necessary to accomplish the job. Proof of these actual costs in the form of an itemized invoice or receipt from each third party providing such equipment or labor must accompany the tow bill.*		

Class C services only.		
Description of Service, Labor or Equipment	**Rate / Fee**	
Additional Wrecker	$ 464.00	Per hour
Dump Truck, Dump Trailer or Drop Dumpster	$ 223.00	Per hour
Rotator/Crane or equivalent	$ 662.00	Per hour
Truck Tractor with Box Trailer or equivalent	$ 260.00	Per hour
Truck Tractor with Flat Trailer or equivalent	$ 267.00	Per hour
Truck Tractor with Landoll/Lowboy/Tilt Trailer or equivalent	$ 300.00	Per hour
Skid Steer or equivalent	$ 212.00	Per hour
Forklift or equivalent	$ 209.00	Per hour
Backhoe or equivalent	$ 241.00	Per hour
Service Truck (includes all tools and equipment on board)	$ 175.00	Per hour
Tower Light System	$ 148.00	Per hour
Complete Air Bag Unit	$ 712.00	Per hour
Additional Labor (General)	$ 79.00	Per person/per hour
Additional Labor (Specialized)	$ 109.00	Per person/per hour

South Carolina Highway Patrol

Wrecker Rotation Inspection

Inspector's Comments:

After my inspection, I find this service to be:

☒ **Approved** – Business is in compliance with Wrecker Regulations and is being recommended for the rotation list.

☐ **Not Approved** – Business is not in compliance with Wrecker Regulations and is NOT recommended for the rotation list. Service was notified in writing as to what deficiencies were identified.

Inspector's Signature: SGT. DA DARLING Date: 11-30-2016

Wrecker Owner's Acknowledgment of Receipt and Compliance if approved:

I do hereby affirm that I have a copy of South Carolina Code of Regulations 38-600 governing rotation list wreckers. I am familiar with its contents and do hereby agree to fully comply with it in order to remain on the rotation list. I understand that any violation of the Wrecker Regulations may result in disciplinary action pursuant to S.C. Code of Regulations 38-600(D) and SCDPS Policy 200.19 Wrecker Rotation Disciplinary Policy. I further agree that if I relocate or change equipment, insurance carriers, telephone numbers or employees, or for any reason become unavailable for service for an extended period of time, I will notify the appropriate Troop Commander in writing. The information I have furnished is true and correct to the best of my knowledge. My business has been inspected and approved this 30 day of November, 2016.

Print Name: Sherry Corbett Signature: [signature]

Key to Inspection Codes:
C = Compliant **NC = Not in Compliance** **NA = Not Applicable**

Form SCHP-A-007 revised September 2016

NOTICE:
Rates for all equipment usage should include the cost of an operator, operating expenses, and the cost to transport the equipment to and from the scene.

Standard Tow: A standard tow is defined as responding to the scene, hooking up the vehicle, performing a general clean up if the call involves responding to a collision scene and providing responsible assistance to the vehicle occupants. In the absence of special operations as defined below, the maximum fee for a Class A or B tow is the flat rate listed above. Fees for Class C tows are billed at an hourly rate.

Special Operations: Special operations are operations involving the process of uprighting an overturned vehicle or returning a vehicle to a normal position on the roadway which requires the use of auxiliary equipment due to the size or location of the vehicle and/or the recovery of a load which has spilled, or the off-loading and reloading of a load from an overturned vehicle performed to right the vehicle. A wrecker service must receive confirmation on-scene at the time of the tow from the investigating Trooper or an SCHP supervisor that special operations are required to perform the tow in order to recover such fees.

* Although no Special Operations fee is set for Class C tows, a wrecker service may recover the actual cost of rented/subcontracted equipment or labor necessary to accomplish the job. Proof of these actual costs in the form of an itemized invoice or receipt from the third party providing such equipment or labor must accompany the tow bill.

If services beyond those for which the wrecker was dispatched are performed (e.g., hazardous waste cleanup; transportation of vehicle, cargo, or occupants(s) to an agreed upon location other than the one required by the Regulation), those services must be billed on a separate invoice.

Storage: Fees begin 12 hours after a vehicle is secured on the wrecker service premises and terminate when the vehicle owner or owner's designee offers to pick up the vehicle and pay the legitimate accrued charges.

A COPY OF THIS FEE SCHEDULE SHALL BE KEPT IN EACH WRECKER AT ALL TIMES AND MUST BE PRESENTED UPON REQUEST TO ANY PERSON FOR WHOM TOW SERVICES ARE PROVIDED, HIS OR HER AGENT, OR ANY DEPARTMENT OF PUBLIC SAFETY EMPLOYEE. ANY COMPLAINTS MUST BE IN WRITING AND FORWARDED TO THE SCHP TROOP COMMANDER.

NOTE: This fee schedule lists the maximum fee that may be charged for each class of wrecker. A lesser fee may be charged at any time in the wrecker service's discretion.

On behalf of the wrecker service named below, I acknowledge that I have received and agree to be bound by the South Carolina Highway Patrol 2017 Wrecker Rotation Fee Schedule and the Department of Public Safety's Wrecker Rotation Disciplinary Policy. Further, I certify that I am authorized to bind the wrecker service named below to the terms of this Fee Schedule and the Department of Public Safety's Wrecker Rotation Disciplinary Policy.

Sherry Corbett — Owner/Representative Name (Printed)

[signature] — Owner/Representative Signature

11-30-2016 — Date

Wayne's Automotive Center
Name of Wrecker Service

001141