

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

S.C. SUPREME COURT

Robin B. Stilwell, Circuit Court Judge

Op. No. 2018-UP-340 (S.C. Ct. App. filed July 25, 2018)
Appellate Case No. 2019-000535

Madel C. Rivero, as Personal Representative
for the Estate of Lilia Lorena Blandin, Respondent,

v.

Sheriff Steve Loftis, in his capacity as
Sheriff of Greenville County Petitioner.

RETURN TO PETITION FOR WRIT OF CERTIORARI

Blake A. Hewitt
BLUESTEIN THOMPSON
SULLIVAN, LLC
P.O. Box 7965
Columbia, SC 29202
(803) 779-7599

Daniel W. Luginbill
J. Christopher Wilson
WILSON & LUGINBILL, LLC
P.O. Box 1150
Bamberg, SC 29003
(803) 245-7799

Daniel J. Farnsworth, Jr.
FARNSWORTH LAW
OFFICES, LLC
P.O. Box 8719
Greenville, SC 29604
(864) 250-9119

Attorneys for Respondent

Other Counsel of Record:

Russell W. Harter, Jr.
Carly H. Davis
CHAPMAN, HARTER & HARTER, PA
P.O. Box 10224
Greenville, SC 29603

Andrew F. Lindemann
LINDEMANN, DAVIS & HUGHES, PA
P.O. Box 6923
Columbia, SC 29260

Attorneys for Petitioner

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QUESTIONS PRESENTED

Respondent would re-state the questions presented as follows:

- I. Did the court of appeals correctly affirm the denial a new trial involving an allegation of intentional concealment during voir dire?
- II. Does the record contain any evidence Mr. Blandin would not have been able to murder his wife on December 10, 2011 if he had been arrested the previous day, as he should have been?

INTRODUCTION

Lilia Blandin was stabbed to death by her husband in December of 2011. The facts are haunting. Lilia called the police after Mr. Blandin punched her and threatened to kill her. The police came to the home but did not arrest Mr. Blandin. He killed Lilia the next day.

This is precisely why South Carolina has a mandatory investigation statute for domestic violence. S.C. Code Ann. § 16-25-70(A). It is also precisely why that same statute says officers may be liable for gross negligence. § 16-25-70(I).

This appeal is about the sheriff's department's refusal to accept a verdict of gross negligence. At trial, the key dispute was credibility. The deputies denied knowing Mr. Blandin had assaulted his wife and threatened to kill her. Lilia's mother disputed this with her personal testimony and with other evidence. The jury found in the plaintiff's favor.

Now, the disputes are different. First, the sheriff's department claims it was denied accurate information during voir dire. Second, the sheriff's department thinks the verdict cannot stand because Mr. Blandin might have murdered his wife some other time if he had been in jail on December 10th. The circuit court and court of appeals rejected these arguments. This Court should reject them too.

STATEMENT OF THE CASE

Lilia called 9-1-1 around 10:15 in the morning on December 9, 2011; the day before she was killed. (R.p.327, lines 13-15). Lilia explained Mr. Blandin assaulted her the night before, that he threatened to kill her, that she fled and slept in her car, and that one of her children remained in the house. Her first words to the dispatcher were:

Yes, I need some help because my husband has been arrested for domestic violence and he's out of jail and he – he's at my house now and he – I take my clothes. I tried to leave the house so I don't have to stay with him, and I tried to get my stuff from it, and he beat me on the stomach and told me he was going to kill me. Now my baby is on the second floor and I have to go get her, but I don't want to go inside because I know he's going to put me in that room and he's going to beat me up.

(R.p.843). Mr. Blandin had two prior arrests for CDV. (R.pp.606 & 882).

Two Greenville deputies responded to the home. They said Lilia denied being assaulted and that they did not know Mr. Blandin threatened to kill her. (R.p.393, lines 8-19; p.397, lines 4-8; p.456, line 12 - p.457, line 5). At trial, the deputies were questioned about the mandatory investigation statute and about a standing “general order” covering criminal domestic violence investigations and arrests. (R.pp.869-877). The deputies said the general order did not apply because Lilia supposedly had not mentioned being assaulted or threatened. (R.p.430, line 16 - p.431, line 20; p.452, line 21 - p.453, line 6).

Madel Rivero is Lilia's mother. She disputed the deputies' version of events. Ms. Rivero witnessed part of Lilia's interaction with the deputies: she even asked one of them why nothing was happening to Mr. Blandin. (R.p.524, line 8 - p.525, line 12). Ms. Rivero insisted she and Lilia told the deputy Lilia had been assaulted. *Id.* She said the deputy responded by saying that was Lilia's “version” and that Lilia had no “evidence.” *Id.*

It is not disputed that Mr. Blandin murdered his wife at her place of employment around 1:15 p.m. the following day; December 10, 2011. (R.p.126, ¶48).

Ms. Rivero filed this lawsuit two years later, in December of 2013. (R.p.114). She brought a claim for wrongful death as well as a survival action. The complaint generally alleged the deputies failed to properly investigate Lilia's allegations and that the deputies were grossly negligent in failing to arrest Mr. Blandin. The complaint also alleged the deputies had written false statements in the supplemental report of their investigation. (R.p.134, ¶84 - p.137, ¶92). They wrote that report after Lilia had been murdered. (R.p.442).

The case was tried over 4 days in the Fall of 2015. (R.p.249). The jury found the sheriff's department had been grossly negligent and awarded \$750,000 in damages on the survival action and \$500,000 for wrongful death. (R.pp.1-2). The court ultimately reduced the awards to \$300,000 each pursuant to the damages limit in the Tort Claims Act. (R.p.9).

The sheriff's department filed multiple post-trial motions in October of 2015, shortly after the jury's verdict. (R.pp.10-11) (listing seven). Then, in November of 2015, the sheriff's department filed an additional post-trial motion. (R.p.195). This last motion claimed two of the jurors had not given accurate responses to a question during voir dire. The venire was asked whether anyone had been a victim of criminal domestic violence. (R.p.35, lines 13-15). A member of the jury contacted the lawyer for the sheriff's department a few weeks after the verdict and claimed these jurors had discussed domestic violence during the jury's deliberations. (R.pp.48-62).

Ms. Rivero opposed the admission of testimony about the jury's deliberations as being barred by Rule 606, SCRE. (R.p.203). On the merits, she argued there was no

evidence anyone on the jury had been a victim of criminal domestic violence. The sheriff's department had submitted an incident report from June of 2015 involving one of the jurors—Juror Burns. Ms. Rivero noted the report described that event as a “nonviolent” incident where Juror Burns’ husband grabbed a telephone out of her hand. (R.pp.82-83).

The circuit court conducted a hearing December 17, 2015. (R.p.213). The sheriff's department abandoned its allegation of concealment as to one of the jurors but expressed a desire to examine Juror Burns. (R.p.224, line 24 - p.225, line 7).

In addition to the arguments of counsel and the parties’ filings, the court considered the transcript of voir dire, the sworn statement of the juror who contacted the lawyer for the sheriff's department, sworn statements from the officers who responded to the nonviolent incident involving Juror Burns, and the recording of Juror Burns’ 9-1-1 call. (R.p.16).

The circuit court ultimately issued three formal orders denying the sheriff's department's post-trial motions.

The first order dealt with voir dire and found the information presented to the court showed Juror Burns had not been a victim of criminal domestic violence. (R.p.6). The court favorably cited this court's decision in *State v. Kelly* for the proposition that the question would not have elicited the information that was allegedly concealed. (R.p.7). The court also explained it had reviewed all of the materials submitted by the parties and that after careful consideration it did not believe an additional evidentiary hearing was needed. *Id.*

The circuit court's second post trial order dealt with the other post trial motions. (R.pp.9-15). The court found causation-in-fact based on testimony about the cycle of domestic violence and on testimony that Mr. Blandin would likely still have been in jail on

December 10th and thus unable to murder his wife on that date if the deputies had arrested him the day before. (R.p.14).

The final post-trial order addressed issues not pertinent to the appeal. (R.p.112-113).

The sheriff's department argued three issues to the court of appeals. In addition to the arguments about Juror Burns and that causation required proof Mr. Blandin would not have eventually murdered his wife, the sheriff's department argued the gross negligence standard did not apply. The department has abandoned the gross negligence issue here.

The court of appeals affirmed the judgment in a unanimous, unpublished opinion. (App.pp.1-9). The court explained the voir dire question—whether anyone had been a victim of criminal domestic violence—was ambiguous because the word “criminal” could cause a juror to believe a prior domestic altercation had to at least result in an arrest. (App.p.4). On causation, the court echoed the circuit court's explanation that if Mr. Blandin had been in jail on December 10th he would not have been able to murder his wife. (App.p.6). The court also cited cases explaining causation is ordinarily a jury question. (App.pp.5 & 8).

ARGUMENTS

As noted above, the circuit court and the court of appeals have rejected the sheriff's department's arguments. This Court should reject them as well, for two main reasons.

First, asking whether anyone has been a victim of criminal domestic violence is not a good question if what the sheriff's department really wanted to know was whether anyone in the venire had ever gotten into an argument with their spouse and called the police. It was a poor question. The sheriff's department also cannot show an abuse of discretion.

Second, there is ample evidence of causation. Causation only requires a reasonable inference that Mr. Blandin would not have murdered Lilia on December 10th but-for the deputies' failure to arrest him. That is plainly supported by the record. Even the department's own expert agreed it was not likely Mr. Blandin would have been released by the next morning if he had been arrested. (R.p.779, line 5 - p.782, line 18).

I. The court of appeals correctly affirmed the denial of a new trial because Juror Burns did not intentionally conceal information during voir dire.

The court of appeals correctly affirmed the circuit court's decision to deny a new trial. Juror Burns did not intentionally conceal information. The sheriff's department's arguments to the contrary are either contradicted by the record or by precedent.

a. There was no intentional concealment. Asking about CDV is not the same as asking whether anyone has called the police during an argument.

Multiple cases describe the governing principles for a motion for a new trial that challenges a juror's qualification to sit on a case.

The general test requires the moving party to show the fact of the juror's disqualification, that the grounds for disqualification were not known prior to the verdict, and that the moving party was not negligent in failing to discover the disqualification before the verdict. This general test appears in several cases including *Gray v. Bryant*, 298 S.C. 285, 288, 379 S.E.2d 894, 896 (1989) and *Thompson v. O'Rourke*, 288 S.C. 13, 14, 339 S.E.2d 505, 506 (1986). The circuit court cited both of these cases. (R.p.6).

This general test also explains the meaning of "disqualification." Disqualification does not mean the juror was disqualified as a matter of law. A new trial is required when the

information would have supported a challenge for cause or would have been a material factor in the complaining party's use of peremptory strikes. Again, relevant authorities include *Gray* and *Thompson*. See *Gray*, 298 S.C. at 288, 379 S.E.2d at 896 (quoting *Thompson*).

A new trial motion based on voir dire is best understood as a specific application of the general "juror disqualification" test. In *State v. Woods*, this Court explained a new trial is required when a juror "intentionally" conceals information that would have supported a challenge for cause or been a material factor in the use of peremptory strikes. 345 S.C. 583, 587, 550 S.E.2d 282, 284 (2001). The Court cited *Thompson* as authority for that rule.

Then, the Court defined "intentional concealment." The Court announced an objective standard, explaining intentional concealment occurs when the voir dire question "is reasonably comprehensible to the average juror and the subject of the inquiry is of such significance that the juror's failure to respond is unreasonable." 345 S.C. at 588, 550 S.E.2d at 284. In other words, "intentional concealment" occurs when a voir dire question is reasonably straightforward and when the subject matter of the question is so significant that a juror's failure to respond would be *unreasonable*.

The question at issue—"Is there anyone among you who has been a victim of criminal domestic violence?" (R.p.35)—is not a good question if what the sheriff's department really wanted to know was whether anyone in the venire had ever gotten into an argument with their spouse and called the police. Criminal Domestic Violence is a legal term describing various statutory offenses. S.C. Code Ann. §§ 16-25-20(A)-(D) (giving the elements of CDV 1st through 3rd). The venire were not given definitions or asked direct questions like whether they ever felt threatened by a spouse or had been injured by a spouse.

This case is like *State v. Sparkman* and *Lynch v. Carolina Self Storage Centers*. Both of those cases dealt with voir dire questions that did not have straightforward application to the information that was allegedly concealed.

In *Sparkman*, members of the venire were asked whether they had been victims of a “serious crime.” 358 S.C. 491, 494, 596 S.E.2d 375, 376 (2004). One of the jurors did not disclose that he had been assaulted 40 years earlier, explaining when asked that he did not even remember the event until after the deliberations began. *Id.* at 495, 596 S.E.2d at 376. This Court explained the term “serious crime” was ambiguous. *Id.* at 497, 596 S.E.2d at 377. The same can fairly be said of this question about criminal domestic violence. The venire was given no explanation about criminal domestic violence and what it involved.

Lynch turns on similar reasoning. There, the venire was asked whether anyone had a close social or personal relationship with any of the attorneys or had a business relationship with any of the law firms. 409 S.C. 146, 155, 760 S.E.2d 111, 116 (Ct. App. 2014). The claimed basis for a new trial was that one of the jurors did not disclose her ex-husband had been represented by another lawyer in one of the law firms. *Id.* The court of appeals did not doubt that this information would have been material to one of the parties in using peremptory strikes but explained “the responsibility ... falls on the attorneys to request precise voir dire questions that are reasonably comprehensible to the average juror.” *Id.* at 156, 760 S.E.2d at 117.

The same thing can fairly be said of this question about criminal domestic violence. Asking about criminal domestic violence is simply not the same as asking whether anyone has gotten in an argument with their spouse, felt threatened by a spouse, or called the police.

b. Respectfully, the Sheriff's department's arguments are either contrary to the record or contrary to precedent.

First, the sheriff's department has repeatedly claimed the circuit court erred by not holding an evidentiary hearing. Respondent does not understand this argument.

The circuit court *had* an evidentiary hearing. It issued a Form 4 order after the hearing and listed of all the materials it received during the hearing. (R.p.16). These materials included the recording of Juror Burns' 9-1-1 call, the transcript of the 9-1-1 call, the police report, and sworn statements from the responding officers. The court specifically mentioned in its order that it had reviewed these things. (R.p.6). Then, the court found these demonstrated Juror Burns was not a victim of criminal domestic violence. *Id.* The court explained it was respectfully denying the request to conduct a further evidentiary hearing because its review of these materials made a further hearing unnecessary. (R.p.7).

Circuit court judges are empowered with "broad discretion" in assessing this sort of new trial motion and the circuit court's decision on this sort of motion is reviewed for abuse of discretion. *State v. Kelly*, 331 S.C. 132, 141-142, 502 S.E.2d 99, 104 (1998). The finding that Juror Burns was not a victim of criminal domestic violence is plainly supported by the record. The incident report describes the event as "nonviolent." (R.p.82). One officer noted Juror Burns did not seem threatened in any way and that there was no evidence of "any domestic violence." (R.p.101). The other officer explained Juror Burns specifically denied any physical violence. (R.p.103).

Second, the sheriff's department has also repeatedly claimed the circuit court should have called Juror Burns for questioning. "Intentional concealment" is principally an

objective test. *Woods* describes the test by referencing the average juror. The circuit court certainly has the discretion to question a juror in this sort of situation, but the argument that the circuit court is required to examine the juror was specifically rejected in *Lynch*. 409 S.C. at 159 n.2, 760 S.E.2d at 119 n.2. Again, the sheriff's department cannot demonstrate the circuit court abused its discretion by declining to haul Juror Burns into court after determining the other evidence demonstrated further inquiry was unnecessary.

Third, the sheriff's department claims the court of appeals has impermissibly "reversed" the circuit court because the circuit court found the voir dire question "clear and unambiguous" (R.p.6) and the court of appeals described the question as "ambiguous." (App.p.4). Here again, Respondent does not understand this argument. Appeals are taken from "orders" and "judgments," not from reasons given in orders. No authority supports the proposition that Respondent could (or should) have cross-appealed a judgment that was entirely in her favor. The court of appeals affirmed the judgment. It did not reverse.

Fourth and finally, the sheriff's department says it is not clear whether ambiguity in a voir dire question is a dispute of fact or of law. The department relies on cases saying intentional concealment is "fact intensive," but that just means intentional concealment depends on the facts. It is difficult to understand why determining whether a voir dire question is ambiguous would be different than determining whether a contract, a deed, a transcript, or a sentencing sheet are ambiguous. See (App.p.34) (citing cases).

The result reached by the circuit court and court of appeals is plainly correct. The question about criminal domestic violence was not a good question if the sheriff's department was looking for more detailed information. This Court should deny review.

II. The record contains ample evidence Mr. Blandin would not have been able to murder his wife on December 10, 2011 if he had been arrested the previous day, as he should have been.

Causation only requires a reasonable inference that Mr. Blandin would not have murdered Lilia on December 10th but-for the deputies' failure to arrest him. Both the circuit court and the court of appeals properly found a jury question was presented here.

Also, this case would be a poor vehicle to review the department's chief argument on causation. The argument seems to be that the verdict cannot stand without evidence Mr. Blandin would never have murdered his wife even if he had been in jail on December 10th, but that was not the argument the department made at the directed verdict stage.

And even if the Court was inclined to overlook the argument's procedural default, the idea that murder might have been inevitable runs into persuasive authority and to the fact that the mandatory investigation statute was designed to prevent precisely this sort of harm. Precedent has rejected this same argument in other contexts. There is no reason that rationale would not apply here.

a. Causation only requires a reasonable inference that Mr. Blandin would not have murdered Lilia on December 10th.

Causation is ordinarily a question of fact for the jury. The circuit court correctly cited *Hill v. York County Sheriff's Department*, for this proposition. See (R.pp.14-15) (citing 313 S.C. 303, 308, 437 S.E.2d 179, 181 (Ct. App. 1993)). This Court's precedent similarly explains the circuit court "is required" to submit causation to the jury as long as more than one reasonable inference can be drawn from the evidence. *Graham v. Whitaker*, 282 S.C. 393, 398, 321 S.E.2d 40, 43 (1984).

Again, all that is required is a reasonable inference that Lilia's murder on December 10th would not have occurred but-for the deputies' negligence. It is difficult to understand how anyone could deny that standard is satisfied here. As already noted, even the department's expert agreed it was not likely Mr. Blandin—who was already out on bond for a CDV arrest two months before—would be released the same day or the next morning, though would likely have the opportunity to post a bond “eventually.” (R.p.779, line 15 - p.782, line 18). There is a reasonable inference Mr. Blandin would not have been able to murder Lilia on December 10th if he had been arrested the day before.

b. This would be a poor vehicle to review the department's argument that murder was inevitable, but even so, that argument runs counter to persuasive authority and to precedent.

The department says this verdict cannot stand without proof that Mr. Blandin's arrest “would have resulted in his long-term detention and separation from his wife, thereby eliminating the threat [that he would kill her].” (Petition, p.18).

The first problem with this argument is that it is not the argument the department made at the directed verdict stage. There, the argument appeared to focus on comparative negligence or intervening cause. Mr. Blandin taunted his wife after the police failed to arrest him; sending threatening text messages, slashing her tires, and calling her workplace. Below, the department's causation argument pointed to these acts, emphasized that Lilia had known about them, and characterized Mr. Blandin's act of killing his wife as an event that broke the chain of causation. (R.p.678, line 14 - p.679, line 5 & p.800, line 10 - p.801, line 1). There was no argument that the plaintiff needed to prove Mr. Blandin would have been incarcerated long enough to remove all of his motive and opportunity to kill his wife.

The second problem with the department's argument is that it runs counter to the mandatory investigation statute's purpose and the provision recognizing liability for gross negligence. Many states enacted statutes like this precisely because of the historical tendency not to enforce domestic violence laws. The gross negligence language in South Carolina's statute is not worth very much if maintaining a successful suit for damages requires the plaintiff to prove a negative—that an arrest would have perpetually prevented the abuser from injuring the plaintiff.

Other states impose liability when an abuser injures a family member soon after a failure to arrest. *Washburn v. City of Fed. Way*, 310 P.3d 1275 (Wash. 2013); *Calloway v. Kinkelaar*, 659 N.E.2d 1322 (Ill. 1995). Cases coming out the other way do so because of harder facts, not because the plaintiff needed to prove an arrest would have prevented any chance at future injury. *Alexander v. Town of Vernon*, 923 A.2d 748 (Conn. 2007).

And precedent already rejects this same argument. Consider *Coleman v. Shaw*, a drowning case where the defendant argued the plaintiff could not prove having a lifeguard on duty (as regulations required) would have prevented the death. That case held requiring proof the drowning would not have occurred would amount to requiring evidence that was “impossible to obtain” due to the very negligence at issue—the failure to have a lifeguard on duty. 281 S.C. 107, 114, 314 S.E.2d 154, 158 (Ct. App. 1984). Here as well, the department is trying to benefit from the deputies' failure to do what they were required to do.

In the same way, it is impossible to overlook the fact that Lilia's injury is precisely the sort of injury that the mandatory investigation statute and the Greenville Sheriff's general order were designed to prevent. Nobody can *prove* what would have happened if the

deputies had arrested Mr. Blandin. It was reasonable, however, for the jury to infer Lilia would not have been murdered on December 10th.

The department believes causation is controlled by a court of appeals opinion where the at-fault driver had a valid drivers license but was driving an uninsured vehicle and caused a wreck. See *Thomas v. S.C. Dep't of Highways & Pub. Transp.*, 320 S.C. 400, 465 S.E.2d 578 (Ct. App. 1995). The plaintiff in that case sued the highway department claiming gross negligence in failing to repossess the uninsured vehicle's plates and registration. The court of appeals found no causation between that alleged negligence and the wreck, explaining the at-fault driver *had* a valid driver's license and that there was no evidence he would not have been operating the same uninsured vehicle or a different vehicle at the time of the wreck. *Id.* at 402, 465 S.E.2d at 580. That case actually hurts the department. The court analyzed causation *at the time of the wreck*. Here, there *is* a reasonable inference Mr. Blandin would have been in jail on December 10th if he had been arrested the day before.

CONCLUSION

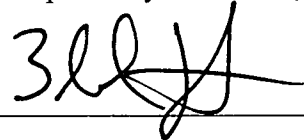
For the foregoing reasons this Court should deny the petition.

May 1, 2019

Daniel J. Farnsworth, Jr.
FARNSWORTH LAW OFFICES
PO Box 8719
Greenville, SC 29604
(864) 250-9119

Daniel W. Luginbill
J. Christopher Wilson
WILSON & LUGINBILL
PO Box 1150
Bamberg, SC 29003
(803) 245-7799

Respectfully submitted,



Blake A. Hewitt # 73674
BLUESTEIN THOMPSON
SULLIVAN, LLC
P.O. Box 7965
Columbia, SC 29202
(803) 779-7599
blake@bluesteinattorneys.com

Attorneys for Respondent

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Sheriff Steve Loftis, in his capacity as
Sheriff of Greenville County Petitioner.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Petitioner with a copy of the *Return to Petition for Writ of Certiorari* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

Russell W. Harter, Jr.
Carly H. Davis
Chapman, Harter & Harter, P.A.
PO Box 10224
Greenville, SC 29603

Andrew F. Lindemann
Lindemann, Davis & Hughes, PA
PO Box 6923
Columbia, SC 29260


Erin Bridges

May 1, 2019