

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appeal from RICHLAND COUNTY

Deandrea G. Benjamin, Circuit Court Judge

Court of Common Pleas

RECEIVED

NOV 22 2019

SC Court of Appeals

Case No. 2018-002167

Isaac Smith, Jr.,Appellant

v.

Johnnie Mae Muller Newton, Respondent

RECORD ON APPEAL

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STATE OF SOUTH CAROLINA)
)
 COUNTY OF RICHLAND)
)
 IN THE MATTER OF)
 JOHNNIE MAE MULLER NEWTON)
)
 IN THE MATTER OF THE)
 RULE TO SHOW CAUSE)
 AGAINST ISAAC SMITH, JR.)
 _____)

IN THE PROBATE COURT
 Case Number: 2016-ES-40-77

PROBATE COURT
 RICHLAND COUNTY, SOUTH CAROLINA

2018 JAN 11 PM 1:47

FILED

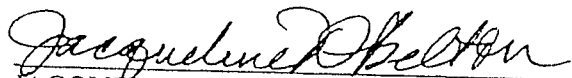
ORDER HOLDING
ISAAC SMITH JR.
IN CONTEMPT OF COURT
AND ORDERING DETENTION

Isaac Smith, Jr., who previously served as the Personal Representative for his aunt Johnnie Mae Muller Newton ("Decedent"), was ordered to appear today to explain the delinquency in repayment of funds owed to the Estate of the Decedent. Isaac Smith, Jr. appeared and was not able explain the delinquency or make the required payment of the balance due pursuant to the September 5, 2017, Order which provided that he shall pay \$30,000.00 total by January 1, 2018. To date, Isaac Smith, Jr. has only paid \$6,000.00 of this amount, which leaves a remaining balance due of \$24,000.00. He states that he cannot pay the total amount due at this time.

It is the finding of this Court that Isaac Smith, Jr. is in willful contempt for his misuse of the Estate's funds and for his failure to repay these funds. Isaac Smith, Jr. was removed as Personal Representative on August 22, 2017, and has had since August 22, 2017, to repay the funds pursuant to a payment plan as laid out during the August 22, 2017, hearing and reaffirmed in the September 5, 2017, Order.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT Isaac Smith, Jr. is held in civil contempt and will be held until the funds are repaid, or until another Order is issued by this Court. Mr. Smith is ordered incarcerated at the Alvin S. Glenn Detention Center.

AND IT IS SO ORDERED.


 JACQUELINE D. BELTON,
 ASSOCIATE PROBATE JUDGE
 RICHLAND COUNTY

January 11, 2018
 Columbia, South Carolina

Isaac Smith, Jr
PLAINTIFF(S)

Johnnie Mae Muller Newton
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled); Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy; Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other
- STAYED DUE TO BANKRUPTCY.**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded;
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

The appeal is Dismissed. Pursuant to South Carolina Code Annotated Section 62-1-308(a), the appeal from probate court was not timely filed. The Notice of Intent to Appeal was filed on February 16 and the parties were served on February 28, which is outside ten day service deadline.

ORDER INFORMATION

This order ends does not end the case.

See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 06/26/2018 .

Isaac Smith, Jr for Isaac Smith, Jr
Isaac Smith, Jr for Isaac Smith, Jr

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRPC.



Richland Common Pleas

Case Caption: Isaac Smith Jr VS Johnnie Mae Muller Newton

Case Number: 2018CP4000403

Type: Order/Electronic Form 4

So Ordered

s/DeAndrea Gist Benjamin, #2161

Electronically signed on 2018-06-26 14:29:56 page 3 of 3

State of South Carolina)
County of Richland) Court of Common Pleas
2018-CP-40-00403

Isaac Smith, Jr.)
vs.) Transcript of Record
Johnnie Mae Muller Newton)
Defendant)

May 11, 2018
Columbia, South Carolina

B E F O R E:

Honorable DeAndrea G. Benjamin, Judge

A P P E A R A N C E S:

Thomas E. Mosley, Esq.
Attorney for the Plaintiff

Heather M. Cairns, Esq.
Attorney for the Defendant

Joy E. Holston
Official Court Reporter

1 THE COURT: This is case number 2018-CP-40-403, Isaac
2 Smith versus Johnnie Mae Muller Newton. This is an appeal
3 from Probate Court, is my understanding?

4 MR. MOSLEY: That is correct.

5 THE COURT: All right. And this, this appeal is by
6 Isaac Smith. Is that correct?

7 MR. MOSLEY: Yes, ma'am. Good morning.

8 THE COURT: Good morning.

9 MR. MOSLEY: How are you doing, Judge.

10 THE COURT: I am great. All right, I will be glad to
11 hear from you.

12 MR. MOSLEY: Okay. Judge, may it please the Court.

13 THE COURT: Yes, sir.

14 MR. MOSLEY: I am Thomas Mosley, as you know.

15 THE COURT: Yes, sir.

16 MR. MOSLEY: And I recently got involved in this
17 matter at the eleventh hour. And I have spoken to Ms.
18 Cairns, who represents the Estate and Ms., Lawyer Dean who
19 apparently represents a direct descendant of the deceased
20 person.

21 THE COURT: Who is that now?

22 MR. MOSLEY: Elnora Dean. She represents the sister
23 of the decedent. My client at this point, Mr. Smith, is a
24 nephew and these parties have been in a very dysfunctional
25 situation, arguing over an Estate, you know, the money and

1 a burnt house. My client, Mr. Smith, is in California and
2 I have been communicating with him just recently. So we
3 are asking for a, first of all, a continuance, and I did
4 my notice of appearance and to initially ask the Court for
5 a continuance. I note that the notices gave the parties a
6 deadline to submit briefs to this particular appeal. I
7 didn't have time, I guess I could have, but the late
8 notice and so much material I didn't have time to prepare
9 any briefs. So I am going to first ask for maybe fifteen
10 to thirty days to present a brief subject to you looking
11 at it and making your decision. I will say, Your Honor,
12 that I think that the opposing counsel has done a great
13 job to edify the Court about the background in this case
14 by making a reply to everything to deny the, to deny the
15 appeal sua sponte for a deficiency with regard to the ten
16 day letter to appeal. At the time Mr. Smith, he accepted
17 service of some orders of the Probate Judge while he was
18 incarcerated in Richland County Detention Center back in
19 February. Just as aside, Judge, he made a vital mistake,
20 he come to South Carolina because it was an allegation
21 that he had spent some Estate money paying some lawyer in
22 California and traveling back and forth. And the parties
23 have entered into an agreement, he was suppose to pay the
24 money back to the Court but he has failed to meet the
25 deadline. So as a condition of getting out of jail he,

1 you know, he had paid X amount of dollars. I think this
2 family is fussing over about maybe \$200,000.00 dollars
3 cash and a burnt house. I think there were some trucks
4 and cars that were distributed to other apparent members.
5 The unique thing about the law with regard to an Estate,
6 which Ms. Cairns represents the Estate, there is a
7 pecuniary interest of everybody involved including me.
8 But primarily, you know, Courts at this particular point,
9 especially Probate Court and its appellate power has more,
10 more than a casual look at the designated time period to
11 do something because as a matter of equity, equitable
12 decisions have far reaching impact on the ability of
13 people to attend each others funeral at the end. You
14 know, this case is about a win/loss situation with lawyers
15 and ultimately all of this nonsense will be trebled
16 towards the advantage of the PR getting five percent, some
17 money, all the lawyers get paid. And as a matter of fact
18 of all of this, diminishes the value of the Estate and
19 everybody gets paid. Ideally, my client, the Court in and
20 of itself, knowing some of this stuff, when my client
21 first appeared and was trying to probate the will the
22 Probate Court simultaneously said, well, since nobody else
23 is here and I will appoint you the PR. I think my
24 opposing counsel's response to that is going to be, well,
25 he had money that he wasn't suppose to take and other

1 family members didn't know about it. Well, on that
2 particular regard, Your Honor, the Estate is a fictional
3 of Western Jurisprudence and created and it really doesn't
4 exist in and of itself. Somebody died and they are dead
5 and the family is fussing over it. So when you look at
6 that from a moral standpoint the nephew, how did Mr. Smith
7 get access to everything, probably because this is a
8 disfunctional family and, you know, he had access. Okay.
9 So ultimately, Your Honor, I beg of you this morning to
10 let us get some transcripts of record. I had talked to my
11 clients earlier and I suggested to them, let's just
12 suppose that the will is no good and you go back to the
13 distribution and there is a hierarchy relationships
14 without even the client of Ms. Cairns, you know, the PR in
15 the Estate. They are more distant relatives so you have a
16 hierarchy, ideally now, you have got to keep in mind that,
17 it is my understanding, her client, I mean the mother,
18 excuse me, the sister of the deceased, they are still
19 fussing over whether or not that lady is incompetent or
20 not. That is one issue.

21 THE COURT: Ms. Dean wasn't notified to be here?

22 MR. MOSLEY: I was curious about that. I called and
23 spoke to her, Your Honor. And by no means, I think both
24 counsel, Ms. Cairns and Ms. Dean have been great lawyers
25 trying to do the best they can for their respective

1 clients, with the clients going through a lot of nonsense.
2 I suggested, as a matter of alternative dispute
3 resolution, which is what we are looking at now, judicial
4 policy, that they take a look at, not in mediation but
5 arbitration between some real good lawyers and some
6 preachers and rather having people waiting for a dollar,
7 have everybody show up so this family can heal and they
8 can attend each others funeral when they die. These cases
9 are very serious and under Western Jurisprudence I think
10 is an obligation of this Court or any Court to sit people
11 down like I do, I am not trying to tell Ms. Cairns' what
12 to do, but sit people down and not let them net effect of
13 our Jurisprudence, and the Jurist who started this system
14 up. And I take these matters serious, Your Honor. And I
15 have precedence with my argument going back to, my good
16 friend, Benjamin Cardozo who was a great Jurist talking
17 about civility in these matters. But, Your Honor, I think
18 we need the transcript of the record. And finally, let me
19 just say this, that I disgruntled last night and I didn't
20 know that there was some legal issues over on the criminal
21 side with regard to post conviction relief and a time
22 table. And I found a word called hybrid representation of
23 our Constitution, didn't create a right to legal
24 representation especially inmates with regard to PCR's and
25 their ten day notice. And this is a similar situation

1 whereby Mr. Smith was in jail, his son was his jailhouse
2 lawyer in the ten days they missed. On the criminal side
3 an appeal is a matter of the jurisdictional issue. But I
4 would beg the Court's indulgence that in Probate Court an
5 appeal to Circuit Court is more than just a notification
6 requirement. This Court and its appellate power over
7 Probate, my understanding of the law, is that he has a
8 right to the facts and issues and make a decision based
9 upon how you view things. So it is not just, boom, bam,
10 bam, thank you, ma'am. I think it would be too
11 conclusively to accept my opponent's argument based upon
12 what she wrote up without the transcript of the record and
13 without some judicial temperament. And I know--

14 THE COURT: Is there not a transcript in this case?

15 MS. CAIRNS: May I speak, Your Honor?

16 THE COURT: From the Probate -- yes, ma'am.

17 MS. CAIRNS: Thank you, Your Honor. I understand
18 much of what Mr. Mosley speaks to. But I think it is
19 important to understand that the matter that brings us
20 before you today is a very simple discreet matter which
21 was simply a motion filed to dismiss the appeal based on
22 the untimeliness of the filings. And so the merits of the
23 case, the facts of what occurred before, the need for
24 transcripts or anything else are not relevant to today's
25 hearing at all. It is completely a matter of the

1 timeliness of his ability to properly file and serve his
2 notice of intent to appeal. The Probate code has been
3 tuned up a few years ago to make appeals from Probate
4 Court very clear in terms of the process. And after the
5 receipt of the written order, which occurred on February
6 12th, Mr. Smith was served the order while in Probate
7 Court. Rule, well code, it is not even a Rule, it is a
8 Code Section, 61-1-308, covers appeals from Probate Court
9 to Circuit Court provided that he had ten days to file his
10 notice of intent to appeal and serve. There has actually
11 been a couple of cases, where the benefits of a couple of
12 cases that say that that is exactly what it says, that
13 they must be served, put them in the U.S. Mail and those
14 things are insufficient. And so in terms of Mr. Mosley's,
15 you know, lack of transcripts and lack of a full grasp of
16 all the facts, it is simply not relevant for today. So I
17 think the need for a continuance for today is not
18 necessary. The only issue is whether or not Mr. Smith
19 filed and served his notice of intent to appeal within the
20 ten days required by statute. And I would offer, even his
21 own--

22 THE COURT: When did he file this?

23 MS. CAIRNS: He filed, he was served the order on
24 February 12th. He filed it in the court on February 16th
25 and it was received by my office on February 28th which is

1 a full five days after the deadline necessary by the
2 rules.

3 THE COURT: Wait a minute. You say he filed his
4 appeal on the 16th?

5 MS. CAIRNS: He filed his notice of intent to appeal
6 on the 16th.

7 THE COURT: That was within the ten days.

8 MS. CAIRNS: That was within the ten days. But the
9 rule also requires service on all the parties within the
10 ten days. And our office was not served with this until
11 the 28th, if I accept service being received by U.S. Mail
12 which I would offer that that would be okay.

13 THE COURT: He was detained at the Department of
14 Corrections?

15 MS. CAIRNS: He was, he was in Alvin S. Glenn until
16 the end of February. That is correct.

17 THE COURT: Do you have a date as to when he mailed
18 it from Alvin S. Glenn. Because, you know, they have--

19 MS. CAIRNS: He mailed it on the 27th, it is
20 postmarked on the 27th, received by my office on the 28th.

21 THE COURT: Okay. You know, sometimes Alvin S. Glenn
22 has a delay.

23 MS. CAIRNS: Yes, there was an effort to actually
24 serve on the order and the order was issued on the 8th, he
25 was brought up to the court on the 12th. He had not

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE MATTER OF THE
ESTATE OF Johnnie Mae
Muller Newton

Isaac Smith, Jr.
Petitioner,

VS.

Estate of Johnnie Mae Muller
Newman, Carrie Lewis, Andrew
Muller, Joseph Muller, Children of
Willie Muller, and Children of
Hebrew Muller.
Respondents,

IN THE COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT
CASE NO: 2019-CP-40-00403
8

MOTION TO SET ASIDE JUDGMENT
ORDER DUE TO INCOMPLETE AND
INSECIPHERABLE TRANSCRIPT

JEANETTE W. MCNEIL
C.C.P., G.S., & F.C.

2019 AUG 14 PM 2:28

RICHLAND COUNTY
FILED

YOU WILL PLEASE TAKE NOTICE THAT THE PETITIONER, Isaac Smith, Jr., Pro, Se, will move this Honorable Court set aside an order rendered by the Probate Court of Richland County pursuant to a hearing held on December 1, 2016 and the decision denying admission a copy of the will of Johnnie Mae Muller for probate in Probate Case Number 2016-ES-40-00077.

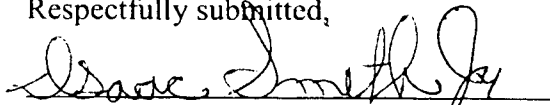
1. A hearing was held on Thursday, December 1, 2016 on the admission of a copy of the will of Johnnie Mae Newton. Petitioner, Isaac Smith, Jr. was seeking a copy of a will which he was the sole devisee to probate.
2. The hearing was held to determine if the copy would be admitted to probate. All known heirs were notified of the time date and location of the hearing.
3. Ms. Carrie Lewis, sister of Mrs. Johnnie Mae Newton was not present at the hearing. Attorney Dean appeared on her behalf. It is called into question whether Attorney Dean legally represented Ms. Carrie Lewis.
4. Attorney Dean acknowledged on Page 13- and 14 of the transcript provided by the Court (See Exhibit "A" attached,) that Mrs. Carrie Lewis was diagnosed with dementia. She further stated that she had not spoken with her but the last time she spoke with Mrs. Carrie Lewis she wanted Attorney Dean to represent her.

5. Most of Attorney Dean's testimony was (inaudible) as was most of the testimony throughout the transcript. (See Exhibit "A" attached. That included important testimony throughout the transcript.
6. The inaudible testimony was crucial to determining whether Attorney Dean could legally represent Mrs. Carrie Lewis. The inaudible portion of the transcript dealt with the mental state of Mrs. Carrie Lewis. The transcript showed that Court admitted hearsay testimony into evidence and that the hearsay testimony influenced the court's decision against the admission of the copy of the will to probate.
7. The inaudible transcript was a result of the defective equipment used to record the hearing and resulted in a compromised record that would damage the petitioner ability to have a fair appeal. The inaudible transcript denies the petitioners constitution right to due process. It prohibits the petitioner's ability to have a fair appeal.
8. The Petitioner is entitled to a fair and equitable ruling from the court and the defective recording device used by the Court prohibited the petitioner from receiving a just decision to which if unjust he has a right to appeal.
9. The missing information and inaudible portions of the transcript represent an altered official document of the Court. Altering transcripts are illegal made unusable and therefore the hearing of which the transcript was recorded is therefore null and void and a new hearing should be scheduled.

WHEREFORE, Petitioner, Isaac Smith, Jr., having fully stated the unconstitutionally of the inaudible transcript, hereby prays that this Court set aside the judgment denying the admission of a copy of the will of Johnnie Mae Muller Newton and a new hearing be held to allow the petitioner his opportunity to make a reasonable case for the admission of the copy of or the will Johnnie Mae Muller Newton be admitted for probate and prays that this Court would inquire into the allegations set forth and issue its Order.

- A. Setting aside the Order pursuant to the hearing held on December 1, 2016 Dismissing this Complaint of the Plaintiff,
- B. For such other relief that this Court may deem just and proper.

Respectfully submitted,



Isaac Smith, Jr. Pro Se, Petitioner
2916 1/4th West Vernon Ave.
Los Angeles CA 90008
323-295-9500

August 13, 2019
Columbia, South Carolina

Judge Jacqueline D. Belton at the Richland County Probate Court on the Estate of Johnnie Mae Newton. At that hearing, Attorney Elnora J. Dean represented to the Court that she was the Attorney for the Respondent, Carrie Muller Lewis. That was a false representation to the court. The official transcript of the hearing documents shows Attorney Elnora J. Dean as the Attorney for the Respondent, Carrie Muller Lewis. Later in the transcript, on page 13, the court said: "And, Ms. Dean, You're here representing, ---- you're the attorney for the Carrie Muller Lewis." Ms. Dean replied: "Correct." Attorney Dean falsely misrepresented to the Court that she was the attorney for Carrie Muller Lewis. I have supplied documentation that she was not the attorney for Carrie Muller Lewis. I have enclosed documents from the Lexington County Probate Court that show that Jesse Near, Esquire was the attorney for Carrie Muller Lewis. Attorney Elnora J. Dean (Page 13 of transcript) stated that Carrie Muller Lewis was an incapacitated person and did not have the capabilities to choose an attorney.

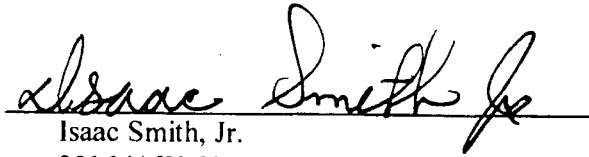
5. At the hearing held on Thursday, December 1, 2016, Attorney Dean acknowledged to the Probate Judge, "Carrie Muller Lewis" was diagnosed with dementia and that she hadn't spoken with Ms. Carrie Muller Lewis and said: "the last time she spoke with her, she wanted me to represent her today for the hearing." (Page 13 and 14 of transcript) Attorney Dean acknowledged the incapacity of Ms. Carrie Muller Lewis and further acknowledged she had not spoken with Ms. Carrie Muller Lewis recently. Despite Attorney Dean's admission to the court that "Carrie Muller Lewis" was not competent to choose a legal representative, the court allowed Attorney Dean to continue and the attorney for "Carrie Muller Lewis."

7. The Probate Court allowed Attorney Dean to Represent Carrie Muller Lewis even though Attorney Dean acknowledged at the hearing on December 1, 2016 that Carrie Muller Lewis was not competent. Attorney Dean basically admitted that she had not authority whatsoever to represent Ms. Carrie Muller Lewis.

8. Sonja L Lewis, not being an heir of Johnnie Mae Newton, had no standing in the Estate of Johnnie Mae Newton. Further, she had no authority to hire an attorney for of Carrie Muller Lewis. Sonja L. Lewis did not have power of attorney for Carrie Muller Lewis. Sonja L. Lewis had no authority to have Ms. Dean represent Carrie Muller Lewis. The Court had already appointed an attorney for Carrie Muller Lewis.

CONCLUSION

Despite Sonja L. Lewis' not having any authority to hire Attorney Elnora Dean to represent Carrie Muller Lewis, Attorney Dean falsely stated she represented Carrie Muller Lewis at a hearing held on August 27, 2017. Judge Amy McCulloch refused to release the transcript from that hearing to me. Because of Attorney Dean misrepresented that she was the legal representative of Carrie Muller Lewis, the court made an adverse ruling in the Matter of Carrie Muller Lewis. These fact fall well within Rule 60(b) (3) fraud, misrepresentation, or other misconduct of the adverse party, and because upon the court this judgement should be set aside.



Isaac Smith, Jr.
2916 ¼ W. Vernon Ave.
Los Angeles, CA 90008
(323)295-9500

January 18, 2019
Columbia, South Carolina

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)
)
Isaac Smith, Jr.)
)
Petitioner)
)
vs.)
)
Estate of Johnnie Mae Newton,)
)
Respondents.)
_____)

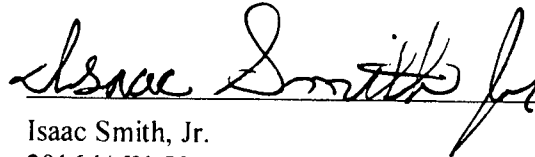
IN THE COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT

CERTIFICATE OF SERVICE

Case No. 2018-CP-40-00403

2019 JAN 18 PM 3:36
JEANETTE W. MORRIS
C.C.P. & G.S.
RICHLAND COUNTY
FILED

I, Isaac Smith, Jr., served upon the Plaintiff this Motion to Set
Aside Judgement under Rule 60 S.C.R.C.P. by delivering a copy of the same to the
address shown below this 18th day of January, 2019.



Isaac Smith, Jr.
2916 ¼ W. Vernon Ave.
Los Angeles, CA 90008
(323)295-9500

Richland County Probate Court
1701 Main Street Heather Cairns, Esquire
2537 Gervais Street
Columbia, SC 29204
Phone: (803) 771-6979

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

Isaac Smith, Jr., Pro Se
2916¼ W. Vernon Avenue
Los Angeles, CA 90008
Telephone: (323) 295-9500

October 19, 2019

RECEIVED

NOV 22 2019

SC Court of Appeals