THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Court of Appeals No. 2020-001695
(Filed February 11, 2021, Rehearing Denied May 12, 2021)

Mark Douglas Hill, III, by and through his Duly appointed Guardian ad Litem, Helen Kaci Hill, Plaintiff..... Respondent,

v.

Cranston Print Works Company d/b/a Cranston Trucking Company, Ryder Truck Rental, Inc., Optimum Staffing, Inc., d/b/a Optimum Logistic Solutions, and Jason E. Burdette, Defendants,

And

Gregory Jones, Sr., as the Father and Duly Appointed Personal Representative of the Estate of Jessica Dawn Jones, Deceased, Plaintiff, ...Respondent,

v.

Cranston Print Works Company d/b/a Cranston Trucking Company, Ryder Truck Rental, Inc., Optimum Staffing, Inc., d/b/a Optimum Logistic Solutions, and Jason E. Burdette, Defendants,

of whom Cranston Print Works Company d/b/a Cranston Trucking Company, Optimum Staffing, Inc., d/b/a Optimum Logistic Solutions, and Jason E. Burdette are the ..... Petitioners.

PETITION FOR WRIT OF CERTIORARI

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CERTIFICATE OF COUNSEL

Counsel for Petitioner Jason E. Burdette certifies that a Petition for Rehearing was made, (Appx pp. 77-103), and finally ruled on by the Court of Appeals on May 11, 2012. (Appx. pp. 12).

QUESTIONS PRESENTED

I. DID THE COURT OF APPEALS ERR IN DISMISSING THIS APPEAL AS AN IMPERMISSIBLE INTERLOCUTORY APPEAL?

II. SHOULD THIS COURT RECOGNIZE THAT CERTAIN DISCOVERY ORDERS ARE IMMEDIATELY APPEALABLE ABSENT REQUIRING A PARTY TO PLACE THEMSELVES IN CONTEMPT?

STATEMENT OF THE CASE

On December 29, 2020, Petitioner Jason E. Burdette ("Burdette" or "Petitioner Burdette") filed a timely Notice of Appeal of the Circuit Court's discovery orders compelling him to re-answer certain Requests for Admission in a particular manner. (Appx. pp. 237-261). Respondents moved to dismiss the appeal on January 11, 2021, arguing that the appeal was an impermissible interlocutory appeal. (Appx. pp. 199-233). Cranston also filed a Notice of Appeal on January 12, 2021. (Appx. 190-198). All three Petitioners, Burdette, Cranston Print Works Company d/b/a Cranston Trucking Company ("Cranston"), and Optimum Staffing, Inc., d/b/a Optimum Logistic Solutions ("Optimum"), filed returns in opposition to Respondents' Motion to dismiss, (Burdette, Appx. pp. 161-189) (Cranston, Appx. pp. 121-160) (Optimum, Appx. pp 111-120), and Respondents filed a Reply. (Appx. pp. 104-110).

On February 11, 2021, the Court of Appeals dismissed the appeal on the basis that "the underlying orders on appeal are not immediately appealable." (Appx. pp. 3-4).

All three Petitioners moved for rehearing. (Burdette, Appx. pp. 77-103) (Cranston, Appx. pp. 36-76) (Optimum, Appx. pp 29-35). The Court of Appeals requested that Respondents file a return to the petitions for rehearing, (Appx. pp. 27-28), which it did. (Appx. pp. 18-26). Petitioners filed replies. (Burdette, Appx. pp. 12-17) (Cranston, Appx. pp. 5-7) (Optimum, Appx. pp 8-11).

On May 12, 2021, the Court of Appeals denied the petitions for rehearing. (Appx. pp. 1-2).

Petitioner Burdette now seeks a writ of certiorari from this Court.

BACKGROUND FACTS

On February 1, 2019, a collision occurred on Interstate I-85 in Spartanburg, South Carolina between Respondents' vehicle and a truck being driven by Burdette. At the time of the accident, Burdette was employed by Optimum and was driving a truck for Cranston. Respondents filed claims in the Spartanburg County Court of Common Pleas against various parties, including Burdette, Optimum and Cranston. (Appx. pp. 125-147).

Burdette was deposed on March 20, 2020. Thereafter, Respondents propounded Requests for Admission on Burdette, to which Burdette timely responded on May 19, 2020. Dissatisfied with Burdette's responses, Respondents moved to have certain matters deemed admitted, which motion Burdette opposed.[1]

After a hearing on various motions, the Circuit Court ordered, *inter alia*, that a number of Burdette's responses to Requests for Admission be revised or "re-answer[ed]" based on his deposition testimony. However most if not all of the responses targeted by

[1] At that time, all three Petitioners were represented by the same counsel. Separate counsel was engaged for Burdette in December 2020.

the Circuit Court are supported either by Burdette's deposition testimony, other evidence submitted to the court, or both. For example, Request for Admission #3 asked Burdette to admit that, "Defendant Jason E. Burdette used his cellular phone on February 1, 2019, prior to impact with the vehicle Jessica A. Jones was traveling in, to communicate with among other people, agents/employees of Defendant Cranston Print Works Company d/b/a/ Cranston Trucking Company." Burdette responded, "**Denied.**" The Circuit Court ordered Burdette to "re-answer" this admission to conform to page 119 of his deposition testimony. However, at his deposition, Burdette confirmed that he had made a number of phone calls the morning of the accident sometime prior to the accident, but could not remember who those calls were to. The only call he confirmed as being to Cranston occurred *after* the accident, at 8:32 a.m. (Appx. pp. 182-186). In addition, a sworn affidavit from Brett Heidt, a Cranston employee, confirms that none of the numbers on the phone record for February 1, 2019 for calls prior to the accident are associated with Cranston. (Appx. pp. 188-189). While Burdette admitted he was using his cell phone "while driving from Greenville to at least the Spartanburg area before the wreck," (Appx. p. 186, lines 8-24), he did not testify that any of those calls were to Cranston and, furthermore, there is no admission that he was using his cell phone immediately "prior to impact" as is implied in Request for Admission No. 3.

Request for Admission No. 8 sought an admission that, "Defendant Jason E. Burdette was never given any safety instruction or underwent any safety training while employed by Defendant Optimum Staffing, Inc. d/b/a Optimum Logistic Solutions, prior to February 1, 2019," to which Burdette responded, "**Denied.**" The Circuit Court ordered Burdette to "re-answer" his admission to conform to page 71 of his deposition transcript.

However, while Burdette testified that Optimum itself did not provide any training, Request for Admission No. 8 is not limited to Optimum and, in fact, Burdette testified that he attended safety meetings with another employer he was leased to, Diamond Hill Plywood. (Appx. p. 174, lines 3-21). He also testified that he underwent a road test with a different company, BI-LO, that he was assigned to work with. (Appx. p. 179, lines 11-19; p. 181, lines 10-14). As a result, Burdette's response to Request for Admission No. 8, as written, is correct.

Request for Admission No. 10 sought an admission that, "Defendant Jason E. Burdette was never advised, either orally or in writing by any individual employed by Defendant Optimum Staffing, Inc. d/b/a Optimum Logistic Solutions of any corporate policies or procedures prohibiting the use of cellular phones while driving trucks as an employee of Defendant Optimum Staffing, Inc. d/b/a Optimum Logistic Solutions prior to February 1, 2019," to which Burdette responded "**Denied.**" The Circuit Court ordered Burdette to "re-answer" this admission to conform to pages 77-78 of his deposition transcript. However, those pages simply discuss Optimum's written policy regarding cell phone use while driving, whereas the Request for Admission covers both "orally or in writing." Burdette testified that he had had a discussion with Brian Conners with Optimum Logistics, who advised that it was ok to use a cell phone "as long as you had a headset … [a] hands free, you were fine." (Appx. p. 187, lines 8-22). Cranston had the same policy. "As long as you had a headset, you're fine." (Appx. p. 187, lines 22-25).[2]

[2] Requests for Admission Nos. 4, 5 and 11 all concern cell phone use. It is established from the phone records submitted in this case that Burdette was not using his cell phone at the time of the accident, a fact which Respondents have never disputed.

Despite Burdette's opposition, and despite the imprecise wording of the various Requests for Admission, the Circuit Court took the remarkable step of ordering Burdette to rewrite or "re-answer" his May 19, 2020 responses to Respondents' Request for Admission Nos. 3, 4, 5, 7, 8, 10 and 11, accepting Respondents' argument that those responses were "directly contradicted" by his prior deposition testimony. The Circuit Court also denied Burdette's and the other Petitioners' motions for reconsideration, and Petitioners appealed to the Court of Appeals.

As noted above, Respondents moved to dismiss the appeal on the basis that it was in impermissible interlocutory appeal, and the Court of Appeals agreed, dismissing Petitioners' arguments regarding the binding nature of responses to requests for admission and the inherent unjustness of the harsh dichotomous choice of either complying with the discovery order and likely being unable to challenge it later on appeal, or facing a serious contempt order in order to appeal it now. Petitioner respectfully submits that there should be an avenue to appeal discovery orders that affect a substantial right, such as the one involved here, short of forcing a party to allow itself to be placed in contempt.

ARGUMENTS

Pursuant to Rule 242, SCACR, Petitioner Burdette hereby petitions this Court for a writ of certiorari to review the Court of Appeals' dismissal of the appeal. Burdette's Petition raises a novel issue that needs to be addressed by this Court. That is, whether a certain limited category of discovery orders—those that involve the merits and/or affect a substantial right—are subject to immediate appeal. Petitioner Burdette urges this Court to find that there is a limited category of discovery orders—including the one at issue here—that both justice and court efficacy require be immediately appealable.

While it is true that, "[a]s a *general rule*, a discovery order is not immediately appealable because it is an interlocutory order." *Ferguson v. Charleston Lincoln/Mercury*, 344 S.C. 502, 510, 544 S.E.2d 285, 290 (2001) (emphasis added), the very statement of that general rule presumes exceptions. Petitioner Burdette submits that requiring a party to provide a particular answer a Request for Admission, especially when that answer is contract iced by Burdette's own deposition testimony and other evidence, is precisely one of those exceptions.

This is because, pursuant to statute, appellate courts have jurisdiction over "[a]ny intermediate judgment, order or decree in a law case involving the merits" and, as well, over "[a]n order affecting a substantial right made in an action when such order … strikes out an answer or any part thereof or any pleading in any action." S.C. Code Ann. § 14-3-330. The Supreme Court has instructed that "[t]he phrase 'involving the merits' means the order 'must finally determine some substantial matter forming the whole or a part of some cause of action or defense.'" *Tucker v. Honda of S.C. Mfg.*, 354 S.C. 574, 576, 582 S.E.2d 405, 406 (2003), *citing Mid-State Distrib., Inc. v. Century Importers, Inc.*, 310 S.C. 330, 334, 426 S.E.2d 777, 780 (1993). In addition, an order affects a substantial right when it, among other things, strikes out a defense such that the defense is lost. *Mid-state Distrib.*, 310 S.C. at 334 n.4, 426 S.E.2d at 780 n.4.[3] South Carolina and federal case law addressing the binding effect of a response to a request to admit make clear that compelling a specific response to a request to admit is far more significant than are either interrogatory

[3] And, while it is true that the imposition of sanctions generally is left to the lower court's discretion, *e.g.*, *Halverson v. Yawn*, 328 S.C. 168, 620, 493 S.E.2d 883, 884 (Ct. App. 1997), a sanction that deprives a party of a substantial right, such as precluding a defense or judicially finding certain facts that essentially eviscerate a defense, is immediately appealable.

responses or deposition testimony, both of which can be contested before the factfinder. The Orders below, compelling a specific response from Burdette to certain Requests for Admission—which responses will constitute binding judicial admissions—involve the merits and affect a substantial right.

An order that effectively forecloses a party from contesting portions of an opposing party's case on the merits affects a substantial right and is immediately appealable. *McLaughlin v. Strickland*, 279 SC 513 at 516, 309 SE2d 787, 790 (Ct. App. 1983) (allowing appellant to contest a consent to adoption that did not comport with his intentions, which simply required the respondent to prove her case below). *Lowndes Prods, Inc. v. Brower*, 262 S.C. 431, 205 S.E.2d 184 (1975), relied on below by Respondents, states that "ordinarily, an order denying or compelling discovery is not directly appealable," 262 S.C. at 434, 205 S.E.2d at 185, but recognizes an exception for orders that "have the effect of determining the scope of the issues at the trial." *Id.* That is precisely what a response to a request for admission does—it effectively determines and limits the scope of issues that need to be tried.

Pursuant to Rule 36(b), SCRCP, "[a]ny matter admitted under this rule is conclusively established unless the court on motion permits withdrawal or amendment of the admission." The very purpose of requests for admission is to determine certain matters and thereby limit the issues needed to be addressed at trial. "An answer to a request under Rule 36 is unlike a statement of fact by a witness made in the course of oral evidence at a trial, or in oral pre-trial depositions, or even in written answers to interrogatories. *It is on the contrary a studied response, made under sanctions against easy denials, to a request to assert the truth or falsity of a relevant fact point out by the request for admission* …"

Airco Indus. Gases, Inc. Div. of BOC Group, Inc. v Teamsters Health & Welfare Pens Fund, 850 F.2d 1028, 1036 (3rd Cir. 1988).[4] The express purpose of requests for admission, which are considered "judicial admission[s]," is to limit and define the facts at issue. *Id.*; *see also Scott*, 353 S.C. at 650, 579 S.E.2d at 157 ("[t]he purpose of Rule 36 is to allow parties to narrow the issues and determine which facts do not need to be proven because they are admitted"). Consequently, facts admitted in response to a request to admit "are conclusively admitted for the purposes of" the litigation in which they are made. *Id.* at 647, 579 S.E.2d at 155. Indeed, where "the language of the request for admission specifically goes to an issue in the pleadings, the admission resulting from a party's failure to respond to the request may override the pleadings." *Id.* at 650, 579 S.E.2d at 157.

"The efficacy of these admissions is akin to the doctrine of judicial estoppel: an admission precludes the admitting party from arguing facts at trial contrary to its responses to a request to admit, absent an amendment to or revocation of the admission as allowed under the rules …. Admissions under Rule 36 are treated as admissions in pleadings." *Scott*, 353 S.C. at 648, 579 S.E.2d at 156. In fact, *Pulte Home Corp. v. Woodland Nursery & Landscapes*, cited in *Scott*, explains that a response to a request to admit "is comparable to an admission in pleadings or stipulation of facts and as such is generally regarded as a judicial admission rather than evidentiary admission of a party. A judicial admission, unless allowed to be withdrawn by the court, is conclusive whereas an evidentiary admission is not conclusive but is always subject to be contradicted or explained." 230

[4] Our Rule 36 "is the language of current Federal Rule 36, as well as substantially the language of Circuit Court Rule 89." Rule 36, SCRCP, Notes; *see also Scott v. Greenville Hous. Auth.*, 353 S.C. 639, 649, 579 S.E.2d 151, 156 (Ct. App. 2003) (the federal rule on requests "for admissions is substantively similar to our rule").

Ga. App. 455, 496 S.E.2d 546, 548 (Ga. Ct. App. 1998); *see also Airco Indus*, 850 F.2d at 1036 (a response to a request to admit is comparable to "[a] judicial admission, deliberately drafted by counsel for the express purpose of limiting and defining the facts in issue, [and] is traditionally regarded as conclusive"). Critically, in *Airco*, the Third Circuit pointed out that an "admission is not merely another layer of evidence, *upon which the district court can superimpose its own assessment of weight and validity*. It is, to the contrary, an unassailable statement of fact that narrows the triable issues in the case," even where a party "could point to conflicting testimonial evidence." 850 F.2d at 1036-1037 (emphasis added). Thus, the Orders below are immediately appealable because they involve the merits and affect a substantial right.

In *Adams v. Orr*, the Supreme Court held the defendant was not deemed to have admitted certain facts where "the request for admissions as worded was subject to more than one reasonable interpretation." 260 S.C. 92, 97, 194 S.E.2d 232, 234 (1973). As noted above, several of the Requests for Admission are worded such that Burdette's responses are consistent with his deposition testimony, given the imprecise wording employed in those Requests. In other words, several of the Requests for Admission that are at issue are imprecisely worded and, as a result, inarguably are "subject to more than one interpretation," and Burdette's responses are correct as served.

Here, the Circuit Court exceeded its authority by weighing the evidence and requiring Burdette to change his answers to the Respondents' Requests for Admission to conform to its view of the evidence. Weighing the evidence is a function reserved to the factfinder. *See, generally, Watson v. Ford Motor Co.*, 389 S.C. 434, 445, 699 S.E.2d 169, 174 (2010) ("[t]he jury serves as the fact finder and is charged with the duty of weighing

the evidence admitted at trial …"). The Court of Appeals compounded the error by dismissing Burdette's appeal.

In addition, a Circuit Court has no authority to require a party to revise their response to a request to admit in a specific manner. Pursuant to Rule 36(b), a "court *may permit withdrawal or amendment* when the presentation of the merits of the action will be subserved thereby and the party who obtained the admissions fails to satisfy the court that withdrawal or amendment will prejudice him in maintaining his action or defense on the merits." Rule 36(b), SCACR (emphasis added). Here, the Court did not "permit" Burdette to either withdraw or amend his response to the subject Requests for Admission but, instead, *ordered* him to serve revised responses that better conform to the Court's and Respondents' view of his prior deposition testimony. Nor did the Court, upon a motion to determine the *sufficiency* of the responses, "order either that the matter is admitted or that an amended answer be served," pursuant to the third paragraph of Rule 36(a), SCACR. The Court did not find that Burdette's responses were *insufficient* but, instead, that they were *incorrect* based on the Court's view of his deposition testimony. Nothing in Rule 36 authorizes a court to order a party to revise a response based on the court's view of the evidence. As noted above, weighing the evidence is reserved for the factfinder. *Watson*, 389 S.C. at 445, 699 S.E.2d at, 174.

Consequently, if the Orders appealed herein are *not* immediately appealable, not only is Burdette deprived of a substantial right to assert certain defenses but, in addition, the goals of Rule 36—"economy and efficiency in resolving disputes," *Scott*, 353 S.C. at 649, 579 S.E.2d at 156[5]—will be frustrated. In other words, if Burdette is forced to wait

[5] As is explained in *Scott*, "[i]f a point is conceded, litigants need not expend effort in

until after a trial (wherein the judicially-revised Requests to Admission preclude him from raising certain defenses) and a jury verdict is returned against him to appeal these Orders, and those Orders are overturned in that later appeal, this case will have to be remanded for a new trial based on Burdette's initial (and correct) responses to the Requests for Admission. There is nothing economical or efficient about such a process.

Respondents criticize Burdette for not waiting until he had been placed in contempt to file his appeal. However, where a party's defense is stricken in part or in whole by a court, there is no need for that party to wait until a contempt order has been issued in order to appeal. *See, e.g., Karppi v. Greenville Terrazzo Co.*, 327 S.C. 538, 489 S.E.2d 679 (Ct. App. 1997) (considering immediate appeal by defendant whose answer, counterclaim and cross-claim were stricken, putting that defendant in default). Cases instructing that a party must "either comply with the discovery order and waive any right to challenge it on appeal, or refuse to comply with the order and appeal after he is held in contempt for his failure to comply," *Davis v. Parkview Apts.*, 409 S.C. 266, 281, 762 S.E.2d 535, 543 (2014), *citing Ex parte Whetstone*, 289 S.C. 480, 346 S.E.2d 881, 882 (1986), all involve a refusal or failure to respond to interrogatories or to produce documents or witnesses for depositions. None of these cases involve requiring a specific response to a request to admit that serves as a binding admission and limits the issues to be tried. Furthermore, pursuant to *Davis*, a party "can either comply with the discovery order and waive any right to challenge it on appeal, or refuse to comply with the order and appeal after he is held in contempt for his failure to comply." 409 S.C. at 281, 762 S.E.2d at 543. In other words, if Burdette did not appeal these severe Rule 37 sanction Orders now, it is more likely than not that

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investigations concerning it nor incur expense in presenting evidence to prove it." *Id.*

Respondents would argue in any later appeal that the opportunity to do so had been waived.[6]

A finding of "contempt is an extreme measure and the power to adjudge a person on contempt is not to be lightly asserted." *State v. Bevilazua*, 316 S.C. 122, 128, 447 S.E.2d 213, 216 (Ct. App. 1994). "A determination of contempt is a serious matter and should be imposed sparingly." *Jobst v. Jobst*, 424 S.C. 64, 78, 817 S.E.2d 515, 523 (Ct. App. 2008); *see also Miller v. Miller*, 375 S.C. 443, 452, 652 S.E.2d 754, 759 (Ct. App. 2007) (same). The Court of Appeals failed to recognize the untenable position in which the application of *Whetstone* and its progeny places a party such as Burdette. Burdette either must comply with the order and lose any right to later appeal it, or refuse to comply and allow himself to be placed in contempt in order to appeal it now.

Burdette urges this Court to grant his Petition and address this issue. Burdette either must comply with the Orders and lose any right to later appeal them, or refuse to comply and allow himself to be placed in contempt in order to appeal it now. This harsh dichotomous choice is especially unfair in this case where Burdette has not refused to participate in discovery, but has both testified at his deposition and responded fully and forthrightly to Respondents' Requests for Admission. Forcing him to "re-write" his answers so that they conform to Respondents' and the Circuit Court's view of his

[6] Indeed, this was part of the basis for Justice Pleicones' dissent in *Davis*: "The majority acknowledges that appellants have done exactly what is required of them but concludes that our review is somehow limited …. The majority is simply wrong to hold that appellants are now foreclosed from arguing that the discovery orders upon which the Dismissal Order's contempt findings and sanctions rest were erroneous." 409 S.C. at 291, 762 S.E.2d at 548.

deposition testimony affects the merits and/or a substantial right and must be heard at this point or else Burdette will be unable to effectively challenge those responses at trial.

This Court should recognize that this appeal raises a novel issue in South Carolina, and hold that an order directing a party to rewrite or "re-answer" a request for admission to conform to the lower court's view of other evidence is immediately appealable, invades the province of the jury, and exceeds the court's authority.

Burdette also joins in and adopts by reference the arguments raised in Petitioners Cranston's and Optimum's Petitions for Writ of Certiorari, to the extent not inconsistent herewith.

CONCLUSION

For all the reasons stated herein, Petitioner Jason E. Burdette respectfully requests that this Court grant his Petition and reverse the Court of Appeals' decision dismissing this appeal. Furthermore, Petitioner Burdette respectfully request this Court to hold that a discovery order compelling particular answers to a request for admission is immediately appealable because it affects a substantial right.

Respectfully submitted,

MCANGUS GOUDELOCK & COURIE, LLC

June 11, 2021

By: _____

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v.

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And

Gregory Jones, Sr., as the Father and Duly Appointed Personal Representative of the Estate of Jessica Dawn Jones, Deceased, Plaintiff, ...Respondent,

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of whom Cranston Print Works Company d/b/a Cranston Trucking Company, Optimum Staffing, Inc., d/b/a Optimum Logistic Solutions, and Jason E. Burdette are the ..... Petitioners.

PROOF OF SERVICE

I certify that I have served Petitioner Jason E. Burdette's **Petition for Writ of Certiorari** and **Appendix** on counsel for Mark Douglas Hill, III, by and through his Duly Appointed Guardian ad Litem, Helen Kaci Hill, and Gregory Jones, Sr., as the Father and Duly Appointed Personal Representative of the Estate of Jessica Dawn Jones, and other counsel of record by emailing it as follows:

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June 11, 2021

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RECEIVED
Jun 11 2021
SC Court of Appeals

June 11, 2021

VIA S.C. COURTS E-FILING & U.S. MAIL
The Honorable Daniel E. Shearouse
Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RE: Gregory Jones, Sr., as the father and duly appointed Personal Representative of the Estate of Jessica Dawn Jones v. Cranston Print Works Company d/b/a Cranston Trucking Company, Ryder Truck Rental, Inc., Optimum Staffing, Inc. d/b/a Optimum Logistic Solutions, and Jason E. Burdette

Civil Action No.:	2019-CP-42-02215 (Spartanburg)
Date of Incident:	February 1, 2019
Carrier Claim No.:	8475923542US
MGC File No.:	2094.20153
Court of Appeals No.:	2020-001695

Dear Mr. Shearouse:

Enclosed for filing please find Jason E. Burdette's Petition for Writ of Certiorari and an Appendix, along with Petitioners' Proof of Service concerning these items.

A copy of each of these documents is being placed in the mail today, along with Petitioner's check in the amount of $250.00.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

McAngus Goudelock & Courie, LLC

Helen F. Hiser

Enclosures

cc: Alexander P. Lewis, Esq. (*via e-mail only*)
W. Blake Cummings, Esq. (*via e-mail only*)
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