THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Jean Hoefer Toal, Chief Justice of the
South Carolina Supreme Court (Retired),
Acting as Circuit Court Judge

Case No.: 2021-000341

William F. Tomz and Frances W. Tomz,
Individually and as Class Representatives, ... Respondents

v.

Capital Investment Funding, LLC,
by and through its Receiver, Jerry T. Saad, and Arthur M. Field, ...Defendants

Of Which Capital Investment Funding, LLC, by and through its Receiver,
Jerry T. Saad is a Respondent and Arthur M. Field is the Appellant.

In Re: Kathryn Taillon, Appellant.

REPLY BRIEF OF APPELLANT ARTHUR M. FIELD

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STATEMENT OF ISSUES ON APPEAL

1. Did the Circuit Court err in not applying the S.C. Uniform Declaratory Judgment Act; or if that Act did not apply, did the Circuit Court lack subject matter jurisdiction?

2. Did the Circuit Court err in holding it had personal or subject matter jurisdiction over Field, a Florida citizen, and this case?

3. Did the Circuit Court err in awarding CIF liquidated damages?

INTRODUCTION[1]

This is a complicated civil case that spans thirteen years of litigation in multiple forums,[2] and involves a related criminal case.[3] At issue in this appeal are rulings in an Amended Order entered March 2, 2021, by retired Chief Justice Jean H. Toal, sitting on the Circuit Court. The Order is the latest step in this extended procedural history, recapped in Appellant's Initial Brief in this matter.

This Reply Brief seeks to identify for this Court where the parties agree, or at least where Respondent chose not to dispute the facts or law offered by Appellant in his Initial Brief. This Reply also refutes and replies to the few substantive arguments offered by Respondent in its Initial Brief.[4] To that end, this Reply Brief also seeks to correct the misstatements of fact and law offered by Respondent, particularly where those misstatements are thinly-veiled *ad hominem* attacks.

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[1] Appellant Field reserves all rights, such that no objection to jurisdiction or defense hereto is waived by this Reply, nor by any other filing(s)

[2] The actions include those listed below. Pursuant to Rule 201(d), SCRE, Appellant Field requests this Court take judicial notice of the existence of these cases, including filing and closing dates, pleadings, and Orders. *See Doe v. Bishop of Charleston*, 407 S.C. 128, 134 n.2, 754 S.E.2d 494, 497 n.2 (2014).

a) *Tomz v. Capital Investment Funding, LLC, and Arthur Field,* 2008-CP-23-03665
b) *Roberts, et al. v. Field, Capital Investment Funding, LLC, Taillon, et al.*, 2008-CP-23-05514
c) *Robert E. Lee, et al. v. Bradford Financial Group, Arthur Field, et al.,* 2008-CP-39-1184
d) *Capital Investment Funding, LLC v. Field*, *Taillon*, *et al.* 6:12-cv-03401-BHH-JDA (D.S.C.)
e) *Capital Investment Funding, LLC v. Field, Taillon, et al.*, 6:13-cv-02326-BHH-JDA (D.S.C.)
f) *Harold Brooks, et al. v. Arthur Field, et al.*, 6:14-CV-02267-BHH-JDA (D.S.C.)
g) *Capital Investment Funding, LLC v. Arthur Field, Taillon, et al.*, 2015-CP-23-01263
h) *Capital Investment Funding v. Calvary Asset Mgt., LLC, Robert Sypher, Elliot Salzman and Arthur Field,* BER-L-3790-12 (NJ 2012)
i) *Capital Investment Funding, LLC v. Arthur Field*, CA18-1513 (Fla. 7th Jud.Dist.)(originally, *Saad v. Arthur Field)*
j) *Capital Investment Funding, LLC v. Arthur Field and Kathryn Taillon*, 3:19-cv-0606-J-32JRK (M.D. Fla. 5/24/19)

[3] *State of South Carolina v. Arthur Field*, 2012-GS-47-08.

[4] Appellant Field relies on all of Appellant Taillon's arguments below and in her Briefs in this matter, as if set forth herein.

STANDARDS OF REVIEW

The Standards of Review that this Court must use in its analysis of the issues presented in this Appeal are addressed in this Initial Brief. The positions on the appropriate standard taken by each Party in their Initial Briefs, respectively, are summarized below:

Issue	**Appellant's Position (Initial Brief)**[5]	**Respondent's Position (Initial Brief)**
Declaratory Judgment	*De Novo*	No response offered.
Jury Trial	*De Novo*	No response offered.
Summary Judgment	*De Novo*	No response offered.
Subject Matter Jurisdiction	*De Novo*	No response offered.
Personal Jurisdiction	Deference is given to the Circuit Court for findings of fact, unless no evidence exists to support such findings.	No response offered.
Res Judicata	*De Novo*	No response offered.

[5] Appellant's Initial Brief, pp. 16-17.

ARGUMENT

1. THE CIRCUIT COURT LACKED SUBJECT MATTER JURISDICTION.

a. The Circuit Court Erred in Not Applying the S.C. Uniform Declaratory Judgment Act, and the Respondent Does Not Respond to Appellant's Argument that Its Motion is a Declaratory Judgment Action.

Respondent CIF's instant state court filing by its caption, its contents, and its request, is brought under the South Carolina Uniform Declaratory Judgments Act (hereafter, "SCUDJA"), which is found at S.C. Code Ann. § 15-53-10, *et seq*. ("Rec. Motion for Declaratory Relief", 2008-CP-23-3665, 12/31/2019) (R.__.) The Circuit Court's Amended Order of March 2, 2021, *sua sponte* effectively rewrote CIF's Declaratory Judgment motion, re-styling it as a "Motion to Enforce Settlement Agreement," but the principal purpose of the filing remained an attempt by Receiver/Respondent to employ the SCUDJA. ("Order" 3/2/2021) (R.__).

In his Initial Brief, Appellant Field argued the Circuit Court erred because SCUDJA does not authorize relief by motion.[6] The SCUDJA requires a new action, including service of a Summons and Complaint pursuant to Rule 4, SCRCP—none of which was done by Receiver in this case. See, e.g., *Stecker v. TALX Corp.*, 384 S.C. 224, 661 S.E.2d 890 (Ct. App. 2009). And if the SCUDJA was the proper vehicle for addressing its claim, the Circuit Court effectively denied Appellant his due process rights and those rights established under state statute and in the S.C. Rules of Civil Procedure, including the right to responsive pleading, discovery, and jury trial. S.C. Code Ann. §15-53-90; Rule 57, SCRCP. In particular, the right to jury trial to determine any issues of fact in a Declaratory Judgment action or breach of contract action is inviolate. *See Legette v. Smith*, 226 S.C. 403, 85 S.E. 2d 576 (1955).

[6] Appellant's Initial Brief, p. 18.

Respondent's Brief addresses the issue of 'whether SCUDJA applies' in one, conclusory sentence. (Respondent's Initial Brief, p. 10.) In its sole sentence on the issue, Respondent offers only a bald conclusion: that the Circuit Court was correct. Respondent does not offer any factual basis, nor any legal basis, for its position. *Id.*

"Issues raised in a brief but not supported by authority are deemed abandoned and will not be considered on appeal." *Hunt v. S.C. Forestry Comm'n*, 358 S.C.564, 573, 595 S.E.2d 846, 851 (Ct. App. 2004). This Court should hold Respondent's unsupported response to be an abandonment of that issue. *Id.*; *accord*, *First Sav. Bank v. McLean*, 314 S.C. 361, 444 S.E.2d 513 (1994)(holding when a party fails to cite authority or when the argument is simply a conclusory statement in its brief, the party is deemed to have abandoned the issue on appeal).

Respondent's Brief also undermines the argument it purports to advance (i.e., 'Respondent needed a legal opinion on the effects of GSA by the Circuit Court') by newly insisting that this matter is an equitable action. (Respondent's Initial Brief, pp. 9-10.) While a Receivership may ordinarily be an equitable matter, the question here is one of contract (i.e., interpreting the GSA); and, contracts are legal matters—not equitable ones. Respondent's reliance on case law from courts sitting as courts of equity is misplaced.[7] This Court should reject Respondent's invitation to end-run around SCUDJA by trying, yet again, to impermissibly convert its December, 2019 filing into a different form.

b. <u>The Circuit Court Erred by Extending Subject Matter Jurisdiction Over These Parties from Judge Miller to Chief Justice Toal.</u>

Respondent argues the Circuit Court had subject matter jurisdiction because: (1) the GSA retained such jurisdiction in Judge Miller to settle disputes concerning the GSA; and (2) because a

[7] *National Cash Register Company v. Burns*, 217 S.C. 310, 60 S.E.2d 615 (1950) ; *Hoile v. National Surety Corporation*, 204 S.C. 110, 28 S.E.2d 638 (1944).

court has continuing jurisdiction over a receivership. (Respondent's Initial Brief, pp. 9-10.) Respondent rests its argument on a substitution of terms in the GSA: where the GSA retains jurisdiction, if any, to "Judge Miller", Respondent replaces his name with 'Any Judge sitting in the 13th Judicial Circuit' to reason itself to the conclusion that Chief Justice Toal had subject matter jurisdiction. Respondent's argument requires the Court to ignore the explicit terms of the GSA that memorialized why it was Judge Miller who, specifically and individually, would be able to hear disputes in this matter. In fact, it was the Respondent who argued in the Florida federal case to U.S. District Judge Corrigan that Judge Miller, and only Judge Miller, could uniquely decide the legal issue presented. (R.____.)

While the serving Chief Justice of the South Carolina Supreme Court, as Respondent argues in its Brief at Page 10, has authority for judicial assignments in the state, the Respondent errs by stopping its analysis there. Chief Justice Beatty's authority for judicial assignments is administrative in nature (i.e., for scheduling purposes) and is not a power to create jurisdiction where it would not otherwise exist. When Judge Miller was recused, any subject matter jurisdiction 'retained' in South Carolina disappeared.

Further, the underlying case from which this appeal originates, 2008-CP-23-3665, was captioned *William and Frances Tomz, Class Representatives v. Capital Investment Funding, LLC and Field.* Any dispute between CIF and Field would be a cross-claim. The GSA expressly stipulates any cross-claim arising from the pending actions is dismissed with prejudice. No continuing jurisdiction exists within the 2008-CP-23-3665 case between Respondent and Field.

This Court should hold that the Circuit Court lacked subject matter jurisdiction.

2. THE CIRCUIT COURT LACKED PERSONAL JURISDICTION.

Appellant's Initial Brief, and the filings in the underlying case, provide a robust factual basis for establishing that Arthur M. Field is a citizen of the State of Florida. (R.___). Those records indicate he has been a Florida citizen since 2012 and those facts are uncontested in Respondent's Initial Brief. (R.___).

On December 31, 2019, when Respondent filed its motion, Field lived in Florida. (R.___). At that time, Field was not a party to any matter then pending in South Carolina. Even if this Court accepted Respondent's argument that Judge Miller retained subject matter jurisdiction, there is no basis to establish personal jurisdiction over a non-party (Field), where the matter was specifically dismissed with prejudice more than two years prior to the commencement of this latest action.[8] There are no terms in the GSA stating personal jurisdiction is retained over the parties being dismissed with prejudice.

To obtain personal jurisdiction over a foreign defendant, a plaintiff must comply with the procedural and substantive requirements of South Carolina's long-arm statute, S.C. Code Ann. § 36-2-803, and the standards established in case law. *International Shoe v. Washington,* 326 U.S.310, 66 S.Ct.154 (1945), *Worldwide Volkswagen v. Woodson,* 444 U.S. 286, 100 S.Ct. 154 (1980) and *Burger King Corp. v. Rudzewicz,* 471 U.S. 462 (1985). The burden is on CIF to demonstrate it did so once Field challenged personal jurisdiction. See *Moltz v. Seneca Balance, Inc.,* 606 F.Supp. 612, (S.D.Fla. 1985)(Courts require extensive proof before extending *in personam* jurisdiction over non-resident defendants.). The case must arise from actions by Field within South Carolina. *Bristol Meyers Squibb Co. v. Superior Court of Calif.,* 137 S.Ct. 1773, 198 L.Ed.2d 395(2017).

[8] Paragraphs 3, 4, and 5 of the GSA, as approved in Judge Miller's orders, specifically ended all litigation. (R.___)

That the GSA was executed in South Carolina is insufficient to predicate the exercise of personal jurisdiction over Field, when he was already being sued by the same plaintiff in Florida in an action solely concerning Florida real property. *Cribb v. Spatholt,* 382 S.C.490, 501 S.E.2d 714 (Ct. App. 2009). If any forum had reason to exercise jurisdiction over Field and the real property, it was Florida, not South Carolina. *Loyd v. Ring's Wholesale Nursery, Inc.*, 315 S.C.88, 431 S.E.2d 632 (Ct. App. 1993). Without a sufficient current connection to South Carolina in 2019, it was error for the Circuit Court to find it had personal jurisdiction over non-resident Field. See *Delta Apparel, Inc. v. Farina,* 406 S.C. 257, 750 S.E.2d 615 (Ct. App. 2013)(finding of personal jurisdiction reversed); *Consulting Engineering Corp. v. Geometric, Ltd.*, 561 F.3d 273 (4th Cir. 2009)(affirming denial of personal jurisdiction). CIF produced no evidence to substantiate its claim that personal jurisdiction should be exercised and did not sustain its burden. *Moore v. Simpson,* 322 S.C.518, 473 S.E.2d 64 (Ct. App. 1996).

Further, even if the exercise of personal jurisdiction could be justified, the other fundamental requirement of obtaining jurisdiction over any defendant is valid service of a Summons and Complaint in accord with Rule 4 of the South Carolina Rules of Civil Procedure. (Appellant's Initial Brief, pp. 31-32.) Nothing in the GSA waived the requirements for service of process upon any person to be made a respondent in any future action. In its Initial Brief, Respondent does not contest that it did not serve a Summons and Complaint upon Field. Absent such service, there is no personal jurisdiction and this case should be dismissed. *Roche v. Young Bros., Inc. of Florence,* 318 S.C.207, 456 S.E.2d 897 (1995). Moreover, where the Respondent has not addressed an issue raised by Appellant, the precedent of this Court is to hold the issue abandoned. *Hunt v. S.C. Forestry Comm'n, supra.* Under *Hunt*, this Court should find the issue abandoned, and therefore rule for the Appellant. *Id.*

3. THE FLORIDA ACTION IS PRECLUDED BY THE DISMISSALS WITH PREJUDICE OF THE SOUTH CAROLINA AND NEW JERSEY ACTIONS, AND RESPONDENT DID NOT DISPUTE THIS IN ITS INITIAL BRIEF.

Appellant Field argued to the Circuit Court and in his Initial Brief that CIF's Petition in Florida was precluded by the principles of *res judicata* and/or collateral estoppel.[9,10]

Although Field believed it was for the Middle District of Florida to make such determination and opposed CIF's request for a stay, CIF placed the matter before a different South Carolina state court. The first action, 2015-CP-23-01263, was dismissed with prejudice in 2018, which precluded CIF from raising the same allegations and claims for relief in a subsequent action in 2019.

The keystone case in South Carolina is *Plum Creek Development v. City of Conway,* 334 S.C.30, 512 S.E.2d 106 (1999). The Supreme Court held:

> *Res judicata* is the branch of law that defines the effects a valid judgment may have on subsequent litigation between the same parties and their privies. *Res judicata* ends litigation, promotes judicial economy and avoids the harassment of relitigation of the same issues. *Res judicata* bars subsequent actions by the same parties when the claims arise out of the same transaction or occurrence that was the subject of the prior action between those parties. …a litigant is barred from raising any issues which were adjudicated in the former suit and any issues which might have been raised in the former suit….Plum Creek …claims, however, because it seeks a different remedy in the present action, monetary damages, than it did in the mandamus proceeding, …the subject matter of *res judicata* has not been established. We disagree…Both the mandamus proceeding and the damages action clearly arise from the same factual basis…The only difference between the two proceedings is the remedy sought…A different remedy,

[9] Appellant Field's Florida counsel presented this to Judge Corrigan in Field's Motion to Dismiss, wherein counsel quoted extensively from the Amended Complaint in 2015-CP-23-01263, *CIF v. Field, Taillon, et al.* demonstrating how paragraphs 157 and 158 thereof, *inter alia,* were mirrored virtually verbatim in the 2019 Petition pending in Florida. Appellant's Initial Brief, pp. 13, 26-27.

[10] The claims for relief in 2015-CP-23-01263 alleging fraud and fraudulent transfer relating to the Florida real property and demand for a constructive trust set forth in Paragraphs 293 and 298 of the Amended Complaint are the same as CIF's Petition for Declaratory Judgment EDF #3, page 2 seeking the same relief. Appellant's Initial Brief, p. 26 n.7.

> however, does not alter the fact that the claims are identical…We conclude *res judicata* applies. *Plum Creek, Id.* 334 S.C. 34-35 (citations omitted).

Field's contention is two-fold. First, the dismissals with prejudice of the South Carolina and New Jersey actions serve to bar the entire collection action in Florida. Any claim CIF may have against Field is merged into the releases and the dismissals with prejudice. Second, even if the entire action is not barred by *res judicata* or collateral estoppel, the issues of fraud and fraudulent transfer are definitely precluded. CIF raised those specific issues in 6:13-cv-02326-BHH-JDA and in 2015-cp-23-01263. Brooks, Tomz, and Finch raised them again in 6:14-cv-02267-BHH-JDA and such persons are privies of CIF, all of whom are represented by the same group of attorneys (i.e., Attorneys Brandt, Pillsbury, Case and Connell). *Wyndham v. Lewis,* 292 S.C. 6, 354 S.E.2d 578, 579 (Ct. App. 1987). The dismissals with prejudice of such actions permanently resolve the claims of fraud and fraudulent transfer. "A case that is dismissed with prejudice indicates an adjudication on the merits and, pursuant to *res judicata*, prohibits subsequent litigation to the same extent as if the action had been tried to a final adjudication." *Jones v. City of Folly Beach,* 326 S.C. 360, 483 S.E.2d 770 (Ct. App. 1997).

This is germane to CIF's Petition to Declare the Homestead rights of Field in Florida. No judgment determining fraud or fraudulent transfer was entered against Field in South Carolina. CIF and its privies had every opportunity to obtain such a determination and did not do so. It may not pursue the identical allegations and claims in a new action in Florida which arose from the same underlying actions giving rise to the South Carolina cases. The issues of fraud and fraudulent transfer have been conclusively decided in Field's favor and CIF is precluded from asserting those issues and claims yet again. *Judy v. Judy,* 393 S.C.160, 712 S.E.2d 408(2011).

Respondent CIF did not advance any argument in its Brief to contest the application of preclusion principles to bar the Florida action and thus concedes them. CIF's failure to address this issue supports Appellant's argument below and in its Initial Brief. The Florida action is barred.

4. AWARD OF LIQUIDATED DAMAGES IS UNSUPPORTED AND UNJUSTIFIED.

Respondent argues in Section III of its Initial Brief that a $250,000 award is proper as liquidated damages and is supported by fact and law. Respondent, and the Circuit Court, are mistaken and in contravention of the GSA.

In the longest section of Respondent's Initial Brief, it goes to considerable effort to paint Appellant Field as having "repeatedly lied and misrepresented facts. . . ." (Respondent's Initial Brief, p. 15.) Plainly, Respondent's true purpose is to attempt to prejudice this Court against Appellant Field. To propel Respondent's smear of the Appellant, the Respondent introduces testimony from the Appellant to the Judicial Merit Selection Commission ("JMSC") in a public hearing on the re-election of Judge Miller on November 18, 2020. (Respondent's Initial Brief, p. 15.) Respondent purposefully omits that Appellant's testimony was offered only after Judge Miller had recused himself from this matter and Chief Justice Beatty assigned the case to Chief Justice Toal by Order dated November 12, 2020. (R.#__.)[11]

At no point did Chief Justice Toal have a first-hand opportunity to evaluate Field's credibility. Chief Justice Toal never held an evidentiary hearing on any matter, much less the jury trial to which Field was entitled under the SCUDJA. Without any jury trial or evidentiary hearing with testimony and cross-examination, there was no trier of fact. And because the weight and credibility of a witness is the sole province of the trier of fact, any factual determination by Chief Justice Toal concerning Field's credibility was error. *Woodall v. Woodall,* 322 S.C. 7, 471 S.E.2d 154 (1996).

[11] Respondent quotes from its Brief to the trial court. The Transcript to which it obliquely refers is not part of the Record on Appeal and was not requested by Respondent on Nov. 10, 2021 in reply to the Clerk's deficiency notice to Respondent. Section III of Respondent's Brief should be disregarded by this Court. Rule 210(h), SCACR.

Moreover, Field's credibility is not at issue for the questions presented. CIF's underlying motion specifically demands damages for Field's litigation conduct in Florida, and nowhere else. There is nothing in the GSA liquidated damages clause that requires an analysis of Field's credibility. The terms of the GSA are expressly limited to very specific circumstances in favor of the defending party in a legal action: (1) a party to the GSA must file a suit or claim against another party—CIF filed in Florida, and all cases were filed by CIF's Receiver Saad, not Appellant Field; (2) the suit or claim must seek to disqualify the GSA—CIF admitted in its Florida pleadings that Field in his Motion to Dismiss sought to "enforce the GSA" and sought specific performance of its releases[12]; and, (3) the party defending such action must prevail—CIF is the Plaintiff, not the Defendant, and it has not prevailed in Florida. Per the express language of the GSA, Respondent may not collect liquidated damages.

The Respondent did not contest Appellants' arguments that Respondent did not substantiate such fees when the computation of attorney's fees is readily available. Respondent did not address the matter in its Initial Brief and it did not attempt to satisfy the six prong test for attorney's fees set out in *Jackson v. Speed.*[13] *Jackson,* 326 S.C. 289, 436 S.E.2d 750 (1997).

If Field's Florida litigation defense is meritless, or if his testimony in Florida is not credible, Judge Corrigan has numerous tools at his disposal to provide relief to CIF, including damages under Rule 11, F.R.Civ.P., the GSA, or that Court's inherent authority to police its own docket. It is not for Chief Justice Toal to do what Judge Corrigan can do himself.

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[12] Appellant's Initial Brief, p. 35, citing EDF #22 and EDF #41 in 3:19-cv-0606-32JRK. (R.__).
[13] *Jackson* requires the Court to consider the following when determining reasonable attorney's fees: "(1) the nature, extent, and difficulty of the case; (2) the time necessarily devoted to the case; (3) professional standing of counsel; (4) contingency of compensation; (5) beneficial results obtained; and (6) customary legal fees for similar services." Jackson v. Speed, 326 S.C. 289, 308, 486 S.E.2d 750, 760 (S.C. 1997)

Respondent wants this Court to believe it is entitled to enormous damages because Field is unbelievably litigious, even though Field only substantively filed a Motion to Dismiss in Florida, a Motion to Recuse and a Motion to Dismiss in South Carolina, and then a Motion to Reconsider, Alter or Amend. Respondent smears Appellant Field as "litigious" for defending himself. Subject to the relevant rules, Field has constitutional rights to defend himself. No Court has sanctioned Field for his litigation defenses in any of these matters.

Were it relevant to the issues in this case, Appellant Field would spend time outlining the myriad examples proving that the parties who have been "litigious" are CIF and its privies, which permit its several attorneys in many states to run-up huge legal fees at the direct expense of the former noteholders of CIF, and were sanctioned by U.S. Magistrate Judge Austin in 6:14-cv-02267-BHH-JDA. (R.____.)

5. RESPONDENT DID NOT CONTEST OTHER ISSUES RAISED BY APPELLANT IN ITS INITIAL BRIEF.

Appellant argued other points in its Initial Brief that Respondent acquiesced to in choosing to not respond:

- Appellant was entitled to remove this action to the U.S. District Court once Chief Justice Toal determined that the 2008-CP-23-3665 case was "open"[14];
- Appellant was entitled to discovery[15];
- Appellant was entitled to have any 'Motion to Enforce Settlement' evaluated under the same standard as a Motion for Summary Judgment under Rule 56, SCRCP[16]; and,

[14] Appellant's Initial Brief, p. 23.
[15] Appellant's Initial Brief, pp. 19-21.
[16] Appellant's Initial Brief, p. 20.

- As the non-moving party, Appellant was entitled to have all facts viewed in a light most favorable to him[17].

CONCLUSION

For the reasons stated above, in its Initial Brief, and for those reasons contained in Appellant Taillon's briefs in this case, Appellant respectfully requests that this Court reverse or vacate the Amended Order entered by the Circuit Court on March 2, 2021, and dismiss "Receiver's Motion for Declaratory Relief."

Respectfully Submitted,

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[17] Appellant's Initial Brief, p. 21.

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THE STATE OF SOUTH CAROLINA
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APPEAL FROM GREENVILLE COUNTY
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In Re: Kathryn Taillon, Appellant.

PROOF OF SERVICE
REPLY BRIEF OF APPELLANT ARTHUR M. FIELD

I certify that I have served Appellant Arthur M. Field's Reply Brief on the below listed Counsel of Record by electronic mail (copy attached) on November 18, 2021.

[SIGNATURE PAGE TO FOLLOW]

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Attachments: Reply Brief of Appellant.pdf

Dear Counsel:

Please find attached Appellant Arthur Field's Reply Brief.

Respectfully submitted,

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