IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA

GeorgiaCarry.Org, Inc., Shane Montgomery, and William Theodore Moore, III,	)	
Plaintiffs,	)	
v.	)	Civil Action No. SPCV18-00523-BA
Thomas C. Bordeaux, Jr., Individually and as Judge of the Chatham County Probate Court,	)	
Defendant.	)	

DEFENDANT'S MOTION TO DISMISS

Comes now, Thomas Bordeaux, in both his official and individual capacity, and moves this Court to dismiss the above captioned action. In support thereof, he shows the following:

As outlined in the complaint, the Honorable Thomas Bordeaux is the Probate Judge of Chatham County. He has served in that capacity since January 2, 2017.

GeorgiaCarry.org is a non-profit organization who states in the pleading that its mission to allow its members to keep and bear arms.[1] The other two named Plaintiffs are citizens of Chatham County. Both applied for gun permits with the Probate Court. Both individual plaintiffs have received those permits.

1. **There are no grounds for relief against Thomas Bordeaux in his individual capacity and the complaint against him should be dismissed.**

1 While the complaint in this case states the only mission of the organization is to allow its members to keep and bear arms, the Georgia Supreme Court noted that the mission of this organization is "1) Educating members, citizens, government leaders, business owners, and law enforcement officers about Georgia's self-defense and gun laws; 2) **Defending the civil rights secured through law by litigation**; 3) Advocate [sic] for improvements in Georgia's self-defense and gun laws; and 4) Informing members about current issues and pending legislation related to self-defense and gun law." (Emphasis added)

The above captioned complaint is for a Writ of Mandamus.[2] O.C.G.A. 9-6-20 in it relevant parts:

> "All official duties should be faithfully performed, and whenever, from any cause, a defect of legal justice would ensue from a failure to perform or from improper performance, the writ of mandamus may issue to compel a due performance if there is no other specific legal remedy for the legal rights."

Mandamus generally does not lie except to compel performance of public duty. Martin v. Hatfield, 251 Ga. 638 (1983). Or stated another way, "Mandamus lies to enforce performance by public officer of public duty. Douglas v. Board of Ed. of Johnson County, 164 Ga. 271 (1927).

Mr. Bordeaux, as opposed to the Honorable Judge Bordeaux, has no ability to grant or deny individual rights. It is absurd to file an action asking an individual to grant rights that may only be bestowed upon a citizen after the proper process is followed by a probate judge. An individual capacity claim could never lie in a Writ of Mandamus which statutorily addresses only "all official duties." *Id.*

It is hard to understand the logic of suing a judge in his individual capacity whether as a part of a Writ or otherwise. Judges in Georgia are cloaked in judicial immunity.

Judges are immune from liability in civil actions for acts performed in their judicial capacity. Lamb v. Sims, 153 Ga. App. 556 (265 SE2d 879) (1980); Smith v. Hancock, 150 Ga. App. 80 (256 SE2d 627) (1979). "A judge will not be deprived of immunity because the action he took was in error, was done maliciously, or was in excess of his authority; rather, he will be subject to liability only when he has acted in the `clear absence of all jurisdiction.' [Cit.]" Stump

---

2 To the extent that this proceeding is also a declaratory action, a private individual cannot grant a permit to carry a concealed weapon and the same reasoning applies.

v. Sparkman, 435 U. S. 349, 356 (98 SC 1099, 55 LE2d 331, 339) (1978); Barlow v. Yenkosky, 146 Ga. App. 872 (247 SE2d 519)(1978).

Assuming Judge Bordeaux acted with actual malice and forethought in the manipulation of an individual's statutory right to carry a gun in public places, which is blatantly untrue, he would nevertheless be immune from suit.

Therefore, all claims against Thomas Bordeaux in his individual capacity must be dismissed.

2. No declaratory action can lie against the Honorable Judge Bordeaux as injunctive relief is barred by the doctrine of sovereign immunity.

The doctrine of sovereign immunity is more than 230 years old and predates the 2nd amendment to the United States Constitution. Lathrop v Deal, 301 Ga. 408 (2017).

Ga. Const. Art. I, Sec. II, Par. IX (e) states:

> Except as specifically provided in this Paragraph, sovereign immunity extends to the state and all of its departments and agencies. The sovereign immunity of the state and its departments and agencies *can only be waived by an Act of the General Assembly* which specifically provides that sovereign immunity is thereby waived and the extent of such waiver. (Emphasis supplied.).

In Georgia Department of Natural Resources et al v Center for a Sustainable Coast, Inc., 294 Ga. 593 (2014), the Supreme Court held that sovereign immunity applied to any suit against an immune party, such as a county or her officers, including those where the only relief sought was injunctive. In that case, like the present facts presented, a non-profit organization filed a declaratory judgment seeking to enjoin the State from issuing certain permits to develop the coastal region. In reversing the Court of Appeals, the Supreme Court held that sovereign immunity applied to injunctive relief. Thus, no action could lie against the DNR for the permitting in question.

In 2017, the Supreme Court squarely addressed this issue again and definitely held that declaratory actions cannot lie against the state or any of her political subdivisions.

> "Simply put, the constitutional doctrine of sovereign immunity forbids our courts to entertain a lawsuit against the State without its consent. In Georgia Dept. of Natural Resources v. Center for a Sustainable Coast, 294 Ga. 593, 602, 755 S.E.2d 184 (2014), we held that the doctrine extends to suits for injunctive relief, and in Olvera v. University System of Ga. Board of Regents, 298 Ga. 425, 428 n.4, 782 S.E.2d 436 (2016), we held that it likewise extends to suits for declaratory relief. But those decisions involved no constitutional claims, and since Sustainable Coast, we have not had occasion to consider whether the doctrine of sovereign immunity extends to claims for injunctive or declaratory relief that rest upon constitutional grounds. See State of Ga. v. Int'l. Keystone Knights of the Ku Klux Klan, 299 Ga. 392, 395 (1), n.11, 788 S.E.2d 455 (2016). In this case, we are confronted squarely with that question. We hold today that the doctrine of sovereign immunity extends generally to suits against the State, its departments and agencies, and its officers in their official capacities for injunctive and declaratory relief from official acts that are alleged to be unconstitutional."

The right to carry a concealed weapon in public places is NOT a constitutional right. Hertz v. Bennett, 294 Ga. 62 (2013). The right to own a gun is protected by the Constitution. The right to carry your gun to church, on public property, or in other specified areas upon the grant of a permit by a probate judge is strictly a statutory right. However, after **Lathrop**, whether the right is statutory or constitutional, under either circumstance, sovereign immunity applies and bars this action.

There is little doubt that the Supreme Court's ruling in Lathrop v Deal altered the landscape of the doctrine of sovereign immunity. Thus, while not raised in the two cases previously cited by the Supreme Court involving the Plaintiff corporation, it is clear after the 2017 holding of the Court that nonprofit organizations such as GeorgiasCarry.Org cannot sue local government for declaratory judgments or injunctive relief. Hence, the complaint fails to state a claim upon which relief can be granted and must be dismissed.

Moreover, sovereign immunity divest the trial court of subject matter jurisdiction. Hence, any attempt by Plaintiffs to seek a ruling from this court on an alleged justiciable legal controversy are barred by a lack of jurisdiction. Sovereign immunity is not merely the freedom from judgments, but the freedom from suit itself so that government may continue to function without interruption.

Therefore, any injunctive relief seeking to declare legal rights are barred and must be dismissed.

3. The action filed by Plaintiffs Montgomery and Moore do not meet the standard for a Writ of Mandamus.

Both Plaintiffs Montgomery and Moore have received gun permits from the Probate Court of Chatham County. As outlined above, as to these two plaintiffs, there is nothing more that this Court can compel the Probate Court to do. Upon the issuance of the license, the relief sought in this petition is moot.

> "A sound conclusion in the instant case requires a recognition of the following characteristics of the writ of mandamus: (1) it is an extraordinary remedy and is never available if there exists any other adequate remedy; (2) it will not issue against a public officer to compel the performance of official duty unless that duty is plain; and (3) it is, by its very nature, a solemn command from the judicial department and carries with it the authority vested in the court by the Constitution." Bankers Life and Casualty v. Cravey, 209 Ga. 274 (1952).

This Court need only examine the first prong of this age old test to determine the case pending dictates dismissal.[3] Plaintiffs Montgomery and Moore cannot show that no other

3 As will be discussed more fully in the next section of this brief, dismissal is required in this matter and not a grant of summary judgment in accordance with GeorgiaCarry.org. v. James. In that case the Supreme Court's dicta and ruling clearly outline that these are matters of law, not fact, and thus dismissal is required.

adequate remedy exist. Indeed, both have the permits sought and thus no remedy is necessary. Likewise, no other remedy is outlined within the petition.[4]

Mandamus can compel an official clothed with discretion to act, but it cannot mandate the outcome. Georgia Dept. of Transp. v. Peach Hill Properties, Inc., 278 Ga. 198, (2004). It is undisputed that Judge Bordeaux acted and that the action sought to be compelled was completed prior to the filing of this petition.

Additionally, O.C.G.A. Section 9-6-20 requires that no other legal remedy be available before a Writ may issue. There is no allegation that any Plaintiff asked for a hearing before the Probate Court. O.C.G.A. 16-11-129 gives a party who is aggrieved the right to seek a hearing if a permit is not issued.

In its entirety, the relevant Code Section reads:

> "(j) Applicant may seek relief. When an eligible applicant fails to receive a license, temporary renewal license, or renewal license within the time period required by this Code section and the application or request has been properly filed, the applicant may bring an action in mandamus or other legal proceeding in order to obtain a license, temporary renewal license, or renewal license. When an applicant is otherwise denied a license, temporary renewal license, or renewal license and contends that he or she is qualified to be issued a license, temporary renewal license, or renewal license, the applicant may bring an action in mandamus or other legal proceeding in order to obtain such license. *Additionally, the applicant may request a hearing before the judge of the probate court relative to the applicant's fitness to be issued such license.* Upon the issuance of a denial, the judge of the probate court shall inform the applicant of his or her rights pursuant to this subsection. If such applicant is the prevailing party, he or she shall be entitled to recover his or her costs in such action, including reasonable attorney's fees." (emphasis added)

First and foremost, the plain language of the code allows the Plaintiffs to only seek that which they already have; to wit, a carry permit. The complaint or petition are void of any

---

4 The requirement for a Writ of Mandamus stands in contrast to the standard for a declaratory judgment as outlined in O.C.G.A. 9-4-2 where other adequate remedies may be available but not utilized.

allegation that either natural person plaintiff sought a hearing before the Probate Court. While the Code Section uses the word "may", the Civil Practice Act and case law of mandamus which outdates carry permits themselves, clearly hold that a writ of mandamus can only issue where there is no other legal remedy available.[5] The hearing offered by the Code is an available legal remedy that neither Plaintiff Montgomery or Plaintiff Moore utilized. It again begs the point that neither of those two Plaintiffs needed to do so as carry permits were issued. However, the lack of attempting to use the statutory remedy allowed in this Code Section is bar to this Court issuing a Writ of Mandamus.

Should this Court find that the two provisions of law are seemingly in conflict, the question presented is further resolved. A Writ may only lie for a *CLEAR* legal right. Where the General Assembly has contradicted a plethora of case law in Title 16 without altering the codified foundation of the Writ in Title 9, there can be no clear legal right upon which this Court can compel an act, even if the act had not been completed.

This Court should also note that in the last decade this carry permit Code Section has been altered almost every year. See Laws 2008, Act 802, § 6, eff. July 1, 2008; Laws 2009, Act 102, § 3-2, eff. July 1, 2009; Laws 2010, Act 643, § 1-7, eff. June 4, 2010; Laws 2011, Act 245, § 16, eff. May 13, 2011; Laws 2014, Act 604, § 1-7, eff. July 1, 2014; Laws 2015, Act 100, § 6, eff. July 1, 2015; Laws 2016, Act 625, § 16, eff. May 3, 2016; Laws 2017, Act 199, § 1, eff. July 1, 2017; Laws 2017, Act 217, § 6, eff. May 8, 2017; Laws 2018, Act 562, § 16, eff. May 8, 2018.

---

5 "The writ of mandamus is of common-law origin, and, in the absence of constitutional or statutory restrictions, is deemed to have vested in those American courts which are considered to have succeeded to the general jurisdiction of the Court of King's Bench. 34 Am. Jur. 816, § 16." Cravey, *supra*.

Given the never ceasing tinkering of the General Assembly with this specific law, the application by a probate judge is an ameba of legal reasoning. The only constant that is unquestioned is that the probate judge has jurisdiction to act.

Moreover, assuming without conceding that the permit code section at question outlines an inflexible 35 day limit to grant or deny the application, that deadline would not offer any relief in this proceeding.

> "[[L]anguage contained in a statute which, given its ordinary meaning, commands the doing of a thing within a certain time, when not accompanied by any negative words restraining the doing of the thing afterward, will generally be construed as merely directory and not as a limitation of authority, and this is especially so where no injury appeared to have resulted from the fact that the thing was done after the time limited by the plain wording of the Act.

Fulton County Board of Tax Assessors v Fast Evictions, LLC, 314 Ga. App. 178 (2012) citing Barton v. Atkinson, 228 Ga. 733, 739(1), 187 S.E.2d 835 (1972);

Further, Plaintiffs allege no harm or injury for the alleged failure to act within the time scheme of the Code Section. "[I]n the absence of injury to the defendant, a statute which directs that some act be done within a given time period, but prescribes no penalty for not doing it within that time, is not mandatory but directory; that is, that in such instances `shall' denotes simple futurity rather than a command." Id.

In the Fulton County case, the Code Section in question contained a default provision. Unless action was taken, the application submitted was granted. Since there record of that case did not show that the Board of Assessors acted within the statute, the effect of the failure of the board to accept or reject the taxpayer's appraisal within 45 days meant the application was granted. The "shall" had to be enforced. See also, Glass v. City of Atlanta, 293 Ga.App. 11, 15(2)(a), 666 S.E.2d 406 (2008).

In this case, O.C.G.A. 16-11-129 contains no such provision. Subsection (d) states in the relevant part:

> "Not later than ten days after the judge of the probate court receives the report from the law enforcement agency concerning the suitability of the applicant for a license, the judge of the probate court shall issue such applicant a license or renewal license to carry any weapon unless facts establishing ineligibility have been reported or unless the judge determines such applicant has not met all the qualifications, is not of good moral character, or has failed to comply with any of the requirements contained in this Code section.

While the Code Section does states deadlines are not to be extended[6], there is no provision for the automatic grant of a license. There is also no provision for the automatic denial of the permit. Hence, under the laws of statutory interpretation, the language of this Code Section is not mandatory but directory.

For these reasons, Plaintiffs have failed to meet the standard for the issuance of a Writ of Mandamus.

4. The action filed by Plaintiffs Montgomery and Moore are moot and should be dismissed.

This case is not such that appellate review can be had without a specific examination of the facts, especially the background of each person applying for a permit. In Georgia Department of Natural Resources et al v Center for a Sustainable Coast, Inc., 294 Ga. 593 (2014) the Court wrote:

> "It is a rather fundamental rule of both equitable jurisprudence and appellate procedure, that if the thing sought to be enjoined in fact takes place, the grant or denial of the injunction becomes moot." Jackson v. Bibb County Sch. Dist., 271 Ga. 18, 19, 515 S.E.2d 151 (1999). When the remedy sought in the trial court is no longer available, then the matter is moot and no longer subject to appeal. Brown v. Spann, 271 Ga. 495, 520 S.E.2d 909 (1999).

---

6 "The judge of the probate court shall date stamp the report from the law enforcement agency to show the date on which the report was received by the judge of the probate court. The judge of the probate court shall not suspend the processing of the application or extend, delay, or avoid any time requirements provided for under this paragraph.

This is also not a case where the Court is being asked to determine an abstract question which does not arise but for the presentation of existing facts or rights. See Collins v. Lombard Corp., 270 Ga. 120(1), 508 S.E.2d 653 (1998) ("a case is moot when its resolution would amount to the determination of an abstract question not arising upon existing facts or rights").

There is nothing but a fact specific question when considering the granting or denial of a permit to carry a concealed weapon as that grant or denial is contingent upon facts such as background checks, the results thereof, the proper use of paperwork and forms as well as payment of a fee. Plaintiff would ask this Court to assume that all factors weigh in favor of an applicant and then ask this Court to decide how the probate court should function. It is this very practice that the Supreme Court has disallowed.

In Sustainable Coast, *supra*, the Court only reviewed the matter based upon an issue of sovereign immunity. Sovereign Immunity does not rely upon the facts of any individual Plaitniff but instead upon the governing authority sued as the Defendant. Thus, this Court must examine the Defendant's status in relation to sovereign immunity to determine if the case is moot.

Counties are entitled to sovereign immunity from damage claims pursuant to Art. I, Sec. II, Par. IX of the Georgia Constitution of 1983. Gilbert v. Richardson, 264 Ga. 744 (1994). Moreover, because a suit brought against a county employee or officer in his official capacity is in reality a suit against the county itself, sovereign immunity extends to county employees or officials acting within their official capacities. See Cameron v. Lang, 274 Ga. 122, (2001); Gilbert, *supra*.

In the present case, this Court cannot rule upon the proper issuance of a gun permit without an examination of each individual plaintiff. Thus, unlike Sustainable Coast, the case is moot. Hence, the petition brought by Plaintiffs Montgomery and Moore must be dismissed.[7]

5. **GeorgiaCarry.Org, Inc. lacks standing to bring such an action.**

GeorgiaCarry.Org, Inc. (herein "GeorgiaCarry.Org") does not have the standing to bring this lawsuit. The Georgia Supreme Court has precisely spoken twice on this exact issue. In both cases, the High Court ruled that GeorgiaCarry.Org lacks standing to sue.

In its first attempt at litigation similar to the matter before the High Court, the Plaintiffs acknowledged that in a Writ of Mandamus, once a license was issued, there was nothing further a trial court could order the Probate Judge to do or not do. In GeorgiaCarry.Org. v. James, 298 Ga. 420 (2016), the Supreme Court here first addressed this organization's lack of standing.

Plaintiff in that decision was a member of GeorgiaCarry.Org and applied for a temporary gun license. That plaintiff had a gun permit that was not expired. Prior to the current permits expiration, the Probate Judge issued a renewed license. Counsel for the plaintiff, the same counsel as these Plaintiffs, acknowledged to the Court the issue was moot. The admission by Plaintiffs' counsel in that matter is a judicial admission that this Court should consider binding in this case. See generally, Pulte Home Corp. v. Woodland Nursery &Landscaping, Inc., 230 Ga. App. 455 (1998).

---

7 In GeorgiaCarry.org v James, supra, the Supreme Court noted that a grant of summary judgment was improper in that the case was moot and must be dismissed. The case was remanded for an entry of dismissal in lieu of the summary judgment order.

On review, the Supreme Court wrote "appellants acknowledged a mandamus action was no longer necessary. They argue, however, they are entitled to recover costs and attorney fees inasmuch as they were the "prevailing party" in the lawsuit." Id . The Court went on to note, "Because [Plaintiff's]Smith's claim was moot **and GeorgiaCarry.Org lacked standing**, it was incumbent upon the trial court to enter an order dismissing appellants' claims." (Emphasis added).

The trial court's denial of an award of attorney's fees was upheld.

Of important in the dicta of James, the High Court states that GeorgiaCarry.Org could not and did not apply for a license to carry a weapon. In fact, a corporation is not allowed under the plain reading of the carry permit law to apply for the permit. Who would be fingerprinted? Whose background check would be reviewed? If a corporate officer changed, would it nullify the permit issued? There are no answers to these questions but they highlight the point that a natural person, with fingerprints, a social security number and a background, are given the statutory right to carry a concealed weapon in certain manners in Georgia.[8]

Six months after the James decision, in GeorgiaCarry.Org, Inc. v Allen, 299 Ga. 716 (2016), the Supreme Court of Georgia again addressed this exact issue. In that case, GeoergiaCarry.Org, Inc. filed a petition seeking an extraordinary writ in the Superior Court of Fulton County. The trial court dismissed the action as lacking standing. The Supreme Court affirmed, holding:

---

8 The right to keep and bear arms as stated in the petition pending before the Court is a constitutional right upon which the Probate Judge of Chatham County cannot control nor does he seek to do so. The right to carry a concealed weapon in public under limited circumstances is a statutory right conveyed by the General Assembly of Georgia. This difference is significant. There are no allegations that the constitutional rights of any person have been infringed upon by Judge Bordeaux. See Hertz v. Bennett, 294 Ga. 62 (2013).

> "We find no indication that the legislature intended for a nonprofit corporation such as Georgia Carry to be considered to be a "person" for purposes considered to be "persons" under the law (see OCGA § 1-3-3 (14)), that is not the case where, as here, the legislature has shown its intent to exclude corporations from the types of "persons" who are authorized to pursue a writ of *quo warranto*. See OCGA § 1-3-2 ("As used in this Code or in any other law of this state, defined words shall have the meanings specified, unless the context in which the word or term is used clearly requires that a different meaning be used"). See also, e.g., Ga. R. Bank & Trust Co. v. Liberty Nat. Bank & Trust Co., 180 Ga. 4, 12, 177 S.E. 803 (1934) ("A corporation is not impliedly within a statutory provision applicable to persons, if it is not within the purpose and intent of such provision, or if an attempt to exclude it otherwise appears") (citation omitted). Accordingly, under a plain reading of OCGA § 9-6-60, Georgia Carry would not be an authorized "person" to pursue a writ of *quo warranto* to challenge the rights of the Commission members to hold their public offices."

While this case was not a writ of mandamus but a Writ of *quo Warranto*, the same standard would apply.

In its Articles of Incorporation, GeorgiaCarry.org states that its purpose is to "focus ... on public interest matters of self-defense and gun laws of the State of Georgia and the United States of America. [Georgia Carry's] assets are be [sic] dedicated to 1) Educating members, citizens, government leaders, business owners, and law enforcement officers about Georgia's self-defense and gun laws; 2**) Defending the civil rights secured through law by litigation;** 3) Advocate [sic] for improvements in Georgia's self-defense and gun laws; and 4) Informing members about current issues and pending legislation related to self-defense and gun law."

The organization, by its own admissions, seeks out litigation. To say that seeking litigation gives a non-profit corporation the right to petition for a Writ of Mandamus is to allow the proverbial fox to guard the hen house. Plaintiff Corporation seeks litigation for litigation's sake with the only relief being sought that remains available are attorney's fees.

Given that the Probate Judge is immune from suit, this attempt to extort fees for an act already completed by the judge is nothing but an end run around the protections of both judicial and sovereign immunity.

6. **Any claims that Plaintiffs are entitled to attorney's fees are barred.**

Under Georgia law today, sovereign immunity has constitutional status, and that immunity may be waived only by an act of the General Assembly or by the Constitution itself. Sustainable Coast, *supra*. O.C.G.A. 16-11-129 allows for the award of attorney's fees only "If such applicant is the prevailing party, he or she shall be entitled to recover his or her costs in such action, including reasonable attorney's fees."

Without repeating the arguments previously advances and citations of authority, the award of attorney's fees in this case can only occur after two findings of this court. First, the court must find that the above referenced code is a waiver of sovereign immunity. Given the lengthy analysis of this issue in Georgia Department of Corrections v Couch, 295 Ga. 469 (2014), it is unclear if this section is intended to as a waiver. Moreover to the extent an ambiguity exist, then this Court must find that no such waiver occurred.

However, assuming the Court does, the Plaintiff's still must be the "prevailing party." As in James, supra, the fact that the applicant Plaintiff received the carry permit mooted the case and the applicant was not the prevailing party. The same facts exist here. Hence, an award of attorney's fees and cost would be improper.

CONCLUSION

GeorgiaCarry.Org, Inc. on behalf of its two members, as a corporation, has sought litigation that is both barred by sovereign immunity and moot. The corporation itself lacks standing and the continued filing on behalf of the corporation in light of the Supreme Court

decisions can be nothing less than frivolous and intended to harass local government, preventing the orderly administration of government. For all of the reasons outlined herein as well as those that will be argued to the Court on August 7th, 2018, Defendant herein prays that this Court dismiss this action in its entirety.

This 26th day of July, 2018.

R. JONATHAN HART
State Bar No. 333692
JENNIFER R. DAVENPORT
State Bar No. 330328
ATTORNEYS FOR DEFENDANT

P.O. Box 8161
Savannah, GA 31412
T: (912) 652-7881
F: (912) 652-7887
Email:rjhart@chathamcounty.org
jdavenport@chathamcounty.org

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the parties in the foregoing action with a copy of this document by placing the same in the United States mail with sufficient postage affixed thereto to assure delivery and properly addressed to:

John R. Monroe, Esq.
John Monroe Law, P.C.
9640 Coleman Road
Roswell, GA 30075

This 26th day of July 2018.

Attorney for Defendant

P. O. Box 8161
Savannah, GA 31412
(912) 652-7881