

IN THE SUPERIOR/STATE COURT OF Athens-Clarke COUNTY

STATE OF GEORGIA

CIVIL ACTION
NUMBER SU15CV0148

Debra Bowman + Dale

Bowman Parents + Legal

Guardians of Emily Bowman,
an Incapacitated **PLAINTIFF**
Adult Vs.

Triple Threat, Inc. d/b/a Barcode,

Chadwick J. Fallows + Ryan

Masters
DEFENDANT

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Kopelman Sifton Law Group, LLC
3405 Piedmont Rd., N.E.
Ste. 500
Atlanta, GA 30305

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 13 day of Feb, 2015.

Clerk of Superior Court/State Court

By: 
Deputy Clerk

FILED IN OFFICE
CLERK SUPERIOR COURT
CLARKE COUNTY, GEORGIA
2015 FEB 13 PM 12:11
DEBRA L. BOWMAN, CLERK
CLARKE COUNTY, GEORGIA
PROJECT INITIALS

IN THE SUPERIOR COURT OF ATHENS-CLARKE COUNTY
STATE OF GEORGIA

FILED IN OFFICE
CLERK SUPERIOR COURT
CLARKE COUNTY, GEORGIA
2015 FEB 13 PM 12:06
BEVERLY LOGAN, CLERK
CLARKE COUNTY, GEORGIA
DOCKET INITIALS

DEBRA BOWMAN and DALE BOWMAN, *
Parents and Legal Guardians of *
EMILY BOWMAN, an Incapacitated Adult, *

Plaintiffs, *

v. *

TRIPLE THREAT, INC., d/b/a BARCODE, *
CHADWICK J. FALLOWS, and RYAN *
MASTERS, *

Defendants. *

Civil Action
File No. SU15CV0148
Plaintiffs Demand
a Jury Trial.

COMPLAINT FOR TORT DAMAGES

COME NOW DEBRA BOWMAN and DALE BOWMAN, Parents and Legal Guardians of
EMILY BOWMAN, an incapacitated adult, Plaintiffs in the above-styled action, and hereby file this
Complaint for Tort Damages against the Defendants above-named, respectfully showing the Court
as follows:

1.

Defendant Triple Threat, Inc., (hereinafter referred to as "Triple Threat/Barcode" or
"Barcode") is a domestic corporation doing business as Barcode on East Clayton Street in Athens,
Georgia.

2.

Defendant Triple Threat/Barcode's registered agent for service of process is Chadwick J.
Fallows, and Defendant Triple Threat/Barcode may be served through that registered agent at 166
East Clayton Street, Athens, Georgia 30601.

3.

Defendant Triple Threat/Barcode is subject to the jurisdiction of this Court.

4.

Venue as to Defendant Triple Threat/Barcode is proper in this Court.

5.

Defendant CHADWICK J. FALLOWS (hereinafter referred to as "Fallows") was, at all times relevant to this action, the CEO, CFO, Secretary, and Registered Agent for Triple Threat/Barcode.

6.

Defendant Fallows may be served at his residence, which is 1206 Carson Graves Road, Watkinsville, Georgia 30677.

7.

Defendant Fallows is subject to the jurisdiction of this Court.

8.

Venue as to Defendant Fallows is proper in this Court.

9.

Defendant RYAN MASTERS (hereinafter referred to as "Masters") was, at all times relevant to this action, co-owner and/or manager of Triple Threat/Barcode.

10.

Defendant Masters may be served at his residence, which is 723 Baxter Street, #3, Athens, Georgia 30605.

11.

Defendant Masters is subject to the jurisdiction of this Court.

12.

Venue as to Defendant Masters is proper in this Court.

13.

On or about February 16, 2013, Emily Bowman and Kyle Edwards were walking east, on the southern side of Oak Street in Athens-Clarke County.

14.

Ms. Bowman and Mr. Edwards stopped in the grass right of way between the parking lot of City Electric located at 410 Oak Street.

15.

Mr. Edwards walked behind the City Electric building because he needed to use the restroom.

16.

Ms. Bowman stood by herself, on the grass right of way, where she waited for Mr. Edwards.

17.

Within moments of stepping away from Ms. Bowman, Mr. Edwards heard an impact and turned to see that Ms. Bowman had been struck by a vehicle.

18.

The vehicle which struck Ms. Bowman left the scene of the collision.

19.

Mr. Edwards immediately went to Ms. Bowman's aid and found Ms. Bowman was unconscious and gravely injured.

20.

Mr. Edwards saw a small red vehicle traveling eastbound on Oak Street beyond (further east) the grassy area where Ms. Bowman was struck.

21.

It was subsequently determined that the vehicle which struck Ms. Bowman was a 1997 Mazda B2300 pickup truck which was driven by William Wilson Heaton, Jr. (hereinafter referred to as "Heaton").

22.

Heaton drove his pickup truck off the road and violently struck Emily Bowman while Heaton was under the influence of alcohol provided by Defendant Triple Threat/Barcode, from whose premises Heaton had departed only minutes earlier.

23.

Heaton was noticeably intoxicated on the premises of Defendant Triple Threat/Barcode while being served alcohol and upon his departure from Barcode in the early morning hours of February 16, 2013.

24.

Despite the fact that the Defendants knew, or should have known, that Heaton was intoxicated and likely to be operating his vehicle upon leaving the Barcode's premises, Defendants failed to take steps to protect the public in general, and Emily Bowman in particular, from the danger posed by Heaton.

COUNT 1

LIABILITY OF DEFENDANT TRIPLE THREAT, INC./BARCODE
PURSUANT TO O.C.G.A. §51-1-40

25.

Paragraphs one (1) through twenty three (24) are realleged as if fully pleaded herein.

26.

On the evening of February 15, 2013 Heaton went to Barcode for the purpose of consuming alcohol.

27.

Heaton arrived at Barcode at approximately 10:30 PM on February 15, 2013, and remained at Barcode until the bar closed at approximately 2:30 AM on February 16, 2013.

28.

Heaton went to Barcode on the above-referenced date(s)/time(s) for the purpose of consuming alcohol.

29.

On those same dates and times, and at that same location, Heaton consumed amounts of alcohol which was provided to him by Defendant Barcode, through its owners, managers, and employees.

30.

Heaton's patronage of Barcode on the above-referenced dates and times was not the first or only time Heaton went to Barcode to consume alcohol.

31.

Heaton was well known to the owners, managers, and employees of Barcode, prior to February 15, 2013 and February 16, 2013.

32.

The owners, managers, and employees of Barcode knew, prior to February 15, 2013 and February 16, 2013, that Heaton was prone to drink to the point of becoming noticeably intoxicated.

33.

The owners, managers, and employees of Barcode also knew or should have known Heaton typically drove to Barcode, and then drove after leaving Barcode after consuming alcohol and becoming noticeably intoxicated.

34.

The above-named Defendants knew that on at least one occasion prior to February 15, 2013 and February 16, 2013, Heaton became noticeably intoxicated and disruptive while at Barcode, which resulted in Heaton being assaulted by a Barcode employee.

35.

Barcode's owners, managers, and employees/staff knew or should have known, prior to February 15, 2013 and February 16, 2013, that Heaton was likely to drive a motor vehicle after departing Barcode's premises where Heaton had become noticeably intoxicated.

36.

Although the Defendants and their managers, employees, and agents were aware that Heaton had driven to Defendant Barcode's premises February 15, 2013 and knew or should have known that Heaton was likely to drive a motor vehicle after departing Barcode's premises on February 16, 2013,

Defendants, individually and through their owners, managers, employees, and agents, in disregard of the consequences of their actions, continued to serve – and took no action to limit the amount of alcohol consumed by or served to – Heaton, and did nothing to deter Heaton from operating a motor vehicle once Defendants were aware of Heaton’s inebriated condition on February 15, 2013 and February 16, 2013.

37.

During the approximate four hours Heaton was at Barcode from the night of February 15, 2013 until the early morning hours of February 16, 2013, Defendant Barcode, its owners, managers, and employees served Heaton approximately ten (10) alcoholic beverages, including what the owners, managers, and employees of Barcode referred to as a “bomb” – a 1.5 ounce shot of liquor dropped in a 12 ounce beer – approximately one hour prior to Heaton leaving Barcode.

38.

Heaton left the premises of Defendant Barcode during the early morning hours of February 16, 2013, and drove a motor vehicle.

39.

Heaton traveled east on Oak Street, and as he approached the area where Ms. Bowman stood in the grassy right of way adjacent to the road, Heaton’s state of intoxication caused him to leave the roadway and strike Ms. Bowman with the right front corner of Heaton’s Mazda pickup truck.

40.

The aforementioned collision caused grievous injuries to Ms. Bowman.

41.

As a direct and proximate result of Defendant Triple Threat/Barcode's serving of alcohol to Heaton, who was then in a state of noticeable intoxication and known, or should have been known, to be driving a motor vehicle in the near future, Emily Bowman suffered, and continues to suffer, emotional distress and severe and permanent physical injuries, as a result of which she incurred, and will continue to incur, substantial medical expenses, lost wages, and pain and suffering, both physical and mental/emotional.

42.

Also, and in the alternative, on February 15, 2013 and February 16, 2013, Defendant Triple Threat/Barcode, acting by and through its owners, managers, employees, and agents, and in disregard of the consequences of their actions, did negligently and knowingly sell, furnish and serve alcoholic beverages to Heaton, at their bar and establishment known as Barcode.

43.

Pursuant to O.C.G.A. §51-1-40(b), Defendant Triple Threat/Barcode is liable to Plaintiffs as a result of the doctrine of negligence per se, that is, negligence as a matter of law, for all of Emily Bowman's injuries and damages proximately caused by Defendant Triple Threat/Barcode's serving of alcoholic beverages to Heaton while he was in a state of noticeable intoxication and while Defendant Triple Threat/Barcode knew, or should have known, that Heaton would soon be driving a motor vehicle.

COUNT 2

NEGLIGENCE OF DEFENDANT TRIPLE THREAT/BARCODE

44.

Paragraphs one (1) through forty one (43) are realleged as if fully pleaded herein.

45.

Defendant Triple Threat/Barcode negligently failed to properly train its employees as to recognition of an intoxicated person.

46.

Defendant Triple Threat/Barcode negligently failed to supervise its employees to ensure that these employees did not serve alcohol to noticeably intoxicated persons who would soon be driving.

47.

As a direct and proximate result of Defendant Triple Threat/Barcode's negligence, Emily Bowman suffered, and continues to suffer, emotional distress and severe and permanent physical injuries, as a result of which she incurred, and will continue to incur, substantial medical expenses, lost wages, and pain and suffering, both physical and mental/emotional.

48.

Defendant Triple Threat/Barcode is liable for all injuries and damages to Emily Bowman proximately caused by its negligence and other improper conduct.

COUNT 3

DIRECT PARTICIPANT LIABILITY - DEFENDANT CHADWICK J. FALLOWS

49.

Paragraphs one (1) through forty six (48) are realleged as if fully pleaded herein.

50.

At all times relevant to this action, Defendant Fallows, as CEO, CFO, and Secretary of Defendant Triple Threat/Barcode, had the right to control the agents and employees of Triple Threat/Barcode, and had the right to discharge the employees and agents of Triple Threat/Barcode.

51.

Defendant Fallows was involved in overseeing, managing, and supervising activities at Barcode.

52.

In his capacity as CEO, CFO, and Secretary of Triple Threat/Barcode, Defendant Fallows controlled and had the right and the duty to exercise ordinary care to, among other things, set or otherwise establish and implement policies and procedures pertaining to Barcode, including but not necessarily limited to: (a) policies and procedures concerning appropriate provision of alcohol to Barcode's customers; (b) policies and procedures concerning how Barcode managers, employees, and agents should interact with and provide safe transport for customers who were noticeably intoxicated; and (c) policies and procedures to prevent Barcode customers who were noticeably intoxicated from operating motor vehicles after leaving Barcode's premises.

53.

Defendant Fallows negligently and/or wilfully failed to implement at Barcode any policies or procedures concerning: (a) appropriate provision of alcohol to Barcode's customers; (b) how Barcode employees and agents should interact with and provide safe transport for customers who were noticeably intoxicated; and (c) to prevent Barcode customers who were noticeably intoxicated from operating motor vehicles after leaving Barcode's premises.

54.

Defendant Fallows had interacted with and/or observed Heaton prior to February 15, 2013 and February 16, 2013, and knew Heaton was prone to drinking to excess, to the point of being noticeably intoxicated.

55.

Defendant Fallows had interacted with and/or observed Heaton prior to February 15, 2013 and February 16, 2013, and knew or should have known Heaton was likely to drive a motor vehicle after becoming noticeably intoxicated at Barcode.

56.

Defendant Fallows had interacted with and/or observed Heaton prior to February 15, 2013 and February 16, 2013, and had observed Heaton in a noticeably intoxicated state/condition, yet Defendant Fallows took no action whatsoever to prevent Heaton from driving a motor vehicle after leaving Barcode's premises in the early morning hours of February 16, 2013.

57.

Despite his interaction with and/or observation of Heaton prior to February 15, 2013 and February 16, 2013, despite his knowledge that Heaton drank to excess – to the point of being noticeably intoxicated – and despite his knowledge that Heaton was likely to drive after becoming noticeably intoxicated, Defendant Fallows did not take any action to prevent Heaton from becoming noticeably intoxicated at Barcode on February 15, 2013 and February 16, 2013, and then driving a motor vehicle with which Defendant Heaton struck and gravely injured Emily Bowman.

58.

As a direct and proximate result of Defendant Fallows' failure to train and/or supervise Barcode's employees/agents, Emily Bowman suffered, and continues to suffer, emotional distress and severe and permanent physical injuries, as a result of which she incurred, and will continue to incur, substantial medical expenses, lost wages, and pain and suffering, both physical and mental/emotional.

59.

As a direct and proximate result of Defendant Fallows' negligent and/or wilful failure to set or otherwise establish and implement policies and procedures pertaining to Barcode, including but not necessarily limited to: (a) policies and procedures concerning appropriate provision of alcohol to Barcode's customers; (b) policies and procedures concerning how Barcode employees and agents should interact with and provide safe transport for customers who were noticeably intoxicated; and (c) policies and procedures to prevent Barcode customers who were noticeably intoxicated from leaving the premises and operating motor vehicles, Emily Bowman suffered, and continues to suffer, emotional distress and severe and permanent physical injuries, as a result of which she incurred, and will continue to incur, substantial medical expenses, lost wages, and pain and suffering, both physical and mental/emotional.

60.

As a direct and proximate result of Defendant Fallows' failure to otherwise take any action on February 15, 2013 and February 16, 2013, to prevent Heaton from becoming noticeably intoxicated and then driving a motor vehicle, Emily Bowman suffered, and continues to suffer, emotional distress and severe and permanent physical injuries, as a result of which she incurred, and

will continue to incur, substantial medical expenses, lost wages, and pain and suffering, both physical and mental/emotional.

61.

Defendant Fallows is personally liable to Emily Bowman based upon the doctrine of direct participant involvement and liability, combined with Defendant Fallows' failure to exercise ordinary and reasonable care in overseeing, managing, and operating Triple Threat/Barcode, for all injuries and damages to Emily Bowman proximately caused by Defendant Fallows' negligence and other improper conduct.

COUNT 4

DIRECT PARTICIPANT LIABILITY - DEFENDANT RYAN MASTERS

62.

Paragraphs one (1) through fifty nine (61) are realleged as if fully pleaded herin.

63.

At all time relevant to this action, Defendant Masters, as co-owner and/or manager of Defendant Triple Threat/Barcode, had the right to control the agents and employees of Triple Threat/Barcode, and had the right to discharge the employees and agents of Triple Threat/Barcode.

64.

Defendant Masters was involved in overseeing, managing, and supervising activities at Barcode.

65.

In his capacity as co-owner and/or manager of Triple Threat/Barcode, Defendant Masters controlled and had the right and the duty to exercise ordinary care to, among other things, set or

otherwise establish and implement policies and procedures pertaining to Barcode, including but not necessarily limited to: (a) policies and procedures concerning appropriate provision of alcohol to Barcode's customers; (b) policies and procedures concerning how Barcode employees and agents should interact with and provide safe transport for customers who were noticeably intoxicated; and (c) policies and procedures to prevent Barcode customers who were noticeably intoxicated from operating motor vehicles after leaving Barcode's premises.

66.

Defendant Masters negligently and/or wilfully failed to implement at Barcode any policies or procedures concerning: (a) appropriate provision of alcohol to Barcode's customers; (b) how Barcode employees and agents should interact with and provide safe transport for customers who were noticeably intoxicated; and (c) to prevent Barcode customers who were noticeably intoxicated from operating motor vehicles after leaving Barcode's premises.

67.

Defendant Masters had interacted with and/or observed Heaton prior to February 15, 2013 and February 16, 2013, and knew Heaton was prone to drinking to excess, to the point of being noticeably intoxicated.

68.

Defendant Masters had interacted with and/or observed Heaton prior to February 15, 2013 and February 16, 2013, and had observed Heaton in a noticeably intoxicated state/condition, yet Defendant Masters took no action whatsoever to prevent Heaton from driving a motor vehicle after leaving Barcode's premises.

69.

Despite his interaction with and/or observation of Heaton prior to February 15, 2013 and February 16, 2013, despite his knowledge that Heaton drank to excess – to the point of being noticeably intoxicated – and despite his knowledge that Heaton was likely to drive after becoming noticeably intoxicated, Defendant Masters did not take any action to prevent Heaton from becoming noticeably intoxicated at Barcode on February 15, 2013 and February 16, 2013, and then driving a motor vehicle with which Defendant Heaton struck and gravely injured Emily Bowman.

70.

As a direct and proximate result of Defendant Masters' failure to train and/or supervise Barcode's employees/agents, Emily Bowman suffered, and continues to suffer, emotional distress and severe and permanent physical injuries, as a result of which she incurred, and will continue to incur, substantial medical expenses, lost wages, and pain and suffering, both physical and mental/emotional.

71.

As a direct and proximate result of Defendant Masters' negligent and/or wilful failure to set or otherwise establish and implement policies and procedures pertaining to Barcode, including but not necessarily limited to: (a) policies and procedures concerning appropriate provision of alcohol to Barcode's customers; (b) policies and procedures concerning how Barcode employees and agents should interact with and provide safe transport for customers who were noticeably intoxicated; and (c) policies and procedures to prevent Barcode customers who were noticeably intoxicated from leaving the premises and operating motor vehicles, Emily Bowman suffered, and continues to suffer, emotional distress and severe and permanent physical injuries, as a result of which she incurred, and

will continue to incur, substantial medical expenses, lost wages, and pain and suffering, both physical and mental/emotional.

72.

As a direct and proximate result of Defendant Masters' failure to otherwise take any action on February 15, 2013 and February 16, 2013, to prevent Heaton from becoming noticeably intoxicated and then driving a motor vehicle, Emily Bowman suffered, and continues to suffer, emotional distress and severe and permanent physical injuries, as a result of which she incurred, and will continue to incur, substantial medical expenses, lost wages, and pain and suffering, both physical and mental/emotional.

73.

Defendant Masters is personally liable to Emily Bowman based upon the doctrine of direct participant involvement and liability, combined with Defendant Masters' failure to exercise ordinary and reasonable care in overseeing, managing, and operating Triple Threat/Barcode, for all injuries and damages to Emily Bowman proximately caused by Defendant Masters' negligence and other improper conduct.

COUNT 5

PIERCING THE CORPORATE VEIL

74.

Paragraphs one (1) through seventy one (73) are realleged as if fully pleaded herein.

75.

Defendant Fallows was the owner and/or operator of Triple Threat, Inc./Barcode.

76.

Defendant Fallows disregarded the corporate entity of Triple Threat, Inc. and made it a mere instrumentality for the transaction of his own affairs. Furthermore, there is such a unity of interest in ownership that the separate personalities of Defendant Fallows and Triple Threat, Inc./Barcode no longer exists or existed, and thus adherence to the doctrine of corporate entity would promote injustice to Emily Bowman and Plaintiffs Debra and Dale Bowman.

77.

Defendant Fallows overextended the privileges in the use of corporate entities in order to evade tort responsibilities.

78.

Defendant Fallows created and implemented a scheme and pattern at Barcode which included the following:

- (A) Allowing Barcode to hire employees and negligently retain employees who were not properly trained and qualified;
- (B) Allowing or encouraging excessive and/or binge drinking among the customers of Barcode, the overwhelming majority of whom were young people who were barely of legal drinking age, or younger;
- (C) Allowing Barcode customers to consume quantities of alcohol which resulted in such customers becoming noticeably intoxicated;
- (D) Allowing Barcode's customers who had become noticeably intoxicated to leave Barcode's premises knowing that such noticeably intoxicated customers were likely to drive motor vehicles;

- (E) Allowing Barcode to not be properly governed and operated;
- (F) Causing Triple Threat/Barcode to be underfunded and undercapitalized;
- (G) Failing to develop, promulgate, and implement policies and procedures at Barcode concerning: (1) appropriate provision of alcohol to Barcode's customers; (2) how Barcode employees and agents should interact with and provide safe transport for customers who were noticeably intoxicated; and (3) to prevent Barcode customers who were noticeably intoxicated from operating motor vehicles after leaving Barcode's premises;
- (H) Failing to properly see that Barcode was properly managed and that all necessary measures were implemented to ensure that noticeably intoxicated patrons, like Heaton, were not permitted to leave Barcode's premises and drive motor vehicles;
- (I) Failing to ensure that Triple Threat/Barcode had adequate liability and/or liquor liability coverage so that victims of Triple Threat/Barcode's negligence and other improper conduct would have an appropriate remedy; and
- (J) By liquidating or otherwise ceasing to operate Triple Threat/Barcode in anticipation of this action being filed.

79.

Defendant did not carry any liquor liability insurance coverage for Triple Threat/Barcode.

80.

Knowing that Barcode employees and staff were not trained properly in how to interact with intoxicated patrons in order to prevent such intoxicated patrons from driving after leaving Barcode's premises, and knowing that Barcode did not have any policies or procedures to provide guidance for

how Barcode's employees and agents should prevent noticeably intoxicated patrons, like Heaton, from leaving Barcode's premises and then driving motor vehicles, and knowing that noticeably intoxicated patrons, like Heaton, were likely to leave Barcode's premises and operate motor vehicles, Defendant Fallows continued to not carry any liquor liability coverage.

81.

Defendant Fallows deliberately underfunded and undercapitalized Triple Threat/Barcode, and failed to provide liquor liability insurance coverage for incidents where innocent victims, like Emily Bowman, were injured due to the neglect and other improper conduct of Triple Threat/Barcode's owners, managers, and employees. Defendant Fallows did so as part of a scheme and deliberate practice designed to ensure that persons, like Emily Bowman, who were injured as a result of Triple Threat/Barcode's negligence and other improper conduct, would have no legal remedy and would not be adequately compensated.

82.

The acts and omissions of Defendant Fallows as described herein, as well as the deliberate misconduct on his part, caused and contributed to the devastating injuries Emily Bowman suffered as described above.

COUNT 6

PUNITIVE DAMAGES

83.

Paragraphs one (1) through eighty (82) are realleged as if pleaded herein.

84.

The acts and omissions of the Defendants as described above demonstrate willful and wanton misconduct, oppression, malice, and conscious indifference to the consequences, including the safety, health, and welfare of Emily Bowman.

85.

The acts and omissions of the Defendants as described above were accompanied by aggravating circumstances. Accordingly, punitive damages should be awarded to punish Defendants for their egregious misconduct, and to deter the Defendants from similar future misconduct.

86.

Accordingly, Defendants are liable to Plaintiffs for punitive damages.

WHEREFORE, Plaintiffs pray for the following:

- (a) That process be issued to the Defendants;
- (b) That Plaintiffs, Debra Bowman and Dale Bowman, Parents and Legal Guardians of Emily Bowman, an Incapacitated Adult, have judgment against Defendants for all of Emily Bowman's injuries, including past and future medical expenses, lost wages and pain and suffering in an amount to be proven at the time of trial;
- (c) That Plaintiffs, Debra Bowman and Dale Bowman, Parents and Legal Guardians of Emily Bowman, an Incapacitated Adult, have judgment against the Defendants for punitive damages in an amount to be determined by the enlightened conscience of a fair and impartial jury;
- (d) That Plaintiffs, Debra Bowman and Dale Bowman, Parents and Legal Guardians of Emily Bowman, an Incapacitated Adult, have a trial by a jury; and

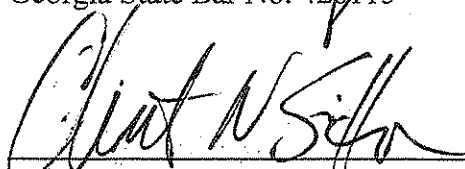
(e) For such other and further relief as this Court deems just and proper.

Respectfully submitted,

KOPELMAN SITTON LAW GROUP, LLC.



RICHARD KOPELMAN
Georgia State Bar No. 428715



CLINT W. SITTON
Georgia State Bar No. 649420

3405 Piedmont Road, N.E.
Suite 500
Atlanta, Georgia 30305
Phone: 404-351-5900
Facsimile: 404-832-8421
E-mail: Richard@KopelmanSitton.com