

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ASSOCIATION OF COMMUNITY)	
ORGANIZATIONS FOR REFORM)	
NOW, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION NO.
)	1:06-CV-1891-JTC
v.)	
)	
CATHY COX, <i>et al.</i> ,)	
)	
Defendants.)	

**PLAINTIFFS’ RESPONSE TO DEFENDANTS’ PROPOSED
SCHEDULE FOR PRELIMINARY INJUNCTION HEARING**

Plaintiffs submit this response to Defendants’ proposed scheduling timetable for three purposes: (1) to correct some gross misrepresentations of fact that were made by Defendants’ counsel, Stefan Ritter, in his recent submission to this Court; (2) to comment briefly as to why they believe Defendants’ proposed schedule is not a fair and workable solution; and (3) to offer a third possible compromise.

Defense Counsel’s Misrepresentation of Facts to the Court

Throughout Mr. Ritter’s response, on behalf of his clients, he has suggested that undersigned counsel for Plaintiffs has been uncooperative in his attempts to

craft a joint proposed scheduling order and unresponsive to Mr. Ritter's emails. Both suggestions are (to use Mr. Ritter's own words from a recent email) "patently false." In fact, Plaintiffs' counsel has been quite responsive and communicative in regard to this issue — usually providing a response to Mr. Ritter's communications within a matter of hours.

Plaintiffs' counsel was somewhat disappointed, though unfortunately not altogether surprised, to find that Mr. Ritter felt the need to attach a series of correspondence between counsel regarding scheduling negotiations, even though the Local Rules of this Court specifically counsel against such behavior. *See* N.D. Ga. L.R. 7.4 (**"Counsel shall not provide the court with copies of correspondence among themselves relating to matters in dispute."**).

What caused Plaintiffs' counsel greater concern, however, was that after Mr. Ritter had decided to flout the Court's local rules by including prohibited email correspondence, he then took it upon himself intentionally to mischaracterize the nature of such communications to this Court by not including the *complete* set of such email correspondence between himself and undersigned Plaintiffs' counsel. Specifically, Mr. Ritter neglected to include the page-long response to his August 21, 2006, 7:59 p.m. email that Plaintiffs' counsel sent to him at approximately 9:49

p.m. that same evening — less than two hours later, well after business hours.

That email, along with the rest of the emails that preceded it, is attached to this response as Exhibit “A” for the Court’s convenience.¹

Despite the fact that he had not included the complete sequence of emails between counsel up to that point, Mr. Ritter nevertheless supplied a “Good Faith Certificate of Counsel,” pursuant to Rule 11 of the Federal Rules of Civil Procedure, wherein he falsely stated, “Attached hereto are true and correct copies of *all* emails with opposing counsel regarding this matter.” (emphasis added).

Plaintiffs submit that such action on Mr. Ritter’s part is not only a violation of Rule 11 but is also in derogation of his duty of candor to this Court and his duty of fairness to opposing counsel. *See* Ga. Rules of Professional Conduct, Rules 3.3 and 3.4.²

¹ Plaintiffs request leave to include this information for purposes of making a complete record, given that Defendants included only a portion of the correspondence.

² Plaintiffs are not seeking the imposition of sanctions against Defendants’ counsel at this point, although they would be well within their rights to do so. *See, e.g., Federated Mut. Ins. Co. v. McKinnon Motors, LLC*, 329 F.3d 805, 808-09 (11th Cir. 2003) (every lawyer, as an officer of the court, has affirmative duty of candor to court and is subject to sanctions for violations thereof or for Rule 11 violations); *Hornady Truck Line, Inc. v. Volvo Trucks North America*, No. CV-98-0037-BH-M, 2000 U.S. Dist. LEXIS 11268 (S.D. Ala. Jul. 18, 2000) (imposing sanctions for attorneys’ violations of duty of candor to court and duty of fairness to opposing counsel). However, undersigned counsel did feel that it was appropriate to bring this issue to the Court’s attention, as part of Plaintiffs’ counsel’s own duty as an officer of the Court. Further, Plaintiffs’ (Footnote Continued ...)

Mr. Ritter's reason for not including that last response from Plaintiffs' counsel should be clear: the inclusion of Plaintiffs' counsel's prompt response would have seriously undercut Mr. Ritter's argument that Plaintiffs' counsel was somehow being non-communicative, uncooperative, and unresponsive in regard to planning and scheduling for the preliminary injunction hearing. This type of "hide-the-ball" behavior should not be countenanced by this Court.

Response to Defendants' Scheduling Proposal

With regard to the substance of Defendants' scheduling proposal, Plaintiffs believe that Defendants' proposed timeline is unworkable for a variety of reasons. First, Defendants' suggested briefing schedule does not give Plaintiffs a reasonable amount of time to submit a reply to any response brief that Defendants may submit. At the status conference hearing, the Court seemed to indicate that a minimum of three business days was reasonable under the circumstances, given Plaintiffs' request for expedited review. Under Defendants' proposal, Plaintiffs would have barely *one* business day to submit a reply brief — even less if

counsel requests this Court's early and active monitoring and assistance to ensure that defense counsel's conduct comports with his professional duties and responsibilities, so as to avoid unnecessarily acrimonious interactions among counsel and further distortions of the record during the pendency of this case.

Defendants chose to wait until late in the evening to file their brief. Such a timeframe would effectively preclude Plaintiffs from being able to submit a rebuttal brief in advance of the hearing.

Second, assuming the Court agrees with Defendants that pre-hearing depositions are necessary in connection with the preliminary injunction motion,³ Defendants' proposal contains no suggested limitations on the scope, number, and duration of pre-hearing depositions, or of the timeframe during which such

³ Again, Plaintiffs submit that such pre-hearing discovery and live witness testimony is unnecessary in connection with this motion and would unnecessarily expand this litigation. The decisions to be made by the Court at the preliminary injunction stage involve mainly legal, not factual, determinations. The essential relevant facts, for purposes of this motion, are that the Plaintiffs desire to conduct voter registration drives in Georgia during the 2006 election season and that, in connection with such drives, Plaintiffs wish to accept unsealed completed voter registration applications and be able to copy such applications, to facilitate their being able to offer the type of voter registration assistance, quality control, monitoring, and follow-up for get-out-the-vote initiatives that they believe are necessary for an effective civic engagement program. Those facts are already set out extensively in the declarations that accompany Plaintiffs' preliminary injunction motion. To the extent that Defendants have policy justifications or other facts that allegedly motivated their actions, they could likewise assert those by way of declarations. It is undisputed that the challenged State Election Board regulation would prohibit Plaintiffs from being able to conduct their drives in the manner summarized above. Thus, those allegations are sufficient to establish the factual background within which the Court would be able to make its legal determinations — particularly given the Eleventh Circuit and Supreme Court guidance that any interference with Plaintiffs' NVRA or First Amendment rights is presumed to cause irreparable harm. *See, e.g., Elrod v. Burns*, 427 U.S. 347, 373 (1976) (First Amendment); *Charles H. Wesley Educ. Found. v. Cox*, 408 F.3d 1349, 1355 (11th Cir. 2005) (NVRA). It is highly unlikely that any amount of pre-hearing discovery will shed any more light on those essential facts.

depositions would occur. Those facts would be essential for the parties to know prior to undertaking discovery.

As a matter of clarification, Plaintiffs are not asking Defendants to submit “responsive pleadings” (i.e., an Answer) in connection with its preliminary injunction response (although they certainly could if they desired to do so). Therefore, Defendants’ reference to Fed. R. Civ. P. 4(d) is inapposite. Rather, Plaintiffs are asking merely that, in connection with Plaintiffs’ expedited consideration request, the Court simply hold Defendants to their ordinary 10-business-day response time under the rules, and that they allow Plaintiffs a reasonable amount of time (at least 3 business days) to submit a reply brief and the Court at least one business day to review the parties’ briefs in advance of the hearing. That would require Defendants to submit their response earlier than September 8 if we are to have a hearing on September 5, 6, 12, or 13, as the Court previously indicated.

The Bottom Line: A Third Compromise Proposal

If the Court believes, after considering the two proposals, that Defendants are entitled to slightly more response time than August 29, Plaintiffs would propose that **Defendants’ response deadline be set at 6:00 p.m. Friday,**

September 1, and that **Plaintiffs' reply deadline be set three business days later, at 6:00 p.m. Thursday, September 7**, with the **hearing to be set on September 12 or 13**. The brief page limitations would be as set forth in Plaintiffs' motion for expedited consideration. Plaintiffs also request that, if the Court is permitting pre-hearing depositions, it adopt the limitations set forth in Plaintiffs' proposed schedule. Finally, Plaintiffs request that the Court indicate whether it is permitting or requiring live witness testimony at the preliminary injunction hearing.

Respectfully submitted this 24th day of August, 2006.

s/ Bradley E. Heard, Esq.

Georgia Bar No. 342209

MOLDEN HOLLEY FERGUSON

THOMPSON & HEARD, LLC

34 Peachtree Street, NW, Suite 1700

Atlanta, GA 30303-2337

Tel.: 404-324-4500

Fax: 404-324-4501

Email: bheard@moldenholley.com

Counsel for All Plaintiffs

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

s/ Bradley E. Heard, Esq.
Georgia Bar No. 342209

CERTIFICATE OF SERVICE

This will certify that I have this day electronically filed the within and foregoing **Plaintiffs' Response to Defendants' Proposed Schedule for Preliminary Injunction Hearing** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

Stefan E. Ritter, Esq.
Senior Assistant Attorney General
Department of Law, State of Georgia
40 Capital Sq SW
Atlanta, GA 30303

Dated this 24th day of August, 2006.

Respectfully Submitted,

s/ Bradley E. Heard, Esq.
Georgia Bar No. 342209

EXHIBIT A

Bradley E. Heard

From: "Bradley E. Heard" <bheard@moldenholley.com>
To: "Stefan Ritter" <Stefan.Ritter@LAW.State.GA.US>
Cc: "Dennis Dunn" <Dennis.Dunn@LAW.State.GA.US>; ""Estelle Rogers' "" <erogers@advancementproject.org>; ""Brian Mellor' "" <electioncounsel1@projectvote.org>; ""Hayes, Dennis C.' "" <dhayes@naacpnet.org>; ""Richardson, Latisha' "" <lrichardson@naacpnet.org>; ""Aurora Vasquez' "" <avasquez@advancementproject.org>
Sent: Monday, August 21, 2006 9:49 PM
Subject: Re: ACORN v. Cox -- Proposed PI Hearing Schedule

Stefan:

Mr. Kettenring is not available that late in the afternoon on Friday. We will look to see what other dates/times are available and whether he will be available in Atlanta or Florida. We will also identify the appropriate 30(b)(6) witnesses to discuss the discoverable factual topics that you identified. We do not expect that anyone will be available to testify as to legal arguments made by counsel -- either in briefs that they did not write or at hearings that they did not attend. That's not an appropriate topic for witness testimony anyway. As I mentioned to you before, at the courthouse, it is simply not possible to have one plaintiff group speak for the other as to how their specific drive(s) were conducted, so if you feel that you need that type of information for purposes of a preliminary injunction hearing, I suppose you'll need to depose all of the organizations.

Secretary Cox is the chief election official of the State and the Chair of the SEB. She was present at the meetings where the amendments in question were discussed, and she voted in favor of the challenged amendments. She is also intimately familiar with the various other ways in which her office and the Board have attempted to restrict private voter registration activity within the state, and she is likewise presumably familiar with the reasons why she and the SEB did so. She is a fact witness. That is why we would need to depose her, given your insistence on actually having an evidentiary hearing instead of proceeding on affidavits, briefs, and oral argument as we originally suggested.

As the Court's docket reflects, we filed a certificate of service on August 15, indicating hand-delivery service of the Complaint, PI motion and brief, and motion to expedite upon you and Dennis Dunn. You acknowledged in open court today that your office likely received the package that day, but that you did not actually get it until the morning of August 16. We asked you to acknowledge service of the Complaint last week. To date, you have not done so.

We have attempted to work on a joint proposed scheduling order with you. It is apparent to me that we are not in agreement as to what that order should be. Therefore, as the Court directed, we will submit our own proposal. Thanks.

--

Bradley E. Heard, Esq.
Molden Holley Ferguson Thompson & Heard, LLC
One Park Tower
34 Peachtree Street, NW, Suite 1700
Atlanta, GA 30303-2337
Tel: (404) 324-4500, Ext. 204
Fax: (404) 324-4501
bheard@moldenholley.com
<http://www.moldenholley.com>

8/23/2006

----- Original Message -----

From: "Stefan Ritter" <Stefan.Ritter@LAW.State.GA.US>

To: "Bradley E. Heard" <bheard@moldenholley.com>; "Stefan Ritter" <Stefan.Ritter@LAW.State.GA.US>

Cc: "Dennis Dunn" <Dennis.Dunn@LAW.State.GA.US>; "'Estelle Rogers'" <erogers@advancementproject.org>; "'Brian Mellor'" <electioncounsel1@projectvote.org>; "'Hayes, Dennis C.'" <dhayes@naacpnet.org>; "'Richardson, Latisha'" <richardson@naacpnet.org>; "'Aurora Vasquez'" <avasquez@advancementproject.org>

Sent: Monday, August 21, 2006 7:59 PM

Subject: RE: ACORN v. Cox -- Proposed PI Hearing Schedule

>I am working on finding a time to take Mr. Kettenring on Wednesday as a
> courtesy to him. Currently the earliest I could do it is 4:30 p.m. (pending
> finding an available court reporter, etc.). If that does not work we will
> travel to take his deposition or I will subpoena him to the hearing, though
> I prefer to take his deposition.

>
> As a courtesy please note that I anticipate that some or all of the
> depositions I will take (with the exception of your one client who is not an
> organization) will be 30(b)(6) depositions. I will want person(s) who can
> speak on behalf of the organizations as to their voter registration drive
> process, both in general and as to how they are conducted in Georgia, the
> specifics of the voter registration drives that have been conducted in
> Georgia over the last two years (including the process, the number of
> registrants, the number of drives, the places where they were conducted),
> the future drives that are planned over the next year in Georgia, the
> Plaintiffs' statements in the affidavits, your brief, and the Complaint, and
> the statements that were made by you today at oral argument. I am informing
> you of this now so that you may begin to determine who these witnesses are.

>
> Unless I hear otherwise (and you have not responded to my request that we
> limit discovery for the moment by designating a few persons to speak on
> behalf of all your clients), I will take a 30(b)(6) from each of your
> clients who conduct voter registration drives and a deposition of your
> individual client.

>
> Please inform me of the basis of your desire to take Ms. Cox's deposition.
> I do not believe she is a fact witness. I do not anticipate submitting an
> affidavit from her. Of course, you have submitted numerous sworn statements
> -- as well as made numerous factual statements orally and in your pleadings
> -- which I am sure you realize subjects your clients to discovery.

>
> Unfortunately, and as I think you know, many of the statements in your email
> below are incorrect. I am disappointed that you will not work on an
> appropriate scheduling order as the court instructed.

>
> You state that you hand served the Complaint and associated pleadings on
> August 15. Please provide proof to me that this happened, since this is not
> on record in the court. Please tell me each person you served, to whom you
> served them, and the capacity in which you served them. My belief is that
> no service will have occurred until tomorrow when I anticipate I can
> acknowledge on behalf of my clients. I have been diligent in this respect.
> Your statement below that I have refused to acknowledge service is patently
> false.

>
> STEFAN RITTER
> Senior Assistant Attorney General

>
> -----Original Message-----

> From: Bradley E. Heard

> To: 'Stefan Ritter'

> Cc: 'Dennis Dunn'; 'Estelle Rogers'; 'Brian Mellor'; 'Hayes, Dennis C.';
> 'Richardson, Latisha'; 'Aurora Vasquez'
> Sent: 8/21/06 6:29 PM
> Subject: RE: ACORN v. Cox -- Proposed PI Hearing Schedule
>
> Stefan:
>
> I will take, from your response below, that we are not in agreement as
> to a joint proposed schedule; accordingly, we will submit our own
> proposal to the Court.
>
> Your contentions as to the application of Local Rules 6.1 and 7.1 are
> wholly without merit. Your response time was appropriately calculated
> at 10 business days based on a September 15 hand-delivery service of the
> referenced motions. You were also served with a copy of the Complaint
> at that time. Your refusal to acknowledge service in the interim should
> not give you additional time when you knew a lawsuit and a preliminary
> injunction motion with an expedited hearing request was pending against
> your clients. You've had the pleadings for almost a week now. You will
> have had ample time to respond to the motion by August 29.
>
> You did not indicate whether you wished to depose Mr. Kettenring on
> Wednesday, when he will be in town. We cannot guarantee that he will be
> in town again prior to a hearing on this motion, so if you want to take
> his deposition, we need to know now so that we can schedule his time
> accordingly. You also failed to advise as to who else you needed to
> depose. We need to know this information immediately, so we can put
> those witnesses on notice and find their available times and dates.
>
> As I said initially, we are not the ones who are insisting upon
> depositions and an evidentiary hearing. However, if Defendants are (and
> the Court seemed inclined to allow you to do so), then we will not be
> denied our right to take relevant pre-hearing discovery either.
> Secretary Cox, Kathy Rogers, Cliff Tatum, and one or more of the other
> SEB members are certainly relevant witnesses, and we fully intend to
> depose and examine them if you move forward with your request for an
> evidentiary hearing. I would ask that, no later than 12:00 noon on
> Wednesday, you give me dates and times during the week of August 28 when
> these witnesses will be available; otherwise, I will have to select
> dates based solely on times that are available and convenient for my own
> schedule. (We will determine our need to depose other SEB members after
> taking the depositions of Secretary Cox, Ms. Rogers, and Mr. Tatum.)
>
> Incidentally, I don't know how or why you would contend that you would
> need deposition testimony from nonparty, nonlawyer witnesses as to my
> characterizations of prior litigation to the Court during a status
> conference. The Court is fully capable of reviewing the relevant
> published decisions, applying the law as stated therein, and drawing its
> own conclusions as to my characterizations of the prior litigation.
>
> Finally, the individual capacity claims are firmly rooted in our
> contention that your clients violated clearly established law, both as
> to the NVRA and the First Amendment, particularly in light of the 11th
> Circuit decision in Wesley, which was just handed down last year. We
> will not dismiss those claims.
>
> Please give me a call if you wish to discuss any of these items in
> greater detail. Thanks.
>
> _____
>

8/23/2006

> From: Stefan Ritter [<mailto:Stefan.Ritter@LAW.State.GA.US>]
> Sent: Monday, August 21, 2006 5:54 PM
> To: 'Bradley E. Heard'
> Cc: Dennis Dunn
> Subject: RE: ACORN v. Cox -- Proposed PI Hearing Schedule
>
>
>
> Brad:
>
>
>
> I thought the court was very clear with you today that the August 29th
> date you claim as a response date will not do. You are also misapplying
> Local Rule 7.1(B) as well as ignoring the rules governing how to count
> time in Local Rule 6.1(A). Of course, the time frames run from service
> as well; there has been no service yet at all. I am hopeful to hear
> from all of my clients by tomorrow and acknowledge service by then, as I
> said today in open court. I will not delay acknowledgment, but the fact
> is service has not yet occurred.
>
>
>
> I am willing to work with you on a fair and appropriate timetable. I
> have previously suggested to you that September 8, 2006, is an
> appropriate timetable for the Defendants' initial responsive pleadings,
> assuming we can get depositions done, of which I am hopeful. I think
> that is less time than the Court was prepared to give me; it is
> certainly less time than the Court suggested, since the Court among
> other things talked about the possibility of Defendants' response during
> the week of the 11th.
>
>
>
> As to depositions, I think there is little choice given the oral
> representations you made about your client's supposed burden, the
> reasons for the regulation, your characterizations of the prior
> litigation, etc., today at the hearing, which I feel I must address.
> Certainly my clients are entitled to examine the facts you claim, as
> well as to present the correct facts, and we will not be denied that.
>
>
>
> I have suggested, to streamline the discovery process, that you
> designate one or two witnesses to testify first from the Plaintiffs'
> side, agreeing that all of your clients be bound by their testimony.
> This will allow us to avoid repetitive depositions, even if it does not
> eliminate the need for all fact witnesses. You have refused.
>
>
>
> I am not happy to hear that you wish to take retaliatory depositions and
> subpoena witnesses who have nothing relevant factually to contribute to
> the preliminary injunction hearing. For what it's worth, I plan to have
> Kathy Rogers at the preliminary injunction hearing (pending her
> availability, of which I will know of in several days). I think she can
> speak for all of the Defendants, so redundant testimony/depositions by
> you of multiple Defendants are unnecessary. Unlike your clients, my
> individually clients are not relevant fact witnesses but are for all
> practical purposes named due to their offices only.
>

>
>
> Finally, I must draw your attention to the fact that your individual
> capacity claims against the Defendants are not warranted by the existing
> law, are frivolous and are intended to harass the Defendants, and so are
> in violation of Fed. R. Civ. Proc. 11(b). I request that you
> immediately dismiss the individual capacity claims.
>
>
>
> I appreciate your immediate attention to the above.
>
>
>
> STEFAN RITTER
>
> Senior Assistant Attorney General
>
> (404) 656-7298
>
>
>
> -----Original Message-----
> From: Bradley E. Heard [<mailto:bheard@moldenholley.com>]
> Sent: Monday, August 21, 2006 4:52 PM
> To: 'Stefan Ritter'; 'Dennis Dunn'
> Cc: 'Brian Mellor'; 'Estelle Rogers'; 'Elizabeth Westfall'; 'Aurora
> Vasquez'; 'Hayes, Dennis C.'; 'Richardson, Latisha'
> Subject: ACORN v. Cox -- Proposed PI Hearing Schedule
> Importance: High
>
>
>
> Stefan/Dennis D.:
>
>
>
> As a follow-up to Stefan's and my conversations after the status
> conference hearing today, and in a further effort to reach an agreement
> with the SEB Defendants concerning scheduling, and after consulting with
> my clients, we are prepared to offer the following:
>
>
>
> 1. Defendants will have the full 10 business days to which they
> are allotted under Local Rule 7.1(B) to file a response to the
> preliminary injunction motion -- which would make Defendants' brief due
> on Tuesday, August 29.
>
>
>
> 2. Plaintiffs will have until Tuesday, September 5, to file a
> reply brief, with a hearing to be scheduled on Wednesday, September 6
> (one of the dates Judge Camp indicated he'd be available to hold a
> hearing).
>
>
>
> 3. The page limitations for briefs would be as set forth in our
> previous motion and proposed order.
>

8/23/2006

>
>
> 4. You indicated you wanted to depose certain individuals,
> including out-of-town witnesses. Please indicate whom you wish to
> depose and how long you anticipate each deposition being. Brian
> Kettenring (who resides in Florida) is scheduled to be in Atlanta this
> Wednesday, August 23, if you need to depose him, so please advise ASAP
> if you intend to take his deposition, so we can carve out some time for
> him on that day. The other party witnesses are in Georgia, and we are
> attempting to find times for them to be available this week as well.

>
>
>
> We reiterate that we do not believe depositions and an evidentiary
> hearing are necessary at this stage, given that the declarations contain
> all of the relevant factual information that these witnesses have and
> that the determination that the Court will need to make at this stage is
> largely a legal one. Such depositions will serve only to needlessly
> expand the scope and costs of this litigation, including unnecessarily
> multiplying the attorneys' fees and costs. Nevertheless, that is your
> clients' choice, and we are attempting to be accommodating to your
> request.

>
>
>
> Also please be aware that, if you are intent on having pre-hearing
> discovery and a live evidentiary hearing in connection with this motion,
> we will probably need to call Secretary Cox, members from her office
> (e.g. Cliff Tatum), and members of the SEB to testify at the hearing as
> well, and we will likely need pre-hearing depositions from them too.

>
>
>
> Please let me hear from you today as to whether we have an agreement as
> to scheduling and what your pleasure is on depositions and a full-blown
> evidentiary hearing. Thanks.

>
>
>
> --
>
>
>
> Bradley E. Heard, Esq.
>
> Molden Holley Fergusson Thompson & Heard, LLC
>
> One Park Tower
>
> 34 Peachtree St NW, Suite 1700
>
> Atlanta, GA 30303-2337
>
> Phone: 404-324-4500 Ext. 204
>
> Fax: 404-324-4501
>
> <<mailto:bheard@moldenholley.com>> bheard@moldenholley.com
>
> <<http://www.moldenholley.com/>> www.moldenholley.com
>

>
>
> Confidentiality Notice
>
>
>
> This message is being sent by or on behalf of a lawyer. It is intended
> exclusively for the individual or entity to whom or which it is
> addressed, and no one else should rely on the contents thereof. This
> communication may contain information that is proprietary, privileged,
> confidential, or otherwise legally exempt from disclosure. If you are
> not the named addressee, you are not authorized to read, print, retain,
> copy or disseminate this message or any part of it. If you have
> received this message in error, please notify the sender immediately by
> email and delete all copies of the message. The inadvertent disclosure
> rules under Georgia law apply to this communication. No attorney-
> client relationship exists by virtue of this communication without a
> signed engagement letter on file with Molden Holley Fergusson Thompson &
> Heard, LLC.
>
>
>
>
>
>