

**IN THE CIRCUIT COURT OF SEBASTIAN COUNTY, ARKANSAS
FORT SMITH DISTRICT
SIXTH DIVISION**

DON PAUL BALES, et al.

PLAINTIFF

VS.

CASE NO. CV-14-0023

THE CITY OF FORT SMITH, ARKANSAS, et al.

DEFENDANTS

**MOTION TO COMPEL DISCOVERY
WITH INCORPORATED BRIEF**

COME NOW the Plaintiffs – Don Paul Bales, Rick Entmeier, and Wendall Sampson – by and through their attorneys, Matthew D. Campbell and Tyler Henderson of Pinnacle Law Firm, PLLC, and for their Motion to Compel Discovery, state:

1. On January 21, 2014, Plaintiffs served Requests for Admission (“Lindsey RFAs”), Requests for Production (“Lindsey RFPs”) (Exhibit 1), and Interrogatories (“Lindsey Interrogatories”) (Exhibit 2) upon Separate Defendant Kevin D. Lindsey (“Lindsey”), through his attorney, Douglas Carson (“Carson”).
2. On January 30, 2014, Plaintiffs served Requests for Production and Interrogatories on Separate Defendants Jarrard Copeland and Alan Haney. These are attached hereto as Exhibit 3 (“Copeland RFPs”), Exhibit 4 (“Haney RFPs”), Exhibit 5 (“Copeland Interrogatories”), and Exhibit 6 (“Haney Interrogatories”).
3. Initially, Lindsey’s responses were due on or before February 21, 2014, and Copeland and Haney’s responses were due March 3, 2014.
4. Carson called Plaintiffs’ attorney on February 20, 2014, acknowledging that Lindsey’s answers to the January 21 discovery requests were due on or before February 21, 2014;

stating that Lindsey's answers to the Lindsey RFAs would be provided shortly after the February 20 telephone call; and affirming that answers to the Lindsey Interrogatories and Lindsey RFPs would be provided on February 21.

5. Lindsey's answers to Plaintiffs' RFAs were provided on February 20. Plaintiffs reserve the right to further object to Lindsey's RFAs at a later date.
6. On February 21, Carson called Plaintiffs' attorney to ask if responses to the Lindsey RFPs and Lindsey Interrogatories could be provided on February 24, because Lindsey would be available on February 24 to review and locate responsive documents. Plaintiffs' attorney agreed to this request.
7. Carson called Plaintiffs' attorney on February 28, acknowledged that Plaintiffs' attorney had been "very generous" in agreeing to extensions of time, and asking if Lindsey could have until March 3 to respond to the Lindsey RFPs and Lindsey Interrogatories. Plaintiffs' attorney agreed to this request, and he gave Carson until March 5 to supply responses to the Copeland RFPs, the Haney RFPs, the Copeland Interrogatories, and the Haney Interrogatories.
8. On March 3, Carson's firm – like much of Fort Smith – was closed due to a snowstorm the previous evening.
9. On March 4, Carson called Plaintiffs' attorney, stated that Plaintiffs would receive responses to the discovery requests that same day after Lindsey came to Carson's office to "go over [the answers]," and noted the good working relationship that Carson and Plaintiffs' attorney had developed throughout the process. No reference was made to the

remaining discovery requests – the Haney RFPs, the Copeland RFPs, the Haney Interrogatories, and the Copeland Interrogatories.

10. Plaintiffs' attorney did not receive Lindsey's responses to Plaintiffs' RFPs or Interrogatories on March 4, despite Carson's statements.
11. On March 6, Plaintiffs' attorney emailed Carson, inquiring as to why none of the discovery requests had been supplied at that point.
12. Carson immediately called Plaintiffs' attorney, stating that Lindsey had been injured in a Segway accident while on his way to Carson's office to review the discovery answers. Carson requested that he be allowed to supply the discovery answers by March 7.
13. On March 7, Carson again called Plaintiffs' attorney, stating that Lindsey was still somewhat injured from his Segway accident, was unable to get to Carson's office on March 7 to finalize the discovery answers, and would certainly be able to provide the answers no later than March 10.
14. On Monday, March 10, 2014, at 3:00 p.m., Carson called Plaintiffs' attorney to inform the latter that Lindsey's discovery response would be provided on that same day and asking for permission to provide Haney and Copeland's responses by March 12.
15. Again, Plaintiffs' attorney agreed to Carson's request, in large part because Plaintiffs' attorney assumed that Lindsey's responses, which were to be provided later that day, would be voluminous, and two extra days for Haney and Copeland would give Plaintiffs time to review the responses to the Lindsey Interrogatories and the Lindsey RFPs.
16. At 6:58 p.m. on March 10, Carson provided Lindsey's purported responses to Plaintiffs' discovery requests.

17. Despite receiving seventeen (17) extra days in which to respond to Plaintiffs' discovery requests, Lindsey's answers to Plaintiffs' Interrogatories (Exhibit 7) were inadequate inasmuch as, *inter alia*, Lindsey:

- a. Gave a purposefully evasive answer to Interrogatory No. 3 by pretending not to understand the plain-language meaning of "oral or written statements;"
- b. Gave an incomplete and purposefully evasive answer to Interrogatory No. 4 by failing to fully respond to the question as presented by Plaintiffs;
- c. Gave an incomplete and insufficient answer to Interrogatory No. 5 by failing to provide contact information for specified personnel and by suggesting that Plaintiffs must contact non-party witnesses only through Defendants' counsel;
- d. Gave insufficient answers to Interrogatory Nos. 6, 7, and 8 by suggesting the Plaintiffs were not entitled to receive documents that were previously referenced in Freedom of Information requests;
- e. Gave an insufficient answer to Interrogatory Nos. 8 and 9 by failing to specify the purpose(s) for which certain evidence might be introduced at trial;
- f. Gave an insufficient answer to Interrogatory No. 10 by failing to obtain documentation or provide requested details regarding previous lawsuits filed against Lindsey while he was employed in St. Charles, Missouri, despite the plain language of Ark. R. Civ. P. 33(a); and
- g. Gave an insufficient answer to Interrogatory No. 11 by stating that the information would be provided at some unspecified future date, despite already having 47 days in which to locate and provide the information.

18. Despite receiving seventeen (17) extra days in which to respond to Plaintiffs' discovery requests, the responses to the Lindsey RFPs (Exhibit 8) were inadequate inasmuch as, *inter alia*, Lindsey:

- a. Gave an insufficient response to RFP No. 1 by failing to provide all documents referenced in response to the Lindsey Interrogatories;
- b. Gave insufficient responses to RFP Nos. 1, 2, 3, 4, and 9 by suggesting that previous responses to FOIA requests obviated Lindsey's duty to provide the information as requested in Plaintiffs' RFPs;
- c. Gave an insufficient response to RFP No. 5 by answering "N/A" to a request for documentation, in any form whatsoever, for an allegation that was entered and investigated as an Administrative Inquiry;
- d. Gave an insufficient response to RFP No. 6 by answering "N/A" to a request for all documentation, in any form, for all other grievances and/or administrative inquiries filed against Plaintiffs;
- e. Gave an insufficient response to RFP No. 7 by stating that a "search is underway" for certain documents, despite having had 47 days in which to conduct the investigation and provide the documents;
- f. Gave an insufficient response to RFP No. 10 by answering "N/A" to a request for all documentation, in any form, of communications between Lindsey and Dawn Sprayberry regarding any investigation of any Plaintiff;
- g. Gave an insufficient response to RFP No. 11 by stating that certain requested documents "will be produced if not previously produced" without identifying the

documents, determining whether they had been previously produced, and producing the remainder, despite having had 47 days in which to locate and produce the same;

- h. Gave an insufficient response to RFP Nos. 12 and 13 by stating that requested schedules, time sheets, and other records “will be produced,” with no statement as to the date and time of production, and despite Lindsey’s already having had 47 days in which to locate and produce the records;
 - i. Gave an insufficient response to RFP No. 16 by failing to provide any of the requested information and hiding behind baseless objections as to burden and relevance, without explanation;
 - j. Gave an evasive, disingenuous response to RFP No. 17 by suggesting that it was unclear whether any documents existed in Capt. Alan Haney’s computer, failing to produce any such documents, pretending that an investigation into the mere existence of documents was ongoing, and stating that such documents would be provided at some unspecified date and time in the future.
19. Aside from the referenced objections to Lindsey RFPs No. 16 and 17, no objections were made to Plaintiffs’ requests. The objections to RFPs No. 16 and 17 were not made within the timeframe allowed by Plaintiffs’ attorney at Carson’s request.
20. On March 11, 2014, Plaintiffs’ attorney sent a good-faith letter (Exhibit 9), via email, to Carson, informing Carson of the flaws in Lindsey’s responses and giving Carson until 4:00 p.m. on Friday, March 13, 2014, to provide proper responses to the Lindsey Interrogatories and Lindsey RFPs, as well as to the Copeland Interrogatories, Copeland

RFPs, Haney Interrogatories, and Haney RFPs, all of which were past due as of the time that the good-faith letter was sent.

21. On the afternoon of March 11, 2014, Carson called Plaintiffs' attorney to discuss the good-faith letter. During this conversation, Carson acknowledged that documents provided in prior Freedom of Information Act ("FOIA") requests were not fulfillment of a discovery request and that not one document had been provided with Lindsey's responses.
22. During the March 11, 2014 telephone call, Carson suggested that he and Plaintiffs' attorney should go through the Lindsey Interrogatories and Lindsey RFPs on March 12, via telephone, to determine what had not been produced.
23. On the morning of March 12, 2014, rather than read through Interrogatories and RFPs that Carson and Lindsey had had for 49 days at that point, Plaintiffs' attorney emailed Carson (Exhibit 10), referring to the good-faith letter, further clarifying why the previous responses were not sufficient, and reiterating that Carson had until 4:00 p.m. to provide appropriate responses to all outstanding discovery requests.
24. On March 13, 2014, at 2:29 p.m., Carson called Plaintiffs' attorney to state that the requested documents were being produced on that date, that Carson believed that all of the outstanding discovery requests were being fulfilled, and that Plaintiffs' attorney should review the provided materials and let Carson know if anything was still missing.
25. From 3:53 p.m. to 6:20 p.m. on March 13, 2014, Carson sent Plaintiffs' attorney 15 emails that purported to be responsive to Plaintiffs' discovery requests.

26. Despite the March 11, 2014 good-faith letter, in which Plaintiffs' attorney specified myriad documents that were missing from the response to the Lindsey RFPs, none of those documents were provided by Carson on as an attachment to any of the March 13 emails.
27. Despite receiving nineteen (19) extra days in which to provide proper responses to the Lindsey Interrogatories, no new responses were provided on March 13, leaving only the original, insufficient responses from March 11 as responses to the Lindsey Interrogatories.
28. Despite receiving ten (10) extra days in which to respond to Plaintiffs' discovery requests, the responses to the Copeland Interrogatories (Exhibit 11) were inadequate inasmuch as, *inter alia*, Copeland:
- a. Provided an insufficient response to Interrogatory No. 7 by stating, "I do not have this information," even though Ark. R. Civ. P. 33(a) requires that the person answering an interrogatory "shall furnish such information as is *available* to the party" (emphasis added), and the information was "available" to Copeland simply by asking a supervisor or having Carson, who is counsel for all named defendants, request the same from Copeland's supervisors; and
 - b. Provided an insufficient response to Interrogatory No. 13 by stating that the name of a certain complainant "will be provided," despite the fact that the interrogatory specifically required Copeland to name the complainant at that time and the deadline for providing answers had passed.
29. Despite receiving ten (10) extra days in which to answer, the responses to the Copeland RFPs (Exhibit 12) were insufficient inasmuch as, *inter alia*, Copeland:

- a. Failed to provide all of the materials referenced in his responses to the Copeland Interrogatories, despite the plain language of Copeland RFP No. 1;
 - b. Failed to locate or provide previously deleted emails, or address that portion of Plaintiffs' request in RFP No. 3;
 - c. Failed to provide the investigative file requested in RFP No. 4 and provided a misleading and evasive answer, despite Copeland's answer to Interrogatory No. 15 referencing a departmental investigation and despite an FSPD policy provided in response to Interrogatory No. 14 making clear that the requested file was to be retained for three years; and
 - d. Failed to provide the records requested in RFP No. 5, and suggested that the same did not exist, despite stating in a summary of a conversation with Dawn Sprayberry (produced in response to Haney RFP No. 8) that Sprayberry had seen multiple records that were responsive to this request.
30. Copeland did not object to any of the Copeland Interrogatories or Copeland RFPs.
31. Despite receiving ten (10) extra days in which to respond to Plaintiffs' discovery requests, the responses to the Haney Interrogatories (Exhibit 13) were inadequate inasmuch as, *inter alia*, Haney:
- a. Provided an insufficient response to Interrogatory No. 2 by broadly referring to prior FOIA requests as possibly containing responsive documents, without specifying in what way those documents were responsive or where Plaintiffs could locate the same;

- b. Provided an insufficient response to Interrogatory No. 4 by failing to provide the required information about the identified persons, despite the plain language of Plaintiffs' Interrogatories stating, "Whenever you are asked to identify any person or organization, the same is to be identified by giving the full name, current or last-known street address, telephone number, and the individual's employer (if known);"
 - c. Provided an insufficient response to Interrogatories No. 5 and 6 by failing to answer questions related to Haney's tax returns; claiming that the same was irrelevant; failing to make these objections within 30 days of service as required by Ark. R. Civ. P. 33(b) (or within the timeframe granted by Plaintiffs' attorney); and failing to apply for a protective order under Ark. R. Civ. P. 26(c), as required under *Calandro v. Parkerson*, 333 Ark. 603, 970 S.W.2d 796 (1998); and
 - d. Provided an insufficient response to Interrogatory No. 10 by failing to provide the requested information regarding the parties, court, and lawsuit generally, as requested in the interrogatory.
32. Despite receiving ten (10) extra days in which to answer, the responses to the Haney RFPs (Exhibit 14) were insufficient inasmuch as, *inter alia*, Haney:
- a. Failed to provide all of the materials referenced in his responses to the Haney Interrogatories, despite the plain language of RFP No. 1;
 - b. Provided an insufficient response to RFP No. 2 by broadly referencing prior FOIA requests, despite Carson's previous admission to Plaintiffs' attorney that FOIA responses were not necessarily responses to discovery request and without

specifying which documents were being reference, when they were provided, and where Plaintiffs could find them;

- c. Provided an insufficient response to RFP No. 3 by failing to provide any previously deleted emails and failing to reference that part of Plaintiffs' request;
 - d. Failed to provide the documents requested in RFP No. 4 and failed to object to production of the same within the 30 days of service or within the original timeframe granted by Plaintiffs' attorney, as required by *Lake Village Healthcare Center, LLC v. Hatchett*, 2012 Ark. 223, 407 S.W.3d 521 (2012); and
 - e. Provided misleading and insufficient responses to RFPs No. 5, 6, and 7, by stating that he lacked "the ability or authority" to provide the requested information, despite producing documents in response to Interrogatory No. 14 / RFP No. 1 that were similar in nature and level of access required to the documents requested in RFPs No. 5, 6, and 7; despite being able, with minimal effort to obtain the requested information from Lindsey or another supervisor; and despite Carson's ability to obtain the same, on behalf of Haney, by contacting Lindsey.
33. The responses to the Lindsey Interrogatories, the Copeland Interrogatories, and the Haney Interrogatories were improper due to the failure of Lindsey, Copeland, and Haney to sign their responses as required by Ark. R. Civ. P. 33(b)(2). The Arkansas Rules of Civil Procedure do not allow Carson to sign the interrogatory responses for each named Defendant, which is what Carson has purported to do; the rules only allow him to sign the objections to specific interrogatories.

34. Given that Carson intimated to Plaintiffs' attorney on three separate occasions that the delay in providing responses to the Lindsey Interrogatories was a need to Lindsey to review and sign the responses, which provided Carson's basis for requesting at least two extensions of time, Carson's failure to have Lindsey properly sign the Interrogatories is especially confusing.
35. As of the date of filing the instant motion, Lindsey has failed to produce or otherwise properly locate within a previously answered FOIA request:
- a. The following documents, records, or other tangible things referenced in his response to the Lindsey Interrogatories and requested by Plaintiffs in Lindsey RFP No. 1:
 - i. "A number of documents authored by potential witnesses," which Lindsey suggested may be responsive (Interrogatory No. 2);
 - ii. "Oral or written statements" from non-parties, which Lindsey suggested may be responsive (Interrogatory No. 3);
 - iii. Pertinent emails located during the search of the email server on August 5 and/or "records" that Lindsey wanted to "protect and secure" by shutting down the server (Interrogatory No. 4);
 - iv. The "sizable" number of documents that Lindsey referenced as possibly responsive (Interrogatory No. 6);
 - v. The "traffic review video" and any "others" that "will be identified" (Interrogatory No. 9);

- vi. Records relating to lawsuits filed against Lindsey while he worked in St. Charles, Missouri (Interrogatory No. 10);
- vii. Records related to previous lawsuits against FSPD, which should have been easy to produce, given that Daily & Woods, as city attorney for nearly four decades, would have access to the files (Interrogatory No. 11);
- viii. The “authorization of Acting Chief Mark Hallum” and “conclusion” made by Lindsey (Interrogatory No. 12);
- ix. Interview with Communicator Ruttle (Interrogatory No. 14);
- x. Additional interview with Angela McCabe (Interrogatory No. 14);
- xi. Any “documented behavior” from Cpl. Sampson (Interrogatory No. 14);
- xii. Records related to the Kegen Bevil allegation about Angela McCabe’s use of pain pills while on duty (Interrogatory No. 14);
- xiii. Interviews with witnesses re: Lee McCabe (Interrogatory No. 14);
- xiv. Any documentation of Ms. McCabe’s “behavior” (Interrogatory No. 14);
- xv. Hunter Bonar’s text messages (Interrogatory No. 14);
- xvi. Documentation that the Angela McCabe complaint was initially entered as Class A (Interrogatory No. 16);
- xvii. “Documentation” concerning Angela McCabe’s complaint (Interrogatory No. 17);
- xviii. The recommendations of Maj. Hallum, Capt. Risley, Capt. Hammond, and Capt. Rannells (Interrogatory No. 18);

- xix. Records relating to Dewey Young and Brandon Bird's complaint about Plaintiffs' access of telephone records (Interrogatory No. 19);
 - b. Emails dating back to July 1, 2012, including deleted emails (RFP No. 3);
 - c. Angela McCabe complaint file (RFP No. 4);
 - d. The initial complaint, Blue Team entry, and investigative file regarding Dewey Young's telephone-records allegation (RFP No. 5);
 - e. Records of any previous investigations into Alan Haney (RFP No. 7);
 - f. All communications with Dawn Sprayberry regarding her investigation of Sgt. Bales, Sgt. Entemeier, and Cpl. Sampson, despite Cpl. Smithson having previously stated that Sprayberry investigated Dewey Young's phone-records allegations (RFP No. 10);
 - g. All communications with any named party regarding any investigation of Sgt. Bales, Sgt. Entmeier, and/or Cpl. Sampson, despite stating that such communications "will be produced" (RFP No. 11);
 - h. All referenced schedules, timesheets, and requests for leave (RFP No. 12);
 - i. All communication with any third party regarding Emily Haney's use of overtime, despite stating that the same would be produced (RFP No. 13);
 - j. Investigatory file of every citizen complaint filed during Lindsey's time as chief of police (RFP No. 16)
 - k. All documents on Alan Haney's computer or FSPD network drive (RFP No. 17).
36. As of the date of filing the instant motion, Copeland has failed to produce or otherwise properly locate within a previously answered FOIA request:

- a. The following documents, records, or other tangible things referenced in his response to the Copeland Interrogatories and requested by Plaintiffs in Copeland RFP No. 1:
 - i. Information regarding the IA Pro software (Interrogatory No. 7);
 - ii. Information regarding citizen complaint filed against Copeland (Interrogatory No. 13);
 - iii. All relevant policies and procedures of the FSPD (Interrogatory No. 14);
 - iv. Documentation of Rhonda Harper's allegations regarding Dawn Sprayberry (Interrogatory No. 15);
 - b. All emails, including previously deleted emails, between Copeland and any named party, from July 1, 2012 to present (RFP No. 3);
 - c. Investigatory file of Dawn Sprayberry (RFP No. 4);
 - d. All records of IA Pro software showing activity or access of files that did not actually occur (RFP No. 5); and
 - e. All communication, in any form, regarding any administrative inquiry or investigation of Sgt. Bales, Sgt. Entmeier, and/or Cpl. Sampson (RFP No. 6).
37. As of the date of filing the instant motion, Haney has failed to produce or otherwise properly locate within a previously answered FOIA request:
- a. The following documents, records, or other tangible things referenced in his response to the Haney Interrogatories and requested by Plaintiffs in Haney RFP No. 1:

- i. Information regarding certain people identified in Haney's responses, as required by the terms of the Interrogatories (Interrogatory No. 4);
- ii. File of lawsuit filed by Judy Holbird (Interrogatory No. 10);
- iii. File regarding Haney's public intoxication charge (if available) (Interrogatory No. 15);
- iv. File regarding Rocky Woods' complaint against Haney (Interrogatory No. 16);
- v. File regarding Haney's complaint against Matthew Holloway (Interrogatory No. 17);
- vi. File regarding Haney's complaint against a "uniformed officer and a dispatcher" (Interrogatory No. 17);
- vii. File regarding Haney's complaint against an "officer for reckless driving" (Interrogatory No. 17);
- b. All emails between Haney and any other named party, including deleted emails, from July 1, 2012, to present (RFP No. 3);
- c. Tax returns for Haney and his wife (RFP No. 4);
- d. Security camera footage (RFP No. 5);
- e. Original, electronic version of documents entered into Blue Team regarding Addisen Entmeier (RFPs No. 6 and 7); and
- f. All communications with any other person regarding any investigation of Sgt. Bales, Sgt. Entmeier, and/or Cpl. Sampson.

38. No refusal or failure to produce certain requested documents, records, or other tangible items should be allowed simply because the defendant claims that he lacks the authority, ability, authorization, or permission to provide the same. Ark. R. Civ. P. 34(a) requires production where the party has the “possession, custody or control” of the material sought, and Carson, as attorney for all three defendants named in this motion, could reasonably have facilitated the production.
39. Similarly, because Haney produced the records regarding Jared Scott, Haney demonstrated that he had the ability to obtain records that he otherwise lacked the authority to access, and his failure to provide all requested records is disingenuous at best.
40. No failure to properly answer an interrogatory in this matter based on an alleged lack of immediate knowledge or access should be countenanced by this Court, as Ark. R. Civ. P. 33(a) requires that the party upon whom the interrogatories are served “shall furnish such information as is available to the party.” All of the requested information was “available” to the parties within the meaning of that rule, as all information was available within the records and knowledge of the Fort Smith Police Department, and each defendant needed only to locate the information and provide it.
41. All of Defendants’ responses to Plaintiffs’ respective RFPs were insufficient inasmuch as they failed to comply with Ark. R. Civ. P. 34(b)(3), which requires that the produced information *shall* either be “organize[d] and label[ed] to correspond with the categories in the production request or produce[d] as kept in the usual course of business if the party seeking discovery can locate and identify the relevant records as readily as can the party who produces the documents” (emphasis added).

42. Carson's explicit assertions on March 11, 2013, that he was, as far as he knew, producing all of the previously unproduced documents could not have been made in good faith, as Carson did not send Plaintiffs' attorney even one document from the Lindsey RFPs, which was the primary focus of Plaintiffs' good-faith letter.


43. Based on paragraphs 1 through 24, *supra*, Plaintiffs aver that they have in good faith conferred or attempted to confer with the person failing to make the discovery, in an effort to secure the information or material without court action.

44. Lindsey, Copeland, and Haney – by and through Carson – have almost entirely failed to make the appropriate discovery disclosures, despite Plaintiffs' good-faith efforts to obtain the same, including five extensions of time at Carson's request.

WHEREFORE, premises considered, Plaintiffs pray that this Court will compel Lindsey, Copeland, and Haney to provide appropriate and complete answers/responses to Plaintiffs' Interrogatories and Requests for Production; require Lindsey, Copeland, Haney, or Carson, or all of them, to pay to Plaintiffs the reasonable expenses incurred in making this motion, including attorneys' fees; and any other relief to which Plaintiffs may be entitled.

Respectfully Submitted,

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By: _____
Matthew D. Campbell

/s/ J. Tyler Henderson
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CERTIFICATE OF SERVICE

I, Matthew D. Campbell, do hereby certify that a true and correct copy of the foregoing has been served via electronic mail on the following designated representatives for Defendants on March 17, 2014:

Mr. Rick Wade Daily & Woods, PLLC P.O. Box 1446 Fort Smith, AR 72901 <i>rwade@dailywoods.com</i>	Mr. Doug Carson Daily & Woods, PLLC P.O. Box 1446 Fort Smith, AR 72901 <i>dcarson@dailywoods.com</i>
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Matthew D. Campbell