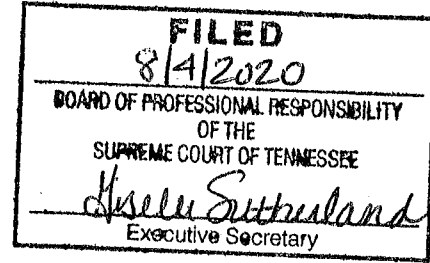


**IN DISCIPLINARY DISTRICT III
OF THE
BOARD OF PROFESSIONAL RESPONSIBILITY
OF THE
SUPREME COURT OF TENNESSEE**



**IN RE: CHARLES GAMMONS WRIGHT
BPR# 000915, Respondent,
An Attorney Licensed to
Practice Law in Tennessee
(Hamilton County)**

DOCKET NO. 2019-3047-3-TL

JUDGMENT OF THE HEARING PANEL

This is a disciplinary proceeding against Charles Gammons Wright, an attorney licensed to practice law in Tennessee. The Petition for Discipline was filed on October 30, 2019 and Mr. Wright timely filed an Answer on December 6, 2019. The final hearing was held on July 15, 2020 in Chattanooga, Tennessee wherein Mr. Wright appeared, *pro se*. After presentation of evidence and the arguments of the parties, the Hearing Panel requested that Mr. Wright and Disciplinary Counsel for the Board submit proposed findings of fact and conclusions of law on or before July 25, 2020. Both counsel for the Board and Mr. Wright timely submitted their proposed findings of fact and conclusions of law to the hearing panel.

Dr. Thomas Brooks retained Mr. Charles Wright to represent him in a federal civil rights lawsuit. On January 23, 2018, a lawsuit was filed by Mr. Wright on behalf of Dr. Brooks against Mr. Kevin Spiegel in his official capacity as Chief Executive Officer of Chattanooga Hamilton County Hospital Authority a/k/a Erlanger Health System. During the course of this lawsuit, Mr. Wright took the deposition of Mr. Spiegel. The deposition was taken on or about August 17, 2018. During Mr. Spiegel's deposition, Mr. Spiegel testified that Erlanger suspended Dr. Brooks' privileges because he refused to submit to a medical exam that included a mental status exam. Mr. Spiegel further testified in the deposition that the request for the mental status examination was in response to an alleged altercation wherein Dr. Brooks allegedly inappropriately grabbed someone's hand.

Mr. Wright testified that following the date of the deposition and for the next couple of months, the relationship between Dr. Brooks and Mr. Wright deteriorated. The hearing panel

accepts the factual assertions made by Mr. Wright that he provided in his Affidavit that he filed in support of his Motion to Withdraw. Those factual assertions support a conclusion that their attorney-client relationship had deteriorated. A copy of the Affidavit was introduced into evidence at the hearing held on July 15, 2020, and a copy of the Affidavit is attached as Exhibit 1 to this Judgment for ease of reference.

On October 16, 2018, Mr. Wright filed a Motion to Withdraw in Dr. Brooks' pending lawsuit, and Mr. Wright submitted the Affidavit which is attached as Exhibit 1 to this Judgment in support of his Motion to Withdraw. The Board contends that the disclosure of information contained in the Affidavit which was provide to the Court and opposing counsel in that lawsuit violated Rule 1.6 of the Tennessee Rules of Professional Conduct "**Confidentiality of Information.**"

At the hearing held on July 15, 2020, the parties disagreed on the issue of whether Local 83.4 of the U.S. District Court for Eastern Tennessee, which governs attorney withdrawal, requires that an affidavit or other documentation be filed in support of an Attorney's Motion to Withdraw. The Board asserts that rule 83.4 does not require the filing on an Affidavit or similar documentation. Mr. Wright contended that Local Rule 7.1 and/or Local Rule 7.2 of the local rules of the U.S. District Court for the Eastern District of Tennessee require some type of supporting information to justify a Motion to Withdraw. The hearing panel finds that Mr. Wright complied with local Rule 83.4 of the local rules of the United States District Court. The Board's counsel conceded this point at the hearing. Furthermore, at the hearing, upon questioning by one of the hearing panel members, the Board's counsel acknowledged that local rule 7.1 and/or local rule 7.2 were applicable to all motions, including a Motion to Withdraw.

The Board of Professional Responsibility does not contend that Mr. Wright violated the Rules of Professional Conduct by withdrawing from the case. However, it is important to note that while the Board of Professional Responsibility does not contend that Mr. Wright violated the Rules of Professional Conduct by withdrawing from the case, the Board clearly stated its position from the beginning of this matter that the Board contends that the disclosure of the information contained in the Affidavit submitted by Mr. Wright to the Court and opposing counsel violated Rule 1.6 of the Rules of Professional Conduct.

It is important for both the Board and Mr. Wright to understand that the issue that the hearing panel must decide is not whether Mr. Wright had a reason to withdraw from the representation of Dr. Brooks. The panel agrees that he did. However, the hearing panel agrees with the Board's counsel that the issue to be decided in this matter is whether, in providing the information contained within the Affidavit to the Court and to opposing counsel, Mr. Wright violated Rule 1.6.

Rule 1.6 of the Tennessee Rules of Professional Conduct provides:

RULE 1.6: CONFIDENTIALITY OF INFORMATION

(a) A lawyer **shall not** reveal **information relating to the representation of a client** unless:

- (1) the client gives informed consent;
- (2) the disclosure is impliedly authorized in order to carry out the representation;
or
- (3) the disclosure is permitted by paragraph (b) or required by paragraph (c).

(b) A lawyer **may reveal** information relating to the representation of a client to the extent the lawyer reasonably believes necessary:

- (1) to prevent the client or another person from committing a crime, including a crime that is reasonably certain to result in substantial injury to the financial interest or property of another, unless disclosure is prohibited or restricted by RPC 3.3;
- (2) to prevent the client from committing a fraud that is reasonably certain to result in substantial injury to the financial interests or property of another and in furtherance of which the client has used or is using the lawyer's services, unless disclosure is prohibited or restricted by RPC 3.3;
- (3) to prevent, mitigate, or rectify substantial injury to the financial interests or property of another that is reasonably certain to result or has resulted from the

client's commission of a fraud in furtherance of which the client has used the lawyer's services, unless disclosure is prohibited or restricted by RPC 3.3;

(4) to secure legal advice about the lawyer's compliance with these Rules; or

(5) to establish a claim or defense on behalf of the lawyer in a controversy between the lawyer and the client, to establish a defense to a criminal charge or civil claim against the lawyer based upon conduct in which the client was involved, or to respond to allegations in any proceeding concerning the lawyer's representation of the client.

(c) A lawyer **shall reveal** information relating to the representation of a client to the extent the lawyer reasonably believes disclosure is necessary:

(1) to prevent reasonably certain death or substantial bodily harm;

(2) to comply with an order of a tribunal requiring disclosure, but only if ordered to do so by the tribunal after the lawyer has asserted on behalf of the client all non-frivolous claims that the information sought by the tribunal is protected against disclosure by the attorney-client privilege or other applicable law; or

(3) to comply with RPC 3.3, 4.1, or other law.

(d) A lawyer shall make reasonable efforts to prevent the inadvertent or unauthorized disclosure of, or unauthorized access to, information relating to the representation of a client.

(Emphasis Added)

In the opinion of the hearing panel, it is clear from the plain language of Rule 1.6 that a lawyer is not permitted to reveal information relating to the representation of a client unless one of the specific subsections of Rule 1.6 or some other rule or law authorizes the lawyer to reveal the information.

In the parties' pre-trial briefs, in the testimony and arguments at the hearing, and in their post-hearing submissions, there is a clear disagreement between the Board's counsel and Mr.

Wright as to whether the information stated by Mr. Wright in the affidavit constituted “information relating to the representation of a client.” The Board takes the position that the information contained within the affidavit constitutes “information relating to Mr. Wright’s representation of Dr. Brooks” and that this language in the Rule 1.6 is broader than just confidential communications covered by the attorney-client privilege. On the other hand, Mr. Wright testified at the hearing that “nothing I said in the affidavit had anything to do with his case” and he restated that position in his post-hearing submission to the panel. Mr. Wright further asserts that he did not violate Rule 1.6 because the information provided in the affidavit was not a confidential communication protected by the attorney-client privilege.

It is the opinion of the hearing panel that the position of the Board’s counsel on this issue is correct. The hearing panel notes that the Board’s position is supported by Comment 3 to rule 1.6 which provides:

“The principle of client-lawyer confidentiality is given effect by related bodies of law: the attorney-client privilege, the work product doctrine, and the rule of confidentiality established in professional ethics. The attorney-client privilege and work product doctrine apply in judicial and other proceedings in which a lawyer may be called as a witness or otherwise required to produce evidence concerning a client. The rule of client-lawyer confidentiality applies in situations other than those where evidence is sought from the lawyer through compulsion of law. The confidentiality rule, for example, applies not only to matters communicated in confidence by the client but also to all information relating to the representation, whatever its source. A lawyer may not disclose such information except as authorized or required by the Rules of Professional Conduct or other law.”

In the opinion of the hearing panel, the information contained within the affidavit constitutes “information relating to the representation of a client” within the meaning of Rule 1.6.

Therefore, the next question to be answered is whether the disclosure of this information to the Court and opposing counsel violated Rule 1.6, or whether the disclosure was authorized or required by Rule 1.6, or, if not authorized by Rule 1.6, by another rule of professional conduct or some other law.

The Board takes the position that the disclosure in the affidavit was not authorized under Rule 1.6 or any other rule of professional conduct or other law. Mr. Wright contends that the disclosure was either impliedly or expressly authorized by Rule 1.16, and also that the due process clause of the Constitution requires the disclosure. In making this latter statement, Mr.

Wright stated at the Board hearing that “Dr. Brooks had a right to procedural due process and to know why I was asking to withdraw from his representation.”

The hearing panel will address each one of these contentions separately.

The first contention is whether the disclosure of the information contained in the Affidavit was allowed or required under Rule 1.6. In Mr. Wright’s written responses to the Board's Request for Admissions, he admitted that he did not have his client’s informed consent to disclose the information contained in the supporting affidavit that he filed with the Motion to Withdraw. Furthermore, Mr. Wright does not contend that the disclosure was impliedly authorized in order to carry out the representation of Dr. Brooks. Therefore, under Rule 1.6, the disclosure of information relating to the representation of Dr. Brooks was not allowed, unless the disclosure was either permitted by Rule 1.6 (b) or required by Rule 1.6(c).

In analyzing whether Mr. Wright was permitted to disclose the information under Rule 1.6 (b), or required disclose the information under Rule 1.6(c), the following undisputed facts are contained within the record.

1. Mr. Wright did not have the consent of the complainant, Thomas J. Brooks, M.D. to disclose the information contained in the supporting affidavit.

Source: Board’s statement of undisputed material facts #4 and Mr. Wright’s response which admitted this statement of fact.

2. The details contained within Mr. Wright’s affidavit in support of his Motion to Withdraw occurred while Dr. Brooks was Mr. Wright's client and occurred while Dr. Brooks’ case was pending before the Court.

Source: Board’s statement of undisputed material facts #5 and Mr. Wright’s response which admitted this statement of fact.

3. The information disclosed by Mr. Wright in his affidavit in support of his Motion to Withdraw does not indicate that Dr. Brooks was committing fraud or attempting to commit fraud.

Source: Board’s statement of undisputed material facts #7 and Mr. Wright’s response which admitted this statement of fact.

4. Dr. Brooks was not committing fraud, nor was he attempting to commit fraud.

Source: Board's statement of undisputed material facts #9 and Mr. Wright's response which admitted this statement of fact.

5. Mr. Wright's disclosure of client information contained in his affidavit in support of his Motion to Withdraw was not made to prevent Dr. Brooks from committing a fraud that was reasonably certain to result in substantial injury to the financial interests or property of another and in furtherance of which Dr. Brooks had used Mr. Wright's services.

Source: Board's statement of undisputed material facts #14 and Mr. Wright's response which admitted this statement of fact.

6. Mr. Wright's disclosure of client information contained in his affidavit in support of his Motion to Withdraw was not made to prevent, mitigate, or rectify substantial injury to the financial interests or property of another that was reasonably certain to result or had resulted from Dr. Brooks' commission of a fraud and in furtherance of which Dr. Brooks had used Mr. Wright's services.

Source: Board's statement of undisputed material facts #15 and Mr. Wright's response which admitted this statement of fact.

7. Mr. Wright's disclosure of client information contained in his affidavit in support of his Motion to Withdraw was not made to secure legal advice about his compliance with the Tennessee Rules of Professional Conduct.

Source: Board's statement of undisputed material facts #16 and Mr. Wright's response which admitted this statement of fact.

8. Mr. Wright's disclosure of client information contained in his affidavit in support of his Motion to Withdraw was not made to establish a claim or defense on his behalf in a controversy between himself and Dr. Brooks, to establish a defense to a criminal charge or civil claim against him based on conduct in which Dr. Brooks was involved, or to respond to allegations in any proceeding concerning his representation of Dr. Brooks.

Source: Board's statement of undisputed material facts #17 and Mr. Wright's response which admitted this statement of fact.

9. Mr. Wright's disclosure of client information contained in his affidavit in support of his Motion to Withdraw was not made to detect or resolve all conflicts of interest arising from a change in his employment.

Source: Board's statement of undisputed material facts #18 and Mr. Wright's response which admitted this statement of fact.

10. Mr. Wright's disclosure of client information contained in his affidavit in support of his Motion to Withdraw was not made to prevent reasonably certain death or substantial bodily injury.

Source: Board's statement of undisputed material facts #19 and Mr. Wright's response which admitted this statement of fact.

11. Senior United States District Judge, Thomas W. Phillips, did not specifically order Mr. Wright to disclose the client information that Mr. Wright provided in his affidavit in support of his Motion to Withdraw in Dr. Brooks' case.

Source: Board's statement of undisputed material facts #20 and Mr. Wright's response which admitted this statement of fact.

In addition to the foregoing undisputed facts, Mr. Wright also testified before the hearing panel that he was not ordered to submit the information contained in the affidavit by the United States Magistrate that heard the Motion to Withdraw, Chris Steger.

During the hearing, Mr. Wright stated that his disclosure was authorized because the disclosure would prevent a crime. The Panel rejects the assertion that Mr. Wright's disclosure was permissible to prevent Dr. Brooks from committing a crime pursuant to Rule 1.6(b)(1). Comment 6 to RPC 1.6 is contrary to Mr. Wright's contention. It provides "...paragraph (b)(1) permits lawyer to reveal information to the extent necessary to enable affected persons or appropriate authorities to prevent the client from committing a crime." Mr. Wright's disclosure in his filed affidavit was not addressed to an affected party or appropriate authority that would prevent Dr. Brooks from committing a crime.

During the hearing, Mr. Wright was specifically asked by the panel which subsection of Rule 1.6 (b) or Rule 1.6 (c) either authorized him or required him to disclose the information in the Affidavit. In response, Mr. Wright stated to the hearing panel that it was not Rule 1.6(b) or 1.6(c) which permitted or required Mr. Wright to disclose the information contained within the affidavit. Instead, he asserted that Rule 1.16 **Declining or Terminating Representation**, and the comments to that rule, either expressly or impliedly authorize the disclosure. In addition, Mr. Wright also stated that the due process clause of the Constitution required him to disclose the information because “Dr. Brooks had a right to know why I was withdrawing”.

The Hearing panel agrees with Mr. Wright that Dr. Brooks had a right to know why Mr. Wright was asking to withdraw from the case. However, the Hearing panel does not accept Mr. Wright’s argument that that he was expressly or impliedly authorized to disclose the information in the affidavit in order to satisfy the “procedural due process rights” of Dr. Brooks to know why Mr. Wright was requesting permission to withdraw. It is clear that Mr. Wright could have and should have communicated those reasons to Dr. Brooks in writing, privately and separately from the Motion to Withdraw and its accompanying Affidavit. By doing so, Mr. Wright would have satisfied his concerns about Dr. Brooks’ right to know why he was asking to withdraw, but at the same time protected that information from disclosure to the Court and opposing counsel. In the panel’s view, Mr. Wright’s constitutional argument is simply misplaced. While the hearing panel agrees that it would be professionally responsible for Mr. Wright to inform his client why he was seeking to withdraw, he could have done that by sending Dr. Brooks a letter communicating the reasons in writing without disclosing the information to individuals other than his client. The hearing panel rejects this argument by Mr. Wright.

In his Answer to the Petition for Discipline, and at the hearing in this matter, Mr. Wright contended that the statements in his affidavit were authorized to be disclosed by Rule 1.16. In his Answer, he cited Rule 1.16 (a), 1.16 (b), 1.16 (b)(1), 1.16 (b)(4), 1.16 (b)(4), 1.16(b)(6) and Comment 2 to Rule 1.16. The hearing panel has reviewed Rule 1.16 and its comments, and it disagrees with Mr. Wright’s contentions on this issue. Nothing in Rule 1.16 expressly or impliedly authorized the disclosure of the information relating to the representation. As the hearing panel as already noted, the Board does not contend that Mr. Wright did not have a good

reason to attempt to withdraw from the representation of Dr. Brooks. The proof shows that he did. The panel finds that Mr. Wright has mistakenly confused his obligation to withdraw with his right or obligation to disclose information relating to the representation of Dr. Brooks in the Affidavit he filed with the Motion to Withdraw. The issue is not whether Mr. Wright had sufficient reasons to file a Motion to Withdraw. The panel finds that he did. The issue in this matter and the basis for the Petition for Discipline is the content of the affidavit filed in support of the Motion to Withdraw. The affidavit contained and disclosed information relating to the representation of Dr. Brooks to the Court and to opposing counsel that was not authorized or required to be disclosed under Rule 1.6. There is nothing in Rule 1.16 which authorizes the disclosure of the information, and the hearing panel rejects the assertion that Rule 1.16 allows the information to be disclosed.

Having considered all of the evidence and the arguments of the parties, the hearing panel finds that Mr. Wright violated Rule 1.6 when he filed the Affidavit which contained information relating to the representation of Dr. Brooks. None of the exceptions under Rule 1.6 authorized or permitted Mr. Wright to disclose this information. None of the other reasons advanced by Mr. Wright provide a basis for disclosing the information in the Affidavit.

Having found that Mr. Wright violated Rule 1.6, the remaining issue for the hearing panel to decide is the discipline that should be recommended. The Board cited several ABA standards and subsections in the Board's pre-trial brief. The Board cited the same standard, but only one subsection, in its proposed findings of fact and conclusions of law. In reviewing the standards and subsections, it is important to determine if the disclosure in this matter was "knowing" or "negligent", and also whether the disclosure caused an injury or potential injury to Dr. Brooks. It is the opinion of the panel that when Mr. Wright filed the Motion with the Affidavit that he sincerely believed he was ethically obligated to withdraw from the representation of Dr. Brooks and that he was required to give sufficient reasons why his withdraw was warranted. The Board did not contend that he did not have a basis for withdrawing, and the panel finds that Mr. Wright did have a basis to file a Motion to Withdraw. It is clear from the evidence and the panel finds from the testimony from Mr. Wright that he did not have any intent to harm his client. Moreover, Dr. Brooks was not called as a witness at the hearing even though he was present. The panel finds it is speculative to conclude that the

information contained in the affidavit caused any actual harm to Dr. Brooks. No convincing proof was offered to the panel on this issue.

In the opinion of the hearing panel, Mr. Wright's actions in disclosing the information in this case are best described as "negligent." He clearly misunderstood the difference between the requirements of Rule 1.6 and Rule 1.16. His misunderstanding and misreading of the rules appears to have been in good faith. In the panel's opinion, his conclusion that he was permitted to disclose the information in the affidavit by Rule 1.16 was a negligent conclusion on his part. The hearing panel finds that the following ABA standard and subsection is the applicable standard for Mr. Wright's conduct in this matter.

4.2 FAILURE TO PRESERVE THE CLIENT'S CONFIDENCES

Absent aggravating or mitigating circumstances, upon application of the factors set out in 3.0, the following sanctions are generally appropriate in cases involving improper revelation of information relating to representation of a client:

- 4.23 Reprimand is generally appropriate when a lawyer negligently reveals information relating to the representation of a client not otherwise lawfully permitted to be disclosed and this disclosure causes little or no actual or potential injury to a client.

The panel recognizes that the Board asserts that there are aggravating factors in this matter, which are Mr. Wright's substantial experience in the practice of law, and the fact that he failed to accept responsibility for his actions. Mr. Wright does have substantial experience in the practice of law, having been licensed since 1972. In the opinion of the hearing panel, these factors do not justify increasing the panel's recommended discipline to any discipline greater than a public censure in this case. The hearing panel unanimously finds and recommends that the appropriate discipline is a public censure.

JUDGMENT

Based upon the facts shown at the hearing and the entire record in this matter, and the application of the Rules of Professional Conduct and considering the ABA Standards, the Hearing Panel finds by a preponderance of the evidence that Mr. Wright committed disciplinary misconduct by violating Rule 1.6 of the Tennessee Rules of Professional Conduct and, accordingly he should receive a public censure.

HEARING PANEL MEMBERS:

John Carson III

John Carson III

William Charles Killian

William Charles Killian

John F. Kimball

John F. Kimball

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF TENNESSEE
SOUTHERN DIVISION

THOMAS J. BROOKS, III, M.D.

Plaintiff,

vs.

KEVIN SPIEGEL, in his individual capacity
and in his official capacity as the Chief
Executive Officer of Chattanooga-Hamilton
Hospital Authority (Doing Business as
Erlanger Health System)

Defendant.

Civil Action File No.: 1:18-CV-12

JURY TRIAL DEMAND

Complaint under the Civil Rights Act 42
U.S.C. § 1983

MOTION TO WITHDRAW AS ATTORNEY OF RECORD

Comes now Charles G. Wright, Jr., attorney of record for Thomas J. Brooks, III, M.D., pursuant to the Local Rule of this court number 83.4 and Rule 8.1:16 of the Supreme Court of Tennessee, and moves the Court to allow him to withdraw from further representation of the Plaintiff, Thomas J. Brooks, III, M.D. The specific reasons are enumerated in the affidavit of the undersigned and the Brief filed in support of this motion. The current address and telephone number of Thomas J. Brooks, III, M.D., are 806 Fort Wood Street, Chattanooga, TN 37403 and 423-326-7012.

RESPECTFULLY SUBMITTED this 6~~7~~ day of October, 2018.

RIVER CITY LEGAL GROUP, PLLC
3116 Brainerd Rd., Suite A
Chattanooga, Tennessee 37411
(423) 493-1926

Charles Wright

CHARLES G. WRIGHT, JR., BPR#915

Attorney for Plaintiff

3116 Brainerd Road, Suite A

Chattanooga, TN 37411

(423) 493-1926 telephone

(423) 493-2142 facsimile

CERTIFICATE OF SERVICE

I hereby certify that on this ~~16th~~ day of October, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, and a copy has been served by email to the following individuals:

Arthur P. Brock

Cara E. Weiner

Joseph Alan Jackson, II

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(423) 493-1926

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN
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SOUTHERN DIVISION

THOMAS J. BROOKS, III, M.D.

Plaintiff,

vs.

KEVIN SPIEGEL, in his individual capacity
and in his official capacity as the Chief
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Hospital Authority (Doing Business as
Erlanger Health System)

Defendant.

Civil Action File No.: 1:18-CV-12

JURY TRIAL DEMAND

Complaint under the Civil Rights Act 42
U.S.C. § 1983

AFFIDAVIT

State of Tennessee
County of Hamilton

I, Charles G. Wright, Jr., after being duly sworn, state as follows:

1. I am over the age of 18 and am competent to make this affidavit. I state the facts referenced herein of my own personal knowledge.
2. I am the attorney of record for Thomas J. Brooks, III, M.D., the plaintiff in this action and have been his attorney from the beginning of the case.
3. I have had problems with representing the plaintiff, which have progressively become worse over time. The majority of my time in representing Dr. Brooks has been spent in responding to the argumentative and aggressive behavior of the plaintiff, who acts as

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if he does not trust me to represent him aggressively and competently. He raises his voice in a loud manner to me and my staff. My staff is afraid that they will be physically assaulted by him.

4. It has been necessary to call 911 for police to come to my office on two different occasions to prevent feared physical altercations from Dr. Brooks who has threatened to change the locks to my office and lock me and my staff out of the office.
5. Dr. Brooks has failed to pay for deposition costs related to taking the deposition of defendant. Dr. Brooks has been argumentative and uncooperative in agreeing on a requested deposition date for him by defendant, and in completing written discovery submitted by defendant's attorney.
6. Dr. Brooks has insisted that he record our attorney-client conversations. He micromanages what I do as his attorney and insists adamantly that he be able to help draft legal documents to suit himself.
7. Dr. Brooks constantly challenges what I do or don't do in his behalf without reasonable basis.

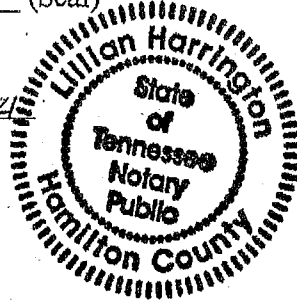
STATE OF TENNESSE
COUNTY OF HAMILTON

SUBSCRIBED AND SWORN TO BEFORE ME, on this 16th day of October, 2018.

Signature: *Lillian Harrington*
NOTARY PUBLIC

(Seal)

My Commission expires: 3-7-2021



Charles G. Wright Jr.
Signature of Affiant

CHARLES G. WRIGHT JR
Printed Name of Affiant


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CERTIFICATE OF SERVICE

I hereby certify that on this ~~16th~~ day of October, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, and a copy has been served by email to the following individuals:

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Joseph Alan Jackson, II
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