

STATE OF NORTH CAROLINA
COUNTY OF CARTERET

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

File No: 19 CV 863

P.Q., by and through his parent, Lindsay Webb; A.J., by and through her parent, Melissa Holden-Jernigan; L.L., by and through her parent, Kristin Leahy; B.S., by and through his parent, Dana Mull; J.M., by and through his parent, Janie Mason; C.M., by and through his parent, Amanda Morrow; D.N., by and through his parent, Cori Herring; P.Q., by and through his parent, Beth Quinn; I.B. and S.B., by and through their parent, Andrea Beasley; K.C., by and through his parent, Kim Nyman; C.D., by and through his parent, Cathleen DuMarce; W.G., by and through his parent, Erin Gordon; R.H. and G.H., by and through their parent, Deanna Hayden; D.H., by and through her parent, Jenier Jolin; D.K., by and through his parent, Danielle Knapp; A.L., by and through her parent, Christiana Leoso; T.M., by and through his parent, Ashley Pittman; C.S., by and through her parent, Brandy Edwards; C.S., by and through his parent, Falyn Styron; J.H., by and through her parent, Amanda Hewes; A.S., by and through her parent, Alayna Amaro; D.W., by and through his parent, Suni Williams; A.B.V., by and through her parent, Ofelia Jimenez; J.R., by and through his parent, Joseph Robinson; .D.C., by and through his parent, Janelle Lopez; M.C., by and through his parent, Monica Best; G.D., by and through his parent, Stacey Dean; L.J., by and through her parent, Latesheca Wallace Johnson; J.L.T., by and through his parent, Juan Torres; G.M., by and through his parent, Glenn Johnston.

Plaintiffs,

v.

Carteret County Public School System Board of Education,

Defendants.

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**COMPLAINT AND MOTION FOR A
PRELIMINARY INJUNCTION**

INTRODUCTION

NOW COME Plaintiffs, by and through legal counsel, and file this Complaint against Defendant Carteret County Public Schools Board of Education pursuant to the North Carolina State Constitution for violating their procedural due process rights in voting to close Marine Science and Technology (MaST) Early College without following the process outlined in N.C. Gen. Stat. §115C-72. Plaintiffs further move this Court, pursuant to N.C. Gen. Stat. § 1-485(1), to enjoin Defendants from closing MaST for the 2019-20 school year.

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Porter Quinn (P.Q.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends Carteret County Public Schools (hereinafter "CCPS"). Plaintiff Lindsay Webb is a resident of Carteret County, North Carolina and the parent of P.Q.
2. Plaintiff Anna Jernigan (A.J.) is a thirteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Melissa Holden-Jernigan is a resident of Carteret County, North Carolina and the parent of A.J.
3. Plaintiff Laurel Leahy (L.L.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Kristin Leahy is a resident of Carteret County, North Carolina and the parent of L.L.
4. Plaintiff Braydon Southerland (B.S.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Dana Mull is a resident of Carteret County, North Carolina and the parent of B.S.
5. Plaintiff John Mason (J.M.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Janie Mason is a resident of Carteret County, North Carolina and the parent of J.M.
6. Plaintiff Cameron Morrow (C.M.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Amanda Morrow is a resident of Carteret County, North Carolina and the parent of C.M.
7. Plaintiff Dylan Nielsen (D.N.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Cori Herring is a resident of Carteret County, North Carolina and the parent of D.N.
8. Plaintiff Phillip Quinn (P.Q.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Beth Quinn is a resident of Carteret County, North Carolina and the parent of P.Q.
9. Plaintiff Isaac Beasley (I.B.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Samuel Beasley (S.B.) is a fourteen-year old

citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Andrea Beasley is a resident of Carteret County, North Carolina and the parent of I.B. and S.B.

10. Plaintiff Kristofer Cummings (K.C.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Kim Nyman is a resident of Carteret County, North Carolina and the parent of K.C.
11. Plaintiff Courtney DuMarce (C.M.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Cathleen DuMarce is a resident of Carteret County, North Carolina and the parent of C.M.
12. Plaintiff Walker Gordon (W.G.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Erin Gordon is a resident of Carteret County, North Carolina and the parent of W.G.
13. Plaintiff Ridge Hayden (R.H.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Ginger Hayden (G.H.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Deanna Hayden is a resident of Carteret County, North Carolina and the parent of R.H. and G.H.
14. Plaintiff Dezerea Hummel (D.H.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Jenier Jolin is a resident of Carteret County, North Carolina and the parent of D.H.
15. Plaintiff David Knapp (D.K.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Danielle Knapp is a resident of Carteret County, North Carolina and the parent of D.K.
16. Plaintiff Arianna Leoso (A.L.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Christina Leoso is a resident of Carteret County, North Carolina and the parent of A.L.
17. Plaintiff Tanner Mills (T.M.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Ashley Pittman is a resident of Carteret County, North Carolina and the parent of T.M.
18. Plaintiff Chanyn Strickland (C.S.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Brandy Edwards is a resident of Carteret County, North Carolina and the parent of C.S.
19. Plaintiff Charles Styron (C.S.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Falyn Styron is a resident of Carteret County, North Carolina and the parent of C.S.

20. Plaintiff Amelia Swacha (A.S.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Alayna Amaro is a resident of Carteret County, North Carolina and the parent of A.S.
21. Plaintiff Jenna Hewes (J.H.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Amanda Hewes is a resident of Carteret County, North Carolina and the parent of J.H.
22. Plaintiff Daryan Williams (D.W.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Suni Williams is a resident of Carteret County, North Carolina and the parent of D.W.
23. Plaintiff Alma Barajas Valadez (A.B.V.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Ofelia Jimenez is a resident of Carteret County, North Carolina and the parent of A.B.V.
24. Plaintiff Jacob Robinson (J.R.) is a fourteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Joseph Robinson is a resident of Carteret County, North Carolina and the parent of J.R.
25. Plaintiff Donovan Chewing (D.C.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Janelle Lopez is a resident of Carteret County, North Carolina and the parent of D.C.
26. Plaintiff Mason Creech (M.C.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Monica Best is a resident of Carteret County, North Carolina and the parent of M.C.
27. Plaintiff Gavin Dean (G.D.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Stacey Dean is a resident of Carteret County, North Carolina and the parent of G.D.
28. Plaintiff La'tecyia Johnson (L.J.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Latesheca Wallace Johnson is a resident of Carteret County, North Carolina and the parent of L.J.
29. Plaintiff Juan Lara Torres (J.L.T.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Juan Torres is a resident of Carteret County, North Carolina and the parent of J.L.T.
30. Plaintiff Gericko Mendoza (G.M.) is a fifteen-year old citizen and resident of Carteret County, North Carolina and attends CCPS. Plaintiff Glenn Johnston is a resident of Carteret County, North Carolina and the parent of G.M.
31. Respondent Carteret County Public Schools Board of Education (hereinafter "Board") is a local board of education established pursuant to Chapter 115C, Article Five, of the North

Carolina General Statutes. Its principal administrative office is located in Beaufort, Carteret County, North Carolina.

32. Pursuant to Article I, § 19 of the North Carolina State Constitution, “No person shall be . . . deprived of his life, liberty, or property, but by the law of the land.”
33. Pursuant to N.C. Gen. Stat. §§ 115C-45(c), an aggrieved person has a right of appeal to the superior court following a final administrative decision of a local school board on the grounds that the decision “is in violation of constitutional provisions, is in excess of the statutory authority or jurisdiction of the board, is made upon unlawful procedure, is affected by other error of law, is unsupported by substantial evidence in view of the entire record as submitted, or is arbitrary or capricious.”
34. This Court has subject matter jurisdiction over this matter pursuant to N.C. Gen. Stat. §§ 7A-240 and 7A-245.
35. In the alternative, this Court has subject matter jurisdiction over this matter as this is an appeal of a final administrative decision by the CCPS Board, pursuant to N.C. Gen. Stat. § 115C-45(c).
36. This Court has personal jurisdiction over this matter pursuant to N.C. Gen. Stat. § 1-75.4(1).
37. Pursuant to N.C. Gen. Stat. § 1-82, the action must be tried in the county in which the plaintiffs or defendants, or any of them, reside at its commencement. As Plaintiffs reside in Carteret County, venue is proper in Carteret County.

FACTUAL BACKGROUND

38. Marine Science and Technologies Early College High School (hereinafter “MaST”) is a public high school in Morehead City, North Carolina, operated by the Board as part of the CCPS. Classified as a “Cooperative Innovative High School” by the State Board of Education, MaST targets students who are at risk of dropping out of high school, first-generation college students, and those who would benefit from accelerated learning opportunities.
39. During the 2018-19 school year, MaST served forty-nine (49) students. Of those forty-nine (49) students, thirty-four (34) students earned at least twelve (12) credit hours (or one full-time semester) of college classes as freshmen in high school. This economic value of these credits for these families is approximated at \$119,323.
40. MaST offers students the opportunity to earn certificates in various trades such as Marine Propulsion and Welding.
41. Upon information and belief, MaST serves the highest percentage of students on free and reduced lunch of the county high schools.

42. CCPS has four (4) high schools: MaST, West Carteret High School (WCHS), East Carteret High School (ECHS), and Croatan High School (CHS).
43. Although other high schools offer students the opportunity to dually enroll in community college classes as juniors and seniors, MaST is the only high school that offers students the opportunity to enroll in community college classes as freshmen and sophomores.
44. MaST is the only high school that provides students transportation to and from the community college to attend college classes. MaST is the only high school that allows students to enroll in such courses at no cost to the student.
45. Each CCPS high schools receives federal and state funding as well as local funding from Carteret County, which is allocated by the Carteret County Board of Commissioners each year.
46. MaST has the lowest per pupil expenditure of all the high schools in the county costing the Board between 10 – 29% less than the other CCPS high schools.
47. A meeting of the Carteret County Board of Commissioners was held on Monday, June 17, 2019. During the meeting, the Commissioners approved the requested funding for MaST as part of the adopted budget; however, the Commissioners gave the Board the discretion to use the approved MaST funds as it deemed appropriate for other expenditures.
48. The very next day, Tuesday, June 18, 2019, the Board sent a Special Meeting Notice to CCPS employees regarding a meeting of the Board to be held forty-eight (48) hours later (i.e., 1:00 PM on Thursday, June 20, 2019), “to consider the funding of [MaST].”
49. Notwithstanding the Board’s frequent use of the automated calling system to notify families of important dates and upcoming events, the Board did not provide any notice to the parents of the students who attend MaST of the Special Meeting.
50. Instead, the Board emailed the notice to employees of the school system and posted the notice on the door of the Board’s meeting room.
51. One of the school system employees contacted Plaintiff Beasley who attempted to contact any MaST parent for whom she had contact information; however, Plaintiff Beasley had no contact information for the vast majority of parents—especially those who were non-English speakers or did not have internet access to reach via social media.
52. Plaintiffs attended the Special Meeting, held in the middle of the workday, to voice their support of the school; however, the Board refused Plaintiffs’ request for public comment.
53. At the Board’s June 20, 2019, Meeting, the Board Chair, Travis Day, made the following motion:

“Given the continued uncertainty of state funding required to sustain Early College, and given the lack of financial support for MaST at the county level, and given the additional lack of funding to sustain numerous teaching positions in other schools throughout our county ... I move that we act on the recommendation of the Board of Commissioners to use local funds previously allocated for MaST, to fund as many unfunded teaching positions as possible. This will leave the MaST Early College High School unfunded and will result in the school needing to be closed.”

54. Upon information and belief, due to the short notice of the meeting, two of the Board members were only able to participate by phone. Those two Board members were opposed to the motion.
55. In addition to making the motion, the Board Chair was also the first to cast his vote in favor of the motion. The Board voted 4-3 in favor of Mr. Day’s motion.
56. As Mr. Day indicated in his motion, the Board’s decision to pass the motion was a decision to remove funding from MaST resulting in its closure.
57. The Board had legal counsel present at the July 20, 2019, Meeting.
58. State law clearly delineates the process required before local boards of education may close schools:

In any question involving the closing or consolidation of any public school, the local board of education of the school administrative unit in which such school is located shall cause a thorough study of such school to be made, having in mind primarily the welfare of the students to be affected by a proposed closing or consolidation and including in such study, among other factors, geographic conditions, anticipated increase or decrease in school enrollment, the inconvenience or hardship that might result to the pupils to be affected by such closing or consolidation, the cost of providing additional school facilities in the event of such closing or consolidation, and such other factors as the board shall consider germane. Before the entry of any order of closing or consolidation, the local board of education shall provide for a public hearing in regard to such proposed closing or consolidation, at which hearing the public shall be afforded an opportunity to express their views. Upon the basis of the study so made and after such hearing, said board may, in the exercise of its discretion, approve the closing or consolidation proposed.

N.C. Gen. Stat. § 115C-72(a)(1) (emphasis added).

59. The Board failed to take any steps to seek the input of parents of students enrolled at MaST, much less of Carteret County citizens, prior to voting to remove all funding and close the school.
60. The Board did not conduct the study required by statute or hold a public hearing.
61. After the meeting, the principal of MaST, an agent of the Board, sent an email to the students and families notifying them of the impending closure of the school.
62. Upon information and belief, the Board then gave the teachers and school administration the option to resign or accept a transfer to other vacant positions within the CCPS.
63. One week later, the Board convened another Special Meeting. Again, the Board did not utilize its existing automated calling system to notify the MaST families of the Special Meeting. Upon information and belief, there was no notice provided to the MaST families who do not speak or read English proficiently.
64. At the June 27, 2019, Special Meeting, the Board voted *post hoc* to go through the process required by the state statute to close MaST.
65. Although Plaintiff Webb, again, asked to submit comment, the Board again refused to allow public comments at this meeting.
66. On a motion from Board member Clark Jenkins, the Board voted to appoint a committee comprised of the curriculum, finance, and technology work group to oversee the study on whether to close MaST.
67. The committee members were selected by the Board Chair. The Committee is comprised of two (2) Board members who voted in favor of the June 20, 2019, motion to close MaST—including the Board Chair—and one (1) member who voted against the motion.
68. The Board did not give any specific charge to the newly formed committee or discuss the parameters of the study or the requirements of the statute.
69. The Board did not vote to rescind the vote taken at the June 20, 2019 Meeting.
70. The Board did not vote to restore funding or reverse any of its decisions regarding the reassignment of faculty from MaST.
71. The Board took no action to rescind or reverse its decision to remove all funding and effectively voted to close the school
72. Immediately, members of the Board published statements reiterating the decision to close MaST has been made. For example, Mr. Day, Board Chair and member of the Committee conducting the study, offered the following comment to the media immediately following the June 27, 2019, vote:

We don't want to give anyone false hope. Even if state funding were available, it's too late in the process to keep the school open. It's just not feasible. We have to hire teachers and personnel. We just want to make sure that all legal procedures are followed in closing the school.

73. Board Member John McLean made the following statement to the media: "We don't want to provide false hope. We will hold another public hearing and a committee will look at it, but what we're doing is voting to follow the correct procedures."
74. Following the June 27, 2019, Meeting, the school district, at the direction of the Board, contacted parents of students enrolled at MaST for the 2019-2020 school year to enroll them in other high schools in the CCPS.
75. Dr. Heather Dietzler, Chief Academic Officer, Director of Science Education, and an agent of the Board, sought parental input and student input for the study by communicating primarily through the students' school-issued emails; however, many students are only able to access their school emails through school laptops, which are not available to them during the summer.
76. When Plaintiff Webb informed the Board that many parents were not getting these communications and asked for the Board to send letters to their homes, the Board did not do so, nor did they use the automated calling system.
77. The Board convened another Special Meeting on July 2, 2019, to outline the parameters of the study. During the meeting, the Board provided those in attendance with a copy of the proposed study and agreed to specific revisions to the study outline.
78. During the meeting, the Committee members, besides the Board Chair, asked for the Board to hire an outside company to conduct the study; however, the Board Chair said the Board could research hiring an outside company but, meanwhile, they would move forward conducting it in-house. Nothing was ever mentioned again during a public meeting about the results of any research into an outside agency conducting this research.
79. Upon information and belief, on July 22, 2019, the MaST principal and other school personnel were required to report to work at their new positions.
80. The Committee released its study on July 22, 2019—over a month after voting to close MaST. Shortly thereafter, the Board uploaded a revised version of the study to the district's website and removed the original version.
81. The study is not an objective analysis as intended by Section 115C-72. and, arguably, does not address the required statutory components. For example, the Board Chair asked the principals to comment on "what type of students they were losing to MaST"; "the number of students you have lost (or could lose in the future) to MaST and how those losses might

impact your school”; and “Do you anticipate a loss of teacher positions at your school if MaST were to remain open? If so, how would this affect your school?” According to the study, the principals were all reluctant to answer these questions.

82. The Board convened a meeting on July 22, 2019, purportedly to review the study with the Committee members. The school attorney began the meeting by reminding the Committee members that the state legislature still had not adopted a budget for this year, and even though all proposed budgets included funding for MaST it was only “speculation” as to whether a budget would be passed that included funding for MaST.
83. The Board scheduled a public hearing for July 24, 2019, giving the public only two (2) days to review the 815-page report and prepare comments. Reportedly, the Board intends to allow public comment at the Public Hearing; however, the Board attorney refused to allow Plaintiffs to present a Power Point to the Board members during their allotted time for comments.
84. The Board is scheduled to meet again on July 29, 2019, and, again, vote on closing MaST only seven (7) business days before the scheduled start of classes.
85. The first day of the 2019-2020 school year for MaST is August 7, 2019.
86. As of the filing of this Complaint, the Board has not rescinded its vote on June 20, 2019 to close MaST.
87. In 2014-15, the CCPS Board followed the process in Section 115C-72 prior to deciding to consolidate two middle schools. This process started in the summer of 2014, included multiple stakeholder meeting with affected parents and students and staff members, a vote was taken in March 2015, and the consolidation was not implemented for an additional five (5) months. The Board, and the Board’s attorney, are aware of how to legally implement the process outlined by statute prior to making such a decision.

CLAIMS

88. The Board’s decision to close MaST was made upon unlawful procedure and violated the requirements of N.C. Gen. Stat. § 115C-72(a)(1) because:
 - a. The Board did not first complete a thorough study of the effects of MaST on the students who are enrolled in the school for the 2019-2020 school year and the CCPS at large, enrollment, the cost of providing additional facilities as a result of closing the school, and other factors.
 - b. The Board did not provide for a public hearing on the potential closure of the school, which would have provided the public an opportunity to voice their concerns and express their opinions on the potential closure.

89. The actions of and statement by members of the Board demonstrate that its June 27, 2019 vote to undergo a formal process is a sham as the decision to close the school has already been made.
90. The Board's decision to close MaST was arbitrary and capricious because it was based upon a lack of fair and careful consideration and failed to indicate the exercise of judgment.
91. The Board's decision to vote on closing MaST prior to giving Plaintiffs notice and the opportunity to be heard prior to voting to close MaST violated the procedural due process rights of Plaintiffs guaranteed by the Fourteenth Amendment to the United States Constitution and Article I, Section 19 of the North Carolina Constitution.
92. The Board's actions following the June 20, 2019 to close MaST-- including reassigning staff and faculty of the school, reassigning students, failing to rescind the June 20, 2019, vote, and public statements made by Board members that "it's too late in the process to keep the school open"— demonstrate that despite its June 27, 2019, vote to undergo a formal process, the decision to close the school has already been made, in violation of Plaintiffs' due process rights to a fair and impartial decisionmaker, as guaranteed by the Fourteenth Amendment to the United States Constitution and Article I, Section 19 of the North Carolina Constitution

MOTION FOR A PRELIMINARY INJUNCTION

Plaintiffs move, pursuant N.C. Gen. Stat. § 1-485(1) and Rule 65 of the Rules of Civil Procedure, for a Preliminary Injunction staying the Board decision pending the outcome of this case. In support of this motion Plaintiffs show to the Court the following:

1. Immediate and irreparable harm will result to Plaintiffs if injunctive relief is not granted.
2. If Defendant is permitted to close MaST seven (7) business days prior to the start of classes, Plaintiffs are unable to enroll in any other choice schools that may afford them the opportunity to enroll in community college classes and earn college credit as freshmen and sophomores.
3. If Defendant is permitted to close MaST for the 2019-20 school year, Plaintiffs—the highest percentage of free-reduced lunch recipients in the county high schools—will be prevented from having the opportunity to earn an equal number of college credits as high school freshmen and sophomores to ultimately reduce college costs.
4. If Defendant is permitted to close MaST for the 2019-20 school year, Plaintiffs will be unable to enroll in trade classes to earn certificates in areas such as welding and marine propulsion available through MaST.
5. Plaintiffs have alleged several serious defects in the procedures used by the Board in making its decision to close MaST in contravention of state law and the state and federal

Constitution. There is a strong likelihood that Plaintiffs will prevail on the merits in the case.

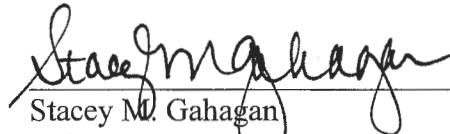
A Preliminary Injunction is warranted.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that the Court:

1. Find that Final Decision of the Board violates the requirements of N.C. Gen. Stat. § 115C-72(a)(1), the due process clause of the Fourteenth Amendment of the U.S. Constitution, and Article I, Section 19 of the North Carolina Constitution;
2. Enter a preliminary injunction staying the implementation of the Board decision pending the outcome of this case and preserving the status quo for the CCPS and MaST school as existed prior to June 18, 2019 1;
3. Award reasonable attorney's fees and costs to Plaintiffs pursuant to N.C. Gen. Stat. § § 6-19.1; and
4. Order such other and further relief as the Court deems just and proper.

Respectfully submitted, this the 24th day of July, 2019.



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