

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS OF
)	THE NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON)	
)	DOCKET NO. 2025-CP-10-2671
ASSIGNMENT DESK WORKS, LLC,)	
)	
PLAINTIFF,)	Plaintiff’s Notice of Motion, Motion and
)	Memo in Opposition to Proposed
vs.)	Intervenor’s Emergency Motion to
)	Intervene, Motion to Dismiss, and for
ALEXIS BERG,)	Sanctions Against All Parties
)	
DEFENDANT.)	

NOW COMES Assignment Desk Works, LLC (Plaintiff), responding to the Honorable Representative Nancy R. Mace’s (Proposed Intervenor) Emergency Motion to Intervene, Motion to Dismiss, and for Sanctions Against All Parties (Motion), filed January 27, 2026, and asking this Honorable Cour to dismiss the Motion and impose sanctions against the Proposed Intervenor for the reasons set forth below.

Brief Factual and Procedural Background

This case arises from Alexis Berg’s (Defendant) violation of the terms of a Settlement Agreement and Release (Agreement) resolving prior litigation in the case of *Cockman et al. v Assignment Desk Works, et al.*, Civil Action No. 2:19-cv-3082-BHH. [Amended Compl. pp. 2-3.] Plaintiff initiated this action on May 7, 2025, and personally served Defendant on May 14, 2025. Thereafter, Plaintiff filed its Amended Complaint on September 25, 2025. Defendant filed her Answer and Counterclaims on October 29, 2025.

Plaintiff’s First Set of Interrogatories to Defendant and First Set of Request for Production to Defendant (First Set of Discovery Requests) were served on May 21, 2025. Defendant

responded to this First Set of Discovery Requests on November 13, 2025, with supplemental responses provided on November 26 and December 10, 2025, and January 7 and January 16, 2026.

The Proposed Intervenor now seeks to intervene in this case despite having no connection to it. She bases her Motion on alleged “privileged material” provided by defense counsel in response to Plaintiff’s discovery requests. Despite having no relation to the instant matter, Proposed Intervenor asks that this Honorable Court

- Permit her to intervene in this case pursuant to Rule 24, S.C. R. Civ. P.;
- Dismiss the Complaint and impose sanctions for violating Rule 11, S.C. R. Civ. P.;
- Impose sanctions for Abuse of Process;
- Strike the Complaint pursuant to Rule 37(b)(2)(C);
- Order the return and sequestration of discovery materials pursuant to Rule 26(b)(5)(B);
- Impose sanctions for violation of Rule of Professional Conduct 4.4, S.C. App. Ct. R. 413¹;
- Impose sanctions for violation of S.C. Code Ann. Sec. 16-15-332²; and
- Issue a Protective Order pursuant to Rule 26(c).

Plaintiff opposes Proposed Intervenor’s Motion.

Argument

Plaintiff requests that the court deny the Motion and not allow Proposed Intervenor to intervene. Because Proposed Intervenor is not—and should not become—a party to this case, Proposed Intervenor’s requests for sanctions and a protective order are not properly before the

¹ Alleged violations of professional conduct fall within the jurisdiction of the Commission on Lawyer Conduct. See Rules for Lawyer Disciplinary Enforcement Rule 3, Rule 413 S.C. App. Ct. R. Because this is not a proceeding before the Commission, Plaintiff treats the alleged violations as Proposed Intervenor’s attempt to support her Motion for sanctions under Rule 11, S.C. R. Civ. P.

² Proposed Intervenor alleges violation of the South Carolina Criminal Code. Plaintiff denies that it, its agents, or its members have violated the Criminal Code or committed the alleged crimes. Because this is a civil proceeding, Plaintiff treats this alleged criminal violation as Proposed Intervenor’s attempt to support her Motion for sanctions under Rule 11, S.C. R. Civ. P.

Court. Out of an abundance of caution, however, Plaintiff addresses these requests in the following memo.

I. Proposed Intervenor fails to state grounds for mandatory or permissive intervention under Rule 24, S.C. R. Civ. P., and her request to intervene should be denied.

Rule 24, S.C. R. Civ. P., sets forth the circumstances and procedure by which a non-party can intervene in a case. A non-party may intervene as of right when the applicant claims an interest relating to the property or transaction which is the subject of the action and she is so situated that the disposition of the action may impair or impede her ability to protect that interest. *Id.* Courts may permit a non-party to intervene when an applicant's claim or defense and the main action have a question of law or fact in common. *Id.* A person who desires to intervene in a case shall serve a motion stating the grounds for intervention accompanied by a pleading setting forth the claim or defense for which intervention is sought. *Id.*

As a threshold matter, Proposed Intervenor's Motion fails because she did not include a pleading that sets forth the claim or defense for which she seeks to intervene as required by section (c) of Rule 24. In addition, Proposed Intervenor has failed to identify grounds for intervention as of right in this matter. Nor has she established a basis for permissive intervention.

A. Intervention as of Right

To intervene as of right, Proposed Intervenor must establish her interest in the action. Our courts have "compared having an interest in the action with constitutional standing, in that that the intervenor must be a 'real party in interest.'" *Ex Parte Builders Mutual Ins. Co.*, 431 S.C. 93, 99, 847 S.E.2d 87, 90 (2020). "A real party in interest ... is one who has a real, actual, material or substantial interest in the subject matter of the action, as distinguished from one who has only a nominal, formal, or technical interest in, or connection with, the action." *Bailey v. Bailey*, 312 S.C. 454, 458, 441 S.E.2d 325, 327 (1994). "[T]he pragmatic consequences of a decision to

permit or deny intervention must be considered and rigid application of Rule 24(a)(2) must be avoided.” *Berkeley Elec. Coop., Inc. v. Mt. Pleasant*, 302 S.C. 186, 394 S.E.2d 712 (1990). A trial court’s ruling on a motion pursuant to Rule 24(a)(2) is reviewed for abuse of discretion. *Id.* The decision to grant or deny a motion to intervene lies within the sound discretion of the trial court. *Ex Parte Builders Mutual Ins. Co.* at 99, 847 S.E.2d at 90.

Proposed Intervenor cannot intervene as of right because she has failed to establish an interest related to this action. This case is about Defendant’s breach of a non-disparagement clause that was part of an Agreement resolving litigation in a prior case. [Amended Compl. pp. 2-3.] Plaintiff brought this action for damages resulting from Defendant’s breach and for an injunction stopping Defendant from making any further disparaging remarks. *Id.* at p. 4. Proposed Intervenor has no interest in the previous litigation that resolved with the Agreement, in the Agreement itself, or in this action to enforce the Agreement.

Proposed Intervenor’s Motion does not address the Agreement or Defendant’s breach. Instead, Proposed Intervenor alleges a pattern of misconduct on the part of Mr. Patrick Bryant. [Motion p. 2.] Proposed Intervenor then spends two pages discussing a separate litigation totally unrelated to the instant action in which Mr. Bryant’s former counsel was sanctioned. *Id.* pp. 2-4. She also alleges that the purpose of this action is to investigate her. *Id.* pp. 8-9, 11-12. Her reference to sanctions in prior, unrelated cases and baseless allegations of investigation do not establish an interest in *this action* as required by Rule 24. Proposed Intervenor also calls this case a “defamation claim” and “defamation action” [Motion pp. 8, 10-11], despite the fact Plaintiff did not plead defamation as a cause of action in this case. Simply put, Proposed Intervenor cannot establish herself as a real party in interest to this case, and she should not be allowed to intervene as of right.

B. Permissive Intervention

Courts may permit a non-party to intervene when the non-party's claim or defense and the main action have a question of law or fact in common. "An intervenor seeking permissive intervention must (1) establish timely application; (2) assert a claim or defense that has a question of law or fact in common with the underlying action; and (3) prove her participation in the underlying action will not delay or prejudice the adjudication of the rights of the original parties." *Ex parte Builders Mutual Ins. Co.* 431 S.C. at 101, 847 S.E.2d at 91. "To warrant permissive intervention under Rule 24(b) an applicant should ordinarily show ... [that she] has a claim or defense involving a question of law or fact in common with the main action. A mere general interest in the subject matter of the litigation is not sufficient." *Ex parte Trustguard Ins. Co.*, 442 S.C. 485, 513, 900 S.E.2d, 448, 463 (Ct. App. 2023). "A reversal of a denial of permissive intervention has been termed 'so unusual as to be almost unique.'" *Ex parte Builders Mutual Ins. Co.* 431 S.C. at 101, 847 S.E.2d at 91 (citing *S.C. Tax Comm'n v Union Cty. Treasurer*, 295 S.C. 257, 262, 368 S.E.2d 72, 75 (Ct. App. 1988)).

Proposed Intervenor has failed to meet the second or third elements for permissive intervention set forth in *Ex parte Builders Mutual Ins. Co.* As to the second factor, Proposed Intervenor has failed to establish that there is a common question of law or fact between her claims and this action. She repeatedly references previous sanctions issued in other litigation. She makes accusations that Plaintiff is "using this litigation as a vehicle to investigate [Proposed Intervenor.]" [Motion p. 3.] She goes on to say that she is "a central subject of the discovery" and that "this action directly targets [Proposed Intervenor's] communications, relationships, and privileged materials." *Id.* p. 4. But a review of Plaintiff's discovery requests, attached to the Proposed Intervenor's Motion as Exhibit D, shows that this is not true.

Plaintiff denies that it has any interest in Proposed Intervenor or seeks to investigate her through discovery. To the extent there is any relationship between Proposed Intervenor and this litigation, she is mentioned in the discovery requests to learn what statements Defendant may have made to her in violation of the Agreement (if at all). And, even if Plaintiff were attempting to investigate Proposed Intervenor through its discovery requests (which is denied), such an investigation would not constitute a common question of law or fact between the Proposed Intervenor and the law and facts of this case. Proposed Intervenor's tangential, false allegations do not rise to the level of a "mere general interest" in the subject matter required for permissive intervention in this litigation. *See Ex parte Trustguard Ins. Co.* at 513, 900 S.E.2d at 463. Her claims have nothing to do with the main claims and defenses in this action, and her request for permissive intervention should be denied.

Proposed Intervenor's participation in this action would cause delay and undue prejudice in the adjudication of the rights of the original parties. Her Motion includes allegations of wrongdoing, requests for sanctions, and it relies on cases that have nothing to do with the instant litigation. When deciding whether to allow a non-party to intervene as of right, Courts should consider whether granting or denying the motion would be an efficient use of judicial resources. *Ex Parte DeBordieu Colony Comm. Ass'n, Inc.*, 442 S.C. 285, 898 S.E.2d 179 (2024). Granting Proposed Intervenor's Motion would be inefficient and distract from the speedy resolution of this case.

II. Proposed Intervenor's Requests for Sanctions Are Not Properly Before the Court and Should Be Denied.

For the reasons set forth above, Proposed Intervenor's Motion to intervene should be denied. If the Court denies the Motion, then Proposed Intervenor has no part in this case and

cannot ask the Court to impose sanctions. But out of an abundance of caution, Plaintiff addresses Proposed Intervenor's grounds for sanctions below.

A. Rule 11

Proposed Intervenor "moves to dismiss [Plaintiff's] Complaint for failing to comply with Rule 11, SCRPC for lack of good ground." [Motion p. 1.] She also asks for sanctions pursuant to Rule 11³ "for the willful violations of procedural safeguards" and "for the improper disclosure of privileged materials, Rule 4.4 SCRPC or respect for rights of third persons and/or attorney misconduct regarding third party rights and lastly, S.C. Code Ann. Sec. 16-15-332." *Id.*

Rule 11, S.C. R. Civ. P., requires an attorney's signature on every pleading, motion, or other paper of a party represented by an attorney. By signing a document, the attorney certifies that she has read it, that there are good grounds to support the allegations or requested information, and that the document is not meant to cause delay. *Id.* A court may impose sanctions if a document is signed in violation of Rule 11. *Id.*

Here, Plaintiff's attorney had good grounds for signing and filing the Complaint and Amended Complaint and for serving the First Set of Discovery Requests. Plaintiff's Amended Complaint alleges that Defendant "made false or disparaging statements" in violation of the Agreement and supports that general allegation with a specific instance. [Amended Compl. p. 3.] Plaintiff's discovery requests reflect a good-faith effort to gather information to support the claims and allegations in the Complaint.

Proposed Intervenor has failed to show that any pleadings or discovery requests in this case were signed in violation of Rule 11. Instead, Proposed Intervenor repeats her allegations that

³ Proposed Intervenor appears to ask for sanctions pursuant to Rule 26(b)(5)(B), S.C. R. Civ. P., on the same grounds. Plaintiff will address Proposed Intervenor's Rule 26 arguments separately.

Plaintiff is attempting to investigate her or access privileged information. As discussed above, she relies on references to past orders in cases not related to this litigation.

“Rule 11 is not intended to be used as a weapon against a client represented by counsel, whose job it is to be knowledgeable of the law and advise a lay client on the best course of action.” *Kovach v Whitley*, 437 S.C. 261, 264, 878 S.E.2d 863, 864-65 (2022). Plaintiff has good grounds for filing its pleadings and serving its discovery requests. Plaintiff’s counsel has not violated any procedural safeguards. Because Plaintiff and Plaintiff’s counsel have not violated Rule 11, Proposed Intervenor’s Motion merely seeks to use Rule 11 as a “weapon against a client represented by counsel,” and should be denied.

B. Abuse of Process

Proposed Intervenor asks this Court to dismiss the Complaint “for lack of good cause and the Court’s inherent authority to dismiss for abuse of process.” [Motion p. 1.] Abuse of process is a tort in South Carolina, and the essential elements of that tort (1) an ulterior purpose, and (2) a willful act in the use of the process that is not proper in the regular conduct of the proceeding. *Pallares v. Seinar*, 407 S.C. 359, 370, 756 S.E.2d 128, 133 (2014). The allegation that a party had a “bad motive” or an “ulterior purpose” in bringing an action is by itself insufficient to sustain a claim of abuse of process. *Id.* at 371, 756 S.E.2d at 133. The party alleging abuse of process must show that the alleged abuser used the legal process *primarily* to accomplish a purpose for which it is not designed. *Id.* (emphasis supplied).

Proposed Intervenor’s basis for her abuse of process claim relies on the same extraneous and unrelated facts as her motion to intervene and her request for sanctions under Rule 11. She asserts, without any grounds, that Plaintiff’s pleadings and discovery requests in this case are meant to harass and investigate her. As previously stated, Plaintiff denies that the purpose of this

litigation is for any reason other than to recover damages and for injunctive relief arising from Defendant's breach of contract. Plaintiff has failed to establish the elements of abuse of process, and her request for relief on this ground should be denied.

C. Rule 37

Proposed Intervenor says that "[t]his action should be dismissed because it was filed with an improper purpose." [Motion p. 10.] She then repeats her allegations that this lawsuit is not a legitimate action but a fishing expedition. *Id.* She ends this section of her Motion with a quote from *Kershaw County Board of Education v. U.S. Gypsum Company*, 302 S.C. 390, 396 S.E.2d 369 (1990): "A dismissal under Rule 37(b)(2)(C) is not mandatory, rather, the trial court is allowed to make such orders as it deems just under the circumstances, and the selection of a sanction is within the court's discretion."

Proposed Intervenor's reliance on *Kershaw County Board of Education* and Rule 37, S.C. R. Civ. P., is misplaced. Rule 37 permits a party to an action to petition a court for an order compelling discovery. It also permits courts to impose sanctions on parties who fail to comply with a discovery order. Proposed Intervenor asks this court to impose sanctions pursuant to Rule 37(b)(2)(C), which permits a court to impose "[a]n order striking out pleadings or parts thereof, or staying further proceedings until the order is obeyed, or dismissing the action or proceeding or any part thereof, or rendering a judgment by default against the disobedient party."

Proposed Intervenor is not a party to this case. She has not moved the Court for an order compelling discovery. Plaintiff has not violated any discovery rules in this matter. There are simply no grounds for awarding the relief requested by Proposed Intervenor under Rule 37.

D. Rule 26

Proposed Intervenor asks for “appropriate sanctions for the willful violations of the procedural safeguards ... pursuant to ... Rule 26(b)(5)(B) for the improper disclosure of privileged materials[.]” [Motion p. 1.] She also asks for a protective order pursuant to Rule 26(c). *Id.* p. 15.

Rule 26, S.C. R. Civ. P., grants rights and remedies of discovery to the parties to an action. The very first word of Rule 26 is “parties.” Section (b)(5)(B) provides a mechanism by which a party who inadvertently produces privileged materials may notify other parties, and it requires other parties to return, sequester, or destroy the privileged information. On its own, it does not provide a mechanism by which the Court may impose sanctions. Rule 26(c) protects parties “or ... the person from whom discovery is sought” from abusive discovery requests that cause “annoyance, embarrassment, oppression, or undue burden by expense[.]”

Discovery rules mandate full and fair disclosure to prevent litigation from becoming a guessing game or ambush for either party. *Scott v Greenville Housing Authority*, 353 S.C. 639, 579 S.E.2d 151 (Ct. App. 2003). A party served with written discovery has a duty to answer it, unless the party objects based on a stated reason or moves for a protective order. *Richardson v. Twenty-One Thousand and no/100 Dollars*, 430 S.C. 594, 846 S.E.2d 14 (Ct. App. 2000).

Here, Plaintiff served proper discovery requests on Defendant and, after some delay, Defendant answered those requests. Proposed Intervenor is not a party to this action. No one has served discovery requests on her in this case, and she does not have grounds to invoke Rule 26. Only Defendant (or some other party that Plaintiff may subpoena) has the power to seek a protective order or the return, sequestration, or destruction of documents. Plaintiff has not received any request to return materials under Rule 26(b)(5)(b) from Defendant, and the only Rule 26(c)

motion filed in this case related to a stay of discovery while a dispositive motion was pending. Proposed Intervenor has no grounds to seek sanctions or a protective order under Rule 26.

III. Request for Sanctions

Rule 11 applies to parties not represented by attorneys. By signing a motion, a pro se party represents to the Court that she has read her motion; that, to the best of her knowledge, information and belief, there is good ground to support her motion; and that it has not been interposed for delay. Rule 11, S.C. R. Civ. P. Likewise, the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Sec. 15-36-10, *et seq.*, (Act) imposes a duty upon pro se litigants to certify that a reasonable attorney in the same circumstances would believe that the facts of her claim may be warranted under existing law, that the initiation of her claim is not meant to harass or injure another party, and that her claim is not frivolous or interposed for delay. *Id.* at Sec. 15-36-10(A)(3)(b-d). The Court is empowered to impose sanctions for a violation of Rule 11 and/or the Act.

Proposed Intervenor's Motion is not supported by good grounds. No reasonable attorney would believe that the alleged facts of her Motion support any cognizable claim under existing law. Rather, her Motion is intended to delay this litigation, harass Plaintiff, its members, and agents. Because the Motion is entirely frivolous, Plaintiff respectfully asks the Court to impose sanctions including but not limited to and award of costs and attorney's fees associated with defending the Motion.

To support its request for sanctions, Plaintiff will briefly reiterate its arguments related to Rule 24 and sanctions above in the context of Rule 11 and the Act.

A. Proposed Intervenor's Petition to Intervene is Not Supported by Good Grounds and Solely Meant to Harass and Delay

Rule 24, S.C. R. Civ. P., exists to promote judicial economy when the rights of all parties affected by litigation may be decided in one action. *Ex parte Gov't Employee's Ins. Co.*, 373 S.C.

132, 138, 644 S.E.2d at 699, 702. Proposed Intervenor’s Motion fails to meet the plain requirements of Rule 24 in several respects. As an initial matter, the Proposed Intervenor failed to include a draft pleading as required by Rule 24(c). Even if Proposed Intervenor had included a pleading, there is no indication what her claim or cause of action would be: Rather than making a clear connection to the breach of contract claim that is at the heart of this action, her Motion focuses on alleged privileged materials and investigations that have nothing to do with this case. She has failed to state good grounds to support her motion. No reasonable attorney would find that the law of contracts supports third party intervention to deal with unrelated claims of privileged materials and surreptitious surveillance. Proposed Intervenor does not even appear to understand the basis for Plaintiff’s lawsuit, as she makes repeated references to “defamation” when this case stems from a breach of contract. [Compare Amended Compl. with Motion pp. 8, 10-11.]

Proposed Intervenor’s Motion does not just fail to meet the requirements of Rule 24, it is also meant to harass and delay. It contains repeated references to prior sanctions issued by Judge Rode in the *GLT2* litigation⁴. Proposed Intervenor calls this case part of a “coordinated scheme” against her. [Motion p. 2.] She even brings up the speech she made on the floor of the United States House of Representatives in which she identified by name certain members of Plaintiff. *Id.* Filing a motion filled with citations to prior litigation and hurtful, public allegations are clearly meant to harass and intimate members of Plaintiff.

There is no right of Proposed Intervenor that is affected by this litigation. Instead, she is attempting to delay this litigation and harass certain individuals.

B. Proposed Intervenor’s Request for Sanctions are Improper

⁴ *GLT2, LLC v. John Doe and Jane Doe*, 2025-CP-10-981. Plaintiff takes this opportunity to highlight Judge Rode’s statement on page 18 of his Final Sanctions Order that “

Proposed Intervenor's requests for sanctions are baseless and meant to intimidate and harass Plaintiff and its members. The request for sanctions under Rule 11, S.C. R. Civ. P., fails because Plaintiff's counsel had good grounds for initiating this breach of contract action and for serving her discovery requests. As discussed more thoroughly above, Proposed Intervenor's request for sanctions under Rules 26 and 37, S.C. R. Civ. P., are procedurally improper. She has no basis for requesting sanctions under these Rules. Even if she did have standing to bring an abuse of process claim (which Plaintiff denies), that claim fails, too, because Proposed Intervenor is unable to satisfy the elements of that cause of action.

Proposed Intervenor references Judge Rode's October 30, 2025, Final Sanctions Order⁵ (*GLT2* Order) multiple times in her Motion. Plaintiff maintains its position that the instant case is in no way related to *GLT2, LLC*, but Judge Rode's statement regarding intervention and sanctions bear repeating.

In finding Rule 11 Sanctions are appropriate here, the Court wants to be clear that **this Order should not be interpreted to expand the scope of Rule 11 by suggesting a non-party may intervene solely for the purpose of seeking sanctions.** The ability to pursue sanctions under Rule 11 is typically triggered when a litigant is forced to defend against a frivolous or improper proceeding. *See e.g. Runyon [v. Wright]*, 322 S.C. 15, 471 S.E.2d 160 (1996)] (explaining that sanctions may be awarded to "the party or parties *defending* against the frivolous action.") (emphasis added).

[*GLT2* Order p. 18]

The Court's award of sanctions in *GLT2, LLC* came in a vastly different and extraordinary context. There, the same Proposed Intervenor was mentioned in a deposition that was taken pursuant to Rule 27's provision permitting testimony before an action is filed, and the contents of

⁵ *GLT2, LLC v. Jane Doe and John Doe*, 2025-CP-10-981 (*GLT2, LLC*)

that deposition were reported on by the media.⁶ This case, by contrast, involves a civil action based on the violation of an Agreement to which the Proposed Intervenor was not a party. Written discovery requests were served after the pleadings were filed, and a review of those requests reveals that they are designed to advance litigation, not to investigate or harass the Proposed Intervenor. The differences between *GLT2, LLC* and this case could not be more obvious, and the extremely unusual circumstances that led to Judge Rode granting Proposed Intervenor's motions in *GLT2, LLC* do not exist here.

The language excerpted from the *GLT2, LLC* Order above highlight just how unusual—and improper—Proposed Intervenor's Motion is in this case.

Conclusion

Proposed Intervenor has no direct, personal, or legal interest in this matter. She has failed to show any basis for being allowed to intervene, nor has she made any substantive showing of prejudice by Plaintiff. Her allegations of abuse of process are without merit. Plaintiff respectfully asks that this Court deny the Proposed Intervenor's Motion to Intervene. Should the question of sanctions or a protective order arise, Plaintiff would also ask that this Court deny Proposed Intervenor's request for sanctions and protective order on the grounds stated above. Furthermore, because there are no good grounds to support Proposed Intervenor's Motion, and because her Motion is meant solely to harass and delay, Plaintiff respectfully asks the Court strike the Motion from the docket, deny all relief requested in the Motion, and award Plaintiff its costs and attorney's fees incurred in defending this frivolous Motion pursuant to Rule 11 and the S.C. Code 16-36-10, *et seq.*

⁶ There was also a procedural defect in that no court order authorizing the deposition was obtained prior to taking the deposition, as required by Rule 27. *See GLT Order* p. 3.

February 2, 2026
Charleston, South Carolina

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