FOR OFFICIAL PUBLICATION

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX

KELVIN DENNIE, **Plaintiff,** **v.** **OLYMPIC RENT-A-CAR, CENTERLINE CAR RENTAL, BUDGET RENT A CAR, RICHARD EVANGELISTA, Commissioner, VI Department of Licensing and Consumer Affairs, TREVOR VELINOR, in his official capacity as COMMISSIONER of the Virgin ISLANDS POLICE DEPARTMENT, and JOHN and JANE DOE,[1]** **Defendants.**	**CASE NO. SX-08-CV-586** **ACTION FOR TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION, PERMANENT INJUNCTION, VIOLATION OF STATUTORY AND BUSINESS RIGHT, UNFAIR UNLAWFUL COMPETITION, and for INTERFERENCE WITH BUSINESS**

Cite as: 2019 VI Super 156

APPEARANCES:

BEVERLY A. EDNEY, ESQ.
Kingshill, St. Croix, VI
Attorney for Plaintiff

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Christiansted, VI
Attorney for Defendants Olympic Rent-A-Car and Centerline Car Rental

H.A. CURT OTTO, ESQ.
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Christiansted, VI
Attorney for Defendant Budget Rent A Car

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[1] In his initial complaint, and subsequent amendments, Plaintiff named Commissioner Devin Carrington and Commissioner Delroy Richards as defendants in their official capacities as Commissioner of the Department of Licensing and Consumer Affairs and Commissioner of the Virgin Islands Police Department, respectively. Pursuant to Rule 25(d) of the Virgin Islands Rules of Civil Procedure, the Court will substitute the names of Richard Evangelista and Trevor Velinor as the individuals who currently hold these positions.

RAYMOND T. JAMES, ESQ.
Virgin Islands Department of Justice
St. Croix, VI
Attorney for the Government Defendants

MEMORANDUM OPINION

ROBERT A. MOLLOY, Judge.

¶1 In this case, the Plaintiff challenges certain car rental companies' ability to provide "courtesy rides" to certain individuals without being in possession of a taxi medallion. Plaintiff also commenced this lawsuit requesting that the Court mandate that certain governmental agencies must prohibit the car rental companies from engaging in this practice.[2] The car rental company defendants moved for summary judgment contending that the statutes Plaintiff seeks relief under do not provide a private right of action. Plaintiff also moved for partial summary judgment contending that, because the car rental defendants cannot establish that they are licensed to provide courtesy rides to their customers, Plaintiff is entitled to prevail on his claims. Thus, Plaintiff seeks partial summary judgment because the Defendants failed to establish that they are licensed to provide courtesy rides to their customers. Because this Court agrees with the defendants that no private right of action is implied, the Court will grant their motions for summary judgment and deny Plaintiff's motion for partial summary judgment.

I. BACKGROUND

¶2 Plaintiff, Kelvin B. Dennie ("Dennie"), is a long-time taxi driver and owner of a taxi medallion[3] that authorizes him to transport "passengers for hire" for a fixed fee in the Virgin Islands. Defendants, Olympic Rent-A-Car ("Olympic"), Centerline Car Rental ("Centerline"), Budget Rent-A-Car ("Budget") (collectively "car rental company defendants") are engaged in the business of leasing drive-yourself motor vehicles to be operated on the highways of the United States Virgin Islands. *See* Fourth Amended Compl. ¶ 3 ("Fourth Am. Compl.").[4] Dennie alleges that the "[d]efendants are not licensed nor possess any statutory or legal authority to solicit and/or transport passengers for hire in defendants' private motor vehicles operated on the highway of the U.S. Virgin Islands." *Id.* at

[2] The Court will address Plaintiff's claims against the government defendants in a separate order.
[3] "'Medallion" refers to an insignia to designate a vehicle a taxi. *See generally*, 20 V.I.C. § 407, *et seq.*
[4] The Court granted Dennie's Motion to Amend the Third Amended Complaint on October 17, 2016.

¶4. Dennie further claims that the defendants are soliciting and transporting "passengers for hire" in violation of the taxi medallion law, 20 V.I.C. § 101 *et. seq.* as well as Act. No. 6533 § 7(c), 20 V.I.C. § 407, and 20 V.I.C. § 413. *Id.* at ¶¶5, 10. Dennie also alleges that the solicitation and transportation of passengers for hire is not the legitimate or regular occupation or business of the defendants, who have been providing "courtesy rides" to their customers. *Id.* at ¶ 6.

II. LEGAL STANDARD

¶3 Pursuant to Rule 56 of the Virgin Islands Rules of Civil Procedure, a party may move for summary judgment identifying each claim on which summary judgment is sought. V.I. R. Civ. P. 56(a). The Court must "grant summary judgment if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law." *Id.* "If the movant meets this burden, the nonmoving party must introduce some evidence showing a genuine issue for trial." *Anderson v. Am. Fed'n of Teachers*, 67 V.I. 777, 788 (2017). If the movant demonstrates the absence of a triable issue of material fact in the record, that movant is entitled to a judgment as a matter of law. *See Rymer v. Kmart Corp.*, 68 V.I. 571, 575-76 (2018). The Court's role in deciding a motion for summary judgment is not to determine truth, but rather to determine whether a factual dispute exists that warrants trial on the merits. *See Williams v. United Corp.*, 50 V.I. 191, 195 (2008).

III. DISCUSSION

A. The Automobile-for-Hire Statute Does not Provide for a Private Right of Action

¶4 In his Fourth Amended Complaint, Dennie alleges that the car rental company defendants are not licensed to solicit and/or transport passengers for hire in Defendants' private motor vehicles. *See* Fourth Amend. Compl. ¶ 4. Dennie further alleges that the defendants' actions constitute a violation of the Automobile-for-Hire statutes and legislation codified at 20 V.I.C. § 101, *et seq.*, 20 V.I.C. § 407, 20 V.I.C. § 413(c), as well as Act No. 6533 § 7(c). *See id.* at ¶¶ 5, 10.

¶5 Act No. 6533, § 7(c) provides that "[a]ny person or entity that carries passengers for hire from one location to another shall use a medallioned vehicle, unless the vehicle is excluded from the definition of automobile for hire under title 20, section 101, Virgin Islands Code." At the time Dennie commenced this litigation in 2008, section 101 of title 20 of the Virgin Islands Code defined "automobiles for hire" as:

> A motor vehicle operated for the purpose of transporting passengers for hire in the Virgin Islands and shall include motor vehicles operated for the purpose of conducting tours whether or not on fixed routes or on established schedules, but shall not include motor vehicles operated as motor busses or passenger-carrying trucks subject to regulation under the provisions of chapter 1, Title 30 of this code nor motor vehicles owned by the Government of the Virgin Islands or by the Government of the United States nor drive-yourself motor vehicles for lease.

20 V.I.C. § 101 (2008 ed.). The statute was amended in 2011 to exclude "courtesy rides from drive yourself motor vehicle operators with current lease agreements with the Port Authority to their customers to or from their rental facility," which was added after the word "lease" at the end of the paragraph. *See* 20 V.I.C. § 101 (2011).

¶6 Under both the 2008 version and the amended version, if a vehicle is not excluded under the definition of "automobile for hire", then the individual must use a medallioned vehicle to transport passengers. The process for acquiring an automobile-for-hire medallion is governed by 20 V.I.C. § 407 which mandates that these medallions are to be sold by the Virgin Islands Taxicab Commission. *See id.* § 407(b); *see also* 3 V.I.C. § 274(f)(1) (authorizing the Virgin Islands Taxicab Commission to issue a medallion "in accordance with the procedures of Title 20, chapter [37], subchapter II"). Section 413(c) expressly prohibits any person from operating an automobile-for-hire in the Virgin Islands "who is not the owner of a medallion validly obtained under [subchapter II of Title 20]." 20 V.I.C. § 413(c). Finally, "[a]ny person who violates any of the provisions of [the automobile-for-hire statute] shall be punished for each offense by a fine of not more than five hundred dollars or by imprisonment for a term not to exceed six months or both." *Id.* § 413(d).

¶7 In their summary judgment motions, the car rental company defendants argue that these statutes do not provide a private right of action and thus, Dennie's claim based on a violation of these statutes must fail. "A private right of action is the right of an individual to bring suit to remedy or prevent an injury resulting from an actual or threatened violation of a legal requirement." *Olive v. deJongh*, 57 V.I. 24, 43 (Super. Ct. 2012) (citing *Wisniewski v. Rodale, Inc.*, 510 F.3d 294, 296 (3d Cir. 2007)). Ultimately, whether a statute provides for an implied right of action is a question of legislative intent. *Id.* at 46. If the legislature explicitly created a private right of action, no further inquiry is needed. *Cf. Estate of Skepple v. Bank of Nova Scotia*, 69 V.I. 700, 736 (2018) ("When the

plain language of a statute is an unambiguous statement of legislative intent, no further judicial inquiry is appropriate.").

¶8 In *Rennie v. Hess Oil Virgin Islands Corporation*, 62 V.I. 529, 550 (2015), the Virgin Islands Supreme Court opined that, when a statute is silent as to who has standing to bring suit, the statute should be broadly interpreted to confer standing. *Rennie* approved of those cases that had recognized "'the common law tradition [that] the denial of a remedy is the exception rather than the rule,' and that 'if a statute was enacted for the benefit of a special class, a remedy was recognized for members of that class.'" *Id.* at 548 (brackets and ellipsis omitted) (quoting *Miller v. V.I. Hous. Auth.*, 46 V.I. 623, 630-31 (D.V.I. 2005)). Under this common law approach, "silence or ambiguity could not be a reason to deny standing to enforce a statute by an individual who the statute was clearly enacted to protect." *Id.*

¶9 In this case, however, the statute at issue is neither silent nor ambiguous as to who has standing to enforce its provisions. Section 413(c) explicitly prohibits a person from operating an automobile for hire without being in possession of a medallion. The penalty for such a violation is found in section 413(d) which imposes "a fine of not more than five hundred dollars or by imprisonment for a term not to exceed six months or both." Thus, it is a criminal act to violate the provisions of the automobile-for-hire statute. *Cf.* 14 V.I.C. § 1 (defining a "crime" as "an act committed or omitted in violation of a law of the Virgin Islands and punishable by imprisonment, fine, removal from office, or disqualification to hold and enjoy any office or honor, trust, or profit."). Under the laws of the Virgin Islands, only the Attorney General, or his/her designee, has the authority to criminally prosecute individuals who commit criminal offenses in violation of the laws of the Virgin Islands. *See* 3 V.I.C. § 114(a)(2) and (3). Accordingly, as a private citizen, Dennie has no right to file a claim for a violation of section 413(c). *Wisniewski*, 510 F.3d at 305 (opining that a statute that provides for "agency enforcement creates a strong presumption against implied private rights of action that must be overcome."); *Horne v. Flores*, 557 U.S. 433, 456 n. 6 (2009) (holding that the agency in charge of administering the statutory scheme is the only body that can enforce the law).

¶10 Additionally, the Automobile-for-Hire statute was not enacted for the benefit for a special class of persons and certainly not to benefit persons who possess a taxi medallion. The Automobile-

for-Hire statute codified in 20 V.I.C. § 401, *et seq.*, establishes the framework for the regulation of automobiles-for-hire as well as the criminal penalties imposed for violating the provision of that chapter. The regulatory nature of the language in the statute was clearly intended to regulate the transportation of passengers on the roads of the Virgin Islands. Thus, this statute was designed to benefit the general public and "if a statute benefits the general public as a whole, no special class is created and the court may not imply a private right action." *Shero v. City of Grove*, Case No. 05-CV-0137-CVE-PJC, 2006 U.S. Dist. LEXIS 80462, at *29-30 (N.D. Okla. Nov. 2, 2006); *see also Yoakum v. Hartford Fire Ins., Co.*, 923 P.2d 416, 421 (Idaho 1996) (opining that plaintiff did not have a private right of action based on the violation of certain criminal statutes because criminal statutes are not designed to protect any special class of persons and legislature did not intend to create a private remedy). The Court recognizes that, generally, criminal legislation does not displace civil remedies. *Cf.* 14 V.I.C. § 102; *accord Dresden v. Detroit Macomb Hosp. Corp.*, 553 N.W.2d 387, 391 (Mich. Ct. App. 1996); *see also Stop Youth Addiction, Inc. v. Lucky Stores, Inc.*, 950 P.2d 1086, 1098 (Cal. 1998). However, there is no language in this statute that would suggest that the Legislature intended to create a private right of action or a private remedy for individuals claiming damages under the statute.[5]

¶11 In light of the fact that the statute in this case is silent as to whether it creates a private right of action and was not enacted to protect a special class of persons, the Court finds the decision of the Supreme Court of the United States in *Alexander v. Sandoval*, 532 U.S. 275 (2001), and its progeny, to be persuasive. In *Sandoval*, the Court addressed whether a federal statute provides an implied private right of action, stating:

> Like substantive federal law itself, private rights of action to enforce federal law must be created by Congress. The judicial task is to interpret the statute Congress has passed to determine whether it displays an intent to create not just a private right but also a private remedy. Statutory intent on this latter point is determinative. Without it, a cause of action does not exist and courts may not create one, no matter how desirable that might be as a policy matter, or how compatible with the statute.

532 U.S. at 286-87 (citations omitted).

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[5] The 2011 amendments to 20 V.I.C. § 101 excluding "courtesy rides from drive yourself motor vehicle operators" from the definition of "automobiles for hire" is another indication that the statute was not enacted to benefit a special class of persons who possess a taxi medallion.

¶12 In interpreting *Sandoval*, the United States Court of Appeals for the Third Circuit opined that *Sandoval* created a two-part test to determine whether a statute provides an implied right of action: (1) whether the legislature intended to create a personal right; and (2) whether the legislature intended to create a private remedy. *See Wisniewski*, 510 F.3d at 301. "Only if the answer to both of these questions is 'yes' may a court hold that an implied private right of action exists under [the statute]." *Id.*; *see also Three Rivers Ctr. v. Hous. Auth. of the City of Pittsburgh*, 382 F.3d 412, 421 (3d Cir. 2004) ("Put succinctly, for an implied right of action to exist, a statute must manifest Congress's intent to create (1) a personal right, and (2) a private remedy."). The Court finds the *Sandoval* test, as distilled by *Wisniewski*, highly instructive here.[6] And, in applying this test, the Court is further convinced that the Automobile-for-Hire statute does not provide an implied private right of action.

¶13 In determining whether a personal right exists under the *Sandoval* test, the Court must begin "by reviewing the text and structure of the statute to determine whether the statute contained rights-creating language that focuses on the individual protected rather than the person regulated." *Wisniewski*, 510 F.3d at 301-02 (quotations omitted) (citing *Sandoval*, 532 U.S. at 288-89). The statutes at issue in this case contain no language whatsoever demonstrating the legislature's intent to create a private right of action. Act No. 6533 simply requires a person who carries passengers for hire to use a medallioned vehicle. Similarly, the Automobile-for-Hire statute codified at 20 V.I.C. § 401, *et seq.*, establishes the framework for the regulation of automobiles-for-hire as well as the penalties imposed for violating the provisions of that chapter. There is no language in these statutory provisions that contain rights-creating language that would allow for Dennie to file a cause of action to enforce the provisions of this statute. "Without any language in the text and structure of

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[6] This Court recognizes that, in *Rennie*, the Virgin Islands Supreme Court declined to follow the four-part test adopted by the United States Supreme Court in *Cort v. Ash*, 422 U.S. 66 (1975), to determine whether a statute created a private right of action. *Rennie*, 62 V.I. at 550 ("The four-prong Cort test is perhaps the textbook example of a rule of statutory construction adopted by the United States Supreme Court to interpret acts of Congress that should not be used to interpret a Virgin Islands statute.") In *Rennie*, however, the Virgin Islands Supreme Court made no mention of the test discussed in *Sandoval*, a 2001 case that was decided after *Cort* and before *Rennie*. Nor did the Court make any mention of any of the other cases effectively overruling *Cort v. Ash*. *See Thompson v. Thompson*, 484 U.S. 174, 189 (1988) (Scalia, J., concurring) ("we effectively overruled the *Cort v. Ash* analysis in *Touche Ross & Co. v. Redington*, 442 U.S. 560, 575-576 (1979), and *Transamerica Mortgage Advisors, Inc. v. Lewis*, 444 U.S. 11, 18 (1979), converting one of its four factors (congressional intent) into *the determinative factor*, with the other three merely indicative of its presence or absence." (emphasis and parenthesis in original)). This Court does not read the Virgin Islands Supreme Court's disapproval of the *Cort* test in *Rennie* to preclude the application of the *Sandoval* test. Nonetheless, as in *Sandoval*, its progenitor and progeny of cases, as well as the teachings of the Virgin Islands Supreme Court, the application of a statute boils down to legislative intent.

the statute to imply the creation of a personal right of action, [the Court] must conclude that it was not the intent of the Virgin Islands Legislature to do so." *Speaks v. Gov't of the V.I.*, Civ. No. 2006-168, 2009 U.S. Dist. LEXIS 3565, *4 (D.V.I. Jan. 14, 2009).

¶14 Assuming, for the sake of argument, that the statute contained "rights-creating" language, the language of the statute clearly shows that the Virgin Islands Legislature did not intend to provide a *private* remedy for violations of the Automobile-for-Hire statute. The express language of section 413(d) establishes that a person who operates a vehicle within the Virgin Islands without being the owner of a medallion "shall be punished for each offense by a fine of not more than five hundred dollars or imprisonment for a term not to exceed six months or both." 20 V.I.C. § 413(d). The Virgin Islands Police Department and the Taxicab Commission share joint enforcement authority over certain traffic violations that occur within the Virgin Islands. *See* 3 V.I.C § 257(a)(5) (stating that the VIPD "shall exercise general control over the enforcement of the laws relating to public safety, and shall . . . administer, supervise, and enforce the regulations and laws covering the ownership, operation, and control of motor vehicles, and direct and control traffic and supervise and enforce the laws relating thereto"); *see also* 20 V.I.C. § 401b (providing that the Taxicab Commission handles citations issued by taxicab inspectors for violations of chapter 37, Title 20, of the V.I. Code). "A statute that provides for agency enforcement creates strong presumption against implied private rights of action that must be overcome." *Wisniewski*, 510 F.3d at 305. As articulated by the Supreme Court of the United States:

> [i]t is . . . an 'elemental canon' of statutory construction that where a statute expressly provides a remedy, courts must be especially reluctant to provide additional remedies. In such cases, '[i]n the absence of strong indicia of contrary congressional intent, we are compelled to conclude that Congress provided precisely the remedies it considered appropriate.'

Karahalios v. Nat'l Fed'n of Fed. Emps., Local 1263, 489 U.S. 527, 533 (1989) (citations omitted). Because the Automobile-for-Hire statute is a criminal statute that explicitly provides for enforcement by law enforcement agencies and finding that this statute was not designed to benefit a special class of individuals, the Court concludes that the common law presumption providing for a private right of action does not apply to this case. Here, the Court must presume that the legislature

provided the remedies that it considered appropriate for a violation of a criminal statute. Dennie has not presented any arguments to overcome that presumption.

B. The Car Rental Company Defendants Do Not Need to Use a Medallioned Vehicle to Provide Courtesy Rides to or from Their Rental Facility Because They Have Lease Agreements with the Virgin Islands Port Authority

¶15 In the alternative, even if the Automobile-for-Hire statute does provide a private right of action, the car rental company defendants argue that they are excluded from the definition of automobile-for-hire and thus, do not need to use a medallioned vehicle to provide courtesy rides because they have lease agreements with the Virgin Islands Port Authority ("Port Authority"). As discussed above, persons who transport "passengers for hire from one location to another must use a medallioned vehicle, unless the vehicle is excluded from the definition of automobile for hire under [20 V.I.C. § 101]." Act No. 6533 § 7(c). In 2011, the Legislature amended the statute to exclude "courtesy rides from drive yourself motor vehicle operators with current lease agreements with the Port Authority to their customers to or from their rental facility" from the definition of "automobile for hire." 20 V.I.C. § 101 (2011). Thus, if a car rental company defendants submit unrebutted evidence that it had a current lease agreement with the Port Authority, then it would be excluded from the definition of "automobile for hire" – and not need to use a medallioned vehicle – to the extent it provides courtesy rides "to their customers to or from their rental facility."

¶16 Both Centerline and Budget provided the Court with an authenticated copy of their respective lease agreements with the Port Authority. *See* Def. Notice of Filing dated Oct. 24, 2016 – Ex. 2; Budget's Notice of Filing dated Oct. 17, 2016 – Ex. 1. Budget also submitted the affidavit of its Operations Manager stating that Budget is in the business of renting motor vehicles to the public, has an approved lease agreement with the Port Authority since June 12, 2001, and its "courtesy rides have been to and from Budget's rental facilities." Shilingford Aff. ¶ 1-4 (Sept. 16, 2015). Olympic did not submit a copy of a lease agreement, but instead submitted an affidavit from its General Manager stating that "Olympic currently leases parking spaces from the [Port Authority] at the Henry E. Rohlsen Airport for the storage of Olympic's rental cars for its customers flying in or out of the airport" and that "Olympic has had such a monthly lease with the Port Authority every month since 2008 when I started with Olympic." Knight Aff. ¶¶1-3. (Oct. 20, 2016). The affidavit further states that "all courtesy rides provided by Olympic are to or from Olympic's rental facility in

Estate Richmond." *Id.* at ¶ 5. While Budget and Olympic have submitted evidence demonstrating that the courtesy rides they provide to their customers are rides to or from their rental facility, Centerline did not submit any evidence on this issue.

¶17 In light of the evidence identified above, the burden now shifts to Dennie to present evidence creating a genuine issue of material fact precluding summary judgment. Dennie has not provided any evidence to create a genuine issue of material fact that Budget or Olympic do not have current lease agreements with the Port Authority or that the courtesy rides they provided to their customers were to or from their respective rental facility. Thus, even if the Court were to conclude that the Automobile-for Hire statutes provided Dennie with a private right of action, Budget and Olympic would be entitled to summary judgment on Dennie's claims they he suffered damages due to these defendants not using a medallioned vehicle to transport passengers.

IV. CONCLUSION

¶18 Because the Court concludes that the Virgin Islands Automobile-for-Hire statute does not provide a private right of action, the Court will grant summary judgment in favor of the car rental company defendants. It necessarily follows that Dennie's motion for summary judgment must be denied. Additionally, even if Dennie had the right to sue under the Automobile-for-Hire statutes, there is no genuine issue of material fact in dispute that Budget and Olympic are excluded from the definition of "automobile for hire," and therefore, do not need to use a medallioned vehicle to transport its passengers to or from its rental facility. An appropriate order follows.

Date: November 15, 2019

ROBERT A. MOLLOY
Judge of the Superior Court

ATTEST:
ESTRELLA H. GEORGE
Clerk of the Court

By: _____
Court Clerk

Date: 11/15/19

ORDERED, ADJUDGED, AND DECREED that the motions for summary judgment filed by the Defendants are **GRANTED;** it is further

ORDERED, ADJUDGED, AND DECREED that Plaintiff's Motion for Partial Summary Judgment, filed on December 11, 2018, is **DENIED;** it is further

ORDERED, ADJUDGED, AND DECREED that Judgment is awarded **IN FAVOR OF** Defendant Olympic Rent-A-Car and **AGAINST** Plaintiff Kelvin Dennie on his claims for violation of 20 V.I.C. § 101 *et. seq.*, Act. No. 6533 § 7(c), 20 V.I.C. § 407, and 20 V.I.C. § 413; it is further

ORDERED, ADJUDGED, AND DECREED that Judgment is awarded **IN FAVOR OF** Defendant Centerline Car Rental and **AGAINST** Plaintiff Kelvin Dennie on his claims for violation of 20 V.I.C. § 101 *et. seq.*, Act. No. 6533 § 7(c), 20 V.I.C. § 407, and 20 V.I.C. § 413; it is further

ORDERED, ADJUDGED, AND DECREED that Judgment is awarded **IN FAVOR OF** Defendant Budget Rent-A-Car and **AGAINST** Plaintiff Kelvin Dennie on his claims for violation of 20 V.I.C. § 101 *et. seq.*, Act. No. 6533 § 7(c), 20 V.I.C. § 407, and 20 V.I.C. § 413; it is further

ORDERED, ADJUDGED, AND DECREED that the Fourth Amended Complaint is **DISMISSED WITH PREJUDICE** and this matter is **CLOSED;** it is further

ORDERED that copies of this Judgment and accompanying Memorandum Opinion shall be provided to Attorney Beverly A. Edney, Attorney Michael J. Sanford, Attorney H.A. Curt Otto, and Assistant Attorney General Raymond T. James.

Date: November 15, 2019

ROBERT A. MOLLOY
Judge of the Superior Court

ATTEST:

ESTRELLA H. GEORGE
Clerk of the Court
By: _____
Court Clerk
Date: 11/15/19