

NO. _____

**IN THE
COURT OF APPEALS
FOR THE
SECOND DISTRICT OF TEXAS
FORT WORTH, TEXAS**

**IN RE: KEITH HALLS, JOHN "JT" THATCH, AND KIP A. ALLISON,
Relators.**

PETITON FOR WRIT OF MANDAMUS

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RECORD AND APPENDIX

Relators Keith Halls, John “JT” Thatch, and Kip A. Allison (collectively, the “Relators”) file the record in this original proceeding as an attachment to this Petition for Writ of Mandamus. Pursuant to Rule 52.3(k)(1)(A) of the Texas Rules of Appellate Procedure, a copy of the Respondent’s e-mail ruling and Orders are included in the Appendix.¹

¹ The attached Appendix submitted by the Relators begins with number “R000001.”

STATEMENT OF CASE

Nature of Case: Real Party in Interest filed a lawsuit against Defendant seeking a declaratory judgment concerning the ownership of a limited liability company, and monetary damages for tortious interference with contract, common-law and statutory fraud, business disparagement, and unlawful appropriation of name and likeness. Thereafter, Real Party in Interest filed an Application for Injunctive Relief against Defendant seeking to prevent the exercise of voting rights in the membership units in the limited liability company.

Respondent: Honorable Margaret Barnes
367th District Court, Denton County

Respondent's actions: (1) Issued a temporary restraining order ("TRO"), then Amended TRO without notice to Relators or Defendant that failed to state why it was issued without notice, (2) Issued an Order to Show Cause directed to Relators based upon the Amended TRO, and (3) Issued a ruling via e-mail on October 28, 2019 and then Order that the Amended TRO was not void *ab initio* (collectively, "October 28 Order").

STATEMENT OF JURISDICTION

This Court has original jurisdiction to issue the requested writ of mandamus. *See* TEX. GOV'T CODE §22.221(a); TEX. R. APP. P. 52.1. This Court has jurisdiction to issue a writ of mandamus to a judge of a district court in a county in this Court's appellate district. TEX. CONST. ART. V, § 6; TEX. GOV'T CODE § 22.221(b)(1). The 367th District Court of Denton County is one of the courts that sits within this Court's appellate district. *See* TEX. GOV'T CODE § 22.201(c). The Respondent is the presiding judge of the 367th Judicial District Court; and accordingly, this Court can issue a writ of mandamus, agreeable to the principles of law regulating such writs, directed to the Respondent.

ISSUES PRESENTED

1. Was the Amended TRO issued by the Respondent, which failed to comply with Rule 680 of the Texas Rules of Civil Procedure due to its failure to state why it was granted without notice to either the Relators or the Defendant, void *ab initio*, and therefore, an abuse of discretion?

* * *

2. Was the Order to Show Cause issued by the Respondent based upon the void Amended TRO also itself void, and therefore, an abuse of discretion?

* * *

3. Was the October 28 ruling issued by the Respondent that the Amended TRO was not void *ab initio* and that Realtors shall appear at a hearing on the Motion to Show Cause an abuse of discretion given that contempt proceedings cannot be predicated on a void order?

TO THE HONORABLE COURT OF APPEALS:

Relators file their Petition for Writ of Mandamus against Respondent², as follows:

PRELIMINARY STATEMENT

Relators are not named parties in the underlying trial court matter. Real Party in Interest filed an *ex parte* Application for Temporary Injunctive Relief in the trial court on August 22, 2019, which Application was both heard and granted on an *ex parte* basis without notice to Defendant or Relators. The Amended Temporary Restraining Order (“Amended TRO”) upon which this mandamus proceeding is predicated does not state why it was issue without notice as required by Texas Rule of Civil Procedure 680.

On September 11, 2019, Real Party in Interest filed a Motion to Show Cause therein requesting that Relators appear at a hearing before the trial court to explain why they should not be held in contempt for failing to abide by the “letter and spirit” of the Amended TRO.

At a preliminary hearing on the Real Party in Interest’s Motion to Show Cause against Relators held on October 17, 2019, Respondent ordered the Relators and the Real Party in Interest to submit briefing on the issue of whether or not the Amended TRO was void *ab initio*, as contended by Relators, due to the failure of the Amended

² Concurrently with the filing of this Petition for Writ of Mandamus, Relators are also filing an Emergency Motion to Stay Proceedings in Trial Court, seeking to stay further proceedings in the trial court until this Court rules on the Petition for Writ of Mandamus.

TRO to comply with Rule 680 of the Texas Rules of Civil Procedure and specify in the order why the Amended TRO was granted without notice to anyone.

Briefing was submitted by the Relators and the Real Party in Interest to the trial court on October 23, 2019, and subsequently on October 28, 2019, Respondent sent an e-mail to the parties which concluded that the Amended TRO was not void *ab initio* and that a Show Cause Hearing against Relators would proceed on November 4, 2019. The Motion to Show Cause and the presently scheduled hearing on the Motion to Show Cause are predicated exclusively upon the Amended TRO.

As set forth below, Respondent's ruling contradicts the plain language of Rule 680 of the Texas Rules of Civil Procedure and black letter law interpreting same which clearly render the Amended TRO void *ab initio*. No contempt proceedings can be predicated upon void orders. Respondent's actions constitute a clear abuse of discretion and Relators have no adequate remedy by appeal as Relators are now subjected to potential contempt based upon a void order. Accordingly, a writ of mandamus should issue directing the Respondent not to take up further proceedings involving the Amended TRO, including but not limited to any contempt proceedings predicated thereon, because the Amended TRO was void *ab initio* due to its failure to comply with Rule 680.

STATEMENT OF FACTS

1. Procedural History.

Real Party in Interest and Defendant are in a dispute concerning the ownership of Alchemist Holdings, LLC (R000001-000012). On August 12, 2019, Real Party in Interest filed a lawsuit against Defendant (R000001-000012). Relators are not specifically mentioned in the lawsuit³ and no relief is sought from Relators in the lawsuit. Paragraph 23 of the Plaintiff's Original Petition summarizes the relief sought and from whom it is sought: "[t]he wrongful actions and conduct of [Defendant] described above have proximately caused damages to [Real Party in Interest], for which he now sues, to the fullest extent of the law" (R000006).

On August 15, 2019, the attorney for the Real Party in Interest was sent a letter from the attorney for Sharing Services Global Corporation that provided:

As you know, Jones, Davis & Jackson, PC serves as outside legal counsel for Sharing Services Global Corporation and its subsidiaries (collectively, the "Company"). Accordingly, at the request of our client, please direct all correspondence on this matter to my attention at the address specified herein.

(R000175-000177).

On August 22, 2019, a full week after receiving the August 15, 2019 letter from the lawyer for Sharing Services Global Corporation, Real Party in Interest filed

³ Relators are not specifically mentioned in the Plaintiff's Original Petition, but Sharing Services Global Corporation is specifically mentioned in the petition. Relators are officers and directors for Sharing Services Global Corporation. In fact, Sharing Service Global Corporation is mentioned by name thirty (30) times in the Plaintiff's Original Petition.

a Verified Application for Injunctive Relief (R000013-000054). The attorney for Real Party in Interest appeared before Respondent the same day and sought to obtain an *ex parte* TRO. Neither Defendant nor Relators were provided with any notice of the hearing on the TRO. Notably, the attorney for the Real Party in interest included the following Certification in the Verified Application for Injunctive Relief which reflects that Real Party in Interest could not have intended the Amended TRO to apply to the Relators:

Howard J. Klatsky, counsel for Plaintiff, certifies that, to the best of his knowledge, the party against who relief is sought *ex parte* is not represented by counsel in the matter made the basis of the relief sought.

(R000019).

An *ex parte* TRO was signed by the Respondent on August 22, 2019 at 11:50 a.m. (R000055-000060).⁴ Thereafter, at 3:13 p.m., an *ex parte* Amended TRO was signed by the Respondent (R000061-000066). **There is nothing in the Amended TRO that states why it was issued without notice.** Neither the words “*ex parte*” nor the words “without notice” appear in the Amended TRO. In fact, the word “notice” only appears twice in the Amended TRO, and not in the context of why it was entered without notice.⁵

⁴ The initial TRO referenced in the record was superseded by the Amended TRO, and thus the initial TRO is not at issue in the underlying trial court or in this proceeding.

⁵ It is revealing of the Real Party in Interest’s tactics that his attorney did not provide notice to the attorney for Sharing Services Global Corporation of the TRO hearing, but did e-mail him a copy of the Amended TRO on the afternoon of August 28, 2019 (R00089-00097). In other words, the Real Party in Interest did not want the attorney for Sharing Services Global Corporation present at the hearing on August 22, 2019, but he did expect the Relators to be bound by the Amended TRO.

On September 11, 2019, Real Party in Interest filed his Motion to Show Cause, requesting that the Respondent find Relators in contempt for actions allegedly taken in violation of the Amended TRO.⁶ (R000068-000109).

A preliminary hearing was held on the Motion to Show Cause on October 17, 2019. (R000110). At that hearing, the Respondent requested that the Relators and the Real Party in Interest submit very short briefs on whether or not the Amended TRO was void *ab initio* due to its failure to state in the body of the Amended TRO why it was issued on an *ex parte* basis, which were filed by October 23, 2019, pursuant to Respondent's request. (R000192-000195; R000196-000199).

On October 28, 2019, the Respondent issued a ruling via e-mail that the Amended TRO was not void *ab initio*, but was in compliance with the applicable rules as set out in the Real Party in Interest's Verified Application for Injunctive Relief, as opposed to the actual Amended TRO itself (R000200). On October 30, the Real Party in Interest and Relators agreed to the form only of the Order reflecting the Respondent's e-mail ruling and that proposed order was submitted to the trial court on October 31, 2019 (R000201-000202).

⁶ While perhaps not germane to this proceeding, Relators deny that they were served with the Application for Injunctive Relief, the TRO, or the Amended TRO, or had notice of the TRO or the Amended TRO before the actions complained of by the Real Party in Interest in the Motion to Show Cause occurred (R ____).

2. The Amended TRO.

The Amended TRO, which is the centerpiece of each of the three issues presented herein, provides in relevant part as follows:

- The style of the case is *Robert Oblon v. Jordan Brock*. Neither Relators or Sharing Services Global Corporation or any of its subsidiaries are parties.
- Relators are not mentioned by name or otherwise anywhere in the Amended TRO, except that Kip A. Allison is mentioned as a candidate for a director position.
- The word “notice” appears only twice in the Amended TRO at page 5 and page 6, and “notice” is never used in the context why the Amended TRO was issued without notice.
- The Amended TRO expired on August 30, 2019 when there was to be a temporary injunction hearing. Real Party in Interest did not seek a temporary injunction or other injunctive relief. The Amended TRO expired by operation of law on September 5, 2019.

SUMMARY OF ARGUMENT

Under Texas law, mandamus is appropriate when a relator demonstrates that the trial court clearly abused its discretion and that the relator has no adequate remedy by appeal. Rule 680 of the Texas Rules of Civil Procedure requires a trial court to state why a temporary restraining order was issued without notice. A temporary restraining order that does not comply with Rule

680 is void. Texas law provides that a trial court abuses its discretion when it issues an order which is void. Texas law further provides that a temporary restraining order is not appealable. Texas law further provides that no contempt proceedings can be predicated upon void orders.

ARGUMENTS AND AUTHORITIES

1. Legal Standard for Issuing Writs of Mandamus.

There is a two-prong standard courts apply to grant petitions for writ of mandamus: the trial court must have abused its discretion, and as a result thereof, the relator must have been left without an adequate remedy on appeal. *Walker v. Packer*, 827 S.W.2d 833, 839-840 (Tex. 1992) (orig. proceeding). “Mandamus relief is proper to correct a clear abuse of discretion when there is no adequate remedy by appeal.” *In re Christus Santa Rosa Health Sys.*, 492 S.W.3d 276, 279 (Tex. 2016) (quoting *In re Frank Kent Motor Co.*, 361 S.W.3d 628, 630 (Tex. 2012)). “A trial court clearly abuses its discretion if ‘it reaches a decision so arbitrary and unreasonable as to amount to a clear and prejudicial error of law.’” *Walker*, S.W.2d at 839 (quoting *Johnson v. Fourth Ct. App.*, 700 S.W.2d 916, 917 (Tex.1985)).

2. The Respondent abused her discretion.

A. A TRO that does not comply with Rule 680 is void.

Rule 680 of the Texas Rules of Civil Procedure provides in relevant part that:

Every temporary restraining order granted without notice shall be endorsed with the date and hour of issuance; shall be filed forthwith in the clerk's office and entered of

record; shall define the injury and state why it is irreparable and why the order was granted without notice; and shall expire by its terms within such time after signing, not to exceed fourteen days, as the court fixes, unless within the time so fixed the order, for good cause shown, is extended for a like period or unless the party against whom the order is directed consents that it may be extended for a longer period.

TEX. R. CIV. P. 680 (emphasis added).

The Texas Supreme Court has succinctly stated that a temporary restraining order which does not meet all of the requirements of Rule 680 is void. *In re Office of Attorney General*, 257 S.W.3d 695, 697-98 (Tex. 2008) (orig. proceeding) (citing *InterFirst Bank San Felipe, N.A. v. Paz Constr. Co.*, 715 S.W.2d 640, 641 (Tex.1986); *Lancaster v. Lancaster*, 155 Tex. 528, 291 S.W.2d 303, 308 (1956)).

Rule 680 requires that the actual TRO state why it was issued without notice. *See In re Office of Attorney General*, 257 S.W.3d at 697. To circumvent this requirement, Respondent's ruling attempted to bootstrap statements contained in the Verified Application for Injunctive Relief filed by the Real Party in Interest. (R000200). Rule 680 does not provide that an application for injunctive relief can be incorporated by reference into a court's actual order. The TRO itself must comply with Rule 680 and state why it was issued without notice or it is void.

B. Respondent abused her discretion by entering a void order.

“A trial court abuses its discretion when it issues a void order.” *In re Elevacity, LLC*, No. 05–18–00135–CV, 2018 WL 915031, at *2 (Tex. App.—Dallas

Feb. 16, 2018, no pet.) (citing *Decker v. Lindsay*, 824 S.W.2d 247, 249 (Tex. App. – Houston [1st Dist.] 1992, no writ).⁷ “Mandamus relief may be afforded where the trial court’s order is void.” *Decker v. Lindsay*, 824 S.W.2d 247, 249 (Tex. App. – Houston [1st Dist.] 1992, no writ) (citation omitted).

The Amended TRO clearly does not fulfill this mandatory requirement of Rule 680 that a temporary restraining order state why it was issued without notice. As noted, neither the words “without notice” nor “*ex parte*” appear anywhere in the Amended TRO. (R000061-000066). Thus, as a matter of law, the Amended TRO was void *ab initio*.

A void temporary restraining order will not support an order of contempt for alleged noncompliance with the order. *Ex Parte Leshner*, 651 S.W.2d 734, 736 (Tex. 1983) (holding that temporary restraining order was void on its face and “will not support an order of contempt.”); accord *In re Garza*, 126 S.W.3d 268, 271 (Tex. App.—San Antonio 2003, no pet.) (“A void order has no force or effect and confers no rights; it is a mere nullity. . . . a trial court that holds a party in contempt for violating a void order necessarily abuses its discretion.”). The Amended TRO entered by the Respondent is unquestionably void for failure to comply with Rule 680, and no contempt proceedings can be predicated upon void orders. Accordingly,

⁷ In fact, Real Party in Interest herein, Robert Oblon, was a relator in the *In re Elevacity, LLC* case and made the same argument to the appellate court that the Relators now make herein, and Robert Oblon properly obtained a ruling from the Dallas Court of Appeals that the temporary restraining order in that case was void. Now, Robert Oblon apparently advances the exact opposite argument from the one he advanced in the *In re Elevacity, LLC* case.

the Show Cause Order and the October 28 Order are also void *ab initio* because they rely solely upon the Amended TRO, which is clearly void *ab initio* as a matter of law.

3. There is no adequate remedy on appeal.

The Texas Supreme Court has also succinctly held that because a temporary restraining order cannot be appealed, there is no adequate remedy on appeal. *In re Office of Attorney General*, 257 S.W.3d at 697 (citing *In re Tex. Natural Res. Commission*, 85 S.W.3d 201, 205 (Tex. 2002); *In re Newton*, 146 S.W.3d 648, 652-53 (Tex. 2004)). *See also, In re S. Foods Grp., LLC*, No. 05-13-01348-CV, 2013 WL 5888255, at *1 (Tex. App.—Dallas 2013, original proceeding) (“A party has no remedy by appeal when a TRO is granted that is not in compliance with the rules, and a writ of mandamus is appropriate in such situations.”); *see also In re Office of Attorney Gen.*, 257 S.W.3d at 698 (“Because temporary restraining orders are not appealable, the Attorney General has no remedy by appeal.”); *In re Rio Grande City Consolidated Ind. Sch. Dist.*, 2016 WL 6609198, at *2 (Tex. App.—San Antonio Sept. 9, 2016, no pet.) (explaining that a party against whom a void temporary restraining order is issued has no adequate remedy by appeal); *Decker*, 824 S.W.2d at 249 (“Mandamus relief may be afforded where the trial court’s order is void.” citations omitted).

Relators cannot appeal the Amended TRO, the Show Cause Order or the October 28 Order. Moreover, Relators are being subjected to contempt proceedings,

including potential fines or confinement, based upon a void order. As a result, mandamus is proper.

CONCLUSION AND PRAYER

Rule 680 of the Texas Rules of Civil Procedure requires a trial court to state why a temporary restraining order was issued without notice. The Amended TRO does not meet this mandatory requirement of Rule 680. Further the Show Cause Order and the October 28, 2019 Order suffer from the same maladies as the Amended TRO. A temporary restraining order that does not comply with Rule 680 is void. The Respondent abused her discretion by issuing a void order which Relators cannot by law appeal. Because the Amended TRO is void, the Order to Show Cause and October 28 Order are also void.

This Court should issue a writ of mandamus directing the Respondent to take up further proceedings involving the Amended TRO because it was void *ab initio* due to its failure to comply with Rule 680 and further directing Respondent that no further proceedings can be held or predicated upon the void Amended TRO, including but not limited to the Motion to Show Cause or any hearing thereon or any other contempt proceedings or otherwise.

WHEREFORE, Relators Keith Halls, John “JT” Thatch, and Kip A. Allison pray that that the Petition for Writ of Mandamus be granted, and for such other and further relief to which they may be justly entitled.

Respectfully submitted,

JONES, DAVIS & JACKSON, PC

By: /s/ Matthew K. Davis

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ATTORNEYS FOR RELATORS

RULE 52.3(J) CERTIFICATION

I certify, pursuant to Rule 52.3(j) of the Texas Rules of Appellate Procedure that I have reviewed the foregoing Petition for Writ of Mandamus and concluded that every factual statement in the Response is supported by competent evidence included in the appendix or records submitted by the parties.

 /s/ Matthew K. Davis
Matthew K. Davis

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was sent by e-mail or e-service to all counsel of record and to Respondent on the 31st day of October 2019.

/s/ Scott R. Meyer

Scott R. Meyer

CERTIFICATE OF RULE 9.4 COMPLIANCE

I certify that the Petition for Writ of Mandamus was prepared with Microsoft Word and contains 2872 words according to the word count of Microsoft Word, excluding those portions exempted by Rule 9.4(i)(1) of the Texas Rules of Civil Procedure.

/s/ Scott R. Meyer

Scott R. Meyer

RULE 52.7(a)(1) CERTIFICATION

I certify, pursuant to Rule 52.7(a)(1) of the Texas Rules of Appellate Procedure that I have reviewed that the Appendix of documents included with this Writ of Mandamus which includes the documents labeled “R000001-R000202” and further certify that those documents constitute every document that is material to Relators’ claim for relief filed in the underlying proceeding and that those documents are true and correct copies of the documents in the record in the underlying proceeding as of the time of the filing of this Petition.\

/s/ Scott R. Meyer

Scott R. Meyer