

DEC 20, 2023 03:53 PM

*Mandy Harrison*  
Mandy Harrison, Clerk  
McIntosh County, Georgia

**IN THE SUPERIOR COURT OF MCINTOSH COUNTY  
STATE OF GEORGIA**

Georgette “Sharron” Grovner, Marvin “Kent”  
Grovner Sr., Lula B. Walker, Francine Bailey,  
Mary Bailey, Merden Hall, Florence Hall,  
Yvonne Grovner, and Ire Gene Grovner Sr.,

Plaintiffs,

v.

McIntosh County, McIntosh County Board of  
Commissioners Kate Pontello Karwacki,  
David Stevens, Davis Poole, William E.  
Harrell, and Roger Lotson, in their official  
capacities,

Defendants.

Civil Action No. SUV2023000144

**PLAINTIFFS’ RESPONSE IN OPPOSITION TO  
DEFENDANTS’ MOTION TO DISMISS**

COME NOW GEORGETTE “SHARRON” GROVNER, MARVIN “KENT” GROVNER SR., LULA B. WALKER, FRANCINE BAILEY, MARY BAILEY, MERDEN HALL, FLORENCE HALL, YVONNE GROVNER, AND IRE GENE GROVNER SR. (collectively, “Plaintiffs”), by and through their attorneys, and timely file this Response in Opposition to the Motion to Dismiss filed by Defendants McIntosh County, Georgia, and the individual Commissioners of the McIntosh County Board of Commissioners in their official capacities.

**Relevant Procedural History**

On October 12, 2023, Plaintiffs filed as an appeal of the September 12, 2023, McIntosh County Zoning Amendment Section 219 (“Section 219”), passed by the McIntosh County Board of Commissioners, a Complaint for Writ of Mandamus, Declaratory Judgment, Injunctive Relief and Equitable Relief. *See* Doc. 1. The Complaint sought 1) a declaratory judgment pursuant to

O.C.G.A. § 9-4-1, *et seq.*, that Section 219 and the process by which it was enacted violated Due Process under Georgia’s Constitution, Zoning Procedure Law, and Open Meetings Act (Counts 1 through 4); 2) declaratory relief pursuant to 42 U.S.C. § 1983 and O.C.G.A. § 9-4-1, *et seq.*, for violations of the Equal Protection clause of the Fourteenth Amendment to the United States Constitution as well as the Georgia state equal protection clause (Counts 5 and 6); 3) a Writ of Mandamus ordering the individual Commissioners to bring Section 219 into compliance with state and federal law (Count 7); and equitable relief permanently freezing property tax increases on Plaintiffs’ properties, pursuant to O.C.G.A. § 9-4-3 (Count 8). The Complaint further prayed that, subsequent to a declaratory judgment in favor of the Plaintiffs, the Court will issue an injunction prohibiting enforcement of Section 219.

On November 20, 2023, Defendants filed an Answer and a Motion to Dismiss, seeking dismissal of all claims for failure to affirmatively allege sovereign immunity, failure to verify the Complaint, and improperly naming individual County Commissioners as defendants. *See* Doc. 38 & 39. The Motion was filed under O.C.G.A. § 9-11-12(b)(1), (b)(2), and (b)(6), alleging lack of jurisdiction over the subject matter, lack of jurisdiction over the person, and failure to state a claim upon which relief can be granted. *Id.* While Defendants request the Court dismiss all of Plaintiffs’ claims based on failure to verify and failure to state a claim upon which relief can be granted, Defendants’ argument regarding lack of jurisdiction over the person, lack of subject matter jurisdiction and sovereign immunity related only to Counts 1–4 and 6–8 of Plaintiffs’ October 12, 2023, Complaint.

On December 20, 2023, pursuant to Georgia’s broad statutory right to amend, as set forth in O.C.G.A. § 9–11–15(a),<sup>1</sup> Plaintiffs filed a Motion for Leave to Amend Complaint to Dismiss Less Than All Parties and attached a Verified Amended Complaint (“Amended Complaint”) as an exhibit to that motion.<sup>2</sup> *See* Doc. 53. If granted, the Motion would permit Plaintiffs to dismiss all Defendants, except McIntosh County, to address lack of jurisdiction over the person. Plaintiffs’ verifications address Defendants’ contention that Plaintiffs failed to state a claim upon which relief can be granted, with respect to all Counts. The Amended Complaint drops Counts 7 and 8, which would otherwise require naming the Commissioners individually, and pleads the statutory basis for waiver of sovereign immunity as to McIntosh County to cure any potential subject matter jurisdiction defects in Counts 1–4 and 6. As shown below, Plaintiffs’ Amended Complaint renders moot Defendants’ Motion to Dismiss in its entirety.

#### **Standard of Review**

“In deciding a motion to dismiss, the court must construe all pleadings most favorably to the party who filed them and must resolve all doubts about such pleadings in the filing party’s favor.” *Bynum v. Horizon Staffing*, 266 Ga. App. 337, 338 (2004). “In Georgia, a defendant who files a motion to dismiss for lack of personal jurisdiction has the burden of proving lack of jurisdiction.” *Home Depot Supply, Inc. v. Hunter Mgmt. LLC*, 289 Ga. App. 286, 286 (2008). The

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<sup>1</sup> As described further in the Motion for Leave to Amend Complaint to Dismiss Less Than All Parties, plaintiffs are entitled to amend as of course all changes made to their Complaint other than their request to drop the individual Commissioners in their official capacities, pursuant to O.C.G.A. §§ 9-11-21 and 9-11-15. *See* Doc. 53.

<sup>2</sup> Plaintiffs initially filed a Complaint naming as Defendants McIntosh County and each Commissioner on the McIntosh County Board of Commissioners in his or her official capacity. However, Plaintiffs subsequently moved this Court for Leave to Amend Complaint to Dismiss Less Than All Parties, namely the Commissioners. This Court’s granting of the Plaintiff’s Motion to Dismiss would result in dismissing the Commissioners in their official capacities. The Amended Complaint was attached as an exhibit to Plaintiffs’ Motion. *See* Mot. To Dismiss Parties, Doc. 53.

facts must be viewed “in the light most favorable to the exercise of personal jurisdiction . . . [.]” *Id.*

A motion to dismiss for failure to state a claim should be denied “if, within the framework of the complaint, evidence may be introduced which will sustain a grant of the relief sought by the claimant . . . [.]” *Sherman v. Fulton County Bd. of Assessors*, 288 Ga. 88, 90 (2010). Even when “a petition for injunction was not verified as required by statute, [that] did not as a matter of law demand its dismissal”. *Bracewell v. Cook*, 192 Ga. 678 (1941); *Agri-Cycle LLC v. Couch*, 284 Ga. 90, 92 (2008).

A motion to dismiss asserting sovereign immunity is based upon the court’s lack of subject matter jurisdiction and not the merits of the plaintiff’s claim. *Bonner v. Petterson*, 301 Ga. App. 443, 443 (2009). “In considering a motion for lack of subject matter jurisdiction based on sovereign immunity, a trial court is not confined to the allegations of the complaint, as the court would be if considering a motion to dismiss for failure to state a claim under O.C.G.A. § 9–11–12(b)(6).” *James v. Georgia Dep’t of Pub. Safety*, 337 Ga. App. 864, 867 (2016). The trial court “has broad discretion in conducting the preliminary hearing on the motion.” *Id.*

### Argument

**I. Defendants’ Motion to Dismiss Should be Denied as Moot Because Plaintiffs Have the Right to Amend their Complaint Under O.C.G.A. § 9–11–15(a), and Plaintiffs Should Otherwise Be Granted Leave to Amend their Complaint to Dismiss Less Than All Parties Pursuant to O.C.G.A. § 9-11-21.**

**a. Plaintiffs May Amend their Complaint Without Leave of Court Until a Pretrial Order is Entered.**

Plaintiffs filed their Amended Complaint on December 20, 2023, attached to Doc. 53 as Ex. A. In the Amended Complaint, Plaintiffs dropped all originally named Defendants other than

McIntosh County, pleaded the basis for the County’s waiver of sovereign immunity, removed their request for mandamus and equitable relief, and revised minor factual allegations.<sup>3</sup>

“A party may amend his pleading as a matter of course and without leave of court at any time before the entry of a pretrial order. Thereafter, the party may amend his pleading only by leave of court or by written consent of the adverse party.” O.C.G.A. § 9–11–15(a). O.C.G.A. § 9–11–15(a) “is to be liberally construed in favor of allowance of amendments, particularly when the opposing party is not prejudiced thereby.” *Glynn-Brunswick Mem’l Hosp. Auth. v. Gibbons*, 243 Ga. App. 341, 346 (2000). “Like the right of amendment, the discretion of the trial court in controlling it is very broad.” *Id.*; *see also Walker v. Sheehan*, 80 Ga. App. 606, 610 (1949).

A pending dispositive motion is not a “pretrial order” that would preclude a party from amending his or her pleading as a matter of course. *See Skylake Property Owners Assoc. v. Powell*, 281 Ga. App. 715, 720 (2006); *see also* O.C.G.A. § 9–11–15(a). Indeed, Plaintiffs’ Amended Complaint was filed early in the litigation and does not prejudice Defendants. Instead, the Amended Complaint would lessen the burden on Defendants by dismissing several Defendants and lessening the number of claims filed against them. Absent a pretrial order and prejudice to Defendants, Plaintiffs are generally free to amend their Complaint.

**b. Plaintiffs Properly Verified Their Amended Complaint.**

Defendants argue that Plaintiffs’ action should be dismissed for lack of verification but concede that this “is an amendable defect.” Defs.’ Mot. to Dismiss at 13–14. Indeed, Georgia courts permit plaintiffs to amend complaints to include verification because “failure to verify a petition

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<sup>3</sup> The substantive changes to the factual allegations in the original complaint included changes made in the paragraphs 29, 30, 31, 34, 50, 103. *See* Pls.’ Amend. Compl., attached to Doc. 53 as Ex. A.

is an amendable defect.” *Harvard v. Walton*, 243 Ga. 860, 861 (1979); *see also DRST Holdings, Ltd. v. Brown*, 290 Ga. 317, 317 (2012); *Davis v. VCP South, LLC*, 297 Ga. 616, 621 (2015).

Proper verification requires sworn statements of personal knowledge, including affidavits based on personal knowledge. *Keyser v Allied Holdings, Inc.*, 266 Ga. App. 192 (2004); *Moore v. Goldome Credit Corp.*, 187 Ga. App. 594, 596 (1988). All affidavits, petitions, answers, defenses, or other matters required to be verified or sworn to under oath are sufficient when they are sworn to before any notary public, magistrate, judge of any court, or any other officer of the state or county where the oath is made who is authorized by the laws thereof to administer oaths. O.C.G.A. § 9-10-113.

Plaintiffs properly verified their Amended Complaint. Plaintiffs’ Amended Complaint includes sworn, notarized, affidavits from all of the Plaintiffs affirming their personal knowledge of the facts and occurrences giving rise to the Complaint. Taken together, the Plaintiffs’ affidavits offer proof supporting the factual allegations in the Amended Complaint. As such, Plaintiffs’ Amended Complaint states a claim upon which relief may be granted, and Defendants’ Motion to Dismiss on this basis should be denied.

**c. Plaintiffs May Amend Their Complaint to Include an Affirmative Pleading of Sovereign Immunity Under Ga. Const. art. I, § 2, ¶ V and O.C.G.A. § 36-66-5.1.**

Defendants ask this Court to dismiss the Complaint because Plaintiffs did not plead the basis for the County’s waiver of sovereign immunity. Defs.’ Mot. to Dismiss at 5. However, Plaintiffs’ Amended Complaint names McIntosh County as the sole Defendant and pleads two bases for waiving sovereign immunity against the County: Ga. Const. art. I, § 2, ¶ V and O.C.G.A. § 36-66-5.1. It is well established that “a pleading deficiency as to subject matter jurisdiction is a procedural one which can be cured by amendment which would relate back to the time of the filing of the original complaint.” *McKesson Corp. v. Green*, 299 Ga. App. 91, 97–98 (2009); *see also*

*Bolden v. Barton*, 278 Ga. 831, 832 (2005). Sovereign immunity is an issue of subject matter jurisdiction, and courts permit amendment to cure sovereign immunity. *See Young v. Johnson*, 359 Ga. App. 769, 771 (2021) (noting that plaintiff “did not explicitly plead a waiver of the City’s sovereign immunity in her complaint, and she failed to amend her complaint to allege such a waiver”); *see also City of Tybee Island v. Harrod*, 337 Ga. App. 523, 524 (2016) (“Sovereign immunity . . . raises the issue of the trial court’s subject matter jurisdiction to try the case . . . [.]” (internal citations omitted)).

Ga. Const. art. I, § 2, ¶ V provides a waiver of sovereign immunity for declaratory and potential injunctive relief against the County, where the County is named as the exclusive defendant. *See* Ga. Const. art. I, § 2, ¶ V(b)(2); *see also State v. SASS Grp., LLC*, 315 Ga. 893, 896 (2023) (interpreting Paragraph V’s exclusivity clause with respect to an action against the State). Plaintiffs’ Amended Complaint is an “action[] filed” against the County within the meaning of Paragraph V.

O.C.G.A. § 36-66-5.1 also provides a waiver of sovereign immunity for declaratory relief against the County. Though it is a relatively new statutory provision that went into effect on July 1, 2022, O.C.G.A. § 36-66-5.1 meets all the requirements of a waiver of sovereign immunity because it is “an act of the General Assembly specifically providing for waiver and delineating the extent of that waiver.” *See Sons of Confederate Veterans et al. v. Newton Cnty. Bd. of Commissioners*, 368 Ga. App. 511, 513 (2023). Through this provision, the General Assembly sought “[t]o ensure that the general public is afforded due process in an orderly way to petition the courts for review of a local government’s exercise of zoning, administrative, or quasi-judicial powers . . . [.]” O.C.G.A. § 36-66-5.1(a). O.C.G.A. § 36-66-5.1(a) “provides [a] mechanism by which each of the powers described in this chapter may be reviewed by the superior court of the

county wherein such property is located[.]” A county is a “local government” that is among the “powers” contemplated by this chapter. *See* O.C.G.A. § 36-66-3 (“Local government’ means any county or municipality which exercises zoning power within its territorial boundaries.”). The General Assembly was careful to describe the extent of the waiver by incorporating by reference the provisions of the Georgia Code pertaining to declaratory judgments and equity jurisdiction:

Zoning decisions as described in this chapter, being legislative in nature, shall be subject to direct constitutional challenge regarding the validity of maintaining the existing zoning on the subject property or the validity of conditions or an interim zoning category other than what was requested in the superior court pursuant to its original jurisdiction over declaratory judgments pursuant to Chapter 4 of Title 9 and equity jurisdiction under Title 23.

O.C.G.A. § 36-66-5.1(a)(1); *see also Sons of Confederate Veterans*, 368 Ga. App. at 513.

Plaintiffs’ Amended Complaint properly pleads a waiver of sovereign immunity under each of these bases. As stated, Plaintiffs are permitted to amend the petition before a pretrial order issues. *See* O.C.G.A. § 9-11-15(a). Under Georgia law, an amended complaint “relates back to the date the original complaint was filed in state court.” *See McKesson Corp.*, 299 Ga. App. at 97-98 (emphasis added). Accordingly, Plaintiffs’ Amended Complaint relates back to the time of the filing of the original complaint and affirmatively pleads a waiver of sovereign immunity under Ga. Const. art. I, § 2, ¶ V and O.C.G.A. § 36-66-5.1. The Amended Complaint cures any procedural deficiency claimed by Defendants on this basis, and Defendants’ Motion to Dismiss should be denied.

**II. Defendants’ Motion to Dismiss Should be Denied Because Plaintiffs Have Petitioned the Court for Leave to Dismiss Parties and Proceed Against the County Alone.**

Defendants argue that this Court must dismiss the Complaint because Plaintiffs did not comply with the exclusivity provision of Ga. Const. art. I, § 2, ¶ V. Defs.’ Mot. to Dismiss at 5-12. As stated, Plaintiffs should be able to proceed with this action under two independent waivers



of sovereign immunity: Ga. Const. art. I, § 2, ¶ V and O.C.G.A. § 36-66-5.1. Even if this Court disagrees and finds that Ga. Const. art. I, § 2, ¶ V is the only applicable waiver provision here, the Court should permit Plaintiffs to dismiss parties to meet the requirements of Paragraph V and deny Defendants' motion to dismiss.

Plaintiffs moved this Court for Leave to Amend to Dismiss Less Than All Parties and to proceed against McIntosh County as the sole Defendant. As set forth in that motion, "[p]arties may be dropped or added by order of the court on motion of any party or of its own initiative at any stage of the action and on such terms as are just." O.C.G.A. § 9-11-21. "The purpose of that statute is to provide procedural relief for plaintiffs who sue too many or too few parties, so that '[m]isjoinder of parties is not ground for dismissal of an action.'" *Young v. Rider*, 208 Ga. App. 147, 148 (1993) (quoting O.C.G.A. § 9-11-21). In exercising its discretion to dismiss parties, a court considers factors such as fairness to the parties and judicial economy, with an eye toward avoiding "the inequitable result of dismissal on [a] hypertechnical basis . . . []." *El Chico Restaurants, Inc., v Transportation Ins. Co*, 235 Ga.App. 427, 429 (1998); *see also Wright v. Safari Club Int'l, Inc.*, 322 Ga. App. 486, 495 (2013). Here, permitting Plaintiffs to dismiss all Defendants except McIntosh County will result in no unfairness to Defendants. Plaintiffs do not seek to add a new party, so there will be no additional service or other delays at this early stage of the litigation. Indeed, the dismissal of parties will serve the judicial economy by reducing the number Defendants before the Court and relieving the individual Commissioners of their burden to participate in the litigation. Proceeding against the County is proper because the County's sovereign immunity was waived at the time that Plaintiffs' cause of action arose pursuant to Ga. Const. art. I, § 2, ¶ V. *See Sons of Confederate Veterans*, 368 Ga. App. at 514 ("[U]nder Georgia law, a waiver of sovereign immunity occurs at the time that the cause of action arises.").

Defendants argue that amendment of the Complaint to dismiss parties is improper because, under Paragraph V’s plain language, the existence of sovereign immunity is “fixed” and decided at the moment Plaintiffs filed the case. Defs.’ Mot. to Dismiss at 15. This argument lacks merit. Defendants have cited no authority interpreting Paragraph V inconsistent with the general principles of joinder and amendment. Nothing in the plain language of Paragraph V precludes Plaintiffs from amending their Complaint to dismiss parties. In fact, the case upon which Defendants’ Motion to Dismiss relies confirms that a properly amended complaint is available to Plaintiffs to invoke Paragraph V’s waiver of sovereign immunity.

In *State v. SASS Grp., LLC*, the plaintiffs sued the State of Georgia and the Gwinnett County District Attorney in her individual capacity, seeking declaratory relief.<sup>4</sup> See 315 Ga. at 895. Defendants filed a motion to dismiss, arguing, in part, that Paragraph V’s exclusivity clause prohibited plaintiffs from naming both the State of Georgia and the District Attorney as defendants. *Id.* Plaintiffs subsequently filed an amended verified complaint, again naming both the District Attorney and the State as defendants. *Id.* at n.3. The Georgia Supreme Court held that Paragraph V’s exclusivity clause required dismissal of the suit because it had been brought against the State and its employee, rather than exclusively against the State as required by Paragraph V. Importantly, when the Georgia Supreme Court held that dismissal of the case was required, the Court noted that it was presented with an amended complaint that included claims against both the State and an individual state employee: “In briefing and at oral argument, there was disagreement between the parties over which complaint was the operative pleading that the Court ought to consider. But deciding this issue is not essential to this case, as both complaints named the District Attorney in

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<sup>4</sup> The *Sass* plaintiffs also sought injunctive relief by filing a motion for a temporary restraining order and an interlocutory injunction against the District Attorney in her individual capacity, which the trial court granted. *Id.*

her individual capacity in addition to the State.” *Id.* at n.9. Not once did the court suggest that amending the complaint to remove the extraneous party was improper or barred by Paragraph V—just that the plaintiffs in that case did not do so.

Unlike in *SASS*, Plaintiffs’ Amended Complaint seeks to proceed against McIntosh County as the sole Defendant. This distinction is critical. The Court in *SASS* was compelled to dismiss a lawsuit where both the original and amended complaints included a defendant other than the State. But when properly distinguished from *SASS*, this case compels no such dismissal, and Plaintiffs should be permitted to proceed with their Amended Complaint against the County.

As such, Plaintiffs have amended their Complaint to name only McIntosh County as a Defendant, and properly plead a waiver of sovereign immunity under Paragraph V and O.C.G.A. § 36-66-5.1. For these reasons, this Court should deny Defendants’ Motion to Dismiss on this basis as moot.

### **Conclusion**

Defendants’ Motion to Dismiss boldly declares that Plaintiffs are not entitled to amend their Complaint. The argument is not supported by a plain reading of the Georgia Constitution or the Amended Code, and Defendants have not cited any controlling authority for this proposition to meet their burden of proof. No error alleged by Defendants is fatal to Plaintiffs’ action in light of their Amended Complaint.

To the contrary, Georgia’s statutes and case law afford Plaintiffs a liberally construed right to amend with respect to sovereign immunity and verification. *See Glynn-Brunswick Mem’l Hosp. Auth.*, 243 Ga. App. at 346. Similarly, this Court has broad discretion to permit Plaintiffs to dismiss parties and proceed against the County to avoid a hypertechnical dismissal of the entire action. *See El Chico Restaurants, Inc.*, 235 Ga.App. at 429. Plaintiffs have taken the appropriate steps to cure

all procedural defects asserted by Defendants: Plaintiffs’ Motion for Leave to Dismiss Less Than All Parties asks the Court to dismiss the individual Commissioners, rendering any alleged defects with respect to jurisdiction over the person moot. Plaintiffs’ verification of the Amended Complaint addresses the alleged failure to state a claim upon which relief can be granted, with respect to all Counts. The Amended Complaint drops Counts 7 and 8 and pleads two separate statutory bases for waiver of sovereign immunity as to McIntosh County to cure any potential subject matter jurisdiction defects in Counts 1–4 and 6. For these reasons, Plaintiffs respectfully pray that this Court deny Defendants’ Motion to Dismiss in its entirety.

This 20th day of December, 2023.

Respectfully submitted,

/s/ Miriam Gutman

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**CERTIFICATE OF SERVICE**

Undersigned counsel hereby certifies that Defendants' counsel has been served electronically with a true and correct copy of the attached Response in Opposition to Defendants' Motion to Dismiss via the Peachcourt electronic filing system, which will make automatic electronic delivery to all parties, and via electronic mail to counsel of record as follows:

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This 20th day of December, 2023.

/s/ Miriam Gutman

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