

COMMONWEALTH OF MASSACHUSETTS

ESSEX COUNTY, SS.

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT
CIVIL ACTION NO.

FRANCELY ACOSTA, an individual, on
behalf of all others similarly situated

Plaintiff

v.

BAY STATE GAS COMPANY, d/b/a
COLUMBIA GAS OF MASSACHUSETTS, a
domestic corporation; and NISOURCE, INC.,
a foreign corporation,

Defendants

**COMPLAINT AND
JURY CLAIM**

Plaintiff brings this putative class action lawsuit (“Complaint”) against Defendants Bay State Gas Company d/b/a Columbia Gas of Massachusetts (“Columbia Gas”) and NiSource Inc. (“NiSource”). Plaintiff avers the following upon personal knowledge and information and belief and based upon the investigation of counsel as to all other facts alleged in the Complaint.

I. INTRODUCTION

1. On or about September 13, 2018, explosions rocked the towns of Lawrence, Andover, and North Andover, Massachusetts resulting in 10 alarm fires, dozens of structure fires and an atmosphere of chaos.

2. The explosions, fires, and chaos resulted from gas lines Defendants operated. These gas lines were antiquated in an unsafe condition, and these conditions resulted in the lines become over pressurized.

3. Defendants over pressurized the gas distribution system, an outcome with known catastrophic consequences, and which should be prevented at all times by multiple, overlapping, and redundant safety systems.

4. As fires and explosions broke out throughout Essex County, a State of Emergency was declared and all homes and businesses were forced to be evacuated.

5. Plaintiff and class members were thrust out of their homes without warning, and forced to find shelter for an indeterminate period of time. They live in fear of additional explosions and fires and have lost the use and enjoyment of their property.

II. JURISDICTION AND VENUE

6. This Court has subject matter jurisdiction over this action pursuant to M.G.L. c. 212, §3 because this action consists of real and mixed actions in which plaintiff's recovery will exceed \$25,000, and pursuant to M.G.L. c. 212, §4.

7. This Court has personal jurisdiction pursuant to M.G.L. c. 223A, §3 because the action arises from the Defendants' transaction of business in this commonwealth, supply of services in this commonwealth, and actions and omissions causing tortious injury in this commonwealth.

8. Venue in this Court is proper under M.G.L. c. 223 because Plaintiff and Class Members reside in Essex County, the action arises from injuries sustained in Essex County, and caused by the Defendants' acts and omissions in Essex County.

III. THE PARTIES

9. Plaintiff Francely Acosta is an individual residing at 108 Salem St., Lawrence, MA 01843.

10. Defendant Bay State Gas Company d/b/a Columbia Gas of Massachusetts (“Columbia Gas”) is a Massachusetts for-profit corporation with its principal place of business at 4 Technology Drive, Suite 250, Weymouth, Massachusetts 01581. It is a wholly owned subsidiary of NiSource, Inc.

11. Defendant NiSource Inc. (“NiSource”) is a Delaware corporation with its principal place of business at 801 E. 86th Avenue, Merrillville, Indiana 46410. NiSource is one of the largest utility companies in the United States, serving approximately 3.5 million natural gas customers and 500,000 electric customers through its Columbia Gas and NIPSCO subsidiaries.

12. At all times relevant to this complaint, Columbia Gas was the agent, servant, joint venture, partner, and/or alter ego of each of NiSource and was at all times operating and acting within the purpose and scope of said agency, service, joint venture, partnership and/or alter ego. Each Defendant has rendered substantial assistance and encouragement to the other Defendants, acting in concert knowing that its conduct was wrongful and/or unlawful, and each Defendant has ratified and approved the acts of each of the remaining Defendants.

IV. FACTUAL ALLEGATIONS

A. The Explosions and Fires

13. Plaintiff and members of the proposed class live in the Merrimack Valley region of Massachusetts, and specifically the towns of Lawrence, Andover, and North Andover.

14. On September 13, 2018 residents, business owners, and tourists of the Merrimack Valley region of Massachusetts were enjoying what they believed to be another typical Thursday morning and afternoon.

15. At approximately 4:00 p.m., numerous fires and explosions erupted in the towns of Lawrence, Andover, and North Andover, Massachusetts. These fires and explosions resulted

from the loss of integrity of the gas distribution system maintained and operated by Defendants Columbia Gas and NiSource.

16. As 10 alarm fires raged through the towns of Lawrence, Andover, and North Andover, a State of Emergency was declared, and all residents were ordered to evacuate their homes and the community. Power and gas was completely suspended.

17. Residents were forced into the night without notice and without the opportunity to collect their belongings and to provide shelter for themselves and their families for an indeterminate amount of time. Prolonging this time period, Defendants required visiting each and every home, approximately 8,600, to shut off all gas meters before Residents could return.

18. This chaos caused great anguish and turmoil for the entire community, who fear for the safety of their families as well as the safety of their property, belongings, and possessions, and who doubt their ability to return to the peaceable lives they formerly lived.

B. Defendants' Maintenance & Operational Failures

19. Defendants Columbia Gas and NiSource provide natural gas services to the affected communities. However, the gas distribution system utilized by the Defendants were and are poorly maintained, antiquated, obsolete, and highly dangerous.

20. Pipeline age and material are significant risk indicators for catastrophic gas explosions. Pipelines constructed of cast and wrought iron, as well as bare steel, are among the pipelines that pose the highest-risk of catastrophic explosion.

21. Cast and wrought iron pipelines are among the oldest energy pipelines constructed in the United States. Many of these pipelines were installed over 60 years ago.

22. The degrading nature of iron alloys, the age of the pipelines, and the design of the pipe joints greatly increase the risk involved with continued use of such pipelines.

23. Cast and wrought iron pipelines were originally constructed to transport manufactured gas beginning in the 1870s and 1880s, with cast iron becoming more popular in the early 1900s.

24. Wrought iron pipelines were joined end-to-end using either threaded or compression couplings, while cast iron pipelines were linked using bell and spigot joints with packing material stuffed in the bell to form a gas tight seal. Since these pipelines transported wet, manufactured gas, the packing material absorbed moisture and generally did not leak.

25. As dry, natural gas began supplanting manufactured gas use in the mid-20th century, the packing material sealing the joints dried out, causing leaks.

26. The biggest threat to cast or wrought iron pipe is earth movement. If these pipelines are disturbed by digging, seasonal frost heave, or changes in ground water levels, leakage may occur.

27. Another serious threat called graphitization is a natural process in which iron degrades to softer elements, making iron pipelines more susceptible to cracking. The extent of graphitization depends on many factors, but gas may leak from the joints or through cracks in the pipe if graphitization has occurred.

28. When leaks occur on low-pressure systems with cast or wrought iron distribution lines, the volume of gas escaping through the failure point is much less than what might escape through the same size failure in a system operating at higher pressures. However, even a relatively small volume of natural gas leakage can have catastrophic consequences.

29. Columbia Gas of Massachusetts utilizes over 471 miles of cast or wrought iron distribution lines. This is among the highest amounts of cast or wrought iron distribution lines

utilized by an American utility company. There are 178 utility companies that utilize a lower number of cast or wrought iron distribution lines.

30. Since the late 1960's, the use of plastic pipe in gas distribution pipelines has steadily increased. Some vintages installed between the 1960s and early 1980s have the potential for brittle-like cracking. The susceptibility is dependent on the resin, pipe processing, and service conditions.

31. Pipes manufactured during the post-World War II construction boom that lasted well into the 1960's were vulnerable to seam quality issues. Since the late 1960's and early 1970's, these seam types are no longer manufactured or installed by pipeline operators. They have been replaced with high frequency (HF) ERW pipe, submerged arc welded (SAW) or seamless pipe, which all have improved steel and seam properties.

32. O&M practice improvement have included usage of cathodic protection for external corrosion mitigation, programs for internal corrosion such as operational pigging and inhibitor injection programs, integrity management assessments, smart pigging, remediation of defects found, and right-of-way monitoring that includes one-call programs.

33. O&M practices in the early 1900's through the early 1950's by some pipeline operators did not include designs for operational pigging, usage of cathodic protection, and sometimes pipe external coatings. Beginning in the 1950's usage of full opening valves for pigging, cathodic protection, and external pipe coatings were being used by most pipeline operators.

34. The lack of an outer coating, which helps to protect the steel from the environment, makes a high level of protection from corrosion, and careful assessment, necessary. This typical protection is referred to as cathodic protection. Methods used to determine the

effectiveness of cathodic protection on bare steel pipelines focus on identifying larger corrosion cells, called “hot spots”. However, small, localized corrosion areas, receiving insufficient cathodic protection, are difficult to identify and can lead to integrity issues.

35. Non-cathodically protected materials were used extensively in natural gas and hazardous liquids pipelines until the 1960’s, when the use of plastic pipe expanded for natural gas distribution systems. Until pipeline coatings were required with the establishment of federal mandates in 1971, some natural gas transmission and distribution operators continued to install pipelines without coatings, particularly in dry areas of the country.

36. In addition to the 471 miles of cast iron or wrought iron distribution lines, Columbia Gas utilizes approximately 260 miles of non-cathodically protected distribution mains. Approximately 14.8% of the services in Columbia Gas’ distribution system are composed of non-cathodically protected steel.

37. The age and lack of protective coating makes such pipelines high risk materials.

38. On October 31, 2017 Columbia Gas identified 150 leaks in its distribution system that required maintenance and \$26,839,832 of leak prone infrastructure and gas distribution lines that required replacement.

39. This high risk and leak prone infrastructure was not replaced by the Defendants prior to September 13, 2018.

40. On September 13, 2018 defendants’ antiquated and high-risk gas distribution system became over pressurized, leading to dozens of explosions and structure fires throughout the Merrimack Valley Region of Massachusetts.

41. Pipe pressure and system pressure is of utmost importance for gas distribution operations. For gas distribution systems to be operated safely, they should be designed with multiple redundancies and safety systems to ensure that pressure integrity is maintained.

42. A failure to maintain adequate pressures can have devastating consequences for a gas distribution system. A loss of pressure integrity can travel through a gas distribution system at the speed of sound and create an incredible amount of leaks.

43. While it is essential for a gas distribution company to take the utmost care to ensure that pressures are adequately maintained, it is fundamental for a utility company knowingly utilizing high risk distribution materials to take every possible precaution to maintain proper pressures in its system.

44. Defendants failure to maintain and prudently operate the pressures in its antiquated and obsolete gas distribution system led to catastrophic failures, explosions, and fires throughout three towns.

C. Defendants' Prior Gas Line Explosions

45. Defendants and related companies have caused similar catastrophic failures in the recent past.

46. Columbia Gas has been fined over \$100,000 by the Massachusetts Department of Public Utilities in recent years for improper gas pressure standards and testing, improper leak classification and response procedures, improper corrosion control, failing to follow safety procedures while repairing a leak, and puncturing a gas line.

47. In 2012, Columbia Gas punctured a gas line in Springfield, Massachusetts, resulting in an explosion that injured 21 people, destroyed a place of business, damaged a dozen adjacent buildings, and caused \$650,000 in damage to city property.

48. One month later in December 2012, a natural gas pipeline operated by Columbia Gas Transmission—at the time one of NiSource’s wholly-owned subsidiaries—exploded in Sissonville, West Virginia. According to a report from the National Transportation Safety Board, the rupture resulted from external corrosion that caused the pipeline’s walls to deteriorate. The NTSB cited NiSource’s subsidiary for a failure to detect the corrosion because the pipeline, installed in 1967, had not been inspected or tested since 1988.

49. In 2013, a service line joining a gas meter on the side of a house failed, causing a fire that destroyed a home in Attleboro.

50. In 2015, Columbia Gas of Ohio, a sister company of Columbia Gas and a wholly owned subsidiary of Nisource, caused a gas release from an improperly abandoned gas service line. The resulting release caused \$9 million in structural damage. The line causing the release was installed in 1960, and not properly plugged and abandoned.

51. The recurrence of catastrophic events, which would never happen at a prudently run gas distribution company, is characteristic of a reckless and wanton corporate culture that puts profits above the safety and wellbeing of its customers. While repairs to aging infrastructure are costly, necessary funds have not been allocated by the Defendants to system improvements, and have instead been spent on lavish corporate expenditures.

52. As a result, thousands of innocent residents of Lawrence, Andover, and North Andover, have had their lives turned upside down by another of NiSource’s and Columbia Gas’ catastrophic failures.

D. Plaintiff’s Experience during the Merrimack Valley Explosions

53. Plaintiff Francely Acosta owns and resides in a home on 108 Salem St., Lawrence, MA 10843. She was at work when explosions erupted through Merrimack Valley and

prohibited from returning to her home. She was unable to rescue her dog and was forced to sleep on a strangers floor on the night of September 13, 2018.

54. For several of the following nights, Plaintiff had to pay \$200 a night for a hotel room that did not have any gas or hot water.

55. Plaintiff has been permitted back into her home, but still does not have any gas or hot water at her home. She lives in fear that her home, and the gas lines servicing it, are unsafe and has lost the peaceable enjoyment of her property. Additionally, her home has lost value as a result of the defendants' failure to maintain the gas distribution system servicing it.

V. CLASS ACTION ALLEGATIONS

56. Plaintiff brings this case as a class action pursuant to Rule 23 of the Massachusetts Rules of Civil Procedure.

57. Plaintiff defines the Class as follows:

“All persons residing within Lawrence, Andover, and North Andover Massachusetts who did not suffer physical injuries or damage to real property, but were forced to evacuate and relocate following the fires and explosions of September 13, 2018.”

58. Excluded from the above Class is any entity in which Defendants have a controlling interest, and officers or directors of Defendants. Also excluded from this Class is any judge or judicial officer presiding over this matter and the members of his or her immediate family and judicial staff.

59. The members of the Class are so numerous that a joinder of all members would be impracticable. Approximately 8,600 households were forced to evacuate and relocate on September 13, 2018.

60. The Class is ascertainable. The Class definition identifies groups of unnamed plaintiffs by describing a set of common characteristics sufficient to allow a member of that

group to identify himself or herself as having a right to recover based on the description, including but not limited to by reference lines drawn on maps. Further, Defendants possess information concerning the identities of the Class Members because they required those Class Members to evacuate and stay away from the affected region until all approximately 8,600 gas meters were shut off in the affected region. Other than by direct notice, alternatively proper and sufficient notice of this action may be provided to the Class members through notice published in newspapers or other publications.

61. A well-defined community of interest in the questions of law or fact involving and affecting all members of the Class exists, and common questions of law or fact are substantially similar and predominate over questions that may affect only individual Class members. This action is amenable to a class-wide calculation of damages through expert testimony applicable to anyone in the Class. The questions of law and fact common to Plaintiff and the Class members include, among others, the following:

- a. Whether Defendants were negligent in the maintenance and operation of gas lines servicing class members' properties;
- b. Whether Defendants owed any duties to Class Members;
- c. Whether Defendants breached one or more duties to Class Members;
- d. Whether Defendants' actions and inactions were a substantial factor in causing harm to Class Members;
- e. Whether Defendants' conduct caused Class Members to evacuate and relocate;
- f. Whether Defendants' conduct interfered with or continue to interfere with the Class Members' comfortable enjoyment of their lives and property;

- g. Whether Defendants' interference was substantial and unreasonable;
- h. Whether Defendants had an interest in the Class Members' comfortable enjoyment of those Class Members' lives and property;
- i. Whether Defendants have engaged in an ultra-hazardous activity;
- j. The extent to which Class Members have been harmed by Defendants' conduct;
- k. What is the proper measure of damages incurred or sustained by the Class Members.

62. Plaintiff's claims are typical of the members of the Class. The evidence and the theories regarding Defendants' alleged wrongful conduct are substantially the same for Plaintiff and all of the Class members.

63. Plaintiff will fairly and adequately protect the interests of the Class members. Plaintiff has retained competent counsel experienced in class action litigation to ensure such protection. Plaintiff and her counsel intend to prosecute this action vigorously.

64. The class action is superior to all other available methods for the fair and efficient adjudication of this case or controversy. Because the injury suffered by any individual Class member may be relatively small, the expense and burden of individual litigation make it virtually impossible for Plaintiff and Class members individually to seek redress for the alleged wrongful conduct. Even if any individual persons or groups of Class members could afford individual litigation, it would be unduly burdensome to the courts in which the individual litigation(s) would proceed. The class action device is preferable to individual litigation(s) because it provides the benefits of unitary adjudication, economies of scale, and comprehensive adjudication by a single court.

65. Prosecution of separate actions by individual Class members would create a risk of inconsistent or varying adjudications with respect to individual Class members that would establish incompatible standards of conduct for the party (or parties) opposing the Class and would lead to repetitious trials of the numerous common questions of fact and law. Plaintiff knows of no difficulty that will be encountered in the management of this litigation that would preclude its maintenance of a class action. As a result, a class action is superior to other available methods for the fair and efficient adjudication of this controversy.

VI. CAUSES OF ACTION

FIRST CAUSE OF ACTION STRICT LIABILITY FOR ULTRA-HAZARDOUS ACTIVITIES

66. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 65 this Complaint as if fully restated here.

67. At all times relevant to this action, Defendants had supervision, custody and control of the natural gas distribution system, and all related components, servicing the communities in which plaintiff and class members reside.

68. At all times relevant to this action, Defendants were under a continuing duty to protect the Plaintiff and the Class from uncontrolled escape of natural gas.

69. Defendants were engaged in ultra-hazardous activities by storing and transporting highly combustible natural gas in a system utilizing known high risk materials.

70. Plaintiff and the Class have suffered harm from Defendants' failure to contain natural gas and the resultant catastrophic explosions and systems failure.

71. The injuries sustained by Plaintiff and the Class as a result of Defendants' discharges and failure to contain natural gas were the proximate result of Defendants' activities of storing and transporting highly combustible gas.

72. The harm to Plaintiff and the Class was and is the kind of harm that would be reasonably anticipated as a result of the risks created by transporting and storing flammable and combustible gas.

73. Defendants' operation of the gas lines and resulting discharges was and remains a substantial factor in causing the harms suffered by Plaintiff and the Class.

74. Defendants are liable to Plaintiff and Class Members for all damages arising from this ultra-hazardous activity, including all compensatory damages, punitive damages, attorney's fees and costs.

SECOND CAUSE OF ACTION
NEGLIGENCE

75. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 65 this Complaint as if fully restated here.

76. Plaintiff and Class Members are individuals who own or lease residential properties in communities that are serviced by Defendants' natural gas distribution system.

77. At all times relevant herein, Defendants maintained and operated the gas distribution system servicing Plaintiff's and Class Members' communities. Defendants owe and owed a duty to Plaintiff and Class Members to use reasonable care in the design, construction, operation, and/or maintenance of all relevant operations and equipment. Such reasonable care includes, but is not limited to designing, constructing, operating, and/or maintaining all operations and equipment in a manner compatible with the reasonable use and enjoyment of the residential properties in the communities in which plaintiff and class members reside, and in compliance with relevant regulations and industry standards.

78. Defendants breached this duty by negligently designing, constructing, operating, and maintaining gas lines; failing to implement reasonable safety and leak prevention practices;

failing to conduct reasonable safety and leak inspections; failing to promptly contain the leaks; failing to ensure gas lines do not become over-pressurized; and failing to replace obsolete high risk materials. This breach caused multiple fires and explosions, directly resulting in the evacuation of Plaintiff's and Class Members' properties, the loss of gas and electrical services, the loss of use and enjoyment of Plaintiff's and Class Members' properties and diminution in property value. Such consequences were a foreseeable result of Defendants' failure to adequately and safely maintain and operate its gas distribution system.

79. Defendants knew, or should have known that their design, construction, operation, and/or maintenance of its gas distribution system could cause the evacuation of Plaintiff's and Class Members' properties, loss of gas and electrical services, the loss of use and enjoyment of Plaintiff's and Class Members' properties and diminution in property value.

80. As a direct and proximate result of Defendants' foregoing negligence, Plaintiff and Class Members suffered damages as alleged herein, including evacuation and loss of use and enjoyment of their property, relocation costs, the loss of gas and electrical services, and diminution in property value. The displacement, inconvenience, and relocation of residents are a direct and proximate result of Defendants' negligence.

81. As a direct and proximate result of Defendants' negligence, Plaintiff and Class Members suffered and will continue to suffer the loss of the quiet use and enjoyment of their properties as well as enjoyment of public properties located in the Merrimack Valley vicinity.

82. Defendants' behavior was grossly negligent, reckless and exhibited willful and wanton disregard for the rights of Plaintiff and Class Members.

83. As a direct and proximate result of Defendants' negligence, recklessness, and willful and wanton indifference to the rights of Plaintiff and Class Members, Plaintiff and Class

Members have suffered legal injury and damages, in an amount to be proven at trial, including, but not limited to, diminution of the value of real estate, the cost to repair unsafe gas lines, plus the value of their lost use and enjoyment of property as a result of Defendants' negligence.

84. Defendants are liable to Plaintiff and Class Members for all damages arising from their negligence, recklessness, and wanton and willful indifference, including compensatory and punitive damages and attorneys' fees. Additionally, Defendants should be enjoined from operating, controlling, or overseeing gas distribution operations until such time as the gas distribution system servicing Plaintiff and Class Members can be operated safely.

THIRD CAUSE OF ACTION **CONTINUING PRIVATE NUISANCE**

85. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 65 this Complaint as if fully restated here.

86. Defendants' failure to maintain and operate its gas distribution system has created an ongoing condition that is dangerous and interferes with the comfortable enjoyment of life and property. Absent abatement, Defendants' actions and inactions may result in additional catastrophic damage. As a result of Defendants' actions and inactions, Plaintiff and Class Members have suffered a loss of use and enjoyment of their property, and have lost the peace of mind that they can occupy their properties safely.

87. Defendants' gas distribution system includes high risk materials that are prone to leaks, discharges and catastrophic consequences.

88. Defendants operated their gas distribution system in a manner that would foreseeably cause leaks, discharges, and catastrophic consequences directly resulting in the evacuation and relocation of approximately 8500 people, including allowing aging and obsolete infrastructure to become over pressurized.

89. The seriousness and gravity of the harm associated with Defendants' maintenance and operation of its gas distribution system outweigh the public benefit of Defendants' conduct. There is no social utility associated with the release of gas, over pressurization of gas distribution lines, or use of obsolete high risk materials.

90. Plaintiff and the Class have suffered and absent abatement will continue to suffer a harm and injury to their residential properties to which they did not consent, and which is different from the type of harm suffered by the general public.

91. Defendants' conduct was a substantial factor in causing harm to Plaintiff and the Class to suffer and to continue to suffer economic harm, injury, and losses, including loss of use and enjoyment of property, and diminution in property values. Plaintiff and the Class are entitled to damages for all such past and present injuries.

92. Plaintiff is informed and believes, and on that basis allege, that the nuisance is continuing and abatable.

VII. PRAYER FOR RELIEF

93. Plaintiff, individually and on behalf of all others similarly situated, requests judgment against Defendants as follows:

- a. For an order certifying the Class and appointing Plaintiff as representative of the Class and appointing the undersigned as Class Counsel;
- b. For an order enjoining Defendants to stop operating their gas distribution system in an unsafe and injurious manner, and requiring that Defendants implement such measures and procedures to ensure that their gas distribution system is operated in a safe manner;

- c. For all recoverable compensatory, statutory, and other damages sustained by Plaintiff and the Class, including disgorgement, unjust enrichment and all other relief under applicable laws;
- d. For costs and litigation expenses;
- e. For both pre-judgment and post-judgment interest on any amounts awarded at the highest allowable rate;
- f. For appropriate injunctive relief, including public injunctive relief;
- g. For payment off attorneys' fees as may be allowable under applicable law;
- h. For exemplary or punitive damages for the conduct alleged above; and
- i. For such other further relief including declaratory relief, as the Court may deem just and proper.

Dated: September 18, 2018

Respectfully submitted,

By their Attorneys,

Tyler Salemme Church (BBO #691427)
Morgan & Morgan, PA
12 Ericsson Street, Suite 2F
Boston, MA 02122
Tel: (857) 383-4902
TChurch@ForThePeople.com

John A. Yanchunis, Esq.*
JYanchunis@ForThePeople.com
Ryan J. McGee, Esq.*
RMcGee@ForThePeople.com
Morgan & Morgan
Complex Litigation Group
201 N. Franklin St., 7th Floor
Tampa, FL 33602
Tel: (813) 223-5505

Frank Petosa, Esq.*

FPetosa@ForThePeople.com

Rene F. Rocha, Esq.*

RMcGee@ForThePeople.com

Morgan & Morgan

Complex Litigation Group

600 N. Pine Island Rd., #400

Plantation, FL 33324

Tel: (954) 318-0268

*Pro Hac Vice forthcoming