

DOCKET NO. 17-1541

IN THE SUPREME COURT OF GEORGIA

PETER B. MANCUSO, Petitioner,

vs.

TDGA, LLC, Respondent

ON PETITION FOR WRIT OF CERTIORARI

TO THE SUPREME COURT

RESPONDENT'S BRIEF IN OPPOSITION

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STATEMENT OF THE CASE

Respondent, TDGA, LLC (herein, “Respondent” or “TDGA”) filed the underlying conventional quiet title action pursuant to O.C.G.A. § 23-3-44 seeking to quiet title to property known as 154 Stafford Street S.W. Atlanta Georgia 30314 (herein “Subject Property”) as to the named Respondents. (R. 4-54.)

Prior to Respondent filing this action, on May 6, 2014, the Sheriff of Fulton County, Georgia sold the Subject Property to TDGA at a tax sale and listed “Marc V Briscoe Estate and Marcia Briscoe and all heirs known and unknown” as the owner of the Subject Property on the vesting tax deed. (R.12-13 and T Ex. P1.) The Petitioner, Peter Mancuso, is the Executor of the Estate of Marcia Briscoe. More than twelve months after the date of the tax sale, Respondent foreclosed the Equity of Redemption pursuant to O.C.G.A. §§ 48-4-45 and 48-4-46. (R.5, R15-26, and T Ex. P 3-4.) Pursuant to the Notice that Appellee prepared and served on all parties (Appendix 2) and as dictated by Georgia law, the last day to tender the redemption amount was July 1, 2015 or forty-five days after legal service of the Notice, whichever date came later. (R.15 and T Ex. P2.)

When preparing the Notice, in order to ascertain the address of Appellant (and all other Respondents to the action), Appellee conducted a Lexis Nexis Comprehensive Person Report search. (R136 and T20-21.) These search results indicated Petitioner Peter Mancuso’s current address was 1620 Hidden Shoals Dr SE Conyers, Georgia 30013-5200, and Appellee mailed a copy of the Notice to that address by certified return receipt mail pursuant to O.C.G.A. § 48-4-45 (a)(2). (R.136.

and T14.) Additionally, on the Petition to Probate Will in Solemn Form that Peter Mancuso filed in the Fulton County probate court, he stated his domicile was 1705 Hwy 138 SE Conyers, Georgia 30013. (R.51-2). Accordingly, Respondent mailed a copy of the Notice to this address by certified return receipt mail pursuant to O.C.G.A. § 48-4-45 (a)(2). (R.139 and T14) Both of these mailings were returned to Respondent "Return to Sender Attempted – Not Known Unable to Forward."¹ (T Ex. P4.) Respondent also published Notice to Peter B. Mancuso on May 20, 27, June 3, and 10, 2015. (T Ex. P4.) In fact, Peter B. Mancuso saw the published Notice and admitted receipt of this Notice by Publication by letter to counsel for TDGA dated June 30, 2015. (T Ex. P5 and Appendix 3). Additionally, after Respondent filed its conventional quiet title action, Peter B. Mancuso contacted counsel for TDGA claiming that he did not receive the Notice so Respondent resent the Notice to him by certified return receipt mail to an address he specified (T13), which also happens to be the same address found on his Petition for Writ of Certiorari. Petitioner received this notice at his P.O. Box on August 5, 2015 and signed for it on August 12, 2015. (T Ex. P4 and Appendix 4) It is uncontested that Petitioner has not tendered the redemption amount to Respondent at any time. (T30.)

Petitioner makes several fanciful and unfounded allegations in his Petition for Writ of Certiorari. Specifically, he claims counsel for TDGA, LLC owns or has an ownership interest in TDGA, LLC. This is untrue and there is no evidence of this

¹ Petitioner conceded during the hearing that he did reside at one of these addresses (T-21), and this likely means he did not claim the mailing.

allegation anywhere in the record. Additionally, Mr. Mancuso alleges that Appellee used a published funeral notice to obtain address for other Respondents named in the Notice of Foreclosure of the Right to Redeem and Quiet Title. This is not true and is unsupported by the record. Petitioner used the Lexis Nexis Comprehensive Person Report search engine to locate all Respondents to the Notice of Foreclosure of the Right to Redeem and subsequent Quiet Title Action. (T11). Lastly, Mr. Mancuso makes unsubstantiated remarks that seek to impinge on the character of TDGA's counsel. These comments are uninformed and are libelous.

During the Special Master hearing, Petitioner revealed that he had dispossessed a prior tenant and had engaged a new tenant from whom he was collecting rents. (T24.) Because of this revelation, the Special Master awarded these illegally collected rents to Respondent. (T24, T34-35.)

As the evidence before the Special Master demonstrated, Petitioner received actual notice of Respondent's foreclosure of the right to redeem, and Respondent met its legal obligation to provide notice to Petitioner. Specifically, Mr. Mancuso received this notice by publication, as evidenced by his letter to counsel, (R140, T Ex.P5, and Appendix 3) and he received a second notice by certified return receipt mail on August 12, 2015. (R137, T Ex.P4, and Appendix 4). It is undisputed the Petitioner did not tender funds to redeem the Subject Property. (T31.) Therefore, the Georgia Supreme Court's Order upholding the Fulton County Superior Court's order awarding Respondent fee simple title to the Subject Property was proper, and this appeal is frivolous and without merit.

ARGUMENT

I. Petitioner has failed to establish grounds for an appeal consistent with Rule 10 of the United States Supreme Court Rules.

Rule 10 of the United States Supreme Court Rules establishes the “Considerations Governing Review on Certiorari.” Though the Court has broad discretion, it provides the “character of the reasons” that the Court considers:

- (a) a United States court of appeals has entered a decision in conflict with the decision of another United States court of appeals on the same important matter; has decided an important federal question in a way that conflicts with a decision by a state court of last resort; or has so far departed from the accepted and usual course of judicial proceedings, or sanctioned such a departure by a lower court, as to call for an exercise of this Court's supervisory power;
- (b) a state court of last resort has decided an important federal question in a way that conflicts with the decision of another state court of last resort or of a United States court of appeals;
- (c) a state court or a United States court of appeals has decided an important question of federal law that has not been, but should be, settled by this Court, or has decided an important federal question in a way that conflicts with relevant decisions of this Court.

This case does not meet any of these “Considerations.” Here, Petitioner did not raise any federal issue at the trial court, and the Georgia Supreme Court’s decision does not conflict with any decision of any federal court. Additionally, Petitioner did not raise his “due process” arguments at the state court level (trial court or Georgia Supreme Court) but is raising them for the first time in his Petition for Writ of Certiorari. (R69-78.) D.C. Court of Appeals v. Feldman, 460 U.S. 462, 103 S. Ct. 1303 (1982)(“the Court will not decide federal constitutional issues raised here for the

first time on review of state court decisions.”) Therefore, this Court should deny Petitioner’s Petition.

II. Petitioner’s due process rights have not been violated because he received proper notice of the foreclosure of the right of redemption, but simply failed to redeem the Subject Property.

Respondent’s foreclosure of the right of redemption complied with all due process requirements and considerations. See Jones v. Flowers, 547 U.S. 220, 126 S. Ct. 1708 (2006) and Hamilton v. Renewed Hope, Inc., 277 Ga. 465, 589 S.E.2d 81 (2003). First, Respondent attempted to serve Petitioner at several addresses it determined might be accurate after conducting a Lexis Nexis Comprehensive Person Report search for Mancuso. (R4-54 and T11.) Additionally and most important, it is uncontested that Mr. Mancuso saw the Notice in the Fulton County Daily Report before July 1, 2015 and that he signed for the Notice on August 12, 2015 (after calling TDGA’s counsel and asking that the Notice be sent to an additional address). (T Ex. P5 and Appendix 3). It is also uncontested that Mr. Mancuso never tendered redemption funds. The Georgia Supreme Court accordingly found that Petitioner received Notice of the Notice of Foreclosure of the Right to Redeem by publication and by certified return receipt mail.

Mr. Mancuso appears to be upset that Respondent had already filed the underlying quiet title action at the time he received the second Notice, but this is immaterial. First, as stated, Mr. Mancuso saw the Notice in the Fulton County Daily Report before TDGA filed its quiet title action and did tender the redemption funds.

More important, Mr. Mancuso never tendered the funds after receiving the second Notice, which he could have done irrespective of whether Respondent had filed a quiet title action. Simply, Mr. Mancuso failed to tender after being served with the Notice of Foreclosure of the Right to Redeem. Thus, Petitioner's due process rights have not been violated and this Court should deny Mr. Mancuso's Petition.

III. Neither TDGA, LLC, its counsel, nor the Special Master to this case acted as state actors for purposes of a § 1983 claim.

Respondent TDGA has shown that Mr. Mancuso's due process rights were not violated in any way because TDGA served him with the Notice of Foreclosure of the Right to Redeem under Georgia law, and Mr. Mancuso simply failed to tender redemption funds. Similarly, TDGA did not subject him to a deprivation of his property rights since he was afforded multiple opportunities to redeem under State law and simply failed to actually tender redemption funds. Furthermore, Mr. Mancuso is raising these deprivation of rights claims for the first time in his Petition. D.C. Court of Appeals v. Feldman, supra. He did not include them in his Answer and Counterclaims. (R-85-94.) Thus, it is not necessary to analyze whether TDGA's counsel or the Special Master appointed pursuant to O.C.G.A. § 23-3-60 et, seq. were "state actors." Though, generally, lawyers are not deemed state actors simply because they are officers of the Court.² Thus, this Court should deny Petitioner's Petition.

² "It is often said that lawyers are 'officers of the court.' But the Courts of Appeals are agreed that a lawyer representing a client is not, by virtue of being an officer of

IV. Petitioner was not entitled to a jury trial in the underling quiet title because no question of fact existed for a jury's determination.

Lastly, Petitioner claims a state-law deficiency in the underlying action because he was denied a jury trial. In fact, Petitioner was not entitled to a jury trial because Respondent filed the action as a conventional quiet title action. O.C.G.A. § 23-3-43.³ Petitioner contends that Respondent's action was a quiet title against all the world in character and therefore, he was entitled to a jury trial. However, as the Supreme Court of Georgia found, there was no question of fact for a jury to decide (irrespective of what type of quiet title action Respondent had filed). Paul v. Keene, 272 Ga. 357, 358, 529 S.E.2d. 135 (2000). Furthermore, even if true, this contention is not a basis for review before this Court because this would be a misapplication of a Georgia state law. See U.S. Supreme Court, Rule 10. Thus, Petitioner's Petition must be denied.

CONCLUSION

This Court should deny Petitioner's Petition because Respondent properly served Petitioner with the Notice of Foreclosure of the Right to Redeem pursuant to Georgia law. O.C.G.A. §§ 48-4-45 and 48-4-46. Simply, Mr. Mancuso failed to tender the redemption funds after receiving proper notice. Furthermore, this Court should

the court, a state actor 'under color of state law' within the meaning of § 1983. quoting Polk County v. Dodson, 454 U.S. 312, 318-19, 102 S. Ct. 445 (1981).

³ "At the option of the complainant as prayed for in the complaint, the court, upon receipt of the complaint, shall submit the same to a special master as provided for in Code Sections 23-3-63 through 23-3-68, except that as in other equity cases there shall be no right to a jury trial." O.C.G.A. § 23-3-43.

deny review since Mr. Mancuso raised his due process arguments and deprivation of property claims for the first time in his Petition.

Respectfully submitted, this the 20th day of February, 2018.

Ayoub & Mansour, L.L.C.

/s/ Carolina D. Bryant
John Ayoub
Georgia Bar No. 029906
Carolina D. Bryant
Georgia Bar No. 940661
Attorneys for Appellee

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Facsimile: 404.806. 7414
Ayoub@ayoubmansour.com
cdbryant@ayoubmansour.com

CERTIFICATE OF SERVICE

The undersigned counsel for Appellee certifies that on this date the foregoing Brief in Opposition was served upon the following party via first class mail:

Peter B. Mancuso
P.O. Box 257
Conyers, Georgia 30012

This the 20th day of February, 2018.

/s/ Carolina D. Bryant __
John Ayoub
Georgia Bar No. 029906
Carolina D. Bryant
Georgia Bar No. 940661
Attorneys for Appellant

APPENDIX 1

O.C.G.A. § 23-3-44:

Proceedings quia timet may be used to remove clouds on title caused by equities of redemption following tax sales; provided, however, that the length of time for redemption shall remain as provided by law and nothing in this Code section shall preclude the necessity of giving all parties at interest notice of this proceeding.

O.C.G.A. § 48-4-45:

(a) After 12 months from the date of a tax sale, the purchaser at the sale or his heirs, successors, or assigns may terminate, foreclose, divest, and forever bar the right to redeem the property from the sale by causing a notice or notices of the foreclosure, as provided for in this article:

(1) To be served upon all of the following persons who reside in the county in which the property is located:

(A) The defendant in the execution under or by virtue of which the sale was held;

(B) The occupant, if any, of the property; and

(C) All persons having of record in the county in which the land is located any right, title, or interest in, or lien upon the property;

(2) To be sent by registered or certified mail or statutory overnight delivery to each of the persons specified in subparagraphs (A), (B), and (C) of paragraph (1) of this subsection who resides outside the county in

which the property is located, if the address of that person is reasonably ascertainable; and

(3) To be published, if that tax sale occurs on or after July 1, 1989, in the newspaper in which the sheriff's advertisements for the county are published in each county in which that property is located, which publication shall occur once a week for four consecutive weeks in the six-month period immediately prior to the week of the redemption deadline date specified in the notice.

(b) Nothing contained in this Code section shall be construed to require that any notice be sent to or served upon any person whose right, title, interest in, or lien upon the property does not appear of record in the county in which the land is located.

(c) The heirs of any deceased owner of any land entitled to notice pursuant to this Code section shall be served by the sheriff or notified as provided in this article.

O.C.G.A. § 48-4-46:

(a) The notice provided for in Code Section 48-4-45 shall be written or printed, or written in part and printed in part, and shall be in substantially the following form:

Take notice that:

The right to redeem the following described property, to wit:

___ will expire and be forever foreclosed and barred on and after the ___ day of __, __.

The tax deed to which this notice relates is dated the ___ day of __, __, and is recorded in the office of the Clerk of the Superior Court of ___ County, Georgia, in Deed Book ___ at page ___.

The property may be redeemed at any time before the ___ day of __, __, by payment of the redemption price as fixed and provided by law to the undersigned at the following address: _____.

Please be governed accordingly.

(b) The purchaser at the tax sale or his heirs, successors, or assigns, as the case may be, shall make out an original notice in substantially the form prescribed in subsection (a) of this Code section and one copy of the notice for each person to be served with the notice. The purchaser shall deliver the notice and the copies together with a list of the persons to be served to the sheriff of the county in which the land is located not less than 45 days before the date set in each notice for the expiration of the right to redeem. Within 15 days after delivery to him, the sheriff shall serve a copy of the notice personally or by deputy upon each of the persons included on the list furnished him who reside in the county. The sheriff shall make an entry of the service on the original copy of the notice. Leaving a copy of the notice at the residence of any person required to be served with the notice shall be a sufficient service of the notice.

(c) If the sheriff personally or by deputy makes an entry that he is unable for any reason to effect service upon any person required to be served, the person who requested that the service be made shall forthwith cause a copy of the notice to be published once a week for two consecutive weeks in the newspaper in which the sheriff's advertisements for the county are published, unless that notice is being published as provided in paragraph (3) of subsection (a) of Code Section 48-4-45. Either publication shall operate as and for all purposes shall be treated as service upon all persons as to whom the sheriff has made an entry that he has been unable to effect service.

(d) Each original notice together with the entry of the sheriff on the notice shall be returned to the person by whom the service was requested upon the payment of the sheriff's costs as provided by law. Any original notice together with the entries on the notice may be filed and recorded on the deed records in the office of the clerk of the superior court of the county in which the land is located.

(e) Service of notices as provided in this Code section may be waived in writing by any person required or entitled to be served with the notice.

APPENDIX II

NOTICE OF FORECLOSURE OF RIGHT TO REDEEM
[REF. O.C.G.A., Section 48-4-5 et seq.; 48-4-45 & 48-4-46]

TO:

MARC V. BRISCOE ESTATE

PETER B. MANCUSO as Executor of the Estate of MARCIA V. BRISCOE

JULIE B. TABOR

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.

BANK OF AMERICA, N.A. as successor-by-merger to COUNTRYWIDE BANK

BARCLAYS BANK DELAWARE

INVESTA SERVICES, LLC as Custodian for CHRISTIANA TRUST

CITY OF ATLANTA, MAYOR KASIM REED

OCCUPANT OF 154 STAFFORD STREET S.W. AND ALL PERSONS KNOWN AND UNKNOWN HAVING OF RECORD IN FULTON COUNTY ANY RIGHT, TITLE INTEREST IN, OR LIEN UPON 154 STAFFORD STREET S.W.

RE: FORECLOSURE OF EQUITY OF REDEMPTION FOR TAX SALE DEED (REF. O.C.G.A. § 48-4-45, 46)

Take notice that:

The right to redeem the following described property, to wit will expire and be forever foreclosed and barred as of five o'clock (5 p.m.) on and after July 1, 2015 or 45 days after legal service of the Notice pursuant to OCGA 48-4-45 et seq., whichever date is later:

ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOT 141 OF THE 14TH DISTRICT, FULTON COUNTY, GEORGIA, BEING LOT 14, BLOCK 14, HUNTER SUBDIVISION, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: BEGINNING AT A POINT ON THE EASTERLY SIDE OF STAFFORD STREET 220 FEET NORTHEASTERLY FROM THE SOUTHEAST CORNER OF STAFFORD STREET AND BURBANK DRIVE; RUNNING THENCE NORTHERLY ALONG THE EASTERLY SIDE OF STAFFORD STREET 50 FEET THENCE EASTERLY SIDE 151.2 FEET; THENCE SOUTH 55 FEET THENCE WESTERLY 172.9 FEET TO THE EASTERLY SIDE OF STAFFORD STREET AND THE POINT OF BEGINNING BEING IMPROVED PROPERTY KNOWN AS 154 STAFFORD STREET, S.W. ACCORDING TO THE PRESENT SYSTEM OF NUMBERING HOUSES IN THE CITY OF ATLANTA, GEORGIA, WITH THE APPURTENANCES THERETO.

Those properties known as 154 STAFFORD STREET S.W., according to the present system of numbering homes and having tax parcel identification number 14 -0141-0008-058-1.

The tax deed to which this notice relates is dated May 6, 2014 and are recorded in the Office of the Clerk of the Superior Court of Fulton County, Georgia in Deed Book 53874 Page 208.

The properties may be redeemed on or before the time and date stated above by payment of the redemption price as fixed and provided by law to the undersigned at the following address:

TDGA, LLC c/o
Carolina D. Bryant, Esq.
Ayoub & Mansour, LLC
675 Seminole Avenue, Suite 301
Atlanta, Georgia 30307
404.892.2599

Please be governed accordingly.

June 30, 3015

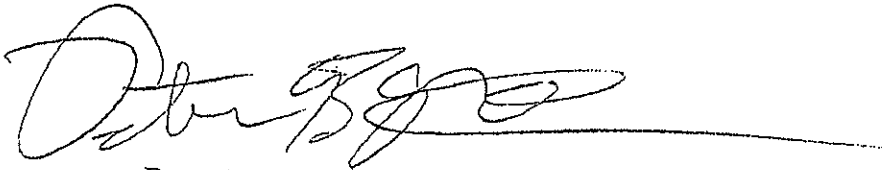
Ms. Carolina D. Bryant
Ayoub & Mansour LLC
675 Seminole Avenue
Suite 301
Atlanta, GA. 30307

RE: Notice of Foreclosure of Right to Redemn-Barment Ad Attached

Dear Ms. Bryant or To Whom It May Concern:

My name is Peter Mancuso and I am the Executor of the Estate of Marcia V. Briscoe. As Executor, I am listed in the enclosed ad from the Fulton Daily Report but have received no notification of same. Please give me a call @ 678-595-5408, in regard to the possibility of finalizing this matter without the necessity of any additional advertising, possible litigation and/or Quiet Title Action and the costs involved with same. I look forward to hearing from you @ 678-595-5408, upon receipt of this correspondence.

Cordially,

A handwritten signature in black ink, appearing to read 'Peter B. Mancuso', with a long horizontal line extending to the right.

Peter B. Mancuso
Executor

CC: Julie B. Tabor

B

1/30/2015

georgiapublicnotice.com/DetailsPrint.aspx?SID=d1u2waeac4y3aruxojzry5c&ID=26581979

Fulton County Daily Report
DAILY REPORT

Publication Name:

Fulton County Daily Report

Publication URL:

legals.dailyreportonline.com

Publication City and State:

Atlanta, GA

Publication County:

Fulton

Notice Popular Keyword Category:

Notice Keywords:

briscoe estate

Notice Authentication Number:

201506300757148626261

1672128750

Notice URL:

legals.dailyreportonline.com/singleLegal.asp?I=120045125575

Notice Publish Date:

Wednesday, June 10, 2015

Notice Content

18205/20/201505/27/201506/03/201506/10/2015http://legals.dailyreportonline.com/singleLegal.asp?I=120045125575NOTICE OF FORECLOSURE OF RIGHT TO REDEEM REF. O.C.G.A., Section 48-4-5 et seq.; 48-4-45 & 48-4-46 TO: MARC V. BRISCOE ESTATE PETER B. MANCUSO as Executor of the Estate of MARCIA V. BRISCOE JULIE B. TABOR MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC. BANK OF AMERICA, N.A. as successor-by-merger to COUNTRYWIDE BANK BARCLAYS BANK DELAWARE INVESTA SERVICES, LLC as Custodian for CHRISTIANA TRUST CITY OF ATLANTA, MAYOR KASIM REED OCCUPANT OF 154 STAFFORD STREET S.W. AND ALL PERSONS KNOWN AND UNKNOWN HAVING OF RECORD IN FULTON COUNTY ANY RIGHT, TITLE INTEREST IN, OR LIEN UPON 154 STAFFORD STREET S.W. RE: FORECLOSURE OF EQUITY OF REDEMPTION FOR TAX SALE DEED REF. O.C.G.A. 48-4-45, 46 Take notice that: The right to redeem the following described property, to wit will expire and be forever foreclosed and barred as of five o'clock 5 p.m. on and after July 1, 2015 or 45 days after legal service of the Notice pursuant to OCGA 48-4-45 et seq., whichever date is later: ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOT 141 OF THE 14TH DISTRICT, FULTON COUNTY, GEORGIA, BEING LOT 14, BLOCK 14, HUNTER SUBDIVISION, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: BEGINNING AT A POINT ON THE EASTERLY SIDE OF STAFFORD STREET 220 FEET NORTHEASTERLY FROM THE SOUTHEAST CORNER OF STAFFORD STREET AND BURBANK DRIVE; RUNNING THENCE NORTHERLY ALONG THE EASTERLY SIDE OF STAFFORD STREET 50 FEET THENCE EASTERLY SIDE 151.2 FEET; THENCE SOUTH 55 FEET THENCE WESTERLY 172.9 FEET TO THE EASTERLY SIDE OF STAFFORD STREET AND THE POINT OF BEGINNING BEING IMPROVED PROPERTY KNOWN AS 154 STAFFORD STREET, S.W. ACCORDING TO THE PRESENT SYSTEM OF NUMBERING HOUSES IN THE CITY OF ATLANTA, GEORGIA, WITH THE APPURTENANCES THERETO. Those properties known as 154 STAFFORD STREET S.W., according to the present system of numbering homes and having tax parcel identification number 14 -0141-0008-058-1. The tax deed to which this notice relates is dated May 6, 2014 and are recorded in the Office of the Clerk of the Superior Court of Fulton County, Georgia in Deed Book 53874 Page 208. The properties may be redeemed on or before the time and date stated above by payment of the redemption price as fixed and provided by law to the undersigned at the following address: TDGA, LLC c/o Carolina D. Bryant, Esq. Ayoub & Mansour, LLC 675 Seminole Avenue, Suite 301 Atlanta, Georgia 30307 404.892.2599 Please be governed accordingly. #2442918:5/2015 4SH

[Back](#)

Box 257
30012

7014 3490 0002 3143 293L



POST OFFICE

MS. CAROLINA D. BRANT
AYOUB and MARSOURLLE
675 SEHAWOLE AVENUE
SUITE 301
ATLANTA, GA. 30307

RETURN RECEIPT
REGISTERED

3030753414

RETURN RECEIPT
REGISTERED

U.S. POSTAGE
PAID
STOCKBRIDGE, GA
30281
JUN 30 15
\$6.74
R2304E105231-10



APPENDIX IV

TD6A-154 Sta Hord

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Peter B. Mancuso
PO Box 257
Conyers, GA 30012

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Signature]

☐ Agent

☐ Addressee

B. Received by (Printed Name)

PB MANCUSO

C. Date of Delivery

08-12-15

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail®

☐ Priority Mail Express™

☐ Registered

☒ Return Receipt for Merchandise

☐ Insured Mail

☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7014 3490 0000 4145 0460

PS Form 3811, July 2013

Domestic Return Receipt