No. 25-140

IN THE SUPREME COURT OF THE UNITED STATES

JENNINE LABUZAN-DELANE

Petitioner

v.

COCHRAN & COCHRAN LAND CO., INC., et al.,

Respondents

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Fifth Circuit

PETITION FOR A WRIT OF CERTIORARI

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Date July 24, 2025

QUESTIONS PRESENTED

In *Celotex Corp. v. Catrett,* 477 U.S. 317 (1986) this Court held: "A defendant cannot get summary judgment through a conclusory assertion that the plaintiff does not have evidence to support the complaint. Instead, the defendant must show the absence of evidence in the discovery record..."

In this case, the Fifth Circuit Court refused to follow the aforementioned ruling.

The Fifth Circuit's opinion conflicts with decisions from most sister circuits.

The questions presented are:

1. Whether a district court may grant summary judgment without affording any opportunity for discovery—contrary to *Celotex Corp. v. Catrett*, 477 U.S. 317 (1986)—where the district court and the Fifth Circuit misapplied Rules 56(d) and 37, disregarding Rule 26(f)'s requirement for initiating discovery.

2. Whether federal courts may, consistent with the Constitution's Supremacy Clause and Contract Clause, impose sanctions against a litigant solely for asserting a claim of title under a federal land patent—contrary to this Court's precedents recognizing land patents as the highest evidence of title.

PARTIES TO THE PROCEEDING

Petitioner is Jennine Labuzan-Delane. Petitioner was the Plaintiff in the district court and the appellant in the United States Court of Appeals for the Fifth Circuit.

Respondents are Cochran & Cochran Land Company, Incorporated, Cochran Farms, Incorporated, Lakeland Farms, L.L.C., Greenlee Family, L.L.C., David T. Cochran, and Jennings Farm, Incorporated. Respondents were the defendants in the district court and appellees in the United States Court of Appeals for the Fifth Circuit.

CORPORATE DISCLOSURE STATEMENT

Pursuant to this Court's Rule 29.6, Petitioner has no parent or publicly held company.

RELATED PROCEEDINGS

U.S. District Court for the Northern District of Mississippi:

Labuzan-Delane v. Cochran & Cochran, et al,

Nos. 4:22-CV-0149 (July 31, 2024)

Labuzan-Delane v. Cochran & Cochran, et al,

Nos. 4:22-CV-0149 (July 24, 2023)

U.S. Court of Appeals for the Fifth Circuit:

Labuzan-Delane v. Cochran & Cochran, et al,

Nos. 24-60393 (Feb. 21, 2025)

Labuzan-Delane v. Cochran & Cochran, et al,

Nos. 24-60393 (Feb. 21, 2025)

Labuzan-Delane v. Cochran & Cochran, et al,

Nos. 24-60393 (Mar. 13, 2025)

Labuzan-Delane v. Cochran & Cochran, et al,

Nos. 24-60393 (Mar. 21, 2025)

TABLE OF CONTENTS

TABLE OF APPENDICES

TABLE OF AUTHORITIES

Cases Page[s]

PETITION FOR A WRIT OF CERTIORARI

Jennine Labuzan-Delane, individually and Pro Se, petition for a writ of certiorari to review the judgment of the Fifth Circuit in this case.

OPINIONS BELOW

The February 21, 2025 opinion of the circuit court, affirming the district court's July 24, 2023 and July 31, 2024 orders granting respondents' summary judgment motions, is unreported and is reproduced in the appendix ("App.") at App. 1a. The July 24, 2023 and July 31, 2024 opinions of the district court granting respondents' motions for summary judgment are reproduced at App. 6a and App. 17a.

JURISDICTION

The Fifth Circuit entered its opinion below on February 21, 2025, making my due date to file this petition on May 22, 2025. Petitioner timely files this petition and invokes this Court's jurisdiction under 28 U.S.C. 1254(1).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The Supremacy Clause of the United States Constitution provides:

> This Constitution, and the Laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution and Laws of any State to the Contrary notwithstanding.

U.S. Const. art. VI, cl. 2.

An example of the Laws of the United States are the Federal Rule of Civil Procedure Rule 26(d)(1). It provides:

> A party may not seek discovery from any source before the parties have conferred as required by Rule26(f)...Fed. R. Civ. P. Rule 26(d)(1)

The Contract Clause of the United States Constitution provides:

> No State shall... pass any...Law impairing the Obligation of Contracts...

U.S. Const. art. I, Sec. 10, cl. 1

INTRODUCTION

If the Federal Rule of Civil Procedure Rule 26(d)(1) provides that Rule 26(f) is the only source to initiate discovery and if this Court's decision in *Celotex Corp. v. Catrett*, 477 U.S. 317 (1986) is binding on lower courts, then Petitioner has an avenue to seek remedy in this Court. This Court's primary holding in Celotex was:

> "Rule 56(c) mandates the entry of summary judgment, after adequate time for discovery and upon motion..." *Id. Celotex Corp. v. Catrett*, 477 U.S. 317 (1986).

In *Gibson v. Chouteau*, 80 U.S. (13 Wall) 92, 99 (1872), this Court summarized Congress's authority:

> "With respect to the public domain, the Constitution vests in Congress the power of disposition and of making all needful rules and regulations. That power is subject to no limitations. Congress has the absolute right to prescribe the times, the conditions, and the mode of transferring this property, or any part of it, and to designate the persons to whom the transfer shall be made. No State legislation can interfere with this right or embarrass its exercise; and to prevent the possibility of any attempted interference with it..."

In addition, in *Fletcher v. Peck,* Justice Marshall explained:

> "...grants are brought within the category of contracts having continuing obligation...When a law is in the nature of a contract, when absolute rights have vested under that contract, a repeal of the law cannot divest those rights...A party to a contract cannot pronounce its own deed invalid, although
> that party be a sovereign State...A grant is a contract executed...A law annulling conveyances is unconstitutional because it is a law impairing the obligation of contracts within the meaning of the Constitution of the United States..." *Fletcher v. Peck,* 10 U.S. 87 (1810).

In *United States v. Stone*, Justice Grier stated:

> "A patent is the highest evidence of title, and is conclusive as against the government and all claiming under junior patents or titles..." *United States v. Stone*, 69 U.S. 525 (1864).

In *French v. Spencer*, 62 U.S. 228 (1858), the Supreme Court explained that land received through a patent remains with the grantee's heirs unless the land is conveyed away by the grantee or by the heirs. *Id*, 62 U.S. 228, 232, 16 L. Ed. 97 (1858).

How could the outcome of this action deviate so far away from the Federal Rule of Civil Procedure Rule 26(d)(1), the Supremacy Clause, and Contract Clause of the United States Constitution? On these important issues, the Fifth Circuit disregards the Rules Enabling Act of 1934, which Congress authorized to create the Federal Rule of Civil Procedure, splits from most of its sister circuits, regarding *Celotex,* and clashes with over 200 years of this Court's decisions concerning land grants.

First, the Fifth Circuit's opinion below held that my argument is unavailing because I failed to initiate "discovery from the defendants under Federal Rule of Civil

Procedure Rule 37 or seek additional time to conduct discovery under Federal Rule of Civil Procedure Rule 56(d)..." Pet. App. 1a.

Second, the opinion below held: "She thus fails to show that there was 'a genuine dispute as to a material fact' sufficient to defeat summary judgment on the ejectment claim..." Pet. App. 1a. The Fifth Circuit is the only circuit to apply the Federal Rule of Civil Procedure in this way—holding that Rule 37 or Rule 56(d) initiate discovery instead of Rule 26(f). This Court held that the District of Columbia Circuit's position was "inconsistent with the standard for summary judgment set forth in Rule 56(c), which provides that summary judgment is proper 'if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits...show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law." *Celotex Corp. v. Catrett,* 477 U.S. 317 (1986). The Fifth Circuit's application of Rule 37 or Rule 56(d) initiating discovery is what this Court cautioned, in *Celotex,* runs the risk of creating inconsistencies that produce unfair holdings and pervasive outcomes.

The Fifth Circuit almost stands alone with this decision, creating a split over granting summary judgment when there was no discovery. In *Celotex*, Justice Rehnquist stated that the D.C. Circuit's holding "conflicted with with that of the Third Circuit in *In re Japanese Electronic Products*, 723 F.2d 238 (1983), *rev'd on other grounds sub nom. Matsushita Electric Industrial Co. v. Zenith Radio Corp.*, 475 U.S. 574 (1986). We granted certiorari to resolve the conflict...and now reverse the decision of the District of Columbia Circuit." *Id.* at *Celotex.*

This split creates a broken system that demonstrates that the circuit courts have

different interpretations of the Federal Laws and this Court's binding decisions. This means that in order for a plaintiff to have a chance to conduct discovery it will depend on where the action is filed.

This Court should grant the petition to address these issues, and this case is a good vehicle to do so. There's no dispute that Petitioner adhered to the Laws of the United States by using Rule 26(f) to compel discovery. The Fifth Circuit's inconsistency with the standard for summary judgment when the Petitioner was denied discovery, and to affirm summary judgment when there was no discovery record provides an opportunity for the Court to once again clarify the proper standards for summary judgment.

STATEMENT OF THE CASE

Petitioner is the direct heir of Charles Augustus Labuzan, one of the original grantees of United States Federal Land Patent, 27859, issued on December 10, 1840. Petitioner presented a certified copy of said United States Federal Land Patent, and the Respondents cited a non-existent 1836 land patent. This dispute arises from Petitioner's efforts to reclaim title to ancestral patented land, which Petitioner alleges was never conveyed by Charles Augustus Labuzan or any heirs of his flesh, and never canceled by a federal act. Relying on 200 plus years of this Court's binding precedent that a land patent is the highest evidence of title recognized under federal law, Petitioner brought an ejectment action in the United States District Court for the Northern District of Mississippi.

Petitioner contacted respondents to initiate a discovery conference under Rule 26(f), but respondents refused to comply. There was no discovery record, and district court

granted respondents summary judgment motions, holding that I should have initiated discovery under Rule 56(d), which permits more time for discovery after it has begun. The district court accepted Respondents' unverified assertion that Petitioner's ancestor conveyed the patented land in 1848, and concluded that Petitioner's ejectment claim failed on that basis, despite the absence of a discovery record. Pet. App. 6a, Pet. 17a. On appeal, the Fifth Circuit ruled that I should have initiated discovery under Rule 37, which enforces discovery after discovery has begun. The Fifth Circuit affirmed. Pet. App. 1a. The lower courts' rulings ignore the procedural protections guaranteed under *Celotex,* which holds that summary judgment is premature where a party has not been afforded a meaningful opportunity for discovery. The lower courts split from the interpretation and application of *Celotex* and the discovery rules across every other circuit.

Again, with no discovery record, the district court held that Petitioner had no claim to the land even if my ancestor didn't convey the patented land because state adverse possession laws would nullify my federal patent rights. The district court, however, ordered Petitioner to issue deeds to Respondents and warned that continued litigation of Petitioner's ancestral claim to federally patented land would subject Petitioner to more sanctions. The Fifth Circuit affirmed, endorsing both the procedural and constitutional defects of the lower court's rulings.

Petitioner seeks review of two federal questions of exceptional importance: (1) whether federal courts may grant summary judgement without affording discovery under Rule 26(f), in conflict with *Celotex* and all other circuit courts; and (2) whether federal courts may sanction a litigant for asserting title under a federal land

patent—despite this Court's precedents recognizing such patents as contracts protected by the Constitution's Supremacy Clause and Contract Clause.

REASONS FOR GRANTING THE PETITION

I. The Fifth Circuit and its sisters are split over whether a party can be granted summary judgment without any discovery

This Court held in *Celotex Corp. v. Catrett*, 477 U.S. 317, (1986), that summary judgment may not be granted unless the record shows an absence of evidence after discovery has occurred. A party cannot simply assert a lack of evidence without there being an actual discovery record. Yet, here, Petitioner was denied the opportunity to initiate discovery under Rule 26(f), and the district court stated that Petitioner should have used Rule 56(d) to initiate discovery. On appeal, the Fifth Circuit stated that I should have used Rule 37 to initiate discovery. Every other circuit has adhered to *Celotex*, reaffirming the requirement that discovery must precede summary judgment.

In *Mesnick*, the First Circuit court stated:

> "In the end, the entry of summary judgment can be upheld only if "the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law." *Mesnick v. General Elec. Co.*, 950 F.2d 816 (1st Cir. 1991).

In *Gallo*, the Second Circuit stated:

> "Considering how often we must reverse a grant of summary judgment, the rules for when this provisional remedy may be used apparently need to be repeated. First,

summary judgment may not be granted unless the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law." *Gallo v. Prudential Residential Servs.*, 22 F.3d 1219, 1223-24 (2d Cir. 1994)

In *Hugh,* the Third Circuit cited this Court's binding decision:

> "A grant of summary judgment is appropriate where the moving party has established that there is no genuine dispute of material fact and "the moving party is entitled to judgment as a matter of law." *Celotex Corp. v. Catrett*, 477 U.S. 317, 322, (1986) (citing Fed. R. Civ. P. 56(c))." *Hugh v. Butler Cnty. Family YMCA*, 418 F.3d 265, 267 (3d Cir. 2005)

In *Street*, the Sixth Circuit explained:

> "Read together, *Liberty Lobby* and *Celotex* stand for the proposition that a party may move for summary judgment asserting that the opposing party will not be able to produce sufficient evidence at trial to withstand a directed verdict motion. If, after sufficient time for discovery, the opposing party is unable to demonstrate that he or she can do so under the *Liberty Lobby* criteria, summary judgment is appropriate." *Anderson v. Liberty Lobby, Inc.,* 477 U.S. 242, (1986); *Celotex Corp. v. Catrett,* 477 U.S. 317, 322 (1986); *Street v. J.C. Bradford & Co.*, 886 F.2d 1472, 1477 (6th Cir. 1989)

In *Nissan Fire*, the Ninth Circuit stated:

> "*Celotex Corp. v. Catrett*, 477 U.S. 317, 322(1986)("Rule 56(c) mandates the entry of summary judgment, after adequate time for discovery and upon motion, against a party who fails to make a showing sufficient to establish the existence of an element essential to that party's case, and on which that party will bear the burden of proof at trial.").But if the nonmoving party produces enough evidence to create a genuine issue of material fact, the nonmoving party defeats the motion" *Nissan Fire & Marine Ins. Co. v. Fritz Cos.*, 210 F.3d 1099 (9th Cir. 2000).

In *Adler*, the Tenth Circuit the plaintiff had adequate time to conduct discovery, creating a discovery record of evidence such as depositions, etc. *See Adler v. Wal-Mart Stores, Inc.*, 144 F.3d 664 (10th Cir. 1998).

In *Rice-Lamarr*, the Eleventh Circuit cited this Court's controlling decision in *Celotex*:

> "The moving party bears the initial burden of informing the court of the basis for its motion and of identifying those materials that demonstrate the absence of a genuine issue of material fact." *See Celotex Corp. v. Catrett*, 477 U.S. 317, 323, 106 S. Ct. 2548, 2552-53, 91 L. Ed. 2d 265 (1986); *Rice-Lamar v. City of Fort Lauderdale*, 232 F.3d 836 (11th Cir. 2000).

In *Tao*, the D.C. Circuit cited this Court's decision in *Liberty Lobby*:

> "Summary judgment should be granted only where there are no genuine issues of material fact, and all inferences must be viewed in a light most favorable to the non-moving party." *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 250 91 L. Ed. 2d 202 (1986); *Tao v. Freeh*, 27 F.3d 635 (D.C. Cir. 1994).

Even prior Fifth Circuit precedent, including *Little v. Liquid Air Corp.*, 37 F.3d 1069 (5th Cir. 1994), and *Dana Bailey v. KS Management Services*, No. 21-20335 (5th Cir. 2022), applied *Celotex* properly. In diverging from all sister circuits and its own precedent, the Fifth Circuit has created a conflict warranting review.

This Court stated the following about the Fifth Circuit:

"Reversal of the Fifth Circuit is necessary to ensure adherence to this Court's constitutional holdings, consistent application of a bedrock legal standard, and fidelity to the rule of law. *See, e.g., James v. City of Boise*, 577 U.S. 406, 307 (2016) (granting summary reversal and emphasizing that lower courts are 'bound by this Court's

interpretation of Federal Law'); *Wearry v. Cain*, 577 U.S. 385, 395 (2016) (per curiam) (noting that this Court 'has not shied away from deciding fact-intensive cases where, as her, lower courts have egregiously misapplied settled law'); *Marmet Health Care Ctr., Inc. v. Brown*, 565 U.S. 530, 532 (2012) (per curiam) (granting summary reversal where lower courts' interpretation of federal law 'was both incorrect and inconsistent with clear instruction in the precedents of this Court')."

II. Sanctioning a Litigant for Asserting Title Under a Federal Land Patent Contravenes the Supremacy Clause and the Contract Clause

Petitioner is the direct heir of an 1840 federal land patent. There are over 200 hundred years of binding decisions in which this Court has repeatedly held that federal land patents are the highest evidence of title, protected from impairment by state laws under the Supremacy Clause and the Contract Clause.

Justice Marshall in *Fletcher* stated:

> "...Thus, grants are brought within the category of contracts having continuing obligation...When a law is in the nature of a contract, when absolute rights have vested under that contract, a repeal of the law cannot divest those rights...A party to a contract cannot pronounce its own deed invalid, although that party be a sovereign State...A grant is a contract executed...A law annulling conveyances is unconstitutional because it is a law impairing the obligation of contracts within the meaning of the Constitution of the United States..." *Fletcher v. Peck*, 10 U.S. (6 Cranch) 87 (1810).

In *French*, which the district court judge properly cited, this Court held:

> "...land received through a land patent remains with the grantee's heirs, unless the land is conveyed away by the grantee or by the heirs." *French v. Spencer*, 62 U.S. 228 (1858).

In *Wilcox*, this Court held:

> "Where a has not been issued for a part of the public lands, a state has no power to declare any title less than a patent valid against a claim of the United States to the land or against a title held under a patent granted by the United States." *Wilcox v. Jackson*, 38 U.S. (13 Pet.) 498 (1839).

These precedents affirm that federal grants confer vested title rights that cannot be nullified or impaired by state doctrines. Yet, the district court sanctioned Petitioner—an heir of the original grantee—for asserting her constitutional and real property-based substantive rights to enforce a federal land patent. The Fifth Circuit affirmed the district court's warning and also sanctioned me. The Fifth Circuit's holding defies this Court's foundational decisions and directly penalizes the invocation of Constitutional protections.

This chilling approach to land patent claims not only conflicts with controlling Supreme Court law, but also raises grave First Amendment concerns. In *NAACP v. Button*, 371 U.S. 415 (1963), this Court made it clear that access to courts is a constitutionally protected form of expression, particularly when used to vindicate legal rights. In *Bill Johnson's Restaurants v. NLRB*, 461 U.S. 731, 743 (1983), the Court further held that even unsuccessful lawsuits cannot be punished unless they are both objectively baseless and filed in bad faith. The district court stated, in its order, the following warning:

> "...the Court finds it appropriate to now impose monetary sanctions for the Defendants' incurred costs...Moreover, the Court cautions Labuzan-Delane about her continued pursuits to acquire ownership of the subject land and engage in litigation regarding the same. The Court will order additional sanctions should Labuzan-Delane engage in such efforts." Pet. App. 17a.

The Fifth Circuit affirmed and stated:

> "The court also acted within its authority by warning Labuzan-Delane that she will face additional sanctions if she continues to pursue meritless claims." Pet. App. 1a

The lower court' rulings discourage good-faith litigation to assert federally protected property rights, precisely the type suppression this Court has condemned. Given that there are, currently, other land patent heirs pursuing claims in the federal courts, this issue is neither isolated nor theoretical. Here are some of the current similar cases:

1. *Scott Brown v. Carrington et al*, No. 25-40099 (5th Cir.)—The lower court held that Texas Rules Against Perpetuities defeat Constitutionally protected land patent rights.

2. *Winans v. McKay*, No. 25-30199 (5th Cir.)—The lower court held that evidence of lack of Notice was introduced too late to assert land patent claim.

3. *Wright v. J&J Properties*, No. 25-30274—The lower court acknowledged an alleged deed, while title remained in the Sovereign United States of America, as the highest evidence of title over a subsequently granted United States Federal Land Patent. If not corrected now, the Fifth Circuit will have judicial license to contravene this Court's interpretation of Federal Law and this Court's 200 plus years of binding determinations concerning United States Federal Land Patents and sanction litigants for simply asserting constitutionally protected property rights.

Circuit Confusion. As demonstrated above, the lower courts' interpretation of federal law 'was both incorrect and inconsistent with clear instruction in the precedents of this

Court, causing a split with most sister circuits. If lower courts use this ruling by the Fifth Circuit to sanction litigants who faithfully comply with the Federal Laws and who assert constitutionally protected property rights, then litigants might venue shop for courts that adhere to this Court interpretation of Federal Law. In addition, Respondents in similar cases at bar will feel emboldened to not comply with Rule 26(f) discovery requests if they know that they can rely on the Fifth Circuit holding as precedent.

Facts. The Petitioner presented a certified United States Federal Land Patent, No. 27859, issued on December 10, 1840, and copies of genealogical records proving that Petitioner is an heir of the grantee. In addition, Petitioner presented a title abstract proving that disputed Respondents title abstract that relied on an 1836 land patent that does not exist.

Application. The Fifth Circuit's opinion contravenes this Court's interpretation of Federal Law and this Court's determinations regarding constitutionally protected federal land patent claims. Under both questions presented for review, the fundamental issue is lower courts can egregiously misapply settled law, resulting in sanctions for litigants who assert constitutionally protected property rights. This Court's decision in *Celotex* provide a remedy.

Importance. This case is not a one off. On the contrary, there are 3 other similar cases that just started in the Fifth Circuit, and if the Fifth Circuit is allowed to continue to circumvent this Court's interpretation of Federal Law, when presented with federal land patent claims, it will cause a domino effect of other circuits following suit and

ignoring this Court's binding determinations. In addition, it would circumvent Congress's dispositive determinations on United States Federal Land Patents, as this Court held:

"...The patent is the instrument which, under the laws of congress, passes the title of the United States. It is the government conveyance...in the action of ejectment in the federal courts the legal title must prevail...in a federal court nor in an answer to an action of ejectment in a state court can the mere occupation of the demanded premises by plaintiffs or defendants, for the period prescribed by the statute of limitations of the state, be held to constitute a sufficient equity in their favor to control the legal title subsequently conveyed to others by the patent of the United States, without trenching upon the power of congress in the disposition of the public lands. That power cannot be defeated or obstructed by any occupation..." *See Redfield v. Parks et al.* 132, U.S. (1889). These are important issues.

Guidance. This Court's decision in *Celotex, Liberty Lobby,* and *Matsushita Electric Industries Co. v. Zenith Radio Corp.,* 475 U.S. 574 (1986), has come to be known as the 1986 Trilogy, setting forth the substantive standards for Rule 56 summary judgements. The Advisory Committee notes to the 2010 Amendments to the Federal Rules make clear that the Celotex standard is still good law. In addition, the aforementioned binding decisions that span over 200 years regarding United States Federal Land Patents are the bedrock authority on understanding the government's conveyance.

III. Statement on Oral Argument

Petitioner respectfully states that if the Court grants certiorari and sets the case for oral argument, Petitioner will retain a member of the Supreme Court bar to argue on her behalf.

CONCLUSION

This case presents an ideal vehicle for the Court to reaffirm the discovery protections outlined in *Celotex*, clarify the proper application of Rule 26(f), and preserve the constitutional supremacy of federal land patents from improper encroachment by state-based defenses and judicial overreach. Petitioner respectfully urges the Court to grant the petition.

Respectfully submitted,

Jennine Labuzan Delare

Signature

Jennine Labuzan-Delare

Print

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