

IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

BARBARA E. SYLVESTER and ANTHONY E.)
SYLVESTER, JR., Individually as the Surviving)
Natural Parents of AMANDA ELIZABETH)
SYLVESTER; and as the Co-Administrators of)
the ESTATE OF AMANDA ELIZABETH)
SYLVESTER, Deceased;)

Plaintiffs,)

v.)

GRADY MEMORIAL HOSPITAL)
CORPORATION, INC. d/b/a GRADY HOSPITAL;))
GRADY EMS, LLC; JOHN/JANE DOE(S) 1-4;)
and X, Y, and Z CORPORATIONS,)

Defendants.)

CIVIL ACTION FILE
NO. _____

JURY TRIAL DEMANDED

PLAINTIFFS' COMPLAINT AND DEMAND FOR JURY TRIAL

COME NOW BARBARA E. SYLVESTER and ANTHONY E. SYLVESTER, JR., Individually as the Surviving Natural Parents of AMANDA ELIZABETH SYLVESTER, and as the Co-Administrators of the ESTATE OF AMANDA ELIZABETH SYLVESTER, Deceased, (collectively "Plaintiffs"), Plaintiffs in the above styled action, and bring this Complaint against Defendants GRADY MEMORIAL HOSPITAL CORPORATION, INC. d/b/a GRADY HOSPITAL; GRADY EMS, LLC; JOHN/JANE DOE(S) 1-4 and X, Y, and Z CORPORATIONS showing the Court as follows:

INTRODUCTION

1.

This is an action arising out of Defendants' failure to provide emergency transport or supply a transport-capable ambulance in response to multiple 911 calls on December 5, 2024, causing the tragic death of 15-year-old AMANDA ELIZABETH SYLVESTER ("MANDY").

MANDY's death was completely preventable. When we call 911 with an emergent need for ambulance transport to a hospital, we have a right to expect an ambulance to be immediately dispatched and a right to rely on that ambulance to arrive.

Ambulance service in Georgia is organized into ten regions, each with multiple Zones. Defendants are the exclusively contracted provider for College Park in the South Fulton Zone of Region 3. If there is no ambulance available, then Defendants must seek mutual aid from other EMS providers so patients in medical emergencies are not left stranded. But that did not happen in MANDY's case. As precious minutes ticked by, Defendants did not send help; did not reach out to other agencies; and did not tell MANDY's parents that no ambulance was on the way, and MANDY – a child – needlessly died because of it.

Plaintiffs bring this action for two reasons: to seek justice for MANDY, and to ensure that other families do not suffer a similar preventable loss.

PARTIES, JURISDICTION, VENUE AND SERVICE OF PROCESS

2.

Plaintiffs BARBARA E. SYLVESTER and ANTHONY E. SYLVESTER, JR., are the Surviving Natural Parents of AMANDA ELIZABETH SYLVESTER ("MANDY") and have standing to bring this action for her wrongful death. (See, Certificate of Death, attached hereto as Exhibit "A").

3.

Plaintiffs BARBARA E. SYLVESTER and ANTHONY E. SYLVESTER, JR. are the Co-Administrators of the ESTATE OF AMANDA ELIZABETH SYLVESTER and bring claims on behalf of the ESTATE OF AMANDA ELIZABETH SYLVESTER for her conscious pain and

suffering, funeral expenses, and all other damages allowed by law. (See, Letters of Administration, attached hereto as Exhibit “B”).

4.

Defendant GRADY MEMORIAL HOSPITAL CORPORATION, INC. d/b/a GRADY HOSPITAL (“GMHC”) is a Georgia corporation whose principal place of business is in Fulton County, Georgia. Defendant GMHC is subject to the jurisdiction and venue of this Court and may be served with legal process by serving its registered agent **CHRISTINE A. GUILLORY**, at its registered office located at **80 Jesse Hill Jr. Drive SE, Atlanta, Fulton County, Georgia 30303**.

5.

Defendant GRADY EMS, LLC (“GRADY EMS”) is a Georgia limited liability corporation whose principal place of business is in Fulton County, Georgia. Defendant GRADY EMS is subject to the jurisdiction and venue of this Court and may be served with legal process by serving its registered agent **CHRISTINE A. GUILLORY**, at its registered office located at **80 Jesse Hill Jr. Drive SE, Atlanta, Fulton County, Georgia 30303**.

6.

Defendants JOHN/JANE DOE(S) 1-4 and X, Y, and Z CORPORATIONS are those yet unidentified individuals and entities who may be liable, in whole or in part, for the damages alleged herein. Once served with process, Defendants JOHN/JANE DOE(S) 1-4 and X, Y, and Z CORPORATIONS are subject to the jurisdiction and venue of this Court.

7.

Defendant GMHC is a private not-for-profit corporation.

8.

Defendant GRADY EMS is a limited liability company wholly owned by Defendant

GMHC.

9.

The operations of Defendant GMHC include the staffing and management of the Grady 911 Dispatch Center.

10.

The operations of Defendant GRADY EMS include the staffing and management of the Grady 911 Dispatch Center.

11.

The individuals staffing the Grady 911 Dispatch Center on December 5, 2024, were, at all times pertinent to the Complaint, employees or agents of Defendant GMHC.

12.

The individuals staffing the Grady 911 Dispatch Center on December 5, 2024, were, at all times pertinent to the Complaint, employees or agents of Defendant GRADY EMS.

13.

Defendant GMHC is not a unit of state or local government.

14.

Defendant GRADY EMS is not a unit of state or local government.

15.

Personal jurisdiction is proper over all Defendants.

16.

This Court has subject matter jurisdiction over all claims asserted in this Complaint.

17.

Venue is proper in this Court and County as to all Defendants.

STATEMENT OF FACTS

18.

On December 5, 2024, 15-year-old MANDY was at the Tracey Wyatt Recreation Center on Godby Road, in College Park, Georgia for volleyball practice with the Dream Chasers Volleyball Club.

19.

Shortly before 6:09 p.m., MANDY collapsed while running laps.

20.

At 6:09 p.m., 911 was called.

21.

At 6:09 p.m., the College Park 911 operator notified Grady 911 dispatch of the need for a Grady ground ambulance at the Tracey Wyatt Recreation Center.

22.

At 6:09 p.m., the College Park 911 operator notified College Park Fire & Rescue.

23.

At 6:10 p.m., a College Park Fire & Rescue non-transport unit was dispatched to the Tracey Wyatt Recreation Center to monitor the patient while awaiting arrival of a Grady ambulance.

24.

Between 6:09 and 6:14 p.m., Defendant GMHC knew they were at Level "0" and had no ground ambulances available to respond to the 911 call.

25.

Between 6:09 and 6:14 p.m., Defendant GRADY EMS knew they were at Level "0" and had no ground ambulances available to respond to the 911 call.

26.

Between 6:09 and 6:14 p.m., Defendant GMHC took no steps to seek mutual aid assistance from another ground transport ambulance service.

27.

Between 6:09 and 6:14 p.m., Defendant GRADY EMS took no steps to seek mutual aid assistance from another ground transport ambulance service.

28.

Defendant GMHC negligently failed to tell College Park 911 or Plaintiffs that they were at Level “0” and had no ambulances available to respond to the 911 call.

29.

Defendant GRADY EMS negligently failed to tell College Park 911 or Plaintiffs that they were at Level “0” and had no ambulances available to respond to the 911 call.

30.

At 6:14 p.m., College Park’s Rescue unit arrived at the Tracey Wyatt Recreation Center in response to the 911 dispatch.

31.

At or about the time the College Park Rescue unit arrived at the scene, MANDY was in respiratory distress and appeared to be having seizures.

32.

Nineteen minutes later, at 6:33 p.m., another public emergency call was made to College Park 911 for MANDY requesting the status of the ground ambulance.

33.

The call was transferred to Grady 911 dispatch.

34.

As of 6:33 p.m., Defendants had not made a ground ambulance available or requested mutual aid to obtain a ground ambulance to transport MANDY.

35.

Shortly after 6:33 p.m., during the second 911 call, Defendants' representative told the Tracey Wyatt Recreation Center Supervisor that GRADY EMS was at "Code Zero," meaning that GRADY EMS did not have any ground ambulances available to send.

36.

The College Park EMTs told Plaintiffs that the College Park Rescue unit could not transport MANDY.

37.

Because Defendants failed to seek mutual aid and no ground ambulance was ever provided, at approximately 6:44 p.m., MANDY was placed into the back of her mother's vehicle for transport to a hospital.

38.

At or about 6:50 p.m., Defendants cancelled the call for emergency transport.

39.

No ground ambulance from Defendant GMHC ever arrived at the Tracy Wyatt Recreation Center on December 5, 2024, for MANDY.

40.

No ground ambulance from Defendant GRADY EMS ever arrived at the Tracy Wyatt Recreation Center on December 5, 2024, for MANDY.

41.

Plaintiff BARBARA E. SYLVESTER was forced to transport MANDY to the hospital herself, in her own private vehicle, in Atlanta rush hour traffic, with no lights, no sirens, no monitoring, no supplemental oxygen, and no medical assistance whatsoever.

42.

At 7:36 p.m., forty-six minutes after being placed in her mother's vehicle, MANDY arrived at Children's Healthcare of Atlanta—Hughes Spalding hospital ("CHOA").

43.

Shortly after arrival, MANDY became unresponsive, suffered a cardio/pulmonary arrest, and could not be resuscitated.

44.

At 8:36 p.m., MANDY was pronounced dead.

45.

The autopsy revealed that MANDY died of treatable bilateral pulmonary emboli.

46.

Pulmonary emboli are readily treatable if treatment is initiated in a timely fashion.

47.

Since she was not transported by ambulance, MANDY did not receive timely treatment.

48.

Defendant GMHC is the exclusive designated ground ambulance provider for College Park, including the Tracey Wyatt Recreation Center.

49.

Defendant GRADY EMS is the exclusive designated ground ambulance provider for College Park, including the Tracey Wyatt Recreation Center.

50.

Defendant GMHC has a duty to respond to 911 calls and emergencies in the city of College Park with a ground ambulance.

51.

Defendant GRADY EMS has a duty to respond to 911 calls and emergencies in the city of College Park with a ground ambulance.

52.

A “ground ambulance” is a motor vehicle specially equipped and intended to be used for the emergency transportation of patients.

53.

Defendant GMHC provides ground ambulance services for remuneration.

54.

Defendant GRADY EMS provides ground ambulance services for remuneration.

55.

Between her collapse at or about 6:00 p.m., and her death at 8:36 p.m., MANDY suffered fright, terror and tremendous conscious pain and suffering.

56.

Defendant GMHC’s failure to timely accomplish MANDY’s transport to a hospital in a ground ambulance delayed delivery of necessary care and treatment to MANDY, which caused and significantly contributed to MANDY’s pain, suffering and untimely death.

57.

Defendant GRADY EMS's failure to timely accomplish MANDY's transport to a hospital in a ground ambulance delayed delivery of necessary care and treatment to MANDY, which caused and significantly contributed to MANDY's pain, suffering and untimely death.

COUNT I: ORDINARY NEGLIGENCE

58.

Plaintiffs re-allege and incorporate all prior paragraphs of the Complaint as if set out here in full.

59.

Defendant GMHC had a duty to provide ambulance services to the City of College Park, generally, and MANDY, specifically.

60.

Defendant GRADY EMS had a duty to provide ambulance services to the City of College Park, generally, and MANDY, specifically.

61.

In calling 911 and waiting for Defendants to send an ambulance, Plaintiffs reasonably relied on Defendants' undertaking of the duty to provide ambulance services to the South Fulton Zone of Region 3.

62.

Defendant GMHC had a duty to have sufficient licensed personnel immediately available to respond to 911 calls with at least one ground ambulance.

63.

Defendant GRADY EMS had a duty to have sufficient licensed personnel immediately available to respond to 911 calls with at least one ground ambulance.

64.

If Defendant GMHC could not timely provide a ground ambulance in response to the 911 call, Defendant GMHC had a duty to seek mutual aid assistance from another licensed ambulance provider.

65.

If Defendant GRADY EMS could not timely provide a ground ambulance in response to the 911 call, Defendant GRADY EMS had a duty to seek mutual aid assistance from another licensed ambulance provider.

66.

Defendant GMHC did not seek mutual aid assistance from another licensed ambulance provider to obtain ground ambulance transport for MANDY.

67.

Defendant GRADY EMS did not seek mutual aid assistance from another licensed ambulance provider to obtain ground ambulance transport for MANDY.

68.

While critical time passed and everyone at the scene waited on Defendants to arrive with ground transport, no ground ambulance ever arrived to transport MANDY.

69.

Defendant GMHC negligently failed to provide ground ambulance services in response to the 911 calls for MANDY on December 5, 2024.

70.

Defendant GRADY EMS negligently failed to provide ground ambulance services in response to the 911 calls for MANDY on December 5, 2024.

71.

Defendant GMHC negligently failed to timely provide ground ambulance services in response to the 911 calls for MANDY on December 5, 2024.

72.

Defendant GRADY EMS negligently failed to timely provide ground ambulance services in response to the 911 calls for MANDY on December 5, 2024.

73.

Defendant GMHC's negligent failure to respond to the 911 calls on December 5, 2024, caused and contributed to MANDY's injuries and death.

74.

Defendant GRADY EMS's negligent failure to respond to the 911 calls on December 5, 2024, caused and contributed to MANDY's injuries and death.

75.

Defendant GMHC's negligent delay in responding to the 911 calls on December 5, 2024, caused and contributed to MANDY's injuries and death.

76.

Defendant GRADY EMS's negligent delay in responding to the 911 calls on December 5, 2024, caused and contributed to MANDY's injuries and death.

77.

Defendant GMHC'S actions constitute a negligent breach of their duty to provide

ambulance services to the City of College Park, generally, and MANDY, specifically, subjecting them to liability in this case.

78.

Defendant GRADY EMS's actions constitute a negligent breach of their duty to provide ambulance services to the City of College Park, generally, and MANDY, specifically, subjecting them to liability in this case.

COUNT II: NEGLIGENCE *PER SE*

79.

Plaintiffs re-allege and incorporate all prior paragraphs of the Complaint as if set out here in full.

80.

Defendant GMHC had a duty to adopt policies consistent with state law and regulatory requirements.

81.

Defendant GRADY EMS had a duty to adopt policies consistent with state law and regulatory requirements.

82.

If Defendant GMHC could not timely provide a ground ambulance in response to the 911 call, Ga. R. & Reg. § 511-9-2-.07 required that Defendant GHMC “**shall** request mutual aid assistance.” (Emphasis added).

83.

If Defendant GRADY EMS could not timely provide a ground ambulance in response to the 911 call, Ga. R. & Reg. § 511-9-2-.07 required that Defendant GRADY EMS “**shall** request

mutual aid assistance.” (Emphasis added).

84.

As a member of the public requesting ambulance service within the South Fulton Zone of Region 3, MANDY was a person within the class protected by Defendant GMHC’s mandatory duty to seek mutual aid assistance from another licensed ambulance provider in the event a ground ambulance was not available from Defendant GMHC.

85.

As a member of the public requesting ambulance service within the South Fulton Zone Region 3, MANDY was a person within the class protected by Defendant GRADY EMS’s mandatory duty to seek mutual aid assistance from another licensed ambulance provider in the event a ground ambulance was not available from Defendant GRADY EMS.

86.

Defendant GMHC’s internal policy for Low System Level Procedures provided that “mutual aid **may** be requested at the discretion of the 911 Communications Supervisor” if medics and a ground ambulance are not available. (Emphasis added.)

87.

Defendant GRADY EMS’s internal policy for Low System Level Procedures provided that “mutual aid **may** be requested at the discretion of the 911 Communications Supervisor” if medics and a ground ambulance are not available. (Emphasis added.)

88.

Defendant GMHC’s policy failed to comply with Georgia law because it wrongly told Defendant GMHC’s employees that the duty to call for mutual aid was discretionary, when in fact it was mandatory.

89.

Defendant GRADY EMS's policy failed to comply with Georgia law because it wrongly told Defendant GRADY EMS's employees that the duty to call for mutual aid was discretionary, when in fact it was mandatory.

90.

Telling employees that an action is discretionary creates a foreseeable risk that they will decide not to take that action.

91.

As a result of Defendant GMHC's policy wrongly informing Defendant GMHC's employees that calling for mutual aid was discretionary, not mandatory, Defendant GMHC's employees did not call for mutual aid from another licensed ambulance provider when they knew they were at Level "0" and had no ground ambulances available to respond to MANDY's medical emergency.

92.

As a result of Defendant GRADY EMS's policy wrongly informing Defendant GRADY EMS's employees that calling for mutual aid was discretionary, not mandatory, Defendant GRADY EMS's employees did not call for mutual aid from another licensed ambulance provider when they knew they were at Level "0" and had no ground ambulances available to respond to MANDY's medical emergency.

93.

The failure of Defendant GMHC's employees to call for mutual aid on December 5, 2024, caused and contributed to MANDY's injuries and death.

94.

The failure of Defendant GRADY EMS's employees to call for mutual aid on December 5, 2024, caused and contributed to MANDY's injuries and death

95.

Defendant GMHC's actions constitute negligence *per se*, subjecting them to liability to Plaintiffs.

96.

Defendant GRADY EMS's actions constitute negligence *per se*, subjecting them to liability to Plaintiffs.

97.

Plaintiffs are entitled to an award of all damages flowing from Defendants' negligence.

COUNT III: DAMAGES FOR WRONGFUL DEATH

98.

Plaintiffs re-allege incorporate each of the above-numbered paragraphs as if fully set forth verbatim herein.

99.

Plaintiffs BARBARA E. SYLVESTER and ANTHONY E. SYLVESTER, JR., are the surviving parents of MANDY and as such are the proper parties to bring this action for the wrongful death of, and to recover the full value of the life of MANDY, without deduction for necessary or personal expenses had she lived.

100.

As a direct and proximate result of each Defendants' negligence, jointly and severally, MANDY suffered a wrongful and untimely death on December 5, 2024.

101.

At the time of her death, MANDY was 15 years old and had a reasonable life expectancy in excess of 64 years according to the Annuity Mortality Table for 1949, Ultimate.

102.

At all times relevant hereto, all Defendants named herein were joint tortfeasors and the combined negligence of all Defendants proximately caused Plaintiffs' damages referenced herein.

COUNT III: ESTATE CLAIMS AGAINST ALL DEFENDANTS

103.

Plaintiffs re-allege and incorporate each of the above-numbered paragraphs as if fully set forth herein verbatim.

104.

BARBARA E. SYLVESTER and ANTHONY E. SYLVESTER, JR. are the Co-Administrators of the ESTATE OF AMANDA ELIZABETH SYLVESTER (the "ESTATE"). As such, Plaintiffs BARBARA E. SYLVESTER and ANTHONY E. SYLVESTER, JR. are the proper parties to bring this action on behalf of the ESTATE.

105.

MANDY suffered tremendous conscious pain and suffering on December 5, 2024, before her death as a result of Defendants' negligence.

106.

The ESTATE also incurred end of life expenses on MANDY's behalf.

107.

Plaintiffs BARBARA E. SYLVESTER and ANTHONY E. SYLVESTER, JR. are entitled to recover on behalf of the ESTATE for the conscious pain of body and mind MANDY suffered

prior to her untimely death on December 5, 2024, as well as the funeral, burial and other related expenses incurred on her behalf as a direct and proximate result of the negligence of Defendants.

COUNT IV: ATTORNEYS' FEES AND EXPENSES OF LITIGATION

108.

Plaintiffs re-allege and incorporate each of the above-numbered paragraphs as if fully set forth verbatim herein.

109.

Defendants have acted in bad faith, been stubbornly litigious or have caused Plaintiffs unnecessary trouble and expense. Therefore, Plaintiffs are entitled to recover from Defendants herein all expenses of litigation, including attorney's fees of a reasonable value to be specially proven at trial pursuant to O.C.G.A. § 13-6-11.

WHEREFORE, Plaintiffs pray for the following relief:

- (1) That Summons issue requiring these Defendants to appear as provided by law and answer the allegations of this Complaint;
- (2) That Plaintiffs have a **TRIAL BY JURY**;
- (3) The recovery from all Defendants of compensatory damages for the bodily injury, fright, terror, pain and suffering of AMANDA ELIZABETH SYLVESTER; and for all medical, funeral and other necessary expenses incurred as a result of the subject incident, and any other damages allowed for by Georgia law, in an amount to be determined by the jury;
- (4) The recovery from Defendants of compensatory damages for the full value of AMANDA ELIZABETH SYLVESTER's life and her wrongful death;
- (5) For Judgment against Defendants for all costs of this action, including reasonable attorneys' fees resulting from Defendants' bad faith, stubborn litigiousness, and/or causing

Plaintiffs unnecessary trouble and expense pursuant to O.C.G.A. § 13-6-11, and/or by otherwise violating O.C.G.A. § 9-11-68 in an amount to be proven at trial;

(6) For such other and further relief as this Court deems just and appropriate.

Respectfully submitted, this 15th day of June, 2026.

/s/ Adam Malone

ADAM MALONE

Georgia Bar No. 468005

MERI BENOIT LINK

Georgia Bar No. 125237

CHRISTOPHER D. CARTER

Georgia Bar No. 529712

WYNN B. SOWERSBY

Georgia Bar No. 072122

MALONE LAW OFFICE

Two Ravinia Drive, Ste. 300

Atlanta, GA 30346

Tel. 770-390-7550

adam@malonelaw.com

meri@malonelaw.com

chris@malonelaw.com

wynn@malonelaw.com

/s/ Liza A. Park

LIZA A. PARK

Georgia Bar No. 714092

BEN CRUMP LAW, PLLC

5 Cowboys Way, Suite 300

Frisco, TX 75034

Tel: (404) 850-8922

Liza@bencrump.com

/s/ Leighton Moore

LEIGHTON MOORE

Georgia Bar No. 520701

THE MOORE LAW FIRM, P.C.

150 E. Ponce de Leon Ave., Suite 225

Decatur, Georgia 30030

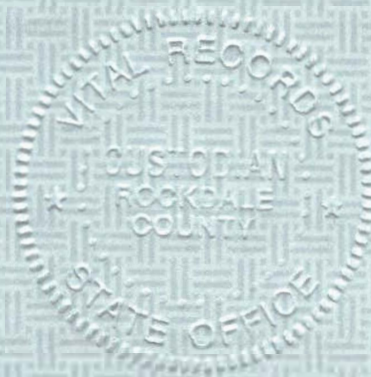
(404) 285-5724

leighton@moorefirmpc.com

GEORGIA DEATH CERTIFICATE

State File Number **2024GA000096186**

1. DECEDENT'S LEGAL FULL NAME (First, Middle, Last) AMANDA ELIZABETH SYLVESTER			1a. IF FEMALE, ENTER LAST NAME AT BIRTH SYLVESTER		2. SEX FEMALE	2a. DATE OF DEATH (Mo., Day, Year) ACTUAL DATE OF DEATH 12/05/2024	
3. SOCIAL SECURITY NUMBER [REDACTED]	4a. AGE (Years) 15	4b. UNDER 1 YEAR Mos.	4c. UNDER 1 DAY Days	Hours	Mins.	5. DATE OF BIRTH (Mo., Day, Year) [REDACTED] 2009	
6. BIRTHPLACE GEORGIA	7a. RESIDENCE - STATE GEORGIA	7b. COUNTY DEKALB		7c. CITY, TOWN STONECREST			
7d. STREET AND NUMBER 4828 HODGDON CORNERS COVE			7e. ZIP CODE 30038	7f. INSIDE CITY LIMITS? NO		8. ARMED FORCES? NO	
8a. USUAL OCCUPATION STUDENT		8b. KIND OF INDUSTRY OR BUSINESS EDUCATION					
9. MARITAL STATUS NEVER MARRIED		10. SPOUSE NAME			11. FATHER'S FULL NAME (First, Middle, Last) ANTHONY ELLIOTT SYLVESTER JR.		
12. MOTHER'S MAIDEN NAME (First, Middle, Last) BARBARA ELIZABETH WILSON		13a. INFORMANT'S NAME (First, Middle, Last) BARBARA ELIZABETH SYLVESTER			13b. RELATIONSHIP TO DECEDENT MOTHER		
13c. MAILING ADDRESS 4828 HODGDON CORNERS COVE STONECREST GEORGIA 30038				14. DECEDENT'S EDUCATION 9th THROUGH 12TH GRADE; NO DIPLOMA			
15. ORIGIN OF DECEDENT (Spanish/Hispanic/Latino) NO, NOT SPANISH/HISPANIC/LATINO			16. DECEDENT'S RACE (White, Black, American Indian, etc.) (Specify) BLACK OR AFRICAN-AMERICAN				
17a. IF DEATH OCCURRED IN HOSPITAL EMERGENCY ROOM/OUTPATIENT			17b. IF DEATH OCCURRED OTHER THAN HOSPITAL (Specify)				
18. HOSPITAL OR OTHER INSTITUTION NAME (If not in either give street and no.) CHILDRENS HEALTHCARE OF ATLANTA AT HUGHES SPALDING			19. CITY, TOWN or LOCATION OF DEATH ATLANTA		20. COUNTY OF DEATH FULTON		
21. METHOD OF DISPOSITION (specify) CREMATION		22. PLACE OF DISPOSITION CREMATION CARE OF GEORGIA INC 1114 BRETT DRIVE SW CONYERS GEORGIA 30094			23. DISPOSITION DATE (Mo., Day, Year) 02/24/2025		
24a. EMBALMER'S NAME NOT EMBALMED		24b. EMBALMER LICENSE NO. -----		25. FUNERAL HOME NAME GREGORY B LEVETT & SONS ROCKDALE CHAPEL			
25a. FUNERAL HOME ADDRESS 1999 HIGHWAY 138 SE CONYERS GEORGIA 30013							
26a. SIGNATURE OF FUNERAL DIRECTOR R JERMAINE WILLIAMS				26b. FUN. DIR. LICENSE NO 4735		AMENDMENTS	
27. DATE PRONOUNCED DEAD (Mo., Day, Year) 12/05/2024		28. HOUR PRONOUNCED DEAD 08:36 PM					
29a. PRONOUNCER'S NAME BOLANLE AKINSOLA			29b. LICENSE NUMBER		29c. DATE SIGNED 12/07/2024		
30. TIME OF DEATH 08:36 PM			31. WAS CASE REFERRED TO MEDICAL EXAMINER YES				
32. Part I. Enter the chain of events-diseases, injuries, or complications that directly caused the death. DO NOT enter terminal events such as cardiac arrest, respiratory arrest, or ventricular fibrillation without showing the etiology. DO NOT ABBREVIATE.						Approximate interval between onset and death	
IMMEDIATE CAUSE (Final disease or condition resulting in death)						MINUTES	
A. PULMONARY EMBOLISM COMPLICATING ASTHMA							
Due to, or as a consequence of							
B.							
Due to, or as a consequence of							
C.							
Due to, or as a consequence of							
D.							
Part II. Enter significant conditions contributing to death but not related to cause given in Part 1A. If female, indicate if pregnant or birth occurred within 90 days of death. DIABETES, OBESITY				33. WAS AUTOPSY PERFORMED? YES		34. WERE AUTOPSY FINDINGS AVAILABLE TO COMPLETE THE CAUSE OF DEATH? YES	
35. TOBACCO USE CONTRIBUTED TO DEATH NO		36. IF FEMALE (range 10-54) PREGNANT NOT PREGNANT WITHIN THE PAST YEAR			37. ACCIDENT, SUICIDE, HOMICIDE, UNDETERMINED (Specify) NATURAL		
38. DATE OF INJURY (Mo., Day, Year)		39. TIME OF INJURY	40. PLACE OF INJURY (Home, Farm, Street, Factory, Office, Etc.) (Specify)			41. INJURY AT WORK? (Yes or No)	
42. LOCATION OF INJURY (Street, Apartment Number, City or Town, State, Zip, County)							
43. DESCRIBE HOW INJURY OCCURRED					44. IF TRANSPORTATION INJURY		
45. To the best of my knowledge death occurred at the time, date and place and due to the cause(s) stated. Medical Certifier (Name, Title, License No.)				46. On the basis of examination and/or investigation, in my opinion death occurred at the time, date and place and due to the cause(s) stated. Medical Examiner/Coroner (Name, Title, License No.) /S/ ROCHELLE SIMON ME			
45a. DATE SIGNED (Mo., Day, Year)		45b. HOUR OF DEATH		46a. DATE SIGNED (Mo., Day, Year)		46b. HOUR OF DEATH	
				02/27/2025		08:36 PM	
47. NAME, ADDRESS, AND ZIP CODE OF PERSON COMPLETING CAUSE OF DEATH ROCHELLE SIMON 430 PRYOR STREET ATLANTA GEORGIA 30312							
48. REGISTRAR (Signature) /S/ CYNTHIA M. BUSKEY					49. DATE FILED - REGISTRAR (Mo., Day, Year) 02/27/2025		



THIS IS TO CERTIFY THAT THIS IS A TRUE REPRODUCTION OF THE ORIGINAL RECORD ON FILE WITH THE STATE OFFICE OF VITAL RECORDS, GEORGIA DEPARTMENT OF PUBLIC HEALTH. THIS CERTIFIED COPY IS ISSUED UNDER THE AUTHORITY OF CHAPTER 31-10, CODE OF GEORGIA AND 511-1-3 DPH RULES AND REGULATIONS.

Cynthia M. Buskey

STATE REGISTRAR AND CUSTODIAN
GEORGIA STATE OFFICE OF VITAL RECORDS

COUNTY CUSTODIAN:

ISSUED BY:

DATE ISSUED:

Gary J. Washington
Vivian D. Sims
FEB 27 2025

**IN THE PROBATE COURT OF DEKALB COUNTY
STATE OF GEORGIA**

IN RE: ESTATE OF)
)
AMANDA ELIZABETH SYLVESTER,) ESTATE NO. 2025-2547
DECEASED)

LETTERS OF ADMINISTRATION

[Bond Waived and/or Certain Powers Granted at Time of Appointment]

At a regular term of Probate Court, this Court granted an order allowing **BARBARA E. SYLVESTER and ANTHONY E. SYLVESTER, JR.** to qualify as Administrators of the above-named Decedent, who was domiciled in this County at the time of his or her death or was domiciled in another state but owned property in this County at the time of his or her death, and that upon so doing, Letters of Administration be issued to such Personal Representatives.

THEREFORE, the said Administrators, having taken the oath of office and complied with all necessary prerequisites of the law, are legally authorized to discharge all the duties and exercise all powers of Personal Representatives, according to Georgia law. In addition, this Court:

[Initial all that apply]

- BCH (a) **POWERS GRANTED:** Grant to the Administrators all of the powers contained in O.C.G.A. § 53-12-261, except the Administrators shall not be authorized to bind the estate by any warranty in any conveyance or contract in violation of O.C.G.A. § 53-8-14(a).
- BCH (b) **REPORTS WAIVED:** Grant to the Administrators the specific power to serve without making and filing inventory, and without filing any annual or other returns or reports to any court.
- BCH (c) **BOND WAIVED:** Waive the specific requirement to post bond.
- BCH (d) **STATEMENTS WAIVED:** Grants to the Administrators the specific power to serve without furnishing to the heirs statements of receipts and disbursements.

IN TESTIMONY WHEREOF, I have hereunto affixed my signature as Judge of the Probate Court of said County and the seal of this office this 10th of February, 2026.

Bedelia C Hargrove

Judge of the Probate Court

*NOTE: The following must be signed if the
Judge does not sign the original of
this document:*

Issued by: 

Deeyona Massay, Clerk of the Probate Court

[Seal]

EXHIBIT B