

Exhibit

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RENE VARGAS, on behalf of himself
and all other similarly situated
persons, known and unknown,

Plaintiffs,

-vs-

TOMMY'S REDHOTS, INC.,

Defendant.

No. 14 C 7144

Chicago, Illinois
January 28, 2016
9:00 a.m.

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE ANDREA R. WOOD

APPEARANCES:

For the Plaintiff: CAFFARELLI & ASSOCIATES LTD.
224 South Michigan Ave.
Chicago, Illinois 60604
BY: MR. ALEJANDRO CAFFARELLI

For the Defendant: LAW OFFICES OF
ROBERT T. HANLON & ASSOCIATES, P.C.
131 East Calhoun Street
Woodstock, Illinois 60098
BY: MR. ROBERT T. HANLON

COLETTE M. KUEMMETH, CSR, RMR, FCRR
OFFICIAL COURT REPORTER
219 South Dearborn Street
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Chicago, Illinois 60604
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1 (Proceedings heard in open court:)

2 THE CLERK: Case 14 CV 7144, Vargas versus Tommy's
3 Redhots.

4 MR. CAFFARELLI: Good morning, your Honor. Alex
5 Caffarelli for the plaintiff. It looks like I'm alone,
6 Judge.

7 THE COURT: It does. Have you had any contact --
8 there was a filing from the defendant, a motion for leave to
9 file an answer instanter. Did you have any reason to think
10 that defense counsel was not going to be here?

11 MR. CAFFARELLI: No, I didn't. I got a call from
12 him at 4:00 o'clock yesterday, late afternoon. My
13 receptionist told me that he wanted to discuss Rule 26
14 disclosure issues, but I was working on a brief, and I said
15 to her to tell him we would just talk in court this morning.
16 So that's all that I heard. So...

17 THE COURT: What I'd like to do, because I would
18 very much like to have defense counsel here to find out what
19 is going on with the failure to file the answer on time, if
20 you don't mind, I'd like to pass the case for a few minutes
21 and re-call it and see if he's just running a little bit
22 late.

23 MR. CAFFARELLI: Sure. I do have a call before
24 Judge Alonzo at 9:30, so if we could squeeze it in before
25 then I'd appreciate that.

1 THE COURT: Yes. We'll re-call the case before
2 9:30.

3 MR. CAFFARELLI: Thank you, Judge.

4 (The Court attended to other matters, after which the
5 following proceedings were held:)

6 THE CLERK: Re-calling case 14 CV 7144, Vargas
7 versus Tommy's Redhots.

8 MR. CAFFARELLI: Alex Caffarelli for the plaintiff.

9 MR. HANLON: Good morning, your Honor. Robert
10 Hanlon on behalf of the defendants.

11 THE COURT: Okay. Good morning.

12 So Mr. Hanlon, I saw that you're requesting to file
13 your answer instanter. What happened that you weren't able
14 to file it by the date I set?

15 MR. HANLON: Judge, you had ordered the plaintiff
16 to tender a copy to me within 40 hours from the last time we
17 were present, which was the 21st of December. I received on
18 January 4th a copy of their first amended complaint
19 containing 12 pages plus exhibits. One of the exhibits was
20 clearly something that says: "Error, undefined defending
21 command." I really believe that was an error.

22 I attempted to file an answer in the time frame
23 that you had set forth, but I couldn't do that because each
24 time I attempted to upload the document there is a thing
25 called Java something on the computer that works with

1 different browsers. Anyway, I hired a company called Wave
2 Tech to come out to my office and fix that. They fixed that
3 on the 15th.

4 I contacted my opposing counsel's office to ask to
5 file that instanter as an unopposed motion. I left them a
6 message; 15 minutes later I get a default from my opposing
7 counsel.

8 I even attempted to contact my opposing counsel
9 yesterday, and I was told by the receptionist that he refused
10 to speak with me. And I asked to speak with the other
11 counsel, Alexis Martin, and she also refused to speak with
12 me.

13 So Judge, I'd like to file motions such as that on
14 an unopposed basis if at all possible, but my opposing
15 counsel can't talk to me, and then I'm getting something on
16 January 4th that I was supposed to get on December 23rd, just
17 before Christmas, then I lost all that time in which to get
18 it done.

19 THE COURT: Any response?

20 MR. CAFFARELLI: Yes. It's hard for me to know
21 where to begin here. And it's -- boy. Where do I begin?

22 THE COURT: Let's begin; was the -- when was the
23 complaint emailed to Mr. Hanlon?

24 MR. CAFFARELLI: It was e-mailed within the 24 to
25 48 -- it was emailed and mailed versus U.S. mail, I

1 believe -- I'm looking at counsel's paper here -- it appears
2 he's referring to the paper copy. So I find it hard to
3 believe that it took that long for the paper copy to get to
4 him. But I have proof that it was also e-mailed to him in a
5 timely manner.

6 I guess I'm just kind of incredulous here. I mean,
7 counsel is an E-filer, and he can go on PACER and pull the
8 complaint, you know. And it seems like that we need to
9 deliver the complaint to him on a silver platter.

10 I just frankly don't believe the ECF issues -- I
11 just don't believe that in light of the course of conduct
12 that's been happening here, and particularly what he just
13 said with regard to the timing of the default. We filed the
14 default before ever hearing from counsel. Counsel, after
15 getting the default, called us about filing his motion for
16 leave to file his answer late. And then in his motion he
17 says that we never responded to him, which is categorically
18 untrue. I have my email from him that was emailed to him
19 that I sent within 45 minutes of his call -- I'm happy to
20 give it to the Court if the Court needs to see it -- saying
21 that under the totality of the circumstances, given his past
22 conduct in this case, which has included constant threats to
23 file Rule 11 sanctions against my associate, completely
24 ungrounded threats -- it's just a bizarre way to practice.
25 And then he files a motion saying that I never responded,

1 which is just categorically untrue.

2 THE COURT: Can you hand the email to my deputy so
3 I can take a look at it? I don't suppose you have an extra
4 copy for Mr. Hanlon.

5 MR. CAFFARELLI: I don't.

6 MR. HANLON: Judge, with respect to that email, I
7 received that after I filed or -- within a second or so of my
8 filing my motion. I had already typed up my motion to file
9 and filed my motion.

10 MR. CAFFARELLI: If you look at the time stamps,
11 you know, we sent that 15 minutes prior to his motion. So
12 what really happened is he got my email, realized we weren't
13 going to agree, and then he filed his motion. So it's
14 disingenuous to say that I didn't respond to him after he
15 reached out to me to file his motion.

16 I would actually, I mean, if the Court is
17 considering allowing counsel leave to file a late answer, I
18 would like to brief this. Because I think this all needs to
19 come to light. Even to the extent that my associate told me
20 last time, she came back to my office after the last status
21 and said: I didn't know Michael Poper was so young, I
22 thought he was an old man.

23 And I said, he is an old man. He was admitted in
24 1968.

25 She said: Oh, there was a 30-year-old that stepped

1 up and said I'm Michael Poper, and I'm withdrawing.

2 And why somebody would come into court and lie to
3 the judge and say that they're Michael Poper, it doesn't make
4 sense. They didn't need to do that. Michael Poper could
5 have come himself.

6 But it's just these little lies and these little
7 misrepresentations which have been cumulative in this case
8 and the level of vitriol that we have been getting from
9 opposing counsel, which I've just never experienced before,
10 and I would like to lay it out before the Court.

11 THE COURT: I'm sorry. I do recall last time the
12 prior attorney, who I understand to be Mr. Poper, he's the
13 person who has the conflict because he has factual
14 information?

15 MR. CAFFARELLI: Yes.

16 THE COURT: And you're saying that was not actually
17 Michael Poper? Is it his son who is in the right age range?

18 MR. CAFFARELLI: I went to the ARDC to confirm my
19 understanding, and he was admitted in 1968. So he's got to
20 be at least 70 years old.

21 THE COURT: Maybe he just looks very young and
22 takes good care of himself. Diet and exercise.

23 MR. CAFFARELLI: Possibly. But it's just
24 demonstrative of what I have been dealing with here. We say
25 things, we send things, we make calls that apparently counsel

1 denies receiving, denies I ever said. And so it's hard,
2 because it seems like we're playing by two different sets of
3 rules here.

4 THE COURT: Okay. Well, Mr. Hanlon, let me give
5 you a chance to respond.

6 MR. HANLON: First of all, Judge, I was here last,
7 I saw no 30-year-old attorney approach the bench and
8 represent himself to be Mr. Poper. Had I seen that I would
9 certainly have informed the Court. Because I know Mr. Poper,
10 and I also know his partner. It was his partner who appeared
11 here. And his partner is in his 70s as well. Although I
12 believe that the Court -- he addressed the Court with respect
13 to his request, and he asked to be excused early, and he
14 left.

15 So to contend that some 30 year-old person was here
16 on behalf of Mr. Poper I think really speaks to some of the
17 inconsistencies that I'm hearing. So you can see it for
18 yourself, Judge, that what they say here as a fact isn't
19 necessarily a fact. And since you were here, I'm sure that
20 you know what took place in your own courtroom.

21 THE COURT: I will tell you what I do recall from
22 the last time you were here is that there seemed to be quite
23 a bit of hostility and some perhaps a communication breakdown
24 between the parties, and I can see that that has not resolved
25 itself.

1 There was a mention of briefing. What is it
2 exactly that you would like to brief?

3 MR. CAFFARELLI: To the extent, you know, he's
4 making representations that he contacted me before he filed
5 his motion, which are just false representations, I would
6 like to correct those representations.

7 I normally don't oppose these things. This is
8 difficult for me, because I am always -- and, you know, you
9 don't know me, Judge, you have recently been elevated to the
10 bench, but I never oppose these things unless there are
11 unusual or strange circumstances. This is one of these
12 cases. It was filed in 2014, and then apparently -- which
13 I'm now starting to doubt, due to the defendant's health
14 conditions we kept getting requests for extensions and
15 extensions and extensions, and months later we finally got
16 the motion.

17 My associate had to try to schedule Rule 26
18 conferences, it was -- contacted opposing counsel four times
19 with no response. The joint status revisions were late.
20 They failed to tender their initial disclosures on time back
21 in March of 2014 after the Court had ordered that the initial
22 disclosures be exchanged. The answer to the first amended
23 complaint was due November 16th of 2015. Nothing was filed.
24 The Court then grants an additional time to file on -- on
25 January 6th of 2016. Nothing is filed. After the renewed

1 motion is filed then finally they file their motion for leave
2 to answer and are pretending that they actually reached out
3 to us before we filed our motion for default. Which is just
4 categorically untrue.

5 It's just the length of time this has taken, the
6 course of conduct throughout that has led me to put my foot
7 down and say I can't stand by while these representations are
8 made and this case gets dragged on and dragged on. My
9 associate is so traumatized she refuses -- which is true --
10 she refuses to speak to him anymore, because every time they
11 have a phone conversation, something that she said or didn't
12 say is misrepresented. So she insists on having everything
13 in writing. And I certainly don't blame her.

14 I just -- for all of these reasons, it's mind
15 boggling to me. This is a hotdog stand, this is a minor wage
16 case, and every conversation from the beginning of this case
17 with my associate from -- with Mr. Hanlon began and ended
18 with a threat to her about filing Rule 11 sanctions and to
19 file a motion to show cause. Which was completely unfounded.
20 And again, not the way we normally practice. So I just don't
21 know what to say.

22 THE COURT: So is your request then that I deny
23 leave to file the answer, or would you be seeking some sort
24 of sanctions? Because there are two different options here.

25 MR. CAFFARELLI: Correct.

1 THE COURT: One thing, my first reaction is that it
2 makes sense to get the case moving, notwithstanding this
3 dispute, to allow the answer to be filed, and if you'd like
4 to make a request for sanctions based on the conduct that
5 you've described, that can be briefed, I can hear what both
6 sides have to say on it and take an appropriate action, and
7 meanwhile the case can go forward with an answer on file and
8 discovery.

9 Alternatively, you can say that what you really
10 want is to try to push for default. I would say under the
11 circumstances I'd be less inclined to go that route because
12 if it turns out that there is misconduct by the attorneys,
13 the default really only punishes the clients. I would
14 consider that request if that's what you're asking for.

15 How would you prefer to proceed?

16 MR. CAFFARELLI: As much as I'm going to hate
17 myself for saying this, as my associate is going to get upset
18 with me, I would prefer to just move forward with this case.
19 It's been pending for a very long time. And it's not in my
20 nature to seek sanctions against counsel, despite what I
21 believe to be the course of conduct here.

22 But I just want to use this opportunity to put the
23 Court on notice that this is happening and I'd like to put a
24 stop to it. And I'd like our communications to be cordial
25 without Rule 11 threats. I would like discovery to be

1 amicable and mutual.

2 We filed a discovery plan. I never heard back from
3 counsel on the filing of a joint discovery plan, so we had to
4 file one on our own. If that can be done, I would like to
5 move forward with the case, Judge. If it can't be done, it
6 can't be done. If counsel can agree to work with me to
7 exchange discovery and move forward with this case, I would
8 like to move forward with the case.

9 MR. HANLON: May I address that, Judge?

10 THE COURT: Go ahead.

11 MR. HANLON: Judge, my opposing counsel has just
12 articulated that his associate, Ms. Martin, won't speak with
13 me. Now he says that he doesn't hear from me in response to
14 some purported call. I haven't received any purported call
15 from him with respect to setting forth a status report. We
16 don't have a motion on file for Rule 23 class certification
17 which they -- which the Court had indicated that it wanted us
18 to confer with. I put that in my email to opposing counsel
19 last night.

20 I attempted to conduct a 37.2 conference. As the
21 Court knows, the last time I was here I articulated that in
22 response to the 26(a) disclosures there was no calculation of
23 damages, just more or less a recital of the prayer for relief
24 that they included within their complaint.

25 So inasmuch as my opposing counsel feigns this

1 trauma that he endured in trying to communicate with me, he
2 has articulated that at least one person in his office
3 refuses to talk to me because she's concerned about a threat
4 of Rule 11. I will acknowledge that I did mention Rule 11
5 because of something that opposing counsel had articulated to
6 me that she intended to do in the face of Rule 11. Which
7 would be something that I would brief at a later point in
8 time if it was necessary.

9 However, that doesn't excuse an attorney who is of
10 record in this case of willingly, knowingly, intentionally
11 refusing to talk with opposing counsel so that it frustrates
12 my ability to get to the point that I can actually have a
13 conference with them under Rule 37. And the local rules
14 command and require that I have a conference, meaning a
15 discussion, and if they want to continue to frustrate that,
16 that's certainly their choice.

17 I've drafted a motion, which I didn't submit today
18 because I wanted to give opposing counsel some time to
19 respond to that, but it seems to me that his comments are
20 disingenuous.

21 I would like to move the case forward. I would
22 like to get this done. I've tendered to my opposing counsel
23 affidavits from every single employee of the company that
24 show that they have been paid all the things that they allege
25 in their complaint that is within the respect of the

1 allegations that there is this scheme and artifice to defraud
2 the employees. So he's got these in his hand. I've given
3 him those documents, I've given him everything that he asked
4 me for.

5 So I don't think that it's necessarily accurate for
6 my opposing counsel to suggest to the Court that I'm not
7 trying to communicate with him and I'm not trying to
8 communicate with them professionally.

9 MR. CAFFARELLI: See, Judge, this is what I'm
10 talking about. Counsel just made a representation that I
11 never contacted him regarding the joint status report which
12 the Court said was due earlier this month. And I have emails
13 here that I sent on January 19th and January 21st that I'm
14 happy to show the Court.

15 Again, if I were a judge, I would be furious with
16 this whole situation. And you rightfully may be furious with
17 this whole situation. But again, it's the little
18 misrepresentations that I never contacted him regarding the
19 joint status report, which are demonstratively false.

20 Like I said, I'm happy to move forward with the
21 case, but not if I keep getting this, you know, these
22 statements that I never contacted him when I contacted him
23 and I have the emails to prove it.

24 THE COURT: Here's what I'm going to do. I am
25 going to grant leave to file the answer instanter. The

1 answer will be docketed. I'll enter the discovery schedule
2 that was proposed in the status report, with initial
3 disclosures due February 5th, fact discovery completed by
4 June 30th, and dispositive motions filed by August 15th.

5 I will entertain a request for sanctions or costs
6 and fees associated with having to file the renewed motion
7 for default based on the failure. That doesn't mean I'm
8 going to grant it. I'll going to give you an opportunity to
9 respond, Mr. Hanlon.

10 But that seems to me the best way to deal with this
11 situation, because it sounds like most of the problems don't
12 stem from the situation with the answer and the late filing,
13 the missed deadlines; it sounds like there is a greater issue
14 here that probably deserves a different approach.

15 Obviously the parties have to be able to work
16 together, you have to take each other's calls, you have to
17 respond to the emails. You should be able to have a
18 professional relationship even if you couldn't stand each
19 other personally. And I'm not saying that's the case, but --

20 MR. HANLON: I don't even know the man, Judge.
21 This is the first time I've met him and the first time I've
22 actually talked with him.

23 MR. CAFFARELLI: Judge, I'm not going to file a
24 sanctions motion. I think there is a special --

25 THE COURT: If you want to make a request for costs

1 I would entertain that as well.

2 MR. CAFFARELLI: No, no, no, no. I think there is
3 a special little place in hell for lawyers who try to
4 sanction other lawyers. We should really try to work it out.

5 Again, it's not my style to do that. I don't want
6 to sanction anybody. I just want to move forward with this
7 case, and I would like the misrepresentations -- or the
8 representations to be accurate, and I would like the
9 communications to be clear. Just because my associate won't
10 talk to Mr. Hanlon doesn't mean I won't talk to Mr. Hanlon.
11 I'm happy to talk to Mr. Hanlon any time. But in light of
12 the -- either misunderstandings, if you want to call them
13 that, or misrepresentations, I would prefer that we put
14 things in writing where we could, because it seems like if
15 it's verbal it either never happened, or something was said
16 that was never said, or vice versa.

17 So I'm not going to file a motion for sanctions. I
18 just want the record to be clear, though, if for some reason
19 in the future the tipping point is reached, we'll reserve
20 that option at that time, but at this point this is -- like I
21 said, this is a minor wage case against a hotdog stand. This
22 is not a major securities class action. I just want to move
23 forward and resolve this case in any way, shape, or form.

24 THE COURT: We'll move forward with it. Obviously
25 it's your decision whether you want to seek any additional

1 relief in the terms of costs or --

2 MR. CAFFARELLI: Understood.

3 THE COURT: -- whatnot, whatever you decide to do
4 we'll follow up on. In the meantime I expect the parties to
5 cooperate in discovery, I expect you to work together to try
6 to get this case resolved either through settlement, or
7 motion practice, or trial. It's going to have to move
8 forward to get to one of those points.

9 Here's what I'm going to do. The fact discovery
10 deadline has just been set for June 30th. I may have the
11 parties back a little sooner than I would normally just to
12 make sure that things are moving forward.

13 Enjoli, can we get a status date in about six
14 weeks?

15 THE CLERK: We can do March 10th.

16 THE COURT: So March 10th at 9:00 a.m. Obviously
17 initial disclosures will need to be made by then. I think
18 there are amended initial disclosures that need to be made.

19 MR. CAFFARELLI: Correct.

20 THE COURT: I would hope that the parties will have
21 started serving any written or document discovery that you're
22 going to serve, talked about depositions, whatever; I would
23 like to hear that some progress has been made when you come
24 back, and hopefully there won't be any more disputes that
25 come up.

1 But everybody should be on notice that if you do
2 need more time to do something, or if there is a problem with
3 a filing, or anything like that, the first thing that I
4 expect counsel to do is reach out to the other side and try
5 to reach some sort of agreement on how to get the problem
6 fixed and keep things moving forward. So if somebody needs
7 an extension, I expect you to first ask the person on the
8 other side, and the person on the other side to be
9 reasonable. They don't have to agree to any kind of crazy
10 amount of extension, that doesn't work either, but I expect
11 both sides to be professional and extend professional
12 courtesies. If you're not able to do those things, I'm sure
13 there will be motions that are filed, and I'll make those
14 decisions for the parties.

15 MR. HANLON: Judge, with respect to the class
16 certification under Rule 23, the claims that are set forth
17 within the first amended complaint, the rule says that that
18 motion for class certification ought to be filed as soon as
19 practical in a case. I'm prepared to defend any Rule 23
20 motion at any point in time my opposing counsel seeks to
21 serve, because I don't believe that he can meet any of the
22 numerosity requirements or the other requirements. That's
23 separate and apart and distinct from what he frames as his
24 Fair Labor Standards Act class. And it seems to me that
25 since he's advanced a class action here I should be able to

1 have some basis by which he thinks that he has a basis to
2 have a class action in this particular case supported by some
3 fact as opposed to just simple allegations by the plaintiff.

4 THE COURT: Well, it may be that the plaintiff
5 requires some discovery in order to be in a position to file
6 a motion for class certification. Is that what's going on?

7 MR. CAFFARELLI: Actually, Judge, I don't believe
8 this is a Rule 23 class. We don't have enough people to do
9 that. This is an opt-in Fair Labor Standards Act class. So
10 once we have an answer on file we intend to file probably
11 within the next few weeks a motion to send notice to the
12 putative -- I would rather call it collective rather than
13 class action, because that's what it is. So yeah, we'll be
14 filing that motion shortly, and we can address that at the
15 time.

16 THE COURT: If you're prepared to do it, it doesn't
17 sound like there is going to be a Rule 23 motion that will be
18 filed --

19 MR. CAFFARELLI: Correct.

20 THE COURT: -- so I'll look forward to getting the
21 papers.

22 MR. HANLON: So we're clear, my opposing counsel is
23 saying that there is no Rule 23 class that he's advancing in
24 this lawsuit?

25 And the reason I'm asking the question, your Honor,

1 is I read the complaint as a portion of his claims can sound
2 only in a Rule 23 class action.

3 MR. CAFFARELLI: I don't believe we filed this as a
4 hybrid. I believe we filed it as a collective under 216(b).
5 Let's see.

6 THE COURT: Well, either way, if there is no motion
7 filed --

8 MR. HANLON: Paragraph 33 of the complaint, Judge,
9 says this action is brought as a class action under Federal
10 Rule of Civil Procedure 23.

11 MR. CAFFARELLI: First amended complaint.

12 THE COURT: I'm sorry. Which paragraph did you
13 reference?

14 MR. HANLON: Paragraph 33, page 8 of the first
15 amended complaint says: "This action is brought as a class
16 action under Federal Rule Civil Procedure 23."

17 THE COURT: It does say that.

18 MR. CAFFARELLI: Okay. Yeah, it was filed as a
19 hybrid 216(b), but we don't intend to file -- if we go that
20 route if the numerosity is there, which I guess we'll
21 discover through the course of discovery -- we'll discover
22 through the Rule 216(b) motion to send notice, I'm not going
23 to file the Rule 23 motion until -- it wouldn't be filed
24 until the very end.

25 And I don't even know that I would file in a case

1 like this, because if it's Rule 23, it's a borderline Rule
2 23. I just don't even see why we're talking about this now.

3 THE COURT: Well, it's in your complaint. I don't
4 think we need to talk about it any further today either. And
5 here's the thing: It is not unusual for the plaintiff to
6 require some discovery in order to be in a position to file
7 and to brief class certification. So I'm not going to
8 penalize the plaintiff at this point for having an allegation
9 in the complaint and having not yet filed a motion,
10 especially given that there hasn't been an answer on file
11 until today.

12 So we'll address that, and when the time comes
13 we'll deal with it, I'll look for a motion to send notice to
14 potential members of the class for collective action
15 purposes, and I'll see the parties again on March 10th.

16 MR. HANLON: Judge, just as a point of
17 clarification with respect to your order, the answer, do you
18 want me to file it as a separate document today, or is the
19 Court just going to accept the exhibit that was attached to
20 the complaint as exhibit -- or the motion as Exhibit B?

21 THE COURT: Let me take a look at this.

22 I'm going to ask you to file it separately. Docket
23 it within 24 hours. I'm doing that in part because the
24 version that's attached is actually not signed, so I'll need
25 a signed version. And separately file that within the next

1 24 hours.

2 MR. HANLON: Yes, your Honor.

3 THE COURT: Okay?

4 MR. CAFFARELLI: Thank you.

5 THE COURT: Thank you.

6 (End of proceedings.)

7 C E R T I F I C A T E

8

9 I certify that the foregoing is a correct transcript

10 from the record of proceedings in the above-entitled case on

11 January 28, 2016.

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15 /s/Colette M. Kuemmeth

Court Reporter

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