BALLARD SPAHR PRO BONO NEWS

WINTER - SPRING 2008

BALLARD SPAHR MEETS PRO BONO CHALLENGE FOR 6TH YEAR!

As a signatory to the Law Firm Pro Bono Challenge, developed by the ABA and administered by the Pro Bono Institute at Georgetown University Law Center, Ballard has pledged to contribute at least three percent of its billable time annually to pro bono work. In 2007, the firm exceeded that goal for the sixth straight year, donating more than 32,000 hours of pro bono services to low income individuals and nonprofits that serve them or other civil and public rights. Ballard is one of a small number of AmLaw 100 law firms whose lawyers, on average, meet this challenge and the American Bar Association's aspirational goal of providing at least 50 hours of pro bono service each year.

DOCUMENTARY CLIENT WINS FILM FESTIVAL AWARDS

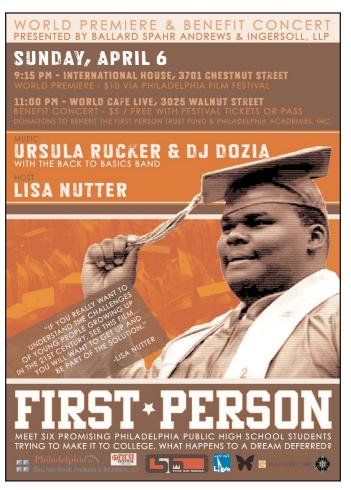
Two years ago, Philadelphia Volunteer Lawyers for the Arts referred a young documentary filmmaker to Ballard for assistance. In April, client Ben Herold won two awards for his documentary, *First Person*, at the Philadelphia Film Festival.

First Person tells the stories of 6 promising public high school students and their struggles to graduate and enter college. See www.firstpersondocumentary.org. Herold came to the documentary with a passion for telling the students' stories, showing how the community and public education system failed the students, and advocating for change. Mike Costa, Steve Kim, and Corey Field worked with Herold on a series of contractual and intellectual property issues, while Michael Fabius, Adiah Ferron, and Chris Jones helped set up a business entity to produce the documentary. More recently, Lindsey Ermey and Benjie Neilson, helped the director set up a trust to use proceeds from the film and fundraising efforts to benefit the students profiled in the firm.

On April 6, Ballard sponsored the World Premiere of the film at International House during the Philadelphia Film Festival. *First Person* won Best Documentary and Producer/Director Herold won the award for Best First Time Film Director. On premiere night, Ballard attorneys were honored at a concert hosted by Philadelphia's First Lady, Lisa Nutter, to benefit both the trust

supporting the students in the documentary and Philadelphia Academies, the high school career development agency headed by Ms. Nutter. Ballard invited first year Penn Law students to attend the film and concert as the firm's guests.

The film has been accepted at additional film festivals and will appear on public television in September 2008. Filmmaker Herold continues working with Lisa Nutter to use the film to develop a citywide conversation on how to effectively educate Philadelphia's neediest students. **Mike Costa** and **Steve Kim** will also be honored for their pro bono work at the Philadelphia Arts and Business Council Lunch in May.



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BALLARD SPAHR RANKS 2nd IN NATION FOR PRO BONO DEDICATION!

The Avery Index, an independent national law firm rating, has ranked Ballard Spahr second in the country for its dedication to pro bono work, based upon national survey data for mid-level associates.

WILLS FOR HEROES UPDATE

Ballard's Wills for Heroes service project has gotten off to a running start this year! The firm is working with the Wills for Heroes Foundation to provide estate planning documents for first responders across the country. The Wills for Heroes effort grew out of reports after the 911 tragedy that more than half of the first responders who died that day did not have wills or other estate planning documents to protect their families. Volunteer attorneys are trained to use computer programs to generate simple wills, health care directives, and powers of attorneys and then spend a day at a fire station or other community site working with first responders. Thus far this year, as a dozen members of the **Phoenix** office have participated in monthly clinics in the Phoenix metropolitan area since January, and individual attorneys have traveled to work at clinics held throughout the state of Arizona; the Los Angeles office turned out in force for an event with the Beverly Hills Fire Department in February and is planning another event this spring; Salt Lake City attorneys helped the Utah Bar kick off the Wills for Heroes program statewide with a clinic in March and another planned for SLC in April; and the DC and Bethesda offices are participating in a clinic with the National Park Service in April. More clinics are being scheduled throughout the year, including a clinic in New York, and a cooperative effort with a major client in Philadelphia and Chicago. All of this translates into



From left: Daniel McKenna, Ballard Spahr Andrews & Ingersoll associate; David Sampson, Ballard Spahr managing partner; Marc Sallus, Beverly Hills Bar Association president; Lydia Wu, Ballard Spahr partner; and Marc Staenberg, Beverly Hills Bar Association executive director; at the Wills for Heroes Foundation event Feb. 9 at the Beverly Hills Fire Department, Fire Station 1. The foundation coordinates free events where lawyers prepare wills and estate plans for first-responder personnel such as police officers and firefighters.

hundreds of wills for first responders, and a major service for those who put their lives on the line every day. Special thanks are due to **Dan McKenna** (Philadelphia) who is leading the firm's effort, **Zack Sakas** who is coordinating the Phoenix effort, and **Michelle Allred** (SLC) who is working with the Utah Bar



Mark Weitzel

Association to implement the program statewide. A big shout out is also due to Mark Weitzel (Philadelphia Information Services Manager), and all the members of Ballard's Information Services staff, who have configured, transported and installed laptops and printers at many of the Wills for Heroes clinic sites so that the lawyers could do their jobs effectively and efficiently.

Phoenix Rising - AZ Office Gets Pro Bono Kudos



Sarah Glover

In March, Ballard's Phoenix office was commended by the Volunteer Lawyers of Maricopa County for the significant number of pro bono case referrals that office has taken since the start of the year. The Phoenix office invited the Volunteer Lawyers to present opportunities to our lawyers and staff last fall and has undertaken a variety of family law, consumer matters and clinic referrals since then. Congratulations to

that office, and pro bono committee representative **Sarah Glover**, for making a difference!

ELECTION YEAR PRO BONO WORK

With the Presidential election in full swing, Ballard pro bono volunteers have been busy! In almost every office, lawyers and paralegals have been volunteering for nonpartisan



election protection efforts, whether run by national groups such as the National Lawyers Committee for Civil Rights, or local government groups such as Philadelphia's Committee of Seventy or the Colorado Lawyers Committee. As has become a tradition, Ballard lawyers helped revise individual state voting guides for the Lawyers' Committee. Thanks to Larry Berger (Phila); Janine Cassisi (VH); Michelle Allred (SLC); and Mike Fabius (Phila) for revising the Ohio manual on a rush basis, just before that state's primary.

The Las Vegas office also saw some courtroom action when **Bill Curran** and **Ariel Stern** were tapped to successfully represent the state Democratic Party in a last-minute challenge to the party's decision to place polling machines in the casinos in order to accommodate resort workers who form the state's largest industry.

NJ Employment Victory



Ed Groh

For the past two years, Ballard has been representing C.A.T.A. (El Comite de Apoyo a Los Trabajadores Agricolas), a non-profit organization dedicated to serving the needs of Delaware Valley's migrant farmworker community against employment-related claims brought by its former Fiscal Officer. The plaintiff claimed that she was the victim of a hostile work environment and retaliation under the

New Jersey Law Against Discrimination ("LAD"), as well as retaliation under the New Jersey Conscientious Employee Protection Act ("CEPA"), as a result of various complaints she made to C.A.T.A.'s Board of Directors about alleged financial improprieties and other misconduct by her supervisor, C.A.T.A.'s

executive director. The facts in this case were numerous, were largely disputed, and involved hundreds of documents and extended depositions. Under the leadership of **Ed Groh**, and with assistance from **Jen Sova** and **Michael J. Miles**, the team filed a summary judgment motion, which, given the NJ venue and complicated record, might have been viewed as a "Hail Mary" pass. In March, the New Jersey



Jen Sova

Superior Court granted summary judgment in favor of C.A.T.A. as to all of plaintiff's claims. In particular, the court agreed that plaintiff's numerous complaints about C.A.T.A.'s executive director involved purely internal disputes of company policy that did not implicate matters of public concern and, therefore,



Michael J. Miles

did not rise to the level of protected activity under CEPA. Moreover, the court agreed that plaintiff' failed to present evidence supporting her claims under the LAD. The decision came after **Michael J. Miles** engaged in three hours of intense oral argument. This was a significant legal decision and a terrific job representing the client on a challenging matter.

Firm Recognition & Pro Bono Awards

Support Center for Child Advocates - April 2008 Volunteer Award to **Barbara Beckman**

First Judicial District of Philadelphia - January 2008
Pro Bono Roll of Honor for Raheemah F. Abdulaleem, Jessica M. Anthony, Alexandra Bak-Boychuk, Aisha M. Barbour, Barbara R. Beckman, Katharine A. Crawford, Marc E. Davies, Shannon D. Farmer, Adam M. Finkelstein, David S. Fryman, Kelly L. Gibson, David B. Gifford, Farrah I. Gold, Amy J. Guttman, Henry E. Hockeimer, William B. Igoe, Cecilia Isaacs-Blundin, Daniel V. Johns, Geoffrey A. Kahn, Erin E. Kepplinger, Edward I. Leeds, Melissa J. Lore, Jeffrey Meyers, Monique M. Mooney, Donna D. Page, Steve T. Park, Eileen B. Quigley, Thomas D. Rethage, Charles L. Rombeau, Mary Gay Scanlon, Julia M. Scharff, Meredith A. Scull, Gina M. Smith, Mark S. Stewart, Marc J. Weinstein and Lynn G. Zeitlin.

Clark County Legal Services - December 2007 100 Hours Pro Bono Award to Shane J. Young

New Associate Wins Trial for Elderly Client

Alexandra Bak-Boychuk joined Ballard Spahr this fall as a labor and employment associate, and won her first trial two months later. Alex and her client were the beneficiaries of Ballard Spahr's active pro bono program, which provides free legal services to low income people while allowing young attorneys to get practical experience.



Alexandra Bak-Boychuk

Client Ada Ramos is a Spanishspeaking, 79-year-old great-great-grandmother who has lived
on the same street in North Phila for 33 years. She was born in
Puerto Rico. Neatly dressed and unfailingly polite, Ms Ramos
looks after her neighbors and neighborhood, and as a block
captain, distributes trash bags to her neighbors and
participates in seasonal clean ups. Therefore, she was
surprised to learn that the city had fined her for trash violations,
and entered judgment against her for over \$652, more than Ms.
Ramos' monthly retirement benefits. Fortunately, Ms. Ramos
had someone to turn to. She contacted the pro bono program
at Ballard Spahr, where she had received help for a tax issue
several years ago.

Alex responded to a call for volunteers and quickly petitioned to open the judgment against Ms. Ramos. She tried the case on the day before Thanksgiving, and the complaint against Ms. Ramos was dismissed and the fines vacated. A relieved Ms. Ramos planned to celebrate by cooking Thanksgiving dinner for her 13 children, 54 grandchildren, 36 great-grandchildren and 4 great-great-grandchildren.

Corporate Pro Bono Corner

Ballard attorneys Lynn Rzonca, Sean McConnell, Amy Trojecki, William Igoe, Brooke McDermitt, and Brendan Collins (Philadelphia) teamed up with in-house counsel at Exelon and the Senior Law Center to write wills and powers of attorney at senior centers in June and December. Exelon's Eastern Pro Bono Manager Kevin Stepanuk organized the clinics.

In September, Ballard conducted its annual training for volunteers at its bimonthly legal clinic at the Sunday Breakfast Association, a homeless shelter in Philadelphia. This effort has been led by **Scott Towers** for more than a dozen years, with paralegal **Hector Navarro** providing invaluable support, including facilitating computer donations to the shelter, formatting clinic documents for electronic distribution, and Spanish-language translation. This year, two members of Sunoco's corporate legal department attended the training and have become regular volunteers at the SBA clinic. Our thanks to **Micheko Kahlon** and **Deborah Carlos** for teaming up with Ballard at the shelter.

Ballard Spahr Jump Starts ABC's Camden Extreme Makeover: Home Edition



Ito r: Nathan Cook, Jeffrey Beenstock, Deb Brigher, Kim Zavatter, Tracy Siebold, and Barbara Casey

Last summer, Ballard was asked to represent a homeless Camden, NJ family when they were chosen to receive a new home on ABC's hit show, "Extreme Makeover: Home Edition". The show featuring the Marrero family aired in November. The Marrero family was chosen after being featured on a special edition of ABC's "20/20" about children living in poverty. Victor Marrero, a single parent, has raised 5 sons in economically depressed Camden, NJ, while suffering multiple heart attacks which have disabled him from work. Ballard got involved after a call from a member of the Board of Trustees of Urban Promise, a non-profit urban ministry. Led by **Barbara Casey**, Ballard assisted in obtaining all of the land use approvals and

drafting the legal documents needed to transfer the land on which the house was built to Mr. Marrero. Others involved in the project **Tracy Siebold, Stephanie Marguccio, Debra Brigher and Kim Zavatter**.

In August, the Extreme Home Makeover crew showed up in Pennsauken and built a home for the Marrero family in a week. Not content with having made sure the construction could occur, our colleagues from Voorhees pitched in to work on the construction site. Donors also furnished the home, and a fund was set up to pay property taxes for several years.

Since the show was filmed, other Ballard attorneys have worked with the family to ensure that their affairs are in order. Gil A. Nusbaum has been working with Victor Marrero to create a will, power of attorney and other estate planning documents, under the supervision of Marilyn Sanborne and Matthew Rosin. Also, Marrero's 19-year-old son, a talented actor and musician, received a scholarship to an acting school in LA, and has scheduled a meeting with Corey Field in our IP group to discuss his career interests and basic legal considerations on entering the entertainment and music industry.

Pro Bono Director Speaks At Nevada Access to Justice Commission



On October 16, Mary Gay Scanlon, Executive Director of Ballard Spahr's Pro Bono Program was a featured speaker at the Nevada Supreme Court's Access to Justice Commission in Las Vegas.

The meeting of major law firms in Southern Nevada explored ways

in which large law firms could assist the Court in expanding legal services and pro bono assistance for low income residents of Nevada. Scanlon was invited to provide a national perspective on such law firm efforts. The meeting was hosted by Supreme Court Justices Michael Douglas and James Hardesty. Ballard lawyers Josh Reisman and Ariel Stern also attended the event.

International & Immigration Pro Bono Projects

Reflecting our ever-shrinking world, Ballard attorneys are engaged in a number of exciting international and immigration pro bono ventures.

 Kaplan Class Action Update - As many will recall, last year, Ballard teamed up with Community Legal Services, HIAS and Council Migration Services, and the Sargent Shriver

National Center on Poverty Law to bring a significant national class action seeking policy changes to prevent tens of thousands of elderly and disabled refugees from losing social security benefits when the US failed to process their citizenship applications in a timely fashion. We are pleased to report that the matter settled this spring with the court's approval of a settlement agreement which instituted sweeping improvements to federal policies and procedures to protect class members, and the actual granting of citizenship to many of the class members. At settlement, Jordana Greenwald (Philadelphia) said "These plaintiffs truly are the 'huddled masses' that have come here seeking a better life. It is rewarding to know that our work will help thousands of needy immigrants to receive the benefits they so desperately need and finally become U.S. citizens." Others on the Ballard team included John P. Lavelle Jr., Jennifer Simon, Cecilia Isaacs-Blundin, Sabrina Mizrachi, John F. Metzger, and Marlene S. Gomez (all Philadelphia). Tom Roberts, formerly of counsel to the firm, was instrumental in bringing the case.

- International Microfinance We have incorporated and provide continuing legal assistance to Capital Sisters International, a non-profit which raises money and invests in microbusinesses in developing countries. The founder is a former Peace Corps volunteer in West and South Africa who serves on the board of the International Alliance for Women (TIAW), where she is the Co-founder and Chair of TIAW's Microenterprise Development Program. She also serves as a Microfinance Advisor to the U.S. State Department. Paul Scott (Denver), Doug Rollow (Philadelphia), Tom Howard (DC), Patrick Gillard (Philadelphia) and Sandra Wintner (Philadelphia) are advising this client.
- Kenyan Criminal Procedure Reform Howard Shafferman (DC) has drafted legislation for the International Justice Foundation to amend the Kenyan Criminal Code to provide a streamlined preliminary hearing procedure to help avoid unjust and prolonged detentions. Plans to introduce the legislation following Kenya's national elections in December were put on hold in the wake of the disruption caused by the uncertain outcome of the elections, but the IJF hopes to introduce the legislation soon.
- Human Trafficking Two years ago, former DC Ballard Associate Deepika Allana provided research and legislative support to Amnesty International with respect to successful passage of a federal law to criminalize human trafficking by US contractors in the Middle East. Deepika then left the firm to take a fellowship with a nonprofit which combats human trafficking, but has helped us to establish a pro bono relationship with that group, the Polaris Project. Members of our intellectual property group, Brian Winterfeldt and Angela Wagner (DC) have

- assisted the Polaris Project with trademark issues, while **Bill Simmons** and **Denise Keyser** (Voorhees) recently undertook a review of the organization's procedures for outreach to victims of human trafficking in the Garden State.
- Liberian Truth & Reconciliation Commission Several lawyers in Phila and NJ offices participated in training with the Liberian Truth and Reconciliation Project to take statements from victims of, and witnesses to, human rights violations during that country's recent civil war. This is the first time that a truth and reconciliation commission has taken statements outside the country at issue. Philadelphia hosts several hundred thousand Liberian immigrants, the 3rd largest population in the US.
- Amicus Brief in Hazelton case Burt Rublin is representing
 the Pennsylvania Chamber of Commerce in an amicus brief
 seeking the Third Circuit's affirmance of a decision striking
 down ordinances passed by City of Hazleton designed to
 deter employers and landlords from employing or renting to
 illegal aliens.
- Individual Asylum, VAWA, Cancellation of Removal Cases -Ballard lawyers also volunteer for a steady stream of cases on behalf of individual immigrants, assisting them with asylum, green card and related issues.

Baltimore Pro Bono Work: "Priceless"



Anne Schroth

On October 22, Anne Schroth was featured in an article in the Maryland Daily Record for her work on behalf of the Center for Fathers, Families & Workforce Development, a nonprofit that helps low-income men and women find employment and reconnect with their families. The Center was first referred to Schroth as a client in 2005, when it needed help with a lease, and reached out to her again last year when

they found a property to purchase. Schroth negotiated the agreement of sale, performed the due diligence, and arranged the final sale in November. The new facility which the Center plans to build will double the number of clients that the organization can serve and have added benefits of being centrally located, near public transportation, and in a neighborhood on the rise. The Center's president, Joseph T. Jones, lauded Schroth's work for the organization - particularly her ability to explain the sale process and the buyer's and seller's responsibilities in layperson's terms. "Even if we'd paid Anne, I can't imagine she would do a better job than she did for us pro bono," he said, terming her assistance "priceless".

SPOTLIGHT

Spotlight on: Dawn's Place



Mary Croft

Once home to an order of nuns, a gabled Victorian home in a once-elegant neighborhood now offers shelter to women desperate to break out of the sex industry.

"It's one of the best things I've done as a lawyer," Ballard Spahr's **Mary Croft** said of helping to turn the Philadelphia house into a haven for former prostitutes.

Ballard Spahr was asked to assist a coalition of people who regularly witness the downward spiral of prostitution. They included the home's former residents, the Sisters of the Good Shepherd nuns, who themselves had offered informal shelter to prostitutes; the public defenders who see the same women cycling through court; and the nurses and mental health workers who care for them. All saw an urgent need to build a support system for prostitutes who want out.



Wendi Kotzen

The result: Dawn's Place, the only shelter of its kind in Philadelphia. Residential support centers for prostitutes are rare in the United States. Dawn's Place is modeled after DIGNITY House, a respected program in Phoenix, founded by a former madam. As does DIGNITY, Dawn's Place offers a complement of services, including medical and mental health care, job training and parenting skills. "They've put together a very

thoughtful program," Croft said of Dawn's Place board members.

Croft, a real estate lawyer, was one of more than a dozen Ballard Spahr lawyers and staff from several practice areas who worked on the project, including Wendi Kotzen, Eileen Quigley and Ellen Bain. In addition to handling the property transfer, a zoning change, the insurance responsibilities and formation of a nonprofit governing body - complicated because this is "not quite a cookie-cutter organization" -- the firm's



Eileen Quigley

team procured various permits needed to rehab the three-story Victorian.



Ellen Bain

The biggest challenge lay in wooing a neighborhood group and its leader. Without the neighbors' blessing, the zoning board would reject the request to establish a safe house for 10 desperate women. But guided by insight and armed with patience, Croft earned their trust. "I think there was an issue of full disclosure, respect for what the concerns were," she said. "We prepared a full written response."

Board members have "big dreams," including the eventual addition of more locations, Croft said, and so does she. "I'm working with wonderful people. I would love to keep being involved."

Las Vegas Has a COW

Maren Parry recently helped Classroom on Wheels (COW) resolve issues that threatened to put the whole program up on blocks. COW operates a mobile preschool program in Las Vegas/Clark County using renovated school buses painted to resemble Holstein cows as preschool



classrooms. Approximately 215 children receive 10 hours of preschool instruction on the buses 4 days a week for the duration of the school year.



Maren Parry

The 16-bus fleet had been housed at a facility for six years; however, when that facility decided to expand, the COW program was notified that the fleet of buses would have to relocate. Parry, a former member of the COW board, became involved as each relocation site raised different legal issues. Ms. Parry spent many hours analyzing and researching each site to ensure that it would meet both the program's needs

and that the program could meet the potential landlord's concerns. According to the program director, it was no small feat to secure affordable parking in central Las Vegas for 16 school buses. When a site was finally selected, many more hours were required to obtain permission from the parties involved, ensure the security parameters were adequate, all parties had communicated their concerns, and finalize the agreement between the City of Las Vegas, its lessee, and COW.

COW's buses have now settled into the new facility, and the program has expressed its thanks to Parry for helping address a crisis that threatened to interrupt services to needy children in the community.

PRO BONO DIRECTOR'S NOTE

Personal Side of Pro Bono

We often focus on the legal challenges and collateral benefits of pro bono work - the unusual case, the cutting-edge legal issues, and the opportunity for professional development, particularly since opportunities for transactional pro bono work have expanded dramatically in recent years. However, one of the most important, and satisfying, aspects of pro bono work is the personal gratification both lawyer and client receive. Anyone who watched the November episode of Extreme Home Makeover, in which the Marrero family of Camden, NJ received the home of their dreams, could see how profoundly this donation of time, effort, and pro bono legal assistance affected that family. And when we alerted the entire firm that the show was to be broadcast, I received dozens of emails, from across the firm, expressing pride in the firm's efforts. It may be obvious how important free legal services are to the indigent client trying to save a home, adopt a child, or get medical benefits. However, as I prepared this newsletter, I was struck afresh by how often the lawyers involved spoke of the importance of the work to them personally - whether because they were able to provide vital help to a family or because it gave them an eyeopening perspective about the harsh realities of poverty which many people in our communities confront every day. So, I want to offer "gratitude" as one of the collateral benefits we receive for pro bono work, and not just from the clients, but gratitude for the realization that we are so very fortunate to have great educations and jobs and colleagues, nice places to live and work, and even our cranky teens, demanding jobs, and hectic lives. In this vein, I'd like to share an email that Cecelia Isaacs-Blundin sent after concluding a representation for an elderly client.

Today I received a beautiful bouquet of flowers from one of the pro bono will clients that was referred to us by the Senior Law Center. I've attached the thank you card that came with them. Although Mr. ———— has decided not to execute a Will or Powers of Attorney, he is incredibly grateful to Psallard for the legal service we offered him free of charge.

I appreciate the opportunity to have worked with Mr. -----, and all the things I learned under **Matt Rosen's** supervision.

Thanks,

Cecilia

Martin Luther King Day Legal Clinic Serves Low Income Clients

For the third year in a row, Ballard attorneys in Philadelphia teamed up with local legal services providers to run a free legal clinic on Martin Luther King Day. Lynn Rzonca, Michael Fabius, Susanna Greenberg, Jason Leckerman, and Aisha Barbour participated in the clinic at Germantown High School, where their presence was noted by the Philadelphia Inquirer.



Michael Fabius and Susanna Greenberg

Denver Lawyers Volunteer at Teen Homeless Shelter



This winter, Denver attorneys Sheri Straily, Devon McGranahan and Ryan Howe began volunteering at the monthly legal clinic at Urban Peak, the only licensed homeless youth shelter in Denver. Urban Peak provides outreach, medical, education

and housing services to young people who would otherwise fend for themselves on the streets. A staff attorney guides the volunteers during their monthly visits, while they assist teens to apply for benefits and negotiate other legal hurdles. According to Straily, the experience has been eye-opening, giving her a glimpse of life in a world which is almost foreign to the one in which Ballard lawyers live and work every day. She reports that many of her young clients, even the ones who seem kind of tough at first, "really just want someone to talk to."

The Ballard Spahr Pro Bono News is published regularly by the firm's Pro Bono Program and highlights the firm's pro bono activities. Please send information for future issues of the newsletter to Mary Gay Scanlon or Lisa Whiteley in the Philadelphia office. If you would like information on how to become involved in the firm's many pro bono programs, please contact any Committee member.

While information in this newsletter is believed to be accurate, it is general in nature, does not purport to be complete, and should not be construed or relied upon as legal advice or legal opinion on any specific facts or circumstances.

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