

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CONFORTI, .
 .
 Plaintiff, .
 . Case No. 17-cv-00050
 vs. .
 . Newark, New Jersey
 ST. JOSEPH'S HEALTHCARE . August 22, 2018
 SYSTEM, INC., et al., .
 .
 Defendants. .

TRANSCRIPT OF HEARING
BEFORE THE HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE

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1 (Commencement of proceedings at 2:48 P.M.)

2

3 THE COURT: Thank you. Good afternoon. We're on
4 the record. It's 2:50, August 22nd, 2018.

5 This is Conforti versus St. Joseph's, 17-50, that's
6 17-0050.

7 May I have appearances of plaintiff first.

8 MR. BARNES: Yes, good afternoon, Your Honor, my
9 name is Tom Barnes. And I am with my colleagues here
10 represent Mr. -- the plaintiff, Jionni Conforti, the
11 plaintiff.

12 THE COURT: Thank you.

13 MR. GONZALEZ-PAGAN: Good morning -- good
14 afternoon, Your Honor. Nice to see you again.

15 THE COURT: Good to see you --

16 MR. GONZALEZ-PAGAN: Omar Gonzalez-Pagan on behalf
17 of the plaintiff.

18 THE COURT: Thank you.

19 MR. DOHERTY: Good afternoon, Your Honor, Thomas
20 Doherty from McCarter & English for the defendants.

21 THE COURT: All right. So relax. You can sit
22 down. I'd prefer that you stand when you argue. Other than
23 that you can sit down. You can use the podium or not.

24 We're here because there is a discovery dispute.
25 And on behalf of plaintiffs, I'll let you summarize the

1 | dispute.

2 | MR. BARNES: Thank you, Your Honor.

3 | THE COURT: Whoever wants to speak.

4 | MR. BARNES: Tom Barnes, again, Your Honor. It's
5 | nice to meet you.

6 | We're here today, Your Honor, on a very simple
7 | discovery request made by Mr. Conforti. Mr. Conforti seeks
8 | essentially the documents and emails from certain members of
9 | a committee formed by St. Joseph's around the time of his
10 | denial of requested medical care that's at the heart of this
11 | case. And the issue before Your Honor is simple in that what
12 | we're simply asking defendants to do is search. Just to
13 | search the emails and the documents of these members of this
14 | committee called the Caring For Transgender Patients
15 | Subcommittee for documents responsive to our discovery
16 | requests. And we argue, Your Honor, that this should be
17 | pretty straightforward and should be a -- documents and
18 | emails that should have already been produced when we asked
19 | for them months ago, as far back as December 2017. But for
20 | three specific reasons, Your Honor, we think the motion
21 | should be granted.

22 | The first, Your Honor, is that this committee and
23 | the documents and emails relevant to this committee are
24 | clearly relevant to this case, to Mr. Conforti's allegations
25 | in this case of discrimination on the basis of sex and

1 transgender status. It's relevant to his request for relief
2 in this case, of seeking damages and injunctive relief. And
3 it's relevant to defendants' own affirmative defenses that
4 they have raised.

5 And specifically, Your Honor, Mr. Conforti's -- the
6 events at the heart of this case is that Mr. Conforti
7 requested in June of 2015 from a doctor named Dr. Brian Day,
8 to receive a hysterectomy to treat his diagnosed condition of
9 gender dysphoria. In June 2015, there was -- the request was
10 made. At the very beginning, Your Honor, it did pro- -- it
11 seemed like everything was proceeding without problem.
12 Dr. Day initially in an email agreed to see Mr. Conforti,
13 agreed to -- agreed to have him come in and discuss the
14 hysterectomy. Dr. Day is an employee of St. Joseph's. He's
15 been there his whole medical career. Mr. Conforti got
16 insurance approved. He talked to employees at
17 St. Joseph's -- an employee of St. Joseph's, the head of
18 nursing, who confirmed that this should be -- that you should
19 be able to receive this hysterectomy at St. Joseph's until
20 certain individuals who, we argue, for impermissible reasons
21 moved to block Mr. Conforti from receive -- or pardon me --
22 denying Mr. Conforti's request.

23 Several months after that, this committee was
24 formed to investigate the very issues at the heart of this
25 case. What kind of -- you know, how do we treat transgender

1 patients? What kind of policies do we have? What kind of
2 policies do we need? What can we do to improve our services
3 to transgender individuals who just come to the door?

4 Importantly, Your Honor, this committee was formed
5 as a -- at least partially, if not a direct result, of
6 Mr. Conforti's case, him --

7 THE COURT: So how does that relate to your --
8 let's -- let's take your argument that it relates to your
9 damages. How does -- let me -- let me just sort of target
10 where I'm coming up short -- and this will go on both
11 sides -- is if this committee was formed in October -- or
12 met -- first met in October, and the relevant time period
13 seems to be between May and June '16, how would this
14 committee's meetings or formation, which, apparently, might
15 have formed on June 15th -- or -- on or about, how would that
16 information affect you? How would it relate back to your
17 case?

18 MR. BARNES: Absolutely, Your Honor. It 's a good
19 question.

20 To clarify the June 15th date, June 15th, 2015,
21 there is a minutes from an ethics committee meeting that
22 discusses Mr. Conforti's case and the other individual --
23 transgender individual's case at St. Joseph's, and then
24 immediately after that, in the same section of that minutes
25 entry, states only to form a committee, basically, to

1 investigate this.

2 And the reason it relates to our case, Your Honor
3 is that this committee had multiple roles. You know, we
4 heard from deposition testimony from Sister Noreen Neary,
5 she's the chair of this ethics committee, that they had
6 several different purposes. One was to discuss what kind of
7 care St. Joseph's can provide to transgender patients. And
8 that's very relevant to their affirmative defenses, at least
9 stating that they could not provide certain services.
10 Additionally, Your Honor, she -- Sister Neary discussed how
11 the committee was to educate St. Joseph's on what they could
12 do, what they cannot do on treating transgender patients with
13 respect to dignity. That sort of education prong is also
14 relevant to our case. And then finally, Your Honor, it's
15 relevant in that they're educating the employees on both
16 St. Joseph's stance on transgender individuals and on their
17 policy and practices.

18 THE COURT: But wasn't the object or the objective
19 of the committee -- and correct me if I'm wrong, I'm sure
20 defense counsel will -- to educate the committee to have a
21 kinder and gentler no?

22 MR. BARNES: Not necessarily, Your Honor. They --
23 and that's part of really why we want these emails and
24 documents, because these discussions are what we want to hear
25 about in that there were policies proposed about how to

1 | handle transgender patients when they come in -- or I should
2 | say recommendations, right, not necessarily policies
3 | proposed. We're not quite sure what actually has come out of
4 | the committee. That's one of the things we're trying to
5 | learn.

6 | What, you know, when a transgender patient comes in
7 | in an emergency, if that emergency is related to the
8 | transition-related care, how can they handle that? You know,
9 | proper use of pronouns when you're meeting transgender
10 | patients; where you -- what would kind of rooms transgender
11 | patients can stay in, generally, how they should be
12 | approaching this issue.

13 | That is at the heard of this case as well.

14 | THE COURT: Okay.

15 | MR. BARNES: And then so the third thing, as I just
16 | referenced, Your Honor, is that their goal was to investigate
17 | this. The -- what -- what St. Joseph's policies were which
18 | would be relevant to the denial in June 2015; the policies
19 | that existed at the same time. And what -- what they thought
20 | was missing and needed to be added and what they thought was
21 | missing but maybe they didn't pursue. Any of those options,
22 | especially for injunctive relief, but as well as just sort of
23 | understanding why St. Joseph's refused to do this or the
24 | basis for it, which we argue was for impermissible reasons,
25 | these documents will help answer that question, I think.

1 THE COURT: Okay. So now what you want is
2 defendant to search -- how many people are on this committee?

3 MR. BARNES: So, Your Honor, we believe there's --
4 from the deposition testimony, from Sister Neary --

5 THE COURT: Right.

6 MR. BARNES: -- we believe that's probably 12 to
7 13.

8 THE COURT: And you wanted defendant to search all
9 of the emails of the 12 and/or 13 members?

10 MR. BARNES: Exactly, Your Honor. The emails and
11 the documents of what -- you know, handouts they might have
12 received from speakers coming in, notes taken during
13 meetings, any sort of record of what was discussed or the
14 decisions. Those sort of core documents are what we're
15 requesting, Your Honor.

16 And I just should just clarify too, this isn't a
17 new request by any means. This was part of our requests --
18 our request for productions. We asked for sort of documents
19 like this. When we found out they hadn't searched any
20 members of the transgender subcommittee, any of their emails
21 or documents, we, you know, pushed back on that, as far back
22 as December 2017, asking them why not, could you search?

23 When we then conferred over last spring, we raised
24 this issue. You know, we asked, requested all members be
25 researched. We proposed several -- sort of a middle ground,

1 and that was rejected. So these aren't new searches by any
2 means --

3 THE COURT: Okay.

4 MR. BARNES: -- but part of our older search,
5 Your Honor.

6 THE COURT: Okay. Let me hear from defendant.

7 MR. DOHERTY: Thank Your Honor. I guess as an
8 initial matter, I'd like to say that the "free exercise"
9 clause of the United States constitution is not an
10 impermissible reason for denying a medical procedure.

11 THE COURT: That's the big your picture.

12 MR. DOHERTY: It is, Your Honor. And a lot of the
13 discovery that's sought now, I would, with due respect,
14 describe as discovery overuse. We're talking about going
15 back and searching 12 or 13 more custodians with 30 or so
16 search terms after we've already done multiple searches that
17 were agreed upon with plaintiff's counsel. We agreed upon
18 the custodians that were searched. And then after that was
19 done, then we're told, no, we want you to do more. So we did
20 some more a second time. And then we were told, that's still
21 not enough. Now, first it was eight. Now, today, it's 12 or
22 13 more additional people be searched.

23 Under the amendments in Rule 26, we believe that
24 this is an instance where the Court, according to the
25 Advisory Committee notes, is encouraged to be aggressive in

1 identifying and discouraging discovery overuse. Searching
2 all these additional subcommittee members is not going to add
3 anything to the case because it really boils down to
4 something that the United States Conference of Bishops has
5 decided: the ethical and religious directives. That's what
6 guided Father Rooney's decision. Subcommittee discussions
7 that happened after the fact are not going to change with the
8 U.S. Conference of Bishops demands of Catholic institutions.

9 There is discovery that's been produced showing the
10 recommendations of that subcommittee. And those
11 recommendations, which appear in the ethics committee
12 minutes, don't show animus or bias or hatred or desire to
13 mistreat. Quite the contrary, they show a Catholic hospital
14 grappling with how can we treat patients in a humane manner
15 while also complying with our obligations in the ERDs.

16 So the recommendations were, for example, if a
17 transgender is starting the reassignment process, finds
18 himself at St. Joe's in an emergency situation, treatment
19 could include administering medication associated with the
20 process, if stopping it would cause harm to the patient.
21 Provide information to -- as to other facilities that would
22 be able to treat the person, if the person's considering
23 transgender reassignment. Providing a private room, if one
24 is available. In fact, Mr. Conforti was given
25 recommendations by Dr. Day of other physicians to go to.

1 This wasn't an instance where the door was slammed on his
2 face and there was a desire to hurt him or to punish him.

3 So getting back to the specifics of this particular
4 application, as I mentioned, there's been two prior
5 collection efforts. Over 12,000 pages of documents have been
6 produced at significant cost, over \$20,000 in e-discovery
7 costs. And that doesn't even consider the burden on a small
8 urban hospital that's mostly, I believe -- hopefully I'm not
9 misspeaking, but I believe most of the patient population of
10 St. Joseph's is charity care or Medicare, Medicaid. It's a
11 not -- not-for-profit institution. And the IT staff there
12 was already stretched thin with the transition to a new
13 document system at the same time they're pulling together all
14 these custodians that we've already searched. Now they're
15 going to be called upon to search, to collect 12 or 13 more?
16 Then we'd have to run that through our e-discovery vendor.
17 And then, as if that's enough, then lawyers have to look
18 through the documents to see what's relevant, responsive, if
19 there are privileges.

20 So it's an awful lot of burden and cost to impose
21 upon a defendant, under the circumstances, when it's really
22 not going to shed any light on why --

23 THE COURT: What's the purpose of this committee?

24 MR. DOHERTY: The trans- -- the subcommittee was
25 intended to educate the ethics committee of the hospital on

1 | what policies are out there at other facilities, for example,
2 | on how to deal with -- how best to deal with transgender
3 | patients in a way that's compassionate and that's compliant
4 | with the ethical and religious directives of the U.S.
5 | Conference of Catholic Bishops.

6 | THE COURT: What about investigating the Conforti
7 | rejection, if you will.

8 | MR. DOHERTY: I believe the deposition testimony is
9 | that the subcommittee was not involved in looking back at
10 | that. It was already a -- for lack of a better word, it was
11 | a done deal. That was June of 2015. The committee didn't
12 | meet until October of 2015, so they weren't going to go back
13 | and --

14 | THE COURT: This is where I have -- I want a
15 | connection -- let me tell you something. I think that
16 | plaintiff is entitled to know more about this subcommittee
17 | and may be entitled to these emails. But I'm having a hard
18 | time connecting the emails to the complaint. That's --

19 | MR. BARNES: May I address that, Your Honor?

20 | THE COURT: Yeah, please. I'm not done with you,
21 | but sit down.

22 | MR. BARNES: So just to maybe address that some of
23 | what Mr. Doherty also said, just to clarify, this case is a
24 | discrimination case.

25 | THE COURT: Right.

1 MR. BARNES: The religion, the aspect of the
2 religious defense defendants have chosen to raise -- and
3 that's within their rights of course, but to raise that as a
4 block to discovery when no motion --

5 THE COURT: I agree with you. I -- and I will tell
6 you that I struggle with this whole case only because you
7 have -- I have to separate that this is discovery from the
8 overall case, because there are overarching issues that I
9 don't have to deal with. So I recognize that.

10 MR. BARNES: Precisely.

11 THE COURT: But I still want to micromanage
12 information. And whatever happens ultimately, I can't
13 consider -- or whatever may happen, I can't consider -- you
14 know, if there's a motion to dismiss pending in a case, that
15 doesn't affect my decisions in discovery. I have to make --
16 have a separation.

17 MR. BARNES: Precisely, Your Honor. And this is
18 relevant directly to your question too. This case, while
19 about discrimination, they have raised the affirmative
20 defense of this First Amendment defense, but interestingly,
21 when you actually look at this ethics and religious
22 directives that defendants have kept citing, it does not
23 prohibit the surgery. Thousands of individuals, cisgender
24 women, have received hysterectomies at St. Joseph's, and the
25 rules have a clear exception for sterilization procedures

1 that are done for medical necessity; medical necessity such
2 as a diagnosed medical condition, which the plaintiff had.

3 So, Your Honor, if that's the case, then the
4 discussions of this committee, these emails back and forth,
5 emails to third parties asking for advice on cases, which
6 we've seen with the ethics committee, emails to -- they work
7 with Garden State Equality, to this, you know, very
8 well-known LGBT, you know, advocacy organization in New
9 Jersey. They've -- you know, ethics committee contacted him
10 and asked him to help out with this transgender subcommittee
11 to help them figure out these issues.

12 So to the extent that they've emailed other people
13 to pull them in to provide advice, to the extent that they've
14 emailed each other with sources, references, articles,
15 discussions about how the ERDs apply in the context of
16 transgender healthcare are important and very relevant, both
17 to, you know, our allegation saying that this was because of
18 bias, not religion, and relevant to our argument that there
19 are ERDs involved, but those don't prohibit this. As every
20 other cisgender woman which has received hysterectomies, so
21 should have an individual who identifies as transgender to
22 treat a mechanical condition.

23 MR. GONZALEZ-PAGAN: Your Honor, if I may, Omar
24 Gonzalez-Pagan, I would just note a couple of additional
25 points here, the first being that there's a question about

1 | not whether the Court or plaintiff is get involved with the
2 | interpretation of the ERDs. The question is how that
3 | St. Joseph's at the time was interpreting that document.
4 | There was testimony from Sister Neary, for example, already
5 | in deposition, that some transition-related care may have
6 | been prohibited or not by the ERDs, but other
7 | transgender-related care may have not been.

8 | That type of -- elucidating that type of
9 | information and testimony explicitly stating that the ERDs
10 | are specifically silent on the issue of gender identity and
11 | transgender status, so looking as to how -- who was
12 | interpreting the ERDs, how they were being interpreted, and
13 | who was making decisions about what's medical necessity in
14 | the context of transgender patients, was it administrators
15 | and religious officials that are not doctors? Or was it
16 | doctors who were being deferred to under medical
17 | recommendations for what consists medical necessity, are
18 | questions that I think are important to both this case and
19 | the question of injunctive prospective relief in the future.
20 | And that is the type of discussion that I surmise, but
21 | obviously are not able to know yet, was being occurring
22 | during the transgender patients committee.

23 | So that is, I think, the information that we're
24 | trying to seek that goes to the heart of this case. It is
25 | who at St. Joseph's was making decision about medical

1 necessity? And who was interpreting the ERDs and how?

2 It is not whether the Court gets entangled on the
3 interpretation of the ERDs. It's whether -- who at
4 St. Joseph's was doing so and whether there are
5 inconsistencies with regards to their defense that they're
6 trying to propose in this case.

7 THE COURT: Defendant.

8 MR. DOHERTY: Yes, Your Honor, if I could respond
9 briefly to the last points made, unless you wanted me to go
10 back to something I was speaking about before, which I'm not
11 quite sure I remember --

12 THE COURT: No, no. No, you're -- you're okay.

13 I understand your point. But you could -- why
14 don't you respond.

15 MR. DOHERTY: Thank you, Your Honor.

16 The ERDs do not say medical necessity. There's not
17 a medical term of art in the ERDs. It's a directive from the
18 U.S. Conference of Catholic Bishops. And it speaks of
19 procedures that induce sterility are permitted where their
20 direct effect is the cure or alleviation of a present and
21 serious pathology and a simpler treatment is not available.
22 That's not medical necessity. And that's something that's
23 promulgated by Catholic bishops.

24 If we're now going to ask the Court to consider
25 issues as if who on the subcommittee agrees with that or if

1 | they think it should be interpreted X way versus Y way,
2 | respectfully, I know Your Honor said that this is an issue to
3 | be considered down the road, but I would submit that under
4 | Rule 26 and whether it's something is even discoverable,
5 | Your Honor should take into account some free exercise case
6 | law, including there's a Third Circuit case -- and
7 | unfortunately, I did not cite this in our opposition,
8 | Your Honor, but it's Tenaflly Eruv Association v. Borough or
9 | Tenaflly, 309 F.3d 144 from the Third Circuit in 2002.

10 | And quoting a U.S. Supreme Court court case, the
11 | Third Circuit observed: If anything turned on whether a
12 | religious practice is mandatory or optional -- this is in the
13 | context of whether I may be mispronounce this, so forgive me,
14 | Your Honor, whether an eruv should be removed from the
15 | utility poles, courts have -- courts would have to question,
16 | quote, the validity of particular litigants' interpretations
17 | of their creeds and perhaps even adjudicate controversies
18 | over religious authority or dogma, tasks that are not within
19 | the judicial ken.

20 | And respectfully, that's what the plaintiff would
21 | like to do, to use to the extent there's anything in the
22 | subcommittee that wasn't picked up through the searches of
23 | Father Rooney's emails, who was the informal chair, or Sister
24 | Medders' [phonetic] emails, who later became, I guess, acting
25 | chair or at least a member of the subcommittee, subcommittee

1 | emails would be -- would have been picked up in those search
2 | in any event. But we're really getting into matters of
3 | interpreting creed. And whether subcommittee members may
4 | have been debating it really has no bearing on what the ERDs
5 | say and what really involve a court in trying to untangle
6 | what the religious document means.

7 | And we don't think that's appropriate for a
8 | court -- think it should be taken into account when weighing
9 | the proportionality of 12 or 13 more custodial searches, the
10 | three dozen keyword searches, the --

11 | THE COURT: So if I were to order the search, it
12 | would be like a custodian as to the 13 names would be the
13 | search?

14 | MR. DOHERTY: It would be to collect the email
15 | counts of, I guess, 12 to 13 more people at St. Joseph's.
16 | And then after those are all collected, which is not easy as
17 | it might sound, to then run searches through them, three
18 | dozen. And then after that, to go through them email by
19 | email to see is it responsive? Is it not responsive? I
20 | mean, we are talking about a hospital here. Some of the
21 | people that are custodians are physicians. So it's not as if
22 | there is not other interests that -- patient
23 | confidentiality --

24 | THE COURT: I know you'd have to go through it.
25 | So I'm going to grant plaintiff's motion. I'm

1 going to ask that you run those searches and review the
2 documents. And if there's a privilege claim of any kind,
3 that you make a privilege log.

4 I will say this. This is -- has no reflection on
5 admissibility. None whatsoever. This is purely a relevance
6 determination at this point in discovery.

7 MR. BARNES: Thank Your Honor.

8 THE COURT: I think that I respect your argument as
9 to proportionality and expense and time. But because of the
10 unknowns that are in the thought processes of this
11 subcommittee, it is discoverable and relevant.

12 So plaintiff's motion is granted.

13 MR. BARNES: Thank Your Honor.

14 THE COURT: Thank you.

15 MR. DOHERTY: Your Honor, if I may, this
16 conference, before it was scheduled for argument, was also to
17 discuss discovery issues, end dates, that type of thing. I
18 don't know that that's something Your Honor wanted to do on
19 the record, but perhaps that --

20 THE COURT: Yeah. So tell me, we're out of time on
21 our dates, or we need a new schedule?

22 MR. BARNES: We have until October 30th,
23 Your Honor. That's the new deadline for close of discovery
24 that you issued.

25 THE COURT: So you want fact end extended?

1 MR. DOHERTY: Your Honor, I would --

2 THE COURT: Obviously.

3 MR. DOHERTY: Before --

4 THE COURT: Because of what you just did to you?

5 MR. DOHERTY: I won't characterize it that way, but
6 Your Honor's ruling, I think, is going to generate a lot of
7 additional work. It's going to take some time for us to do.

8 THE COURT: What do you think is an appropriate
9 fact end? It's not a drop-dead date.

10 MR. DOHERTY: Your Honor, I would think that we
11 probably would need another 90 days on top of where we're at.

12 THE COURT: Okay.

13 MR. DOHERTY: We have other depositions to be done.

14 THE COURT: Okay. You've got it.

15 So what's the date now?

16 MR. BARNES: It currently is October 30th,
17 Your Honor.

18 MR. GONZALEZ-PAGAN: January, Your Honor.

19 THE COURT: January 30th.

20 MR. BARNES: Did you -- Your Honor, did he mean 90
21 additional days on top of the 60-odd days until then?

22 MR. DOHERTY: Yes --

23 (Simultaneous conversation)

24 THE COURT: He wanted to run -- to run from the
25 last fact end date. Right?

1 MR. DOHERTY: Right. The last fact end date,
2 Your Honor, was to be October 30th. Given what I'm now going
3 to have to undertake, I think 90 days on top of that --

4 THE COURT: Yeah, I'm going to give it to you.

5 MR. DOHERTY: Thank Your Honor.

6 THE COURT: January 30th, that means? 2019.

7 Make it -- yeah, January 30. And I will
8 schedule -- I'm going to schedule a telephone conference in
9 October, so I can find out what the status of those searches
10 is and anything else that's a problem. Or not a problem.

11 MR. BARNES: Your Honor, one other issue. We would
12 also, I think, there might be some deadlines about the expert
13 deadlines, so we need to set in this case too. I don't know
14 if you want to defer it until October.

15 THE COURT: But is expert going to run parallel to
16 fact? Or does fact need to be concluded to do expert?

17 MR. GONZALEZ-PAGAN: Your Honor, so far we have
18 been dealing with -- post finishing fact discovery. We have
19 not set any deadlines, as per Your Honor's request.

20 THE COURT: Is that your opinion as well? Fact has
21 to run through before we start expert?

22 MR. DOHERTY: Yes, Your Honor.

23 THE COURT: So why don't we hold off on an expert
24 schedule.

25 MR. GONZALEZ-PAGAN: Okay. Thank you, Your Honor.

1 THE COURT: That's not to say you shouldn't be
2 looking for experts.

3 MR. GONZALEZ-PAGAN: We're already ...

4 THE COURT: So I'll have a telephone conference in
5 October. And let's see what our status is.

6 Anything else we need to talk about?

7 MR. DOHERTY: No, Your Honor.

8 MR. BARNES: No, Your Honor.

9 THE COURT: Okay. Thank you very much.

10 MR. BARNES: Thank you very much.

11 UNIDENTIFIED SPEAKERS: Thanks, Your Honor.

12 (Conclusion of proceedings at 3:16 P.M.)

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I further certify that I am in no way related to any of the parties hereto nor am I in any way interested in the outcome hereof.

s/ *Sara L. Kern*

29th of August, 2018

Signature of Approved Transcriber

Date

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