

16th JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. MARY

STATE OF LOUISIANA

NO.

DIVISION “ “

[REDACTED] and
CERTAIN UNDERWRITERS AT [REDACTED]
and [REDACTED] ALL SUBSCRIBING
TO INSURANCE POLICY NO. [REDACTED]

VERSUS

[REDACTED]

FILED: _____

DEPUTY CLERK

MOTION FOR PROTECTIVE ORDER

NOW INTO COURT, through undersigned counsel, come Plaintiffs, [REDACTED]
[REDACTED] and Defendants [REDACTED]
[REDACTED] as Parties to the above-captioned matter, to jointly
request entry of a Stipulated Protective Order pursuant to La. C.C.P. art. 1426.

Respectfully submitted,

[REDACTED]

[REDACTED]

MONTGOMERY, BARNETT, BROWN,
READ, HAMMOND & MINTZ, L.L.P.
3300 Energy Centre – 1100 Poydras Street
New Orleans, LA 70163-3200
Phone: (504) 585-3200 - Fax: (504) 585-7688
Attorneys for Plaintiffs

16th JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. MARY

STATE OF LOUISIANA

NO.

DIVISION “ “

[REDACTED] and
CERTAIN UNDERWRITERS AT [REDACTED]
and [REDACTED] ALL SUBSCRIBING
TO INSURANCE POLICY NO. [REDACTED]

VERSUS

[REDACTED]

FILED: _____

DEPUTY CLERK

STIPULATED PROTECTIVE ORDER

Pursuant to Plaintiffs’ and Defendants’ joint Motion for Protective Order, and La. C.C.P. art. 1426(7), the Parties to the above-captioned matter hereby submit this proposed Stipulated Protective Order for the purpose of ensuring that documents and/or plans disclosed to the Defendants by the Plaintiffs are used for limited purposes and that the same remain confidential and not subject to disclosure beyond what is contemplated herein, whether pursuant to secondary attempts at compulsory process or otherwise. Accordingly, the Parties, by their undersigned Counsel, hereby stipulate, subject to approval and entry by the Court, as follows:

Definitions and Terms

As used in this Protective Order, the following definitions and terms shall apply:

“**Confidential Information**” means the plans and/or designs labeled [REDACTED] and/or [REDACTED] or otherwise, pertaining to [REDACTED] or otherwise, prepared by [REDACTED], for Plaintiff [REDACTED] or any other documents designated “CONFIDENTIAL” and produced by Plaintiffs to Defendants by request in the above-captioned matter, which contain trade secrets or other confidential, strategic, research, development, and/or commercial information, as such terms are contemplated

by La. C.C.P. art. 1426(7), and which, if disclosed, would materially affect the Plaintiffs' business, commercial or financial interests.

“**Counsel**” means the counsels of record in this action and their law firms as well as other attorneys or consultants employed or retained by such law firms.

“**Defendants**” mean [REDACTED]

“**Disclosed**” is used in its broadest sense and includes, *inter alia*, directly or indirectly shown, divulged, revealed, produced, described, transmitted or otherwise communicated, in whole or in part.

“**Discovery**” is defined as the term is used in the Louisiana Code of Civil Procedure.

“**Discovery Material**” means any documents, answers to interrogatories, responses to requests for admission, deposition testimony, deposition transcripts and exhibits, other responses to requests for information and/or other written information, whether produced voluntarily or involuntarily in the course of this action, or in response to discovery requests in this litigation by any party or protected person.

“**Document**” is given its plain and ordinary meaning, including electronic or digital data.

“**Other Person**” means any person or entity, juridical or otherwise, not including Plaintiffs and Defendants.

“**Party**” or “**Parties**” means the Plaintiffs and/or the Defendants in this action.

“**Plaintiffs**” mean [REDACTED] and Certain Underwriters at [REDACTED] and [REDACTED] all subscribing to Insurance Policy No. [REDACTED]

“**This action**” means the above-captioned civil action pending in this Court, including any related discovery, pretrial, trial, post-trial, or appellate proceedings.

Types of Material That May Be Designated Confidential and Methods of Designation

Any Discovery Material may be designated by the Plaintiffs as “Confidential” under this Protective Order. Such designation shall constitute a representation to the Court and Counsel for Defendants that Plaintiffs believe in good faith that the material so designated constitutes Confidential Information as defined in this Protective Order.

Such Discovery Material may be designated Confidential Information by (i) providing copies of the Discovery Material that are stamped “CONFIDENTIAL” or (ii) furnishing a separate written notice to Defendants or their Counsel at the time of their production identifying the documents or

materials as Confidential Information or (iii) communicating the confidential nature of the Discovery Material to the Defendants in any other fashion.

Inadvertent production of or failure to designate any information as Confidential Information shall not be deemed a waiver of the Plaintiffs' claim of confidentiality as to such information, and the Plaintiffs may thereafter designate such information as Confidential Information, as appropriate.

Permissible Uses of Discovery Material

Defendants and all component persons identified below who obtain access to Confidential Information produced in connection with this action shall use only such Confidential Information for purposes of this action, including any appeal of the Court's ruling, and any ancillary proceedings relating to the same Parties and subject matter, and shall not use such Confidential Information for any other purpose, including the furtherance of that person's business interests or in any unrelated administrative or judicial proceeding. Defendants shall inform promptly the Plaintiffs if disclosure pursuant to this section is made.

Except as otherwise authorized by this Protective Order, Confidential Information may be disclosed, according to the terms of this Protective Order, only to the following persons:

1. the captioned Court;
2. Counsel;
3. associated personnel of any person within categories 1 and 2, for whom access to Confidential Information is necessary to assist such persons in this action, including any Court personnel assisting the Court, litigation assistants, paralegals, secretarial or other clerical personnel, and stenographers or other persons involved in taking or transcribing testimony in this action;
4. consultants, experts or litigation support services, including outside copying services, retained by a party for the purpose of assisting that party in this action, and principals and employees of the firm with which consultants or experts are associated; and
5. other persons not included in the above paragraphs who may testify as a witness, either at a deposition or at a court proceeding, for the purpose of assisting in the preparation or examination of the witness or potential witness.

Persons described paragraphs 4 and 5 (and their associated personnel) shall be deemed bound by the terms of this Protective Order upon its entry by the Court. Persons described in paragraphs 4 and 5 shall advise their associated personnel of this Protective Order prior to providing their associated personnel access to Confidential Information.

Each individual described in paragraphs 4 and 5, to whom Confidential Information is disclosed, shall not disclose that information to any other individual, except as provided in this Protective Order, or use it for any purpose other than in connection with this action. Before any Confidential Information may be disclosed to any person described in paragraphs 4 and 5, he or she shall first read this Protective Order or shall have otherwise been instructed in his or her obligations under the Protective Order by Counsel for Defendants. Additionally, before any Confidential Information may be disclosed to any consultant or expert described in paragraph 5, he or she shall execute a confidentiality agreement stating the following:

I, [name, position of employment], hereby acknowledge that I am about to receive Confidential Information. I certify my understanding that such information is to be provided to me pursuant to the terms and restrictions of the Protective Order of [date entered] in [caption and docket number of this action]. I have been given a copy of and have read this Protective Order and agree to be bound by its terms. I agree to submit to the jurisdiction of the Court for the sole purpose of having the terms of this Protective Order enforced.

The original of such executed confidentiality agreement shall be retained by Counsel for Defendants for a period of one year following the final resolution of this matter.

Counsel for Defendants may disclose Confidential Information to any witness or potential witness, provided Counsel for Defendants has obtained consent of Counsel for Plaintiffs.

Use of Confidential Information at any Hearing

The Parties shall confer and attempt to agree, before any hearing, on the procedures under which Confidential Information may be introduced into evidence or otherwise used at such hearing. Absent agreement, the Court shall be asked to issue an order governing the use of such Confidential Information at any such hearing upon reasonable notice to all Parties.

Procedures Upon Termination of Action

Within sixty (60) business days following the running of any applicable time to appeal any order or ruling entered in this action, the Defendants and/or their Counsel shall either (i) return to the Plaintiffs and/or their Counsel all copies of all Confidential Information obtained through discovery in this action or (ii) certify to that person that all such materials have been destroyed beyond recognition.

Miscellaneous

This Protective Order shall not affect the right of any Party to oppose production of Discovery Material on any ground permitted by the Louisiana Code of Civil Procedure, including any applicable privilege. Moreover, this Protective Order shall not affect the scope of discovery by any party that is not otherwise proper under the Louisiana Code of Civil Procedure.

Nothing in this Protective Order shall prejudice the right of any Party to move the Court to broaden or restrict the rights of access to and use of Discovery Material, or to seek modifications of this Protective Order upon due notice to all other Parties.

All persons governed by this Protective Order, by reviewing Confidential Information or otherwise, hereby agree to the jurisdiction of this Court over their person for the purpose of any action seeking to enforce the terms and conditions of this Protective Order, or for any action for contempt for violation of the terms of this Protective Order.

CONSIDERING THE FOREGOING “Motion for Protective Order” jointly filed on behalf of Defendants and Plaintiffs,

IT IS ORDERED that said motion is **GRANTED** and that the foregoing Stipulated Protective Order is hereby entered in this Court in this matter.

Franklin, Louisiana, this _____ day of _____, 2007.

JUDGE

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 (MR. DUCLOS CALLING JUDGE)
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 THE CLERK: Yes.
 20 MR. DUCLOS: Sorry. I'm
 21 calling from a deposition. This concerns
 22 Case Number [REDACTED].
 23 THE CLERK: Okay.
 24 MR. DUCLOS: I'm wondering if

1 we can speak to the Judge about a
 2 possibility of a protective order.
 3 THE CLERK: Can you hold on
 4 one moment? Who's calling?
 5 MR. DUCLOS: Justin DuClos,
 6 representing [REDACTED].
 7 THE CLERK: How do you spell
 8 your last name?
 9 MR. DUCLOS: D-U, capital
 10 C-L-O-S.
 11 THE CLERK: L-O-X?
 12 MR. DUCLOS: S, as in Sam.
 13 THE CLERK: You're with [REDACTED]
 14 [REDACTED]? Hold on, please.
 15 MR. DUCLOS: Sure.
 16 THE CLERK: Go ahead, Judge.
 17 THE HONORABLE [REDACTED] [REDACTED]
 18 Hello.
 19 MR. DUCLOS: Hello, your
 20 Honor. Justin DuClos calling on behalf of
 21 [REDACTED].
 22 THE HONORABLE [REDACTED] [REDACTED]
 23 Good afternoon. How are you?
 24 [REDACTED] [REDACTED]

125

1 included subjects for the contractor's work
 2 and the contractor's extra work. And
 3 Attorney [REDACTED] has, throughout the course
 4 of Mr. [REDACTED] deposition, inquired into such
 5 subjects as the plans, specifications for
 6 the plans, requirements of DEM and is now
 7 beginning a line of questioning concerning
 8 other contractors' remedial work on the
 9 project; and I'm calling because Attorney
 10 [REDACTED] feels that these are within the
 11 scope of our designation, and I believe that
 12 they are not. Again, we have designated
 13 Mr. [REDACTED] the [REDACTED], to discuss
 14 [REDACTED] work -- that's the contractor -- and
 15 [REDACTED] alleged extra work on the project.
 16 THE HONORABLE [REDACTED] [REDACTED]
 17 Okay. Let me hear from the other side.
 18 MR. [REDACTED] Your Honor,
 19 it's [REDACTED] [REDACTED] The work of [REDACTED] was
 20 based on certain plans and specifications
 21 that were authored solely by this witness.
 22 He's testified that he alone created the
 23 plans and specifications that were sent to
 24 the bidders and for which were to be used to

127

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 THE HONORABLE [REDACTED] [REDACTED]
 5 Okay. Good afternoon.
 6 MR. DUCLOS: Your Honor, we
 7 are sitting in a deposition at Attorney [REDACTED]
 8 [REDACTED] office in [REDACTED].
 9 I have [REDACTED] here as a corporate
 10 designee for [REDACTED]. He's
 11 the [REDACTED].
 12 THE HONORABLE [REDACTED] [REDACTED]
 13 Uh-huh.
 14 MR. DUCLOS: This is a case
 15 concerning road construction and a claim by
 16 the contractor for contract termination and
 17 for extra work.
 18 THE HONORABLE [REDACTED] [REDACTED]
 19 Okay.
 20 MR. DUCLOS: The [REDACTED] has
 21 counter-claimed for improper performance and
 22 has third-party'd the bonding company. Now,
 23 designations were made for [REDACTED]
 24 [REDACTED] on a Notice of Deposition that

126

1 construct the project, so, yes I am.
 2 THE HONORABLE [REDACTED] [REDACTED]
 3 Did he -- let me interrupt you. Did he
 4 testify to that at this deposition?
 5 MR. [REDACTED] Yes, your
 6 Honor. I don't think any party disputes
 7 that.
 8 MR. DUCLOS: Although I did
 9 object to the line of questioning.
 10 THE HONORABLE [REDACTED] [REDACTED]
 11 Okay.
 12 MR. [REDACTED] So, I'm asking
 13 him questions about the plans and
 14 specifications that he prepared. A central
 15 issue in this litigation is a claim by [REDACTED]
 16 that those plans and specifications were
 17 defective, which led to a wrongful
 18 termination by [REDACTED]. And
 19 I think Attorney DuClos is objecting,
 20 because he's, he's trying to overtly
 21 technically read the designation and prefers
 22 that I probably issue another notice of
 23 designee so he can go and prep the witness
 24 and to bring the same witness back here; but

128

1 I would submit, your Honor, he's here and he
2 prepared the plans and specifications. They
3 relate to our claim. He's been designated
4 to testify about our claim. So, he's a
5 proper witness for that. And you know,
6 objections like this are doing nothing more
7 than directing the witness and delaying the
8 deposition.

9 And the other issue he raised
10 with your Honor was he's objecting to a line
11 of questioning regarding some invoices from
12 another contractor that the [REDACTED] hired to
13 remediate my client's work. That's their
14 argument. So, I've asked him whether the
15 work that this contractor did was outside
16 the scope of the original plans.

17 The first witness that the
18 [REDACTED] designated earlier today and yesterday
19 could not answer questions regarding the
20 work performed by this remediation
21 contractor and directed me to this witness
22 to go ahead and figure out what the costs
23 were as they were allocated to my client.

24 THE HONORABLE [REDACTED] [REDACTED]

129

1 of the current notice, and I would submit
2 that it does because this witness has been
3 designated to testify regarding the work
4 that was performed by [REDACTED] and the extra
5 work that [REDACTED] performed --

6 THE HONORABLE [REDACTED] [REDACTED]

7 That portion I agree that he can be examined
8 on that, but the first ground, as requested,
9 he cannot be at this time.

10 MR. [REDACTED] Okay. Thank
11 you, your Honor.

12 MR. DUCLOS: Thank you, your
13 Honor.

14 THE HONORABLE [REDACTED] [REDACTED]

15 Is that clear to both sides?

16 MR. [REDACTED] Is that clear
17 to you?

18 MR. DUCLOS: I believe --

19 MR. [REDACTED] Could we ask,
20 your Honor, to just --

21 THE HONORABLE [REDACTED] [REDACTED]
22 Reiterate?

23 MR. [REDACTED] Yes.

24 THE HONORABLE [REDACTED] [REDACTED]

131

1 Understood.

2 MR. [REDACTED] I mean I would
3 submit, your Honor, that this entire line of
4 questioning is proper, and this is nothing
5 more than a tactic to disrupt the
6 deposition.

7 MR. DUCLOS: May I rebut, your
8 Honor.

9 THE HONORABLE [REDACTED] [REDACTED]
10 I think I have heard enough. I'm going to
11 grant the oral motion to confine the scope
12 of the deposition to the notice that was
13 served upon the [REDACTED] I fully understand
14 and appreciate that it may, it probably will
15 result in a further deposition, but the
16 Deponent is entitled to some notice of the
17 areas where the Deponent will be examined
18 upon and to prepare for that; and so, I'm
19 going to essentially grant the request for
20 a, for the order.

21 MR. [REDACTED] Your Honor, one
22 thing that the parties are disputing is
23 whether or not the questions relating to the
24 plans and the damages fall within the scope

130

1 Certainly. The aspects where the work that
2 was performed by the contractor and any
3 other remedial work, he may be -- the
4 deposition can continue on that inasmuch as
5 he was -- if the representation has been
6 made -- that he was the person designated to
7 testify on that subject matter. The other
8 portion, though, the initial argument by the
9 [REDACTED] attorney, he cannot be questioned on
10 that.

11 MR. DUCLOS: And that would
12 pertain to the plans, specifications, DEM
13 standard?

14 THE HONORABLE [REDACTED] [REDACTED]
15 That is correct.

16 MR. DUCLOS: And the like.

17 THE HONORABLE [REDACTED] [REDACTED]
18 That is correct.

19 MR. DUCLOS: And the, just, if
20 you don't mind, your Honor, the protective
21 order limits Mr. [REDACTED] designation to the
22 work of the contractor alone?

23 THE HONORABLE [REDACTED] [REDACTED]
24 That's -- that's only one of the areas that

132

1 he was designated for.

2 MR. DUCLOS: The work and the,
3 quote, unquote, alleged extra work of the
4 contractor.

5 MR. [REDACTED] Your Honor, if
6 I may suggest, just as a practical matter --
7 this is [REDACTED] -- you know, if
8 Attorney DuClos doesn't believe that his
9 client is prepared to testify, I mean I have
10 no objection if they want to suspend this
11 deposition, and I will simply issue a notice
12 to this individual and examine him about
13 whatever, you know, I choose to examine him
14 about and do it in a way other than a
15 corporate designee deposition.

16 THE HONORABLE [REDACTED] [REDACTED]
17 Is that satisfactory?

18 MR. DUCLOS: It's not. Being
19 that the [REDACTED] is the original
20 Defendant here, we have designated Mr. [REDACTED]
21 for a certain topic that was chosen by
22 Mr. [REDACTED] and to the extent that
23 Mr. [REDACTED] wants to now broaden that
24 scope, I would say he would have to resubmit

1 simply suspend at this point, given what's
2 already been testified to, and simply
3 reissue a notice for him, you know,
4 individually on another day.

5 THE HONORABLE [REDACTED] [REDACTED]
6 I believe that the -- does the [REDACTED] wish to
7 be heard on that statement or request?

8 MR. DUCLOS: Yes, your Honor.
9 I do object to that given that Mr. [REDACTED] has
10 set time aside in advance to be here on this
11 designation, which until this time was
12 satisfactory, and Mr. -- excuse me,
13 Mr. [REDACTED] and Mr. [REDACTED] has, knowing full
14 well in advance for months, that the
15 subjects of this deposition were to be
16 [REDACTED] work and [REDACTED] allegedly extra
17 work, knew that Mr. [REDACTED] was designated for
18 those purposes and raised no objection.

19 MR. [REDACTED] Your Honor,
20 that --

21 THE HONORABLE [REDACTED] [REDACTED]
22 I believe the party may properly suspend and
23 renote, and I don't see anything in -- I'm
24 not being made aware of anything in the

1 a new notice and that we can appropriately
2 survey the [REDACTED] and find who would best,
3 with the most information, be able to inform
4 Mr. [REDACTED] about those subjects. It's
5 simply a matter of getting this right and
6 accurate and not positioning Mr. [REDACTED] to say
7 things that he doesn't know anything
8 about.

9 MR. [REDACTED] Your Honor, I'm
10 certainly free to issue a notice of
11 deposition directly to Mr. [REDACTED]

12 THE HONORABLE [REDACTED] [REDACTED]
13 Well, you certainly are. Whether or not it
14 would be fruitful remains to be seen.

15 MR. [REDACTED] Well, your
16 Honor, he's the one who actually designed
17 this project and was there on the ground the
18 entire time. And he is the one who retained
19 consultants to test soil. He is the one who
20 dealt with them. He is the one who dealt
21 with the completion contractors. This man
22 is intimately involved in this project. So,
23 you know, based on your Honor's order, I
24 would suggest, respectfully, and prefer to

1 Rules or under -- that would suggest
2 otherwise, so I think that they would be
3 entitled to do so; and the only issue then
4 would be try to come up with some convenient
5 time that's suitable for all the parties and
6 the witness.

7 MR. [REDACTED] That's fine,
8 your Honor. I'm willing to work with them
9 on that. I have been flexible on this.
10 Just so your Honor knows, there are several
11 topics in our notice that cover the topics
12 that I'm going over today. The argument
13 they are making is that it wasn't this
14 witness they wanted to testify about those
15 subjects. Unfortunately, the first witness
16 that they did designate didn't have any
17 knowledge and told me to talk to this
18 witness, so now we are in a situation where
19 they don't want me to talk to him, so they
20 have sought this protective order.

21 THE HONORABLE [REDACTED] [REDACTED]
22 All right. Anything further, gentlemen?

23 MR. DUCLOS: Nothing other
24 than that I would disagree with that

1 characterization.
 2 THE HONORABLE [REDACTED] [REDACTED]
 3 I'm sure you're entitled to do so. All
 4 right, gentlemen. Have a good day.
 5 MR. [REDACTED] Thank you, your
 6 Honor.
 7 MR. DUCLOS: Thank you, your
 8 Honor.
 9 THE HONORABLE [REDACTED] [REDACTED]
 10 You're welcome.
 11 MR. [REDACTED] Pursuant to the
 12 Court's direction, we will suspend the
 13 deposition and I'll issue a notice directly
 14 to Mr. [REDACTED] and we will come back and finish
 15 on another day. We are off the record.
 16 [REDACTED] [REDACTED]
 17 [REDACTED]
 18 [REDACTED] [REDACTED]
 19 [REDACTED]
 20 [REDACTED] [REDACTED]
 21 [REDACTED] [REDACTED]
 22 [REDACTED]
 23 [REDACTED] [REDACTED]
 24 [REDACTED] [REDACTED]

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]

1 [REDACTED]
 2 [REDACTED] [REDACTED] [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]

[REDACTED]