20-3487; 20-3513; 20-3516; 20-3525; 20-3528; 21-1132; 21-1134; 21-1135

EIGHTH CIRCUIT
COURT OF APPEALS

BROCK FREDIN,

Plaintiff-Appellant,

-against-

GRACE ELIZABETH MILLER,
CATHERINE MARIE SCHAEFER,

Defendant-Appellees.

-against-

LINDSEY ELISE MIDDLECAMP,

Defendant-Appellee.

-against-

JAMIE KREIL,

Defendant-Appellee.

On Appeal from the United States District Court for the
District of Minnesota

APPELLANT'S CORRECTED PETITION FOR REHEARING AND REHEARING *EN BANC*

Brock Fredin
PO BOX 1051
Hudson., WI 54016
(612) 424-5512 (tel.)
brockfredinlegal@icloud.com
(tel.) 612-424-5512
Plaintiff-Appellant, Pro Se

Karl Johann Breyer
Kutak Rock
60 S. 6th St. #3400
Minneapolis, MN 55402
jonbreyer@kutakrock.com
Attorney for Defendant-Appellees

Anne M. Lockner
Robins Kaplan
800 Lasalle Ave #2800
Minneapolis, MN 55402
annelockner@robinskaplan.com
Attorney for Defendant-Appellee

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Statutes

Rules

INTRODUCTION

On August 10, 2021, this Court ignored two-hundred and fifty years of First Amendment precedent and issued a breathtakingly unconstitutional order restricting Appellant's free speech and his right to petition while threatening "detainment" if Appellant refuses to comply. Specifically, without a hearing or any adjudication by a jury (or factfinder) that the content is defamatory, harassing or otherwise not protected by the First Amendment, this Court affirmed an injunction directing Appellant to remove certain websites and YouTube videos. These websites and videos are unquestionably protected First Amendment speech as they:

- legitimately criticize a public official, namely U.S. Magistrate Judge Hildy Bowbeer, for her conduct on the bench;
- legitimately criticize attorneys K. Jon Breyer, Stephen C. Likes, Anne M. Lockner, J. Haynes Hansen, Ena Kovacevic and Charlie C. Gokey as well as their law firms Kutak Rock LLP and Robins Kaplan LLP for their attorney misconduct, unethical actions, racism and their facilitation of corrupt behavior of a Special Assistant U.S. Attorney Lindsay Middlecamp. Appellant's criticisms in the websites and YouTube videos are valid and important issues of public concern; and
- satirically mocked and parodied attorneys Anne M. Lockner, L. Haynes Hansen, and K. Jon Breyer as well as their law firms Robins Kaplan

LLP and Kutak Rock LLP with spoof advertisements (satire and parody are protected by the First Amendment).

Even more astonishing, this Court did not stop at merely directing Appellant to remove existing content. Instead, this Court issued an order affirming a wide-sweeping prior restraint on Appellant's free speech by prohibiting him from publishing any content about the district court, the district court's staff, Defendants-Appellees, Defendants-Appellees' counsel and any future counsel retained by Defendants-Appellees' for **five (5) years**. No Court – either state or federal – has even come close to being so brazen or flippant towards the First Amendment and its protections. What is even more insidious and illustrative of an abuse of power, this Court affirmed wrapping a plainly unconstitutional injunction and directives in the cloak of the district court's "inherent sanction power" to thwart Appellant's right to an adjudication on the merits and to be free from prior restraint of free speech under the First Amendment.

Nowhere in this Court's August 10, 2021 conclusory and summary Order does it address any of the First Amendment concerns or issues that its directives or prior restraints raised. This is because this Court no doubt knows that District Court of Minnesota Judge Susan Richard Nelson's November 23, 2020 order is blatantly unconstitutional and this Court banked on the fact that Appellant, a *pro se* litigant, would not be able to appreciate the serious legal and constitutional issues the

injunction invokes. This is truly unacceptable and smacks of a drumhead legal proceeding. This is particularly so given that this Court affirmed Judge Nelson's use of her "inherent sanction power" to restrict Appellant from engaging in speech – without a trial, much less a meaningful opportunity to be heard – about a law firm, Robins Kaplan LLP, that Judge Nelson was not only employed at, but had a significant ownership stake in prior to being appointed to the bench by President Barrack Obama.

As shown below, this Court's August 10, 2021 Order, which affirms the district court's November 23, 2020 order directing Appellant to remove certain content from the Internet and prohibits Appellant from prospectively publishing content, is facially and unquestionably unconstitutional, and a blatant abuse of discretion. Just like President Joe Biden – weak, frail, and in cognitive decline – this Court's August 10, 2021 actions show that it is taking incompetence to cartoonish levels. As such, the district court's November 23, 2020 order is void and must immediately be reversed pursuant to 28 U.S.C. § 1292(a)(1) and (a)(3).

FACTUAL BACKGROUND

Appellant incorporates and refers the Court to the fact section of the principal brief for a recitation of the pertinent facts to this petition for rehearing and rehearing *en banc* ("*En Banc*").

ARGUMENT

A. The Court Incorrectly Held That The District Court's November 23 Order is An Not An Abuse of Discretion Where it is Unconstitutional as It Ordered a Prior Restraint and Directed the Removal of Speech Without an Adjudication on the Merits

It is well-settled that a court cannot issue a prior restraint and direct the removal of speech via an injunction or otherwise without there first being an adjudication on the merits that the speech is not protected by the First Amendment. The Supreme Court has affirmed this notion repeatedly. Indeed, it has held that "[t]he special vice of a prior restraint is that communication will be suppressed, either directly or by inducing excessive caution in the speaker, before an adequate determination that it is unprotected by the First Amendment." *Pittsburgh Press Co. v. Pittsburgh Comm'n on Human Rel.*, 413 U.S. 376, 390 (1973). Put another way, "a judicial injunction that prohibits speech *prior to a determination* that the speech is unprotected [] constitutes a prior restraint." *Auburn Police Union v. Carpenter*, 8 F.3d 886, 803 (1st Cir. 1993) (emphasis added); *Salinger v. Colting*, 607 F.3d 68 (2d Cir. 2010) ("Every injunction issued before a final adjudication on the merits risks enjoining speech protected by the First Amendment."); *see also Sid Dillion Chevrolet*, 559 N.W.2d 740, 747 (Neb. 1997) ("Absent a prior adversarial determination that the complained of publication is false or a misleading representation of fact, equity will not issue to enjoin a libel or slander …."); *Advanced Training Sys., Inc. v. Caswell Equip. Co., Inc.*, 352 N.W.2d 1, 11 (Minn. 1984) (holding that trial court may only enjoin an individuals from making

defamatory statements "after a full jury trial" on the merits that the speech is fact or otherwise unprotected by the First Amendment).

It cannot be disputed that there was no adjudication or determination on the merits concerning whether Appellant's YouTube videos and websites are constitutionally protected free speech. Rather, Defendants-Appellees and their counsel demanded an end-run around the adversarial process of determining the constitutionality of Appellant's speech by requesting that an injunction be issued through the district court's "inherent power to sanction." Shockingly, Judge Nelson ignored the serious due process and First Amendment concerns of Defendants-Appellees request and obliged their demand by issuing a sweeping injunction under the guise of its "inherent power to sanction" directing Appellant to remove his YouTube videos and websites without a full and fair trial (or even a hearing) on the merits.

As the case law above sets forth, Appellant is entitled to a full trial on the merits in front of a jury on the issue of whether or not the speech contained in his existing YouTube videos and websites is protected by the First Amendment. *See Caroll v. President & Com'rs of Princess Anne*, 393 U.S. 175, 180 (1986) (holding that the lack or notice or meaningful opportunity to be heard renders a prior restraint on free speech invalid and unconstitutional).

B. The Court Incorrectly Held That The District Court's November 23, 2020 Order Is Not An Abuse of Discretion Where it is Unconstitutional as It

Failed to Identify with Particularly What Was Objectionable or Otherwise Not Protected by the First Amendment with Respect to the Existing Website and YouTube Content

It is further well-settled that any restriction on speech must be narrowly tailored. Specifically, the Supreme Court has held that an order issued in the "area of First Amendment rights" must be "precis[e]" and narrowly "tailored" to achieve the "pin-pointed objective" of removal of unprotected speech. *Carroll*, 393 U.S. at 183-84. "In order for an injunction to pass constitutional muster, the suppression must be limited to the precise statements [] found to be libelous [or otherwise unprotected]." *Nolan v. Campbell*, 690 N.W.2d 638, 653 (Neb. 2004). In other words, an injunction must be "limited as it is to material found either libelous or disparaging after a full jury trial." *Advanced Training Sys*., 352 N.W.2d at 11; *see also Auburn Police Union*, 8 F.3d at 903-04 (holding that injunction must be narrowly tailored when enjoining speech). Judge Nelson's November 23, 2020 Order is an abuse of discretion where she did not "narrowly tailor" nor made it "precise" in enjoining Appellant's speech and directing the removal of all of Appellant's existing YouTube videos and websites concerning Defendants-Appellees' counsel and Magistrate Judge Bowbeer. *See Tory v. Cochran*, 544 at 738 (holding that a prohibited on speech "should not "swee[p]" any "more broadly than necessary"). (*See* App. Ex. A.; November 23, 2020 Order at 8, 25.) [*Fredin v. Kreil*, Dst. Dkt No. 39.]

C. The Court Incorrectly Held That The District Court's November 23 Order Is Not An Abuse of Discretion Where it is an Unconstitutional Prior Restraint on Future Speech

Again, a "judicial determination that prohibits speech prior to a determination [on the merits] that the speech is unprotected [] constitutes a prior restraint." *Auburn Police Union*, 8 F.3d at 903. A prior restraint – a "government regulation that limits or conditions in advance the exercise of protected First Amendment activity," which can include "a judicial injunction that prohibits speech prior to a determination that the speech is unprotected" – bears a "heavy presumption against its constitutional validity." *Id.*; *see also Alexander v. U.S.*, 509 U.S. 544 (1993) (explaining that a prior restraint is suppression of speech by the government in advance of its actual expression or publication). The Supreme Court has described the elimination of prior restraints as the "chief purpose" of the First Amendment. *Gannett Co. v. DePasquale*, 433 U.S. 358, 393 n. 25 (1979); *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539, 557 (1976) ("The main purpose of the First Amendment is to prevent all such previous restraints upon publications as had been practiced by other governments."). "[P]rior restraints on speech and publication are the most serious and the least tolerable infringement on First Amendment rights." *Tory v. Cochran*, 544 U.S. at 738.

The district court's November 23, 2020 Order prohibits Appellant from engaging in speech prior to, and effectively without, any judicial determination that

the speech is not protected by the First Amendment. As such, Judge Nelson's November 23, 2020 Order directing Appellant to refrain prospectively from engaging in speech or publishing content about Defendants-Appellees, Defendants-Appellees' counsel or the district court and its staff is an unconstitutional prior restraint. *See Pittsburg Press Co.*, 413 U.S.at 390 ("The special vice of a prior restraint is that communication will be suppressed, either directing or by inducing excessive caution in the speaker, before an adequate determination that it is unprotected by the First Amendment.").

D. The Court Incorrectly Held That Appellant's YouTube Videos Which Public Officials Are Not Protected Under The First Amendment As Legitimate Criticism of a Public Official

There is nothing harassing, invasive or otherwise objectionable about these statements, which are an exhaustive list of the statements made in the videos. They are all legitimate opinions and criticisms of public officials. *See Conroy v. Kilzer*, 789 F.Supp. 1457, 1468 (D. Minn. 1992) (holding that statements that 'accuse a public official of misconduct" are not "as a matter of law … sufficiently extreme or outrageous"); s*ee also Garrison v. Louisiana*, 379 U.S. 64, 77 (1964) ("The *New York Times* … public-official rule protects the paramount public interest in the free flow of information to the people concerning public officials, their servants. To this end, anything which might ouch on an official's fitness for office is relevant.").

The right to criticize or offer opinions about a public official is guaranteed by the First Amendment. *See Glasson v. City of Louisville*, 518 F.2d 899, 904 (6th Cir. 1975) ("The right of an American citizen to criticize public officials and policies and to advocate peacefully ideas for change is 'the central meaning of the First Amendment.'" (*quoting New York Times v. Sullivan*, 376 U.S. 264 (1964)); *Barnes v. McDowell*, 848 F.2d 725, 734 (6th Cir. 1988) (noting that charges of public corruption are entitled to constitutional protection); *Fine v. Bernstein*, 726 N.W.2d 137, 144 (Minn. 2007) ("The First Amendment protects statements of opinion."); *see also Dun & Bradstreet, Inc. v. Greenmoss Builders*, 472 U.S. 749, 780 (1985) ("[W]hen an alleged libel involves criticism of a public official or a public figure, the need to nurture robust debate of public issues and the requirements that all state regulation of speech be narrowly tailored coalesce to require actual malice as a prerequisite to any recovery."). Appellant's existing content is plainly protected speech criticizing a public official, namely U.S. Magistrate Judge Hildy Bowbeer, rendering the November 23, 2020 Order directing the removal of the two (2) videos unconstitutional. More importantly, Judge Nelson directive prospectively prohibiting "substantially similar" content containing criticisms of Magistrate Judge Bowbeer and the district court in general violated the First Amendment. *See New York Times v. Sullivan*, 376 U.S. 254, 269 (1964) ("It is a prized American privilege

to speak one's mind, although not always with perfect good tase, on all public institutions.").

E. The Court Incorrectly Held That Appellant's Websites and YouTube Videos which Criticize Defendants-Appellees' Counsel Are Not Protected under the First Amendment as Legitimate Matters of Public Concern

These statements and criticisms directed squarely at matters of public importance are protected under the First Amendment. *See Dun & Bradstreet*, 472 U.S. at 758-59 ("[S]peech on matters of public concern is at theheart of the First Amendment's protection" (internal quotation marks omitted)); *Snyder*, 562 U.S. at 452 (2011) ("The First Amendment reflects a profound national commitment to the principle that debate on public issues should be uninhibited, robust, and wide-open" (internal quotation marks omitted); *Connick v. Myers*, 46 U.S. 138, 145 (1983) ("[S]peech on public issues occupies the highest rung of the hierarchy of First Amendment values, and is entitled to special protection").

Indeed, if Defendants-Appellees' publication of unverified, spurious and plainly disparaging allegations of rape of Twitter is a matter of public concern as held by Judge Nelson in its ordering granting Defendants-Appellees motion for summary judgment (*See Fredin v. Middlecamp*, Dst. Dkt. No. 237; *Fredin v. Miller*, Dst. Dkt. No. 206), then there can be no question that Appellant's videos and websites containing (uncontested) factual assertions of corruption, attorney misconduct, the effective financing of law enforcement misconduct and racial

discrimination about two of the most prominent law firms in Minneapolis – Robins Kaplan LLP and Kutak Rock LLP – are also matters of public concern protected by the First Amendment.

F. The Court Incorrectly Held That Appellant's Websites and YouTube Videos Satirically Mocking Defendants-Appellees' Counsel Are Not Protected under the First Amendment as Parody

As show below, all of these videos, along with others like it, are satirical spoofs and parodies clearly protected by the First Amendment. "The First Amendment, which protects individuals from laws infringing free expression, allows [] ridicule in the form of parody. *Nike, Inc. v. Just Did It Enterprises*, 6 F.3d 1225, 1227 (7th Cir. 1993). Indeed, the Supreme Court has held unequivocally that the First Amendment protects satire and ridicule in the form of parody. *See Hustler Magazine v. Falwell*, 485 U.S. 46 (1988). That case draws close parallels to Appellant's speech in this case and is best explained as follows:

> The United States Supreme Court examined the issue [of whether parody is protected by the First Amendment] when *Hustler Magazine* published a **'parody' advertisement** … [i]t concluded, however, that "publication of a caricature such as the ad parody" was protected by the First Amendment.

Cardtoons, L.C. v. Major League Baseball Players Ass'n, 838 F.Supp. 1501, 1515-16 (N.D.Okl. 1993) (emphasis added); *see also Blum v. Schlegel*, 18 F.3d 1005, 1012 n. 5 (2d Cir. 1994) (nothing that First Amendment protection is afforded to parody and satire). "[T]he Supreme Court has found parodies, political cartoons, and satires generally entitled to First Amendment protection and non-actionable." *Antigua Coll.*

of Med. v. Woodward, 837 F.Supp.2d 686, 696 (E.D.Mich. 2011). Moreover, "broad scope [is] permitted [of] parody in First Amendment law." *Groucho Marx Prods. v. Day and Night Co.*, 689 F.2d 317, 319 n. 2 (2d Cir. 1982).

There is no question that Appellant's spoof parody law firm advertisements concerning Robins Kaplan LLP, Anne M. Lockner and L. Haynes Hansen are protected parody under the First Amendment, much like Hustler Magazine's parody advertisement of Reverend Falwell. Appellant published the videos with the obvious intent to mock and ridicule Appellees' counsel drawing inspiration from legal advertising and advertising on their own firm web site. *See Campbell v. Acuff-Rose Music, Inc.*, 510 U.S. 569, 590 (1994) (explaining that parody is "literary or artistic work that imitates the characteristic style of an author or work for comic effect or ridicule"). Courts dealing with similar parodies and satirical content have found such speech to be protected. *See Layshock v. Hermitage School*, 412 F.Supp.2d 502, 508 (W.D.Pa 2006) (denying temporary restraining order where student's "creation of parody was conduct protected by the First Amendment"); *Busch v. Viacom Int'l, Inc.*, 477 F.Supp.2d 764, 777 (N.D.Tex. 2007) ("[T]he First Amendment protected parody, such as the 'fake endorsement' of Pat's Diet Shake at issue in the challenged broadcast …."); *In re Outsidewall Tire Litigation*, 748 F.Supp.2d 557, 564 (E.D.Va. 2010) (holding that defendant "had a legitimate First Amendment right to express himself … and to create parody of the plaintiff's organization" (internal quotation

marks omitted)); *See muller v. Fairfax County School Bd.*, 878 F.2d 1578, 1583 (4th Cir. 1989) (holding that teacher's letter criticizing board of education "spiced with satire" was protected under the First Amendment); *L.L. Bean, Inc. v. Drake Publishers, Inc.*, 811 F.2d 26 (1st Cir. 1987) (holding that noncommercial parody was protected and recognizing the role of parody "as a form of social and literary criticism"); *Pring v. Penthouse Int'l, Ltd.*, 695 F.2d 438 (10th Cir. 1982) (holding defendants' bawdy "spoof" and "ridicule" of Miss America pageant entitled to full range of First Amendment protection). It was consequently unconstitutional and a violation of Appellant's First Amendment rights for Judge Nelson to order the removal of his parody spoof advertisement videos concerning Robins Kaplan LLP, Anne M. Lockner and L. Haynes Hansen in her November 23, 2020 Order.

To underscore this point and the fact that Appellant's videos are protected speech, the videos without question satisfy the hallmark of parody as outlined by numerous courts, including the Supreme Court. Specifically, no one could reasonably believe that Appellant's mock legal advertisement are real or otherwise convey actual facts. *See Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 20 (1990) ("[A] satire or parody must be assessed in the appropriate content; it is not actionable if it cannot reasonably be interpreted as stating actual facts about an individual" (internal quotation marks omitted).); *see also Farah v. Esquire Magazine*, 736 F.3d 528, 536 (D.C. Cir. 2013); *see Pring*, 695 F.2d at 422 ("The test is not whether the

[content] is or is not characterized as 'fiction,' 'humor,' or anything else … but rather whether the charges portions in context could be reasonably understood as describing actual facts about the plaintiff or actual events in which she participated.").

G. The Court Incorrectly Held That The District Court's Inherent Powers Can Foreclose Appellant's Access to the Court

This Court must vacate the injunction as it violates Appellant's access to the courts. *Procup v. Strickland*, 792 F.2d 1069 (11th Cir. 1986) (vacating an injunction that prohibited filings by indigent prisoner without an attorney and holding that litigants "cannot be completely foreclosed from access to the court."); *see* also *Miller v. Donald*, 541 F.3d 1091, 1097 (11th Cir. 2008); *Warren v. Michigan Department of Corrections*, No. 1:05-cv-652 (W.D. Mich. Oct. 4, 2005).

H. The Court Incorrectly Held That Complete Denial of Discovery Is Not An Abuse of Discretion

The district court prevented Appellant from engaging in discovery. The blanket prohibition on discovery fundamentally prejudiced Appellant. Denying discovery on all "discovery requests substantially prejudiced [Appellant]." *McMillian v. Wake County Sheriff's*, 399 F. App'x 824 (4th Cir. 2010). A "court's blanket denial of discovery is an abuse of discretion if discovery is 'indispensable to a fair, rounded, development of the material facts.'" *United States*

v. Warden, *Pontiac Corr. Ctr.*, No. 95 C 3932, 1996 WL 341390, at *7 (N.D. Ill. June 18, 1996) (quoting *East v. Scott*, 55 F.3d 996, 1001 (5th Cir. 1995)).

Judge Nelson erred and abused discretion by denying Appellant discovery. *Toney v. Gammon*, 79 F.3d 693 (8th Cir. 1996) (reversing district court's denial of discovery.).

I. The Court Incorrectly Held That District Court Can Err, Summary Judgement Inapplicable Where There Exists A Genuine Issue of Material Fact

This district court erred where a genuine issue of material fact exists on all claims. *Parisi v. Wright*, Hennepin County, Case No. 27-CV-18-5381, 5/18/2020 Ord. (https://reason.com/wp-content/uploads/2020/05/ParisivWright.pdf; https://reason.com/volokh/2020/05/22/1m-award-for-law-professor-libeled-by-ex-girlfriends-rape-accusation/); *Daly v. N.Y. Life Ins. Co., No*. 1:12cv125 (S.D. Ohio Sep. 30, 2017) ("Denying summary judgement on a defamation claim where the defamatory statements created genuine issue of material fact where it "adversely" impacted the plaintiff's trade, business or profession.).

CONCLUSION

For the reasons above, the Court should grant Appellant's petition for rehearing and rehearing *en banc*. The Court should further reverse the District Court's November 23, 2020 injunction, reverse the dismissal of the operative Complaints in each case or summary judgement motions, and remand this matter.

Dated: August 23, 2021

s/ Brock Fredin

Brock Fredin
(tel.) 612-424-5512
brockfredinlegal@icloud.com
Appellant

CERTIFICATE OF COMPLIANCE

This petition/brief complies with the page limitation established by Federal Rule of Appellate Procedure 35(b)(2) in that it does not exceed fifteen (15) pages in length, excluding the parts of the petition/brief exempted by Federal Rule of Appellate Procedure 32(a)(7)(B)(iii). This petition/brief also complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and (a)(6), as it has been prepared in Microsoft Word using a proportioned spaced typeface of 14-point Times New Roman font.

Dated: August 23, 2021

s/ Brock Fredin

Brock Fredin
(tel.) 612-424-5512
brockfredinlegal@icloud.com
Appellant

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2021, I electronically filed the foregoing Appellant's Petition for Rehearing and Rehearing *En Banc* with the Clerk of the Court for the United States Court of Appeals for the Eighth Circuit by using the appellate CM/ECF system. The following participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system:

Karl Johann Breyer
Kutak Rock
60 S. 6th St. #3400
Minneapolis, MN 55402
jonbreyer@kutakrock.com
Attorney for Defendant-Appellees

Anne M. Lockner
Robins Kaplan
800 Lasalle Ave #2800
Minneapolis, MN 55402
annelockner@robinskaplan.com
Attorney for Defendant-Appellee

Dated: August 23, 2021

s/ Brock Fredin
Brock Fredin
(tel.) 612-424-5512
brockfredinlegal@icloud.com
Appellant

Eighth Circuit Court of Appeals

PRO SE Notice of Docket Activity

The following was filed on 08/24/2021

Case Name: Brock Fredin v. Lindsey Middlecamp
Case Number: 20-3487

Docket Text:
PETITION for enbanc rehearing and also for rehearing by panel filed by Appellant Mr. Brock Fredin in 20-3487, 20-3513, 20-3516, 20-3525, 20-3528, 21-1132, 21-1134, 21-1135 w/service 08/24/2021 [5068708] [20-3487, 20-3513, 20-3516, 20-3525, 20-3528, 21-1132, 21-1134, 21-1135]

The following document(s) are associated with this transaction:
Document Description: Petition for rehearing enbanc and for rehearing by panel

Notice will be mailed to:

Notice will be electronically mailed to:

Mr. Karl Jon Breyer: Jon.Breyer@KutakRock.com, mary.flahavan@kutakrock.com
Mr. Brock Fredin: brockfredinlegal@icloud.com
Mr. Charles Gokey: cgokey@robinskaplan.com, bstevens@robinskaplan.com
Mr. Haynes Hansen: hhansen@robinskaplan.com
Ms. Ena M. Kovacevic: ekovacevic@robinskaplan.com
Ms. Anne Michele Lockner: ALockner@RobinsKaplan.com, dvanalstine@robinskaplan.com