

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re: Baycol Products) File No. MDL 1431
Litigation) (MJD/SRN)
)
) Minneapolis, Minnesota
) December 13, 2006
) 10:00 a.m.
)

BEFORE THE HONORABLE MICHAEL J. DAVIS
UNITED STATES DISTRICT COURT JUDGE

(TELEPHONE STATUS CONFERENCE)

APPEARANCES

For the Plaintiffs: RICHARD LOCKRIDGE, ESQ.
ELIZABETH CABRASER, ESQ.
STACY HAUER, ESQ.

For Defendant Bayer: ADAM HOEFLICH, ESQ.
PETER SIPKINS, ESQ.
SUSAN WEBER, ESQ.
DOUGLAS MARVIN, ESQ.

For Defendant
GlaxoSmithKline: FRED MAGAZINER, ESQ.

Also present: MAGISTRATE JUDGE SUSAN NELSON
SPECIAL MASTER ROGER HAYDOCK

Court Reporter: LORI A. SIMPSON, RMR-CRR
1005 U.S. Courthouse
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Proceedings recorded by mechanical stenography;
transcript produced by computer.

P R O C E E D I N G S

IN CHAMBERS

(PARTIES APPEARING VIA CONFERENCE CALL)

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THE COURT: Good morning. Who do we have here?

MR. LOCKRIDGE: This is Dick Lockridge for the Plaintiffs.

MS. HAUER: Stacy Hauer for the Plaintiffs.

MS. WEBER: Susan Weber for Bayer.

MR. SIPKINS: Peter Sipkins for Bayer.

LAW CLERK: And Katie for the Court.

MS. WEBER: Your Honor, I believe that Adam was planning to join us. He had to jump out of a meeting. I know Fred had a conflict and I didn't know whether he was able to break loose or not.

THE COURT: All right.

MS. CABRASER: Hello?

MR. LOCKRIDGE: And that's Elizabeth Cabraser, I believe.

MS. CABRASER: Yes. Hi, it's Elizabeth.

MR. LOCKRIDGE: We are on and the Court is on also, Elizabeth.

THE COURT: Good morning to all. This is Judge Davis. Magistrate Judge Susan Nelson is in chambers with me and my court reporter is recording this for posterity.

On December 11, 2006 I moved the hearing that was

1 to be heard -- be held by Magistrate Judge Nelson on
2 January 23, 2007 to January 30, 2007 before me at 9:00
3 before we had the Daubert hearings.

4 That has raised some issues that have come across
5 in several e-mails that we received yesterday and so I've
6 asked to have this conference call so we can resolve what
7 issues may be before the parties.

8 I think the main issue that I've seen is whether
9 or not a stay in discovery is in effect. Is that correct?

10 MS. WEBER: Yes, Your Honor.

11 MR. LOCKRIDGE: I believe, actually, Your Honor --
12 this is Dick Lockridge -- the stay is in effect at the
13 moment.

14 THE COURT: Well, how is a stay in effect of my
15 order when I didn't stay it?

16 MR. LOCKRIDGE: Well, perhaps it's not. It had
17 been our understanding after meeting with Judge Nelson that
18 there was going to be --

19 THE COURT: Well, let's back up.

20 MR. LOCKRIDGE: Okay.

21 THE COURT: I think before I get angry about this
22 whole procedure, I hope you have reviewed the transcript of
23 the last status conference that we had on November 8th
24 regarding setting up a committee.

25 And we have been together for five years and I've

1 had a number of committees involving -- whether or not it's
2 a magistrate judge or a special master and all those matters
3 have come back to me if there was any recommendations for
4 stays or changes in any orders. And I am not happy that
5 someone tried to tell Magistrate Judge Nelson that she had
6 authority, which she did not have authority, to stay an
7 order from this Court.

8 It was clear what the committee was to do.
9 Nothing more other than report back to this Court so I can
10 make some final decisions on what we would be doing dealing
11 with remand of the cases that were left in Phases I, II,
12 III, and IV. I have reviewed Plaintiffs' letter to
13 Magistrate Judge Nelson and I am furious that you have gone
14 outside the bounds of what this committee was supposed to be
15 about.

16 If you review the transcript and what was said by
17 Mr. Zimmerman about setting up an end game and remand
18 committee, it was to get into a mechanism for this Court to
19 remand cases and trying to cut down the amount of discovery
20 that was being taken, if that was a problem, and to expedite
21 any other discovery that we could -- that was out there so
22 that we could get these matters ready for motions for
23 remand. Nothing more. Nothing less.

24 The Plaintiffs went outside the bounds and
25 unfortunately because -- Magistrate Judge Nelson does not

1 have the institutional history of this case, of all the
2 things this Court has done and all the times that I have
3 denied Plaintiffs' requests for stopping of discovery.

4 And I have implemented PTO 149 for one reason and
5 one reason only, to make sure that the cases that were ready
6 to go to trial would be ready and we would have the
7 appropriate discovery so they could be remanded.

8 I do not have a copy of the hearing that went on
9 before Magistrate Judge Nelson, but I am going to order it
10 and if I see anything in that transcript that alerts me that
11 things were said to the magistrate that should not have been
12 said, I will take the appropriate action on January 30th.

13 Now, let's get back to what this committee was
14 supposed to be about.

15 MR. LOCKRIDGE: Your Honor, this is Dick
16 Lockridge. I certainly apologize for us for --

17 THE COURT: Well, you tell me how a magistrate
18 judge can contradict an order by an Article III judge. How
19 long have you been practicing?

20 MR. LOCKRIDGE: A long time, Your Honor.
21 Obviously she cannot do that and I'm certainly sorry for
22 anything we put in that letter that was inappropriate.

23 THE COURT: You put her in a position that she
24 should not have been put in. That's why I've kept control
25 of this matter, so I would know exactly what was going on

1 all the time on this MDL. As you know, Magistrate Judge
2 Lebedoff was a close friend of mine, is a close friend of
3 mine and he had limited contact with this MDL.

4 Now, let's move on to what the purpose of this
5 committee is about. It's for me to get from both sides
6 hopefully a proposal, if you can both agree on a proposal,
7 on how we can streamline discovery and get these matters
8 back to the transferor court in 2007.

9 I would like -- there are some Minnesota cases, I
10 found out on November 8th. I don't know how many there are.
11 Mr. Lockridge, have you found out how many Minnesota cases
12 there are?

13 MR. LOCKRIDGE: I believe there are ten, but I
14 could be wrong on that, Your Honor. Admittedly we had been
15 focusing on reviewing cases to see if we could get and if
16 the plaintiff counsel were interested and wanted to dismiss
17 their cases and using that as a mechanism to streamline the
18 process.

19 THE COURT: Well, back up. I'm not new to this
20 case. We spent close to two years trying to find Minnesota
21 cases to try and those cases had to be vetted with the
22 attorneys that handled those cases and it took a long time
23 for us to even get a number of cases -- well, at least two
24 cases that would be triable. And by the time we were ready
25 to try them, the nonrhabdo cases were dismissed and the

1 rhabdo cases were settled.

2 So I don't understand for the life of me how you
3 are going to get together within a month's time and have a
4 list of cases that should be dismissed. I'm not concerned
5 about cases that should be dismissed. If they should be
6 dismissed, they should be dismissed. That is a waste of
7 time.

8 MR. LOCKRIDGE: All right.

9 THE COURT: Now, the filing that the Defense
10 presented to Magistrate Judge Nelson had some interesting
11 statistics and I don't think I'm going to violate any
12 confidentiality here in reporting that the Defense shows
13 that close to 93 percent of the cases are dismissed out when
14 the plaintiff's deposition is noticed or is taken. Would
15 that be accurate, Susan?

16 MS. WEBER: That includes dismissals that occur
17 through narrowing and --

18 THE COURT: Well, 90 percent --

19 MS. WEBER: By the time we get to the end of the
20 plaintiff's deposition, 93 percent of the cases would be
21 gone.

22 THE COURT: 90 percent of -- let's see.
23 72 percent were dismissed before the depositions were
24 noticed, 18 percent were dismissed after their depositions
25 were noticed but before the depositions went forward,

1 1.4 percent were dismissed because they failed to appear for
2 their depositions, and 2.9 percent were dismissed after
3 their depositions went forward but before any other witness
4 was deposed.

5 So that tells us that that's narrowing the cases
6 immediately and so we should take that into consideration,
7 accelerating taking the deposition of the plaintiff so if
8 those cases are going to be dismissed, they're dismissed out
9 with prejudice so we can whittle down the number of cases
10 that will be going back on remand.

11 MR. HOEFLICH: Thank you, Judge.

12 THE COURT: I'm sorry. Who is this?

13 MR. HOEFLICH: I'm sorry, Judge. This is Adam
14 Hoeflich.

15 THE COURT: Hi, Adam.

16 MR. MAGAZINER: Your Honor, Doug Marvin and Fred
17 Magaziner and Adam joined the call just after it began, I
18 believe. We are sorry we were a moment late.

19 THE COURT: And so it would seem like we need to
20 compress the schedule for Phases III and IV and what I would
21 like to do is see if we can combine Phases III and IV into
22 just one phase.

23 MS. WEBER: Can I offer a comment on that, Your
24 Honor?

25 THE COURT: Yes.

1 SPECIAL MASTER HAYDOCK: Good morning, Judge
2 Davis. This is Roger. I finally made the call.

3 THE COURT: Hi, Roger.

4 SPECIAL MASTER HAYDOCK: Good morning, everyone.

5 UNIDENTIFIED SPEAKER: Good morning, Roger.

6 MS. WEBER: The reason we kept III and IV in
7 separate phases in the draft order that we provided to Judge
8 Nelson was that the narrowing process hasn't completed for
9 IV and the final order dismissing cases from Phase IV -- and
10 my latest numbers show that we've got about a thousand
11 plaintiffs who haven't filed reports from Phase IV. That
12 final order won't be entered until I think sometime in
13 February.

14 So we kept III separate to try and start Phase III
15 ahead of Phase IV because it doesn't make sense to start
16 noticing up Phase IV depositions until we know who really is
17 in play there.

18 THE COURT: All right.

19 MR. HOEFLICH: Judge, this is Adam. The bottom
20 line is we remain ready and willing to work with the
21 Plaintiffs to work on a remand procedure and to work on
22 methods for streamlining Phases III and IV as expeditiously
23 as possible.

24 THE COURT: Good. What about cutting down the
25 number of depositions? Because it seems like if the

1 plaintiff's deposition is taken and the treating physician's
2 deposition is taken, the vast majority of the cases are
3 being dismissed at that point or after those depositions are
4 taken.

5 MR. HOEFLICH: Your Honor, as you know, I believe
6 the number of cases in which we've taken more than five
7 depositions is just a handful. We are doing no more than we
8 believe is reasonably necessary for us to prepare for trial
9 and the Plaintiffs have not at this point made any showing
10 that we've been unreasonable. I believe the number of cases
11 where more than --

12 THE COURT: Adam, I've got your filings and I
13 don't need to hear it repeated again.

14 MR. HOEFLICH: Thank you.

15 THE COURT: I'm trying to streamline the process.
16 At the status conference I threw out the number of five. I
17 think Mr. Lockridge agreed to five. And then if the
18 Defendants needed to do more than five, they could file a
19 motion showing cause why they needed to take more than five
20 depositions. Would the Defense be against that change?

21 MR. HOEFLICH: That's fine, Your Honor, and we
22 will come to the Court if we need to do that. We will try
23 to take the depositions in as reasonable a way as we can.
24 We will continue to do that.

25 THE COURT: Mr. Lockridge, is that agreeable?

1 MR. LOCKRIDGE: Yes. That's excellent. Very
2 good.

3 THE COURT: Now --

4 MR. LOCKRIDGE: I might note, Your Honor, that I
5 have reviewed the timing here on Ms. Weber's proposal. She
6 did send us a proposed order that she sent to Judge Nelson
7 and I think the timing looked pretty good or even perhaps on
8 Phase IV could be compressed a little bit.

9 THE COURT: All right. So you're in agreement
10 with that or at least --

11 MR. LOCKRIDGE: Yes.

12 THE COURT: -- for first glance? Because I know
13 that you haven't had time to study it --

14 MR. LOCKRIDGE: Right.

15 THE COURT: -- and taken it back to your committee
16 to see if it's a viable option for you.

17 What about Phase -- let's see. Let's finish up
18 with Phases III and IV. What I would like to do is, can we
19 organize these cases into the appropriate number of cases
20 going back to the different districts so we don't have it
21 going back -- one case going back and then another case
22 going back three months later or ten cases going back two
23 months later? Can we group them in any way and say cases
24 are going back to Eastern District of Pennsylvania or the
25 Southern District of Texas or Central District of

1 California? Is there any way that we can group these cases
2 so we can keep track of them and try to remand them as a
3 group?

4 MS. WEBER: Okay. So you would rather have -- if
5 we've got hypothetically 20 cases that will eventually be
6 going back to Southern District of Texas --

7 THE COURT: Right.

8 MS. WEBER: -- that we would -- would you want
9 them all at once in 20 --

10 THE COURT: Yes, I would because --

11 MS. WEBER: -- or blocks of 10? I am just trying
12 to think in terms of scheduling. You don't want a trickle?

13 THE COURT: No, I don't want a trickle effect
14 because then the judges -- what may happen or might happen
15 in our district, that a judge may handle one of the cases
16 and finish up with it and then another one would come in and
17 he would have or she would have the expertise in the matter
18 and another judge would end up handling it just by the
19 rotation.

20 So what I would like to do is, because the numbers
21 aren't going to be that great, that we send them back in
22 groups so the districts can set up a procedure to monitor
23 all the cases. And even if they want me to come down on an
24 intercircuit transfer and try the cases, I can do that too.

25 MR. LOCKRIDGE: Your Honor, this is Dick

1 Lockridge. Again, we can certainly at least, obviously,
2 group them by the phases. The thing is the Plaintiffs --
3 obviously when we are done with Phase I, we would like to
4 have those cases remanded as soon as possible rather than
5 waiting for the end of Phase III and IV.

6 THE COURT: Yeah, I agree with that, but I am just
7 wondering if we have an idea where the distribution of the
8 cases are going to be going back to.

9 MS. WEBER: It varies from phase to phase, Your
10 Honor. I couldn't tell you with any specificity right off
11 the top of my head. I do know Phase IV is going to be very
12 heavy in the hurricane zone because we have a bunch of cases
13 that got moved in that phase. I think we've got wide
14 distribution on the early phases.

15 What might make sense and I think it would address
16 the management problems you've identified and the
17 Plaintiffs' concerns is if we did sort of a two stage type
18 remand and maybe we did Phases I and II together and then
19 III and IV.

20 I think we don't want to remand anything until
21 we've got the Daubert ruling and so that's going to take you
22 a while to work through.

23 THE COURT: No, it won't.

24 MR. HOEFLICH: Your Honor, I would suggest on this
25 point that now that we have the Court's charge and everyone

1 is on the same page, we get together with the Plaintiffs on
2 these issues and others concerning remand and timing.

3 MR. LOCKRIDGE: That's fine, Your Honor. My guess
4 is that we can at least compress I and II since Phase II
5 will also be done fairly soon anyway and maybe address III
6 and IV a little bit later.

7 THE COURT: Let me give you some other issues that
8 I would like for you all to discuss. Are there many rhabdo
9 cases left that are --

10 MR. LOCKRIDGE: Your Honor, this is Dick Lockridge
11 again. I do not believe there are very many at all. Just a
12 very small handful.

13 THE COURT: All right. Shouldn't they go back
14 immediately? Those would be easy to remand.

15 MR. HOEFLICH: Your Honor, I believe we should try
16 to mediate those cases before remand.

17 THE COURT: Well, if you've located and noted that
18 they were rhabdo cases, I thought it was automatically that
19 you were involved in mediation with them.

20 MS. WEBER: Your Honor, I know of one rhabdo case
21 that's left in Phase I that we would still like to try MDL
22 mediation on, I believe.

23 One of the difficulties in terms of identifying
24 rhabdo cases is that we've got expert reports that use the
25 word "rhabdo" pretty freely. And when you get down to the

1 actual deposition, I don't think the PSC will dispute that
2 some of the reports that use the word "rhabdo" do not turn
3 out to be rhabdo cases. So in some of these, in order to
4 determine that it's not a rhabdo case we have to get a bit
5 down the road on discovery.

6 MR. LOCKRIDGE: That's probably true. This is
7 Dick Lockridge again. I think we have been calling a few of
8 those sort of rhabdo-like, if you will, but it's my
9 understanding, Susan, that a few of those have also --
10 they've been subject to mediation and even a few of them
11 settled.

12 THE COURT: Well, I don't know about --

13 MS. WEBER: -- a list of rhabdo cases and get them
14 into the mediation process, Your Honor.

15 THE COURT: Well, which mediation process, the
16 Shook Hardy one or the Court's one?

17 MR. LOCKRIDGE: Well, we would rather do the
18 Court's one, Your Honor.

19 THE COURT: Well, I understand that, but that
20 again delays having the matter remanded. We can still have
21 a mediator be working on the case and have the case
22 remanded.

23 MR. LOCKRIDGE: That's obviously fine with us. We
24 would like --

25 THE COURT: Having mediation going on while it's

1 being remanded, it's not exclusive, I don't think.

2 MR. LOCKRIDGE: No, not at all.

3 THE COURT: What I'm trying to do is to move these
4 cases along and if we have a rhabdo case that is not going
5 to settle, let's get that one to the transferor court and
6 have it tried.

7 MR. HOEFLICH: Your Honor, we will address that
8 with Plaintiffs as well.

9 THE COURT: All right. The Minnesota cases, since
10 they're here, I would like to take a special interest in
11 making sure that we move those cases along quite quickly and
12 that we can even start setting trial dates.

13 And I need -- again, Mr. Lockridge, I think you
14 made a suggestion in your letter that for economies of scale
15 that several cases would have to be tried together. I have
16 no problems with that, that can be done, but I need a
17 recommendation from you on how that should be done.

18 MR. LOCKRIDGE: Perhaps, Your Honor, we can meet
19 with and talk to the Defendants about this and perhaps we
20 can pull out the Minnesota cases from the remaining phases
21 and expedite those.

22 MR. MAGAZINER: Your Honor, this is Fred
23 Magaziner. May I ask Mr. Lockridge a question for
24 clarification?

25 THE COURT: You may.

1 MR. MAGAZINER: Dick, are you saying there are ten
2 cases in the District of Minnesota filed by Minnesota
3 residents or ten cases filed in the District of Minnesota
4 who are residents of various states?

5 MR. LOCKRIDGE: That's a good point, Fred. My
6 understanding and this is -- I'm not certain at all about
7 this, but there are ten cases filed in the District of
8 Minnesota. I do not believe that all ten are filed by
9 Minnesota residents.

10 MR. HOEFLICH: Judge, I think both sides should
11 look at what remains in Minnesota and get together to
12 discuss this as well. I know that Plaintiffs and we will
13 disagree vehemently on what should be done, but I think we
14 should join that issue and look at a process for discovery
15 on those cases.

16 MR. MAGAZINER: We certainly should find out what
17 the facts are first.

18 MR. HOEFLICH: Yes.

19 THE COURT: All right. Now, this morning I had
20 Defense's e-mail of their proposed supplemental addition to
21 PTO 149 and I know that you haven't had a chance to really
22 look at it from the PSC's side of it, but at least that sets
23 down the types of things that I was looking for.

24 If we can even compress it even more, that would
25 be helpful and put in the ideas I would want about Minnesota

1 cases and also rhabdo cases, getting those back as quickly
2 as possible, and then identifying those cases in Phases I
3 and II that are ready for remand so I can propose that to
4 the panel.

5 MR. LOCKRIDGE: Once again, Your Honor, I
6 obviously understand and fully agree with that and
7 preliminarily I have looked at this proposal and it doesn't
8 look too bad, but since I did just get it this morning, I
9 would like to run it by the rest of the PSC.

10 And I suggest that -- obviously we're going to
11 have an extensive meeting with Adam and Susan and others and
12 this would be one of the issues that we can discuss, but
13 hopefully we can come to an agreement on this point anyway.

14 THE COURT: All right. When do you want to meet?
15 Sometime next week?

16 MR. LOCKRIDGE: I can certainly meet next week.

17 MS. WEBER: So can I.

18 MR. HOEFLICH: So can I.

19 MS. CABRASER: This is Elizabeth Cabraser. I will
20 make myself available.

21 THE COURT: Mr. Lockridge, you pick a time and
22 date.

23 MR. LOCKRIDGE: Just a moment, Your Honor.

24 THE COURT: I'm sorry. Mr. Lockridge?

25 MR. LOCKRIDGE: Yes, I'm here. I'm just pulling

1 up my calendar, Your Honor, if you will just bear with me a
2 moment, please. I'm in New York. How about the 20th, does
3 that work, Wednesday?

4 MS. CABRASER: Dick, this is Elizabeth. I have to
5 be at a status conference with Judge Breyer in Bextra and
6 Celebrex on the 20th, but --

7 MR. LOCKRIDGE: The 21st, perhaps? Is that
8 getting too close to the holidays?

9 MS. CABRASER: I will have to be in Minnesota on
10 the 21st in any event.

11 MR. LOCKRIDGE: There you go.

12 MR. HOEFLICH: I would think we could do this by
13 conference call as well if you need to be somewhere else --

14 MS. CABRASER: True.

15 MR. HOEFLICH: -- just as long as we all set
16 ourselves aside.

17 MS. CABRASER: True.

18 MR. HOEFLICH: Either one of those days would work
19 for me.

20 MR. LOCKRIDGE: The 21st in the morning?

21 UNIDENTIFIED SPEAKER: Morning is better for me on
22 the 21st.

23 MR. HOEFLICH: Sounds good. I think we have a
24 plan.

25 THE COURT: Pick a time.

1 MR. LOCKRIDGE: 9:00.

2 MR. HOEFLICH: That works for us.

3 MS. WEBER: Okay.

4 THE COURT: Now, do you want Magistrate Judge
5 Nelson and Special Master Haydock to be involved or do you
6 want to work it out yourselves for right now?

7 MR. LOCKRIDGE: Your Honor, this is Dick again. I
8 actually think that perhaps it would be just as well if we
9 try to work it out ourselves. I think we can work out
10 probably 95 percent of this amongst ourselves.

11 MR. HOEFLICH: Your Honor, we would be fine with
12 the special master, but we will do whatever the Plaintiffs
13 think is best.

14 THE COURT: All right. I should tell you that the
15 special master and I have talked, and he is going to
16 volunteer his time from now on and not charge the parties.
17 And so you should give him good thanks for the holiday gift
18 he is giving you.

19 MR. LOCKRIDGE: Thank you.

20 MS. CABRASER: Thank you very much.

21 MS. WEBER: That is astounding. Thank you.

22 SPECIAL MASTER HAYDOCK: You're welcome. The end
23 needs to happen sooner than later. I will do whatever I can
24 to help you folks reach that end.

25 MR. LOCKRIDGE: Thank you.

1 MS. WEBER: We deeply appreciate it.

2 SPECIAL MASTER HAYDOCK: If you want me on the
3 call, I can be so. If not, I can wait.

4 MR. HOEFLICH: I think we are good, but we will
5 endeavor to involve the Court wherever both parties think it
6 would be helpful.

7 THE COURT: All right. And when are you going to
8 report to me?

9 MR. HOEFLICH: The day after the meeting, would
10 that suffice, Your Honor?

11 THE COURT: Yes. Can you do it by e-mail?

12 MR. HOEFLICH: Yes, we can.

13 THE COURT: And then we'll continue talking the
14 following week and working out the other issues so by
15 January we'll have -- the first week in January we'll have a
16 good idea of what cases I will be asking for the panel to
17 remand.

18 MR. HOEFLICH: Thank you, Judge.

19 THE COURT: Any other issues that we have to deal
20 with, Susan?

21 MS. WEBER: I think that covers it, Your Honor.
22 Thank you.

23 THE COURT: Dick?

24 MR. LOCKRIDGE: Well, this is Dick Lockridge
25 again. Once again, Your Honor, and to both of you let me

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just apologize on behalf of the PSC. We certainly did not, obviously, mean to mislead anybody. I'm certainly sorry for anything that we did and I hope we can move forward here.

THE COURT: I think we are moving forward.

MR. LOCKRIDGE: All right. Thank you, Your Honor.

THE COURT: Have a good day.

(Proceedings adjourned at 10:30 a.m.)

* * *

I, Lori A. Simpson, certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter.

Certified by: Lori A. Simpson, RMR-CRR