No. 10-76

IN THE

Supreme Court of the United States

GOODYEAR LUXEMBOURG TIRES SA, ET AL.,

Petitioners,

v.

EDGAR D. BROWN, ET UX., CO-ADMINISTRATORS OF THE ESTATE OF JULIAN DAVID BROWN, ET AL.,

Respondents.

On Writ of Certiorari to the North Carolina Court of Appeals

BRIEF OF WASHINGTON LEGAL FOUNDATION AND ALLIED EDUCATIONAL FOUNDATION AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS

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QUESTION PRESENTED

Whether a foreign corporation is subject to general in personam jurisdiction in a cause of action neither arising out of nor related to any contacts between that corporation and the forum state, merely because the corporation places into the stream of commerce products that are then distributed by third parties to the forum state.

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U.S. Dep't of State, "Enforcement of Judgments,"
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INTERESTS OF *AMICI CURIAE*

The Washington Legal Foundation (WLF) is a non-profit, public interest law and policy center with supporters in all 50 states.[1] WLF devotes a substantial portion of its resources to defending and promoting free enterprise, individual rights, and a limited and accountable government. WLF regularly publishes monographs and other publications on these and related

[1] Pursuant to Supreme Court Rule 37.6, *amici* state that no counsel for a party authored this brief in whole or in part; and that no entity, other than *amici* and their counsel, made a monetary contribution intended to fund the preparation and submission of this brief.

topics. In addition, WLF has regularly appeared before this and numerous other federal and state courts to urge adherence to traditional restraints on the judiciary's exercise of personal jurisdiction. *See, e.g., Mother Doe v. Hamdan*, No. 07-293-KSF, 2008 U.S. Dist. Lexis 93758 (E.D. Ky. Nov. 18, 2008); *Mother Doe v. Sheikh Mohammed*, 632 F. Supp. 2d 1130 (S.D. Fla. 2007).

The Allied Educational Foundation (AEF) is a non-profit, charitable and educational foundation based in Englewood, New Jersey. Founded in 1964, AEF is dedicated to promoting education in diverse areas of study and has appeared as *amicus curiae* in this Court on a number of occasions.

Amici agree with Petitioners that the State appeals court's holding below–that a foreign manufacturer's mere introduction of its products into the stream of commerce, standing alone, can support a downstream State's assertion of general jurisdiction over that manufacturer–is wholly unsupported by this Court's jurisprudence. *Amici* also fear that the decision below, if allowed to stand, threatens to undermine the important federal interest in fostering improved foreign commerce and international relations.

Amici have no direct interest, financial or otherwise, in the outcome of this case. *Amici* submit this brief solely to further the public interest in safeguarding this Court's longstanding limitations on the exercise of personal jurisdiction by U.S. courts over foreign corporations. All parties have consented to the filing of this brief, and letters of consent have been lodged in the Court's docket.

STATEMENT OF THE CASE

This case raises important issues about the continued viability of this Court's longstanding limitations on the exercise of personal jurisdiction by U.S. courts over foreign corporations following the holding below–that a foreign manufacturer's mere introduction of its products into the stream of commerce, standing alone, can support a downstream State's assertion of general jurisdiction over that manufacturer.

In April 2004, two North Carolina residents were killed in a bus accident just outside Paris, France. *See* Pet. App. 2a. On behalf of the decedents' estates, Respondents brought a products liability action in North Carolina state court against multiple European defendants, including Petitioners Goodyear Luxembourg Tires SA, Goodyear Lastikleri T.A.S., and Goodyear Dunlop Tires France SA, and their corporate affiliate, The Goodyear Tire & Rubber Company. *Id.* The complaint sought money damages arising from the "design, construction, testing, and inspection" of an allegedly defective tire. *Id.*

Petitioners are tire manufacturers operating in Luxembourg, Turkey, and France, respectively. *Id.* at 22a. They have no physical or business presence in North Carolina and took no affirmative action to cause their tires to be marketed, distributed, or sold in North Carolina. *Id.* Instead, other, separate entities were solely responsible for the introduction of Petitioners' tires into the United States, including North Carolina. *Id.* at 22a-23a. Of the more than 90 million tires manufactured by Petitioners from 2004 to 2007, only 45,000, or .05 percent, were distributed by separate entities in North Carolina. *Id.* at 26a. The particular

tire at issue in the bus accident was never distributed in North Carolina, and "the present dispute is not related to, nor did it arise from, [Petitioners'] contacts with North Carolina." *Id.* at 12a.

Petitioners moved to dismiss the complaint for lack of personal jurisdiction, arguing that their lack of contacts with North Carolina precluded the court from exercising jurisdiction over them consistent with the Due Process Clause. *Id.* at 3a. In support of their motion, Petitioners submitted evidence to establish that the allegedly defective tire was manufactured in Turkey, sold and used entirely in France, and involved in an accident in France. *Id.*

The trial court denied the motion. Emphasizing that *other* tires manufactured by Petitioners were ultimately distributed in North Carolina, the court held that Petitioners "knew or should have known that some of th[eir] tires were distributed for sale to North Carolina residents." *Id.* at 33a. Because "North Carolina has a substantial interest in allowing its citizens a forum for the redress of grievances," the court found that Petitioners "have continuous and systematic contacts with North Carolina and are conducting substantial activity within North Carolina" such that they "could reasonably anticipate being haled into court in North Carolina" for any claim arising anywhere in the world. *Id.* at 34a-35a.

The North Carolina Court of Appeals affirmed. Because the plaintiffs' claims were neither related to nor arose from Petitioners' contacts with North Carolina, the court agreed that "this case involves general rather than specific jurisdiction." *Id.* at 12a-13a. But despite acknowledging that Petitioners took no affirmative

action to cause their tires to be distributed in North Carolina (and that other entities were solely responsible for doing so), the appeals court upheld the trial court's exercise of personal jurisdiction over Petitioners. *Id.* at 22a.

The dispositive question for the appeals court was "whether [Petitioners] have purposefully injected their products into the stream of commerce without any indication that they desired to limit the area of distribution of their product so as to exclude North Carolina." *Id.* at 20a. Concluding that Petitioners "knew or should have known that a Goodyear affiliate obtained tires manufactured by [Petitioners] and sold them in the United States in the regular course of business," the appeals court agreed with the trial court that Petitioners are subject to suit in North Carolina for all claims, regardless of where they arise. *Id.* at 28a. In doing so, the court rejected Petitioners' argument that such a "stream of commerce" analysis is simply inapposite in a general jurisdiction case. *Id.* Failing to address the federal authority cited by Petitioners, the appeals court noted only that Petitioners "have not cited a North Carolina case" rejecting placement of products in the stream of commerce as a basis for general jurisdiction. *Id.*

Relying on authority from three federal circuits that the mere placement of goods into the stream of commerce cannot support an exercise of general jurisdiction, Petitioners sought review from the North Carolina Supreme Court; that request was denied without opinion.

SUMMARY OF THE ARGUMENT

This Court has long recognized that among the freedoms protected by the Due Process Clause is the freedom not to be haled into court indiscriminately. This case involves a single tire manufactured in Turkey and involved in an auto accident in France. None of the events giving rise to this suit occurred in the United States, and none of the Petitioners–three tire manufacturers operating in Luxembourg, Turkey, and France–are citizens or even residents of the United States. Petitioners took no affirmative action to cause their tires to be distributed in North Carolina, and the type of tire involved in the accident is not even distributed in North Carolina. Yet, despite the absence of any meaningful connection between Petitioners and the forum State, Respondents seek to hale each of them into a North Carolina court.

The court below concluded that jurisdiction was proper in this case because Petitioners "knew or should have known that a Goodyear affiliate obtained tires manufactured by [Petitioners] and sold them in the United States in the regular course of business." Pet. App. at 28a. But such foreseeability, standing alone, has *never* been the legal threshold for satisfying personal jurisdiction under this Court's jurisprudence. Instead, this Court has inquired whether the defendant's conduct and connection with the forum State are such that he should reasonably anticipate being haled into court there. This inquiry is satisfied when the defendant "purposefully avails" itself of the privilege of conducting activities in the forum state. No such showing was made here.

In the trial court below, Petitioners submitted evidence establishing their lack of any relevant contacts with the State of North Carolina. For their part, Respondents never refuted this evidence. Indeed, the only nexus between Petitioners and North Carolina results from the fact that residents of North Carolina traveled to Europe, where they were involved in an accident allegedly caused, in part, by one of Petitioners' tires. But these contacts are completely irrelevant for purposes of general jurisdiction, since the unilateral activity of those who claim some relationship with a nonresident defendant cannot satisfy the requirement of contact with the forum State.

At a bare minimum, the mere distribution of Petitioners' products by other entities into North Carolina via the stream of commerce offers no basis for that State to assert general jurisdiction over claims wholly unrelated to Petitioners' contacts there. And absent some connection between the in-state sale of the product at issue and an in-state injury resulting from its use (i.e., *specific* jurisdiction), a Petitioners' mere introduction of a product into the stream of commerce offers North Carolina no legitimate interest in adjudicating all claims anywhere against Petitioners.

Furthermore, one of the functions of this Court's personal jurisdiction jurisprudence is to protect against expansive assertions of state authority. If allowed to stand, the decision below will ensure that businesses who sell products internationally will be unable to predict where they may properly be subject to suit, despite this Court's admonition that the American legal system should afford "a degree of predictability." *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 297 (1980).

The unduly expansive exercise of general jurisdiction by American courts is already sufficiently offensive from the perspective of many foreign legal systems that it has had a significant adverse impact on foreign trade relations. And once U.S. state courts begin to assert general jurisdiction over foreign companies lacking any connection to the United States, those countries where such companies are based will likely do the same to American businesses. It is difficult to overestimate the deterrent effect on international commerce that will result from allowing a State to leverage a foreign company's relatively small stream of sales by other entities into general jurisdiction over a company's global conduct.

ARGUMENT

I. THIS COURT'S JURISPRUDENCE PROVIDES NO BASIS FOR NORTH CAROLINA'S EXERCISE OF GENERAL JURISDICTION OVER PETITIONERS

Among the freedoms protected by the Due Process Clause is the freedom not to be haled into court indiscriminately. This case hinges on a single tire manufactured in Turkey and involved in an auto accident in France. None of the events giving rise to this suit occurred in the United States, and none of the Petitioners, who were defendants below, are citizens or even residents of the United States. Petitioners took no affirmative action to cause their tires to be distributed in North Carolina, and the type of tire involved in the accident is not even distributed in North Carolina. Yet, despite the absence of any relevant connection between these foreign entities and the forum State, Respondents

seek to hale three tire manufacturers operating in Luxembourg, Turkey, and France into a North Carolina court.

The North Carolina Court of Appeals concluded that jurisdiction was proper in this case because Petitioners "knew or should have known that a Goodyear affiliate obtained tires manufactured by [Petitioners] and sold them in the United States in the regular course of business." Pet. App. at 28a. But such foreseeability, standing alone, has never been the legal threshold for satisfying personal jurisdiction under this Court's jurisprudence. *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 474 (1985) ("[F]oreseeability is not a 'sufficient benchmark' for exercising personal jurisdiction.").

Rather, "the foreseeability that is critical to due process analysis . . . is that the defendant's conduct and connection with the forum State are such that he should reasonably anticipate being haled into court there." *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 297 (1980). This inquiry is satisfied when the defendant "purposefully avails itself of the privilege of conducting activities" in the forum state. *Burger King Corp.*, 471 U.S. at 475. Only when a foreign corporation "purposely avails" itself of the privilege of conducting activities within the forum state, does "it ha[ve] clear notice that it is subject to suit there, and can act to alleviate the risk of burdensome litigation by procuring insurance, passing the expected costs on to consumers, or, if the risks are too great, severing its connection with the State." *World-Wide Volkswagen Corp.,* 444 U.S. at 297.

General jurisdiction–which gives the forum State blanket jurisdiction over *all* of a defendant's conduct no

matter where it occurs–attaches only when there are "continuous and systematic general business contacts" between the nonresident corporation and the forum state. *Helicopteros Nacionales de Columbia v. Hall*, 466 U.S. 408, 412 (1984). Because general jurisdiction must be justified solely by the defendant's substantial contacts with the forum state, "general jurisdiction is a demanding standard that is considerably more stringent" than that employed for specific jurisdiction. *Santora v. Starwood Hotel & Resorts Worldwide, Inc.*, 580 F. Supp. 2d 694, 698 (N.D. Ill. 2008); *see Metro. Life Ins. Co.*, 84 F.3d 560 at 568 ("The standards are more stringent for general jurisdiction."); *Tuazon v. R.J. Reynolds Tobacco Co.*, 433 F.3d 1163, 1169 (9th Cir. 2006) ("The standard for general jurisdiction is high; contacts with a state must approximate physical presence.") (citation omitted); *Meier v. Sun Int'l Hotels*, 288 F.3d 1264, 1274 (11th Cir. 2002) ("A foreign corporation's contacts with the forum that are unrelated to the litigation must be substantial in order to warrant the exercise of general personal jurisdiction.").

In the trial court below, Petitioners submitted evidence establishing their lack of any relevant contacts with the State of North Carolina. Among the facts established by that evidence are that Petitioners (1) lack any physical presence in the state of North Carolina; (2) have never had a place of business, mailing address, or phone number in the state; (3) have never manufactured, designed, or sold products in North Carolina or shipped their products into the state; (4) have never paid taxes in North Carolina, maintained bank accounts there, held board meetings there, or negotiated contracts there; (5) have never employed sales representatives or any other kind of employees in the state; (6) have never advertised or solicited business in North Carolina; and (7) have

never appointed registered agents in North Carolina or even used its court system. *See* JA 155-57, 165-67, 184-86. For their part, Respondents never refuted this evidence.

Indeed, the only connection in this lawsuit between Petitioners and North Carolina results from the fact that residents of North Carolina traveled to Europe, where they were involved in an accident allegedly caused in part by one of Petitioners' tires. But these contacts are completely irrelevant for purposes of general jurisdiction, since the "unilateral activity of those who claim some relationship with a nonresident defendant cannot satisfy the requirement of contact with the forum State." *Hanson v. Denckla*, 357 U.S. 235, 254 (1958). Instead, the "minimum contacts must come about *by an action of the defendant purposefully directed toward the forum state*." *Asahi Metal Indus. Co. v. Superior Court*, 480 U.S. 102, 112 (1984) (citation omitted) (emphasis in original).

At a bare minimum, the mere distribution of Petitioners' products, by other entities, into North Carolina via the stream of commerce offers no basis for that State to assert general jurisdiction over claims wholly unrelated to Petitioners' contacts there. Most relevant here, "[t]he placement of a product into the stream of commerce, without more, is not an act of the defendant purposefully directed toward the forum state" so as to give rise to jurisdiction. *Asahi*, 480 U.S. at 110. Rather, this Court requires both that the defendant "regularly *sold*" the product at issue in the forum state, *id.* at 121 (Brennan, J., concurring in judgment), and that the product caused injury in the forum state, *World-Wide Volkswagen*, 444 U.S. at 297. Neither requirement is satisfied here.

The only category of case that can possibly satisfy these requirements is one that "arise[s] out of or relate[s] to" the defendant's contacts with the state, *i.e.*, a specific-jurisdiction case. *Helicopteros*, 466 U.S. at 44. But Respondents have already conceded that Petitioners' "contacts [did] not directly relate to the event giving rise to the cause of action" and that they were only "alleg[ing] that general jurisdiction" existed. JA 472. The North Carolina Court of Appeals agreed, concluding that "[t]he present dispute is not related to, nor did it arise from, [Petitioners'] contacts with North Carolina," and that Respondents must satisfy the requirements for general jurisdiction. Pet. App. at 12a-131.

Absent some such connection between the in-state sale of the product at issue and an in-state injury from its use, a foreign corporation's mere introduction of a product into the stream of commerce provides a forum State with no legitimate interest in adjudicating all claims against that corporation "in *any* litigation arising out of *any* transaction or occurrence taking place *anywhere* in the world." *Purdue Research Found. v. Sanofi-Synthelabo, S.A.*, 338 F.3d 773, 787 (7th Cir. 2003) (emphasis in original). Simply put, North Carolina has no valid basis for exercising global jurisdiction over Petitioners.

II. THE DECISION BELOW THREATENS TO UNDERMINE THE FEDERAL INTEREST IN FOSTERING FOREIGN COMMERCE AND INTERNATIONAL RELATIONS

One of the functions of this Court's personal jurisdiction jurisprudence is to protect against expansive assertions of state authority by "ensur[ing] that the States, through their courts, do not reach out beyond the

limits imposed on them by their status as coequal sovereigns in a federal system." *World-Wide Volkswagen*, 444 U.S. at 292. In considering the "procedural and substantive policies of other nations whose interests are affected by the assertion of jurisdiction," this Court has called for courts "to consider the procedural and substantive policies of other nations," and the "Federal interest in [the] Government's foreign relations policies." *Asahi*, 480 U.S. at 115. Such considerations, properly weighed, commend "an unwillingness to find the serious burdens on an alien defendant outweighed by minimal interests on the part of the plaintiff or the forum State." *Id.*

Among other things, allowing general jurisdiction over foreign companies for claims unrelated to their contacts with the United States raises complex choice of law issues, which are often expensive to litigate and difficult to resolve. For their part, Respondents have never shown that they cannot seek suitable relief in a European forum more closely connected to their injury. Under such circumstances, it makes no sense for a North Carolina court–from its vantage point half-way around the world–to address matters fully capable of being addressed by a foreign tribunal.

The North Carolina appeals court's expansive view of general jurisdiction not only stands athwart this Court's own jurisprudence, but is also contrary to the jurisdictional practice in the rest of the world. In the European Union, for example, general jurisdiction over a corporation is strictly limited to where the entity has its "statutory seat," "central administration" or "principal place of business." *See* Kevin M. Clermont & John R.B. Palmer, *Exorbitant Jurisdiction*, 58 Me. L. Rev. 474, 477 (2006). If it has a "branch" or "agency," it

may be sued there only "as regards a dispute arising out of the operations" of that branch or agency. *Id.; see also* Jens Dammann, *Adjudicative Jurisdiction and the Market for Corporate Charters*, 82 Tulane L. Rev. 1869, 1873 (2003) (noting that European firms may be sued for any cause of action only in their domicile or "general forum").

It is difficult to overestimate the deterrent effect on commerce that will result from allowing a State to leverage a foreign company's relatively small stream of sales by other entities into general jurisdiction over a company's global conduct. This issue is substantial because of the critical importance of foreign trade to our national economy. "'Great care and reserve should be exercised when extending our notions of personal jurisdiction into the international field.'" *Asahi*, 480 U.S. at 115 (quoting *United States v. First Nat'l Bank*, 379 U.S. 378, 404 (1965) (Harlan, J., dissenting)). Such care and reserve, as embodied by this Court's personal jurisdiction jurisprudence, provides the international business community with an important degree of predictability that allows its members to "structure their primary conduct with some minimum assurance as to where that conduct will and will not render them liable to suit." *World-Wide Volkswagen*, 444 U.S. at 297. But permitting North Carolina to exercise general jurisdiction over Petitioners under the facts of this case will drastically undermine that predictability.

Such jurisdictional uncertainty has the potential to interfere with the federal government's ability to foster improved foreign relations and international trade. Congress, in conjunction with the Executive Branch, has consistently sought to increase America's standing in world markets. These important efforts will

be severely undercut if the decision below is allowed to stand. For these reasons, this Court has long emphasized that United States "foreign relations policies, will be best served by . . . an unwillingness to find the serious burdens on an alien defendant outweighed by minimal interests on the part of the plaintiff or the forum State." *Asahi*, 480 U.S. at 115; *Michelin Tire Corp. v. Wages*, 423 U.S. 276, 285 (1976) (recognizing that the United States "must speak with one voice when regulating commercial relations with foreign governments"). Indeed, many nations have already "objected to the extraterritorial jurisdiction asserted by courts in the United States" so as to prevent the U.S. Department of State from securing international agreements on the reciprocal recognition of judgments. *See* U.S. Dep't of State, "Enforcement of Judgments," available at http://travel.state.gov/law.judicial/judicial_691.html (last visited Nov. 12, 2010).

Broad assertions of general jurisdiction over foreign companies by United States courts also risk retaliation against American companies abroad. A foreign firm that increasingly finds itself subject to suit in an American state court on any unrelated cause of action merely because its products are introduced into the stream of commerce may well find it more beneficial to strictly limit its commercial dealings to other countries. And once U.S. state courts begin to assert general jurisdiction over foreign companies lacking any connection to the United States, those countries where such companies are based will likely do the same to American businesses. This undoubtedly will negatively impact foreign trade by deterring foreign firms from doing business with the United States. *See Helicopteros*, 466 U.S. at 425 n.3 (Brennan, J., dissenting) (noting the

Solicitor General's concern that an expansive interpretation of personal jurisdiction "will cause foreign companies to refrain from purchasing in the United States for fear of exposure to general jurisdiction on unrelated causes of action").

CONCLUSION

Amici curiae request that the Court reverse the judgment below.

Respectfully submitted,

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