

IMMEDIATE STAY OF ORDER REQUESTED

Docket No. _____

IN THE COURT OF APPEAL
SECOND APPELLATE DISTRICT, DIVISION SIX

**RICHARD STEINER, CHRISTIE STEINER,
SIMONA FARRISE AND THE FARRISE FIRM, P.C.**

Petitioners,

vs.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA**

Respondent.

VOLKSWAGEN GROUP OF AMERICA, et al.

Real Parties in Interest.

*Santa Barbara County Superior Court, Case No. 1374169
The Hon. Thomas Anderle, Judge Presiding*

**PETITION FOR WRIT OF MANDATE OR
OTHER APPROPRIATE RELIEF;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
SHARON J. ARKIN; EXHIBITS**

Simona A. Farrise, Esq. (CSB 171708)
Carla V. Minnard, Esq. (CSB 176015)
FARRISE FIRM, P.C.
225 South Olive, Suite 102
Los Angeles, CA 90012
T: (310) 424-3355
F: (510) 588-4536
farriselaw@farriselaw.com

Sharon J. Arkin (CSB 154858)
THE ARKIN LAW FIRM
333 S. Grand Avenue, 25th Floor
Los Angeles, CA 90071
T: (541) 469-2892
F: (866) 571-5676
E: sarkin@arkinlawfirm.com

Attorneys for Petitioners RICHARD STEINER and CHRISTIE STEINER

FULL LIST OF REAL PARTIES IN INTEREST

VOLKSWAGEN GROUP OF AMERICA, INC.;

FORD MOTOR COMPANY;

NISSAN NORTH AMERICA, INC.;

PNEUMO-ABEX CORPORATION

CERTIFICATE OF INTERESTED PARTIES

Pursuant to California Rule of Court 8.208, petitioners and their counsel certify that apart from the attorneys representing the petitioners in this proceeding, as disclosed on the cover of this Brief, petitioners and their counsel know of no other person or entity that has a financial or other interest in the outcome of the proceeding that petitioners or their counsel reasonably believe the Justices of this Court should consider in determining whether to disqualify themselves under canon 3E of the Code of Judicial Ethics.

Dated: August 22, 2011

SIMONA A. FARRISE

TABLE OF CONTENTS

<u>WHY EXTRAORDINARY RELIEF SHOULD BE GRANTED</u>	1
<u>PETITION</u>	5
<u>PRAYER</u>	8
<u>VERIFICATION</u>	10
<u>MEMORANDUM OF POINTS AND AUTHORITIES</u>	11
1. EXTRAORDINARY RELIEF BY WAY OF MANDATE IS APPROPRIATE	
2. THE TRIAL COURT’S ORDER IS A PRIOR RESTRAINT ON FREE SPEECH THAT DOES NOT COMPORT WITH THE MANDATED SHOWING REQUIRED PRIOR TO ISSUANCE OF SUCH AN ORDER	
<u>DECLARATION OF SIMONA A. FARRISE</u>	21
<u>CERTIFICATE OF LENGTH OF BRIEF</u>	23

TABLE OF AUTHORITIES

CASES

Aguilar v. Avis Rent A Car System, Inc. (1999) 21 Cal.4th 121

Chaplinsky v. New Hampshire
(1942) 315 U.S. 568

Dailey v. Superior Court
(1896) 112 Cal. 94

Kingsley Books, Inc. v. Brown
(1957) 354 U.S. 436

Maggi v. Superior Court (Alkosser)
(2004) 119 Cal.App.4th 1218

Nebraska Press Ass'n v. Stuart
(1976) 427 U.S. 539

Pittsburgh Press Co. v. Human Rel. Comm'n (1973) 413 U.S. 376

Saari v. Jongordon (1992)
5 Cal.App.4th 797

Southeastern Promotions, Ltd. v. Conrad (1975) 420 U.S. 546

U.S. v. Carmichael (M.D. Ala. 2004)
326 F.Supp.2d 1267, 1279

STATUTES

California Constitution, art. 1, § 2, subd. (a)

U.S. Constitution, First Amendment

WHY EXTRAORDINARY RELIEF SHOULD BE GRANTED

The trial court in this case took the unprecedented – and unjustified – action of ordering the plaintiffs’ counsel in this personal injury asbestos case *to take down part of her firm’s website during the pendency of the trial of this case* in order to assure that the jurors do not view it. And it did so without any formal briefing on the issue, and despite the fact that it had specifically admonished the jury not to look up any lawyer, law firm or information about the subject of the action.

The trial court’s order is an absolute and absolutely improper abrogation of counsel’s First Amendment right of free speech and enforces a prior restraint without demonstration of the existence of the constitutional requirements necessary to justify it. Immediate relief is necessary in order to prevent the trial court’s unconstitutional order from taking effect.

PETITION

1. Petitioners, Richard Steiner and his wife, Christie Steiner, and are the plaintiffs in an asbestos personal injury action entitled *Steiner v. Advance Auto Parts, et al.*, Santa Barbara County Superior Court, Case No. 1374169, originally filed in the Los Angeles County Superior Court on March 23, 2010 and later transferred to Santa Barbara County. [Exhibit 1.]

Petitioner Simona Farrise and her law firm, Farrise Firm, P.C., are counsel of record for the Steiners. [Farrise Decl., ¶ 1.]

2. The defendants remaining in the action are Volkswagen Group Of America, Inc., Ford Motor Company, Nissan North America, Inc., and Pneumo-Abex Corporation. [Farrise Decl., ¶ 3.]

3. Mr. Steiner has been diagnosed with lung cancer and the complaint alleges personal injury damages resulting from asbestos exposure. His wife seeks loss of consortium damages. [Exhibit 1.]

4. Jury selection in the case started on or about August 16, 2011. [Farrise Decl., ¶ 5.]

5. On Thursday, August 28, 2011, the trial court swore in a jury of twelve people, with the selection of alternates to be concluded on Monday, August 29, 2011. [Farrise Decl., ¶ 6.] After being sworn in, the trial court read preliminary instructions to the jurors. Those instructions included an admonishment to the jury not to “google the lawyers.” [Farrise Decl., ¶ 6.]

6. On Sunday, August 21, 2011, at 4:00 p.m. counsel for defendant Volkswagen Group of America (“VWGOA”) e-mailed plaintiffs’ counsel a letter demanding that significant portions of her website (www.farriselaw.com) be “taken down” as inflammatory and “prejudicial.” Counsel also demanded a response by 6:00 p.m. that day. [Farrise Decl., ¶

7, Exhibit 6, pp 109-112.]

7. On the same day, however, VWGOA also served on counsel and the trial court by e-mail a copy of its “Motion for Order to Show Cause Why Farrise Law Website Should Not be Taken Down During Trial” and including the declaration of Charles E. Finberg. [Farrise Decl., ¶ 8; Exhibit 6.]

8. On Monday morning, August 22, 2011, defendant Ford Motor Company joined in VWOGA’s “motion” for an “OSC.” [Exhibit 7.]

9. On Monday morning, August 22, 2011, plaintiffs and their counsel submitted by e-mail to the trial court and the defendants an “Objection to the Defendant Volkswagen Group of America, Inc.’s Motion for an Order to Show Cause Why Farrise Law Website Should Not be Taken Down During Trial.” [Farrise Decl., ¶ 10; Exhibit 8.] In that document, plaintiffs objected to VWOGA’s “motion” as procedurally improper; noted that the law presumes that jurors obey the instructions that they should not access the internet with regard to any person or issue in this case and that, even if they did not comply with that admonishment there were other structural means of dealing with the issue if and when it arose; and objected to any such potential order as constitutionally improper.

(Ibid.)

10. Just prior to the lunch break that morning, at approximately

11:55 a.m., the trial court took up the matter. [Farrise Decl., ¶ 11.] First, the trial court construed the plaintiffs’ “Objection” as their “Opposition” to the OSC itself, rejected the objections raised, **and ordered that the Farrise Firm website be pulled down.** [Farrise Decl., ¶ 11.]

11. At the end of the day that same day, the issue came up again because, in the interim and consistent with the trial court’s determination during the pre-lunch break argument that the order should be “mutual,” plaintiffs requested that the defendants’ counsel be similarly required to pull down **their** websites. [Farrise Decl., ¶ 12; Exhibit 9.] At that point the trial court modified its order and limited its application to the discussion of two verdicts plaintiffs’ counsel had obtained in **other actions** – neither of which involve VWOGA. [Farrise Decl., ¶ 13.] The trial court did not respond to plaintiffs’ request that defense counsel be required to similarly redact and edit **their** websites. [Farrise Decl., ¶ 13.]

12. Accordingly, pursuant to the trial court’s current order, plaintiffs’ counsel is required to remove two specific items from her website discussing her involvement in **other cases**, and defendants are not subject to any similar order. [Farrise Decl., ¶ 14.]

PRAYER

Petitioners pray that this Court:

1. **Issue an immediate stay of the order requiring the Farrise Law Firm or Simona Farrise to pull down, redact or remove anything from the www.farriselaw.com website;**
2. Issue an writ of mandate directing the Superior Court to revoke its order requiring the Farrise Law Firm or Simona Farrise to pull down, redact or remove anything from the www.farriselaw.com website;
3. Issue an alternative writ directing respondent Superior Court directing the Superior Court to revoke its order requiring the Farrise Law Firm or Simona Farrise to pull down, redact or remove anything from its www.farriselaw.com website; and,
4. Grant such other and appropriate relief as may be just and proper.

Dated: August 23, 2011

Respectfully submitted,

FARRISE FIRM, P.C.

THE ARKIN LAW FIRM

By _____
SIMONA A. FARRISE
SHARON J. ARKIN

VERIFICATION

I, SIMONA A. FARRISE, declare as follows:

I am one of the attorneys for the petitioners. I have read the foregoing petition for Writ of Mandate and know its contents. The facts alleged in the petition are within my own knowledge and I know these facts to be true, except as to those which are stated on the basis of the attached Declarations. Because of my familiarity with the relevant facts pertaining to the trial court proceedings, I, rather than the petitioner, verify this petition.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this verification was executed on August 23, 2011 at Santa Barbara, California.

SIMONA A. FARRISE

MEMORANDUM OF POINTS AND AUTHORITIES

1.

**EXTRAORDINARY RELIEF BY WAY OF
MANDATE IS APPROPRIATE**

The extraordinary relief requested in this petition is warranted. First, neither the Steiners nor Ms. Farrise or her law firm have any adequate remedy at law.

The resolution of free speech and prior restraint issues resulting from a trial court's order during pending litigation are properly addressed by way of a writ proceeding. (*Maggi v. Superior Court (Alkosser)* (2004) 119 Cal.App.4th 1218, 1224, fn 3.)

2.

**THE TRIAL COURT'S ORDER IS A PRIOR RESTRAINT
ON FREE SPEECH THAT DOES NOT COMPORT
WITH THE MANDATED SHOWING REQUIRED
PRIOR TO ISSUANCE OF SUCH AN ORDER**

As explained in *Maggi* at 1224-1224, the First Amendment to the U.S. Constitution provides that "Congress shall make no law . . . abridging

the freedom of speech.” Similarly, the California Constitution provides that “[e]very person may freely speak, write and publish his or her sentiments, on all subjects, being responsible for the abuse of this right. A law may not restrain or abridge liberty of speech or press.” (California Constitution, art. 1, § 2, subd. (a).)

As the California Supreme Court noted more than 100 years ago that the “working of this section is terse and vigorous, and its meaning so plain that construction is not needed. The right of the citizen to freely speak, write, and publish his sentiments is *unlimited*, but he is responsible at the hands of the law for an abuse of that right. He shall have *no censor* over him to whom he must apply for permission to speak, write or publish, and what he publishes.” (*Dailey v. Superior Court* (1896) 112 Cal. 94, 97, emphasis added, cited by the Supreme Court in *Aguilar v. Avis Rent A Car System, Inc.* (1999) 21 Cal.4th 121, 142.)

Gag orders – such as the trial court’s order in this case, requiring plaintiff to withdraw statements on her own web site – are “prior restraints” and “are disfavored and *presumptively invalid*.” (*Maggi*, at 1225; emphasis added; see, also, *U.S. v. Carmichael* (M.D. Ala. 2004) 326 F.Supp.2d 1267, 1279, 1290-1291 [order requiring defendant to take down website is a prior restraint].) As the California Constitution makes abundantly clear, speech cannot be limited or restrained, although its *effect* can be punished. In

other words, with limited exception¹, an individual's right to make defamatory statements cannot be abrogated before a court adjudicates those statements to be defamatory. But that does not preclude imposition of damages resulting from the statements. Similarly, in the absence of a judicial determination that racist comments actually created a hostile environment and are likely to be repeated, an employer cannot be restrained from making racist comments, but can be punished by imposition of damages where that speech creates a hostile work environment. (*Aguilar v. Avis Rent A Car System, Inc.* (1999) 21 Cal.4th 121, 141 [injunction proper **only** after there has been a final judicial adjudication that the speech at issue is unprotected].)

No such showing has been made here. The two parts of the website that the trial court has ordered be removed during the course of the trial relate to **true, factual statements** about **other** cases – neither of which involves VWOGA. There has been no showing that the statements are false or defamatory. There has been no showing that the statements are not constitutionally protected speech.

¹ For example, “fighting words,” obscenity and illegal commercial speech may all be regulated – but none of those exceptions apply here. (See, e.g., *Chaplinsky v. New Hampshire* (1942) 315 U.S. 568, 572 [fighting words]; *Kingsley Books, Inc. v. Brown* (1957) 354 U.S. 436 [obscene materials]; *Pittsburgh Press Co. v. Human Rel. Comm’n* (1973) 413 U.S. 376 [illegal commercial speech].)

The only “showing” made is that the statements, *if discovered* by the jury, *might* be “prejudicial” to the defendants. But it is impossible to demonstrate how that prejudice might work – since the website discusses *other* plaintiffs in *other cases* with *other diseases*. Plus, there are just as many discussions on defendants’ counsels’ websites about all the cases *they* have won.

More significantly, the real, true, fundamental problem with the court’s order is that there has been no showing that it is necessary. There has been no showing that any juror has viewed the website *or that any juror is likely to*. Indeed, the trial court specifically admonished the jury not to “google the lawyers.” It is to be presumed that – absent any evidence to the contrary – jurors have followed and will follow the instructions they have been given. (*Saari v. Jongordon* (1992) 5 Cal.App.4th 797, 807, fn 6.) And the judge can and should reaffirm that admonishment frequently, and explain to the jury the violation of the court’s orders could lead to criminal contempt.

Other courts have also concluded that requiring that a website be taken down or modified because of pending litigation is an unconstitutional prior restraint that does not implicate concerns regarding a fair trial. For example, in *U.S. v. Carmichael* (M.D. Ala. 2004) 326 F.Supp.2d 352, the defendant in a money laundering case created a website which displayed

information about the criminal case, including information regarding informants and government agents working on the case and requesting additional information. The prosecution sought to have the website taken down, but the court refused, finding that such an order would be an unconstitutional prior restraint. As the court acknowledged, “[t]he court’s inherent authority or discretion to regulate the actions of trial participants is similarly limited by the constitutional rights of the parties.” (*Id.*, at 1279.) The *Carmichael* court held that even the implied threat of harm to the government agents and informants was insufficient to meet the stringent requirements of a prior restraint. Given that, there is certainly no basis for any limitation on Ms. Farris’s speech in this case.

It is tragic that defendants have so little faith in the jury system. But they have failed to justify their mistrust and have not shown – and cannot show – that the jury, or any particular member of it, will disobey the court’s instructions.

And even if a member of the jury does so, that does not justify a prior restraint. Indeed, there are procedural processes in place in the event that something like that happens: Dismiss the offending juror and replace him or her with an alternate. If, in the remote event the offending jury communicates their findings to the rest of the jury, then a mistrial can be declared. But what *cannot* happen is that plaintiffs’ counsel be required to

modify her own website presentations which set forth constitutionally protected speech.

Gag orders are “unconstitutional unless (1) the speech sought to be restrained poses a clear and present danger or serious and imminent threat to a protected competing interest; (2) the order is narrowly tailored to protect that interest; and (3) no less restrictive alternatives are available.” (*Maggi, supra*, internal quotations omitted.) The trial court’s order in this case does not comply with any of those mandates:

First, given that the jury has been admonished – and can be admonished again and more vociferously – there is no “clear and present danger” that any juror will view Ms. Farrise’s website or, even if one did, it would impair defendants’ right to a fair trial in light of the other instructions to the jury that it is only what they hear from the witness stand or see in the documents admitted into evidence that they can consider in reaching their verdict. Indeed, an approved alternative to a gag order is to engage in “searching questioning of potential jurors” and “the use of emphatic and clear instructions.” (*Nebraska Press Ass’n v. Stuart* (1976) 427 U.S. 539, 564.)

Second, the order is not narrowly tailored to protect the defendants’ interest in a fair trial because it completely silences speech, whereas the same goal can be accomplished by reinforcing to the jury that they must not

“google the lawyers” and that doing so will subject them to criminal contempt charges.

Third, the “less restrictive alternative” is the same, i.e., rather than restraining speech, the jurors can be admonished and *if any of them disobey the order, they can be dismissed from the jury* and/or held in criminal contempt. The worst case scenario is that a mistrial is declared. But there is no justification – none – for forcing plaintiffs’ counsel to suppress her constitutionally-protected speech, since other alternatives can cure the problem.

And the case law makes clear that the threat of criminal contempt sanctions or declaring a mistrial is preferred over restraint of constitutional speech. As the United States Supreme Court explained in *Southeastern Promotions, Ltd. v. Conrad* (1975) 420 U.S. 546, 558-559, the “presumption against prior restraints is heavier – and the degree of protection broader – than that against limits on expression imposed by criminal penalties. Behind this distinction is a theory deeply etched in our law: a free society prefers to punish the few who abuse rights of speech *after* they break the law than to throttle them and all others beforehand.” (Emphasis in original.)

That is the situation here: There is no justification for restraining counsel’s speech. What must be restrained is the jury’s access to that

speech, not the speech itself. If jurors cannot restrain themselves, they are the ones who should be punished, not plaintiffs' counsel.

Since defendants have made no showing at all – none – that any juror has, or will, disobey the court's instructions, they cannot meet their burden. Having failed to meet their burden, defendants are not entitled to the relief ordered by the trial court and the trial court's order must be reversed.

Dated: August 23, 2011

Respectfully submitted,

FARRISE FIRM, P.C.

THE ARKIN LAW FIRM

By _____
SIMONA A. FARRISE
Attorneys for Petitioner

DECLARATION OF SIMONA A. FARRISE

I, SIMONA A. FARRISE, DECLARE:

1. I am admitted to the courts of this state and am the principal in the Farrise Firm, P.C., one of the counsel of record for plaintiffs in this proceeding.

2. Attached as Exhibit 1 is a true and correct copy of plaintiffs' complaint filed in this action on March 23, 2010.

3. The defendants remaining in the action are Volkswagen Group Of America, Inc., Ford Motor Company, Nissan North America, Inc., and Pneumo-Abex Corporation.

4. As alleged in the Complaint, Mr. Steiner has been diagnosed with lung cancer and the complaint alleges personal injury damages resulting from asbestos exposure. His wife seeks loss of consortium damages. [Exhibit 1.]

5. Jury selection in the case started on or about August 16, 2011.

6. On Thursday, August 28, 2011, the trial court swore in a jury of twelve people, with the selection of alternates to be concluded on Monday, August 29, 2011. After being sworn in, the trial court read preliminary instructions to the jurors. Those instructions included a specific admonishment to the jury not to "google the lawyers."

7. On Sunday, August 21, 2011, at 4:00 p.m. counsel for defendant Volkswagen Group of America (“VWGOA”) e-mailed me a letter demanding that significant portions of my website (www.farriselaw.com) be “taken down” as inflammatory and “prejudicial.” Counsel also demanded a response by 6:00 p.m. that day. [Exhibit 6, pp 109-112.]

8. On the same day, however, VWGOA also served on counsel and the trial court by e-mail a copy of its “Motion for Order to Show Cause Why Farris Law Website Should Not be Taken Down During Trial” and including the declaration of Charles E. Finberg, a true and correct copy of which is attached as Exhibit 6.

9. On Monday morning, August 22, 2011, defendant Ford Motor Company joined in VWGOA’s “motion” for an “OSC.” A true and correct copy of that joinder is attached as Exhibit 7.

10. On Monday morning, August 22, 2011, I submitted by e-mail to the trial court and the defendants an “Objection to the Defendant Volkswagen Group of America, Inc.’s Motion for an Order to Show Cause Why Farris Law Website Should Not be Taken Down During Trial,” a true and correct copy of which is attached as Exhibit 8. In that document, plaintiffs objected to VWGOA’s “motion” as procedurally improper; noted that the law presumes that jurors obey the instructions that they should not

access the internet with regard to any person or issue in this case and that, even if they did not comply with that admonishment there were other structural means of dealing with the issue if and when it arose; and objected to any such potential order as constitutionally improper. (*Ibid.*)

11. Just prior to the lunch break that morning, at approximately 11:55 a.m., the trial court took up the matter. First, the trial court construed the plaintiffs' "Objection" as their "Opposition" to the OSC itself, refused to provide me with an opportunity to fully brief the issue, rejected the objections to the proposed order which I raised orally, ***and ordered that the Farrise Law Firm website be pulled down.*** The court also ordered that, if requested, it would make the order mutual and would require defendants to do the same with regard to their websites.

12. During the lunch break I instructed my staff to prepare just such a requested. A true and correct copy of the original request and declaration of Sharon J. Arkin is attached as Exhibit 9, and that Request and supporting materials was served by e-mail on the trial court and all counsel no later than 2:00 p.m. on August 22, 2011. A corrected Request, a true and correct copy of which is attached as Exhibit 10, was submitted by the same means a few minutes later.

13. The issue came up again at the end of the day. At that point the trial court modified its order and limited application of the order to the

discussion of two verdicts I had obtained in *other actions* – neither of which involve VWOGA. The trial court did not respond to my request that defense counsel be required to similarly redact and edit *their* websites.

14. Accordingly, pursuant to the trial court’s current order, I am required to remove two specific items from my website which discuss my involvement in *other cases*, and defendants are not subject to any similar order.

15. The trial court has not yet issued a written order, but the court’s verbal order in court was clear and unmistakably violates my constitutional rights to free speech and immediate action by this Court is respectfully requested. In the event that the trial court issues a written order, it will be provided to this Court immediately.

16. I have requested expedited preparation of the relevant reporter’s transcripts and will provide those supplementally as soon as they are obtained.

I declare under penalty of perjury under the laws of the State of California that the foregoing declaration is true and correct and that this declaration was executed on August 23, 2011 at Santa Barbara, California.

SIMONA A. FARRISE

CERTIFICATE OF LENGTH OF BRIEF

I, Simona A. Farrise, declare under penalty of perjury under the laws of the State of California that the word count for this Brief, excluding Tables of Contents, Tables of Authority, Proof of Service and this Certification is 3857 words as calculated utilizing the word count feature of the Word for Mac software used to create this document.

Dated: August 23, 2011

SIMONA A. FARRISE

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address 225 S. Olive St., Suite 102, Los Angeles, CA 90071.

On **August 23, 2011**, I personally served the documents described as:

**PETITION FOR WRIT OF MANDATE OR OTHER
APPROPRIATE RELIEF; MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF SHARON J. ARKIN**

**EXHIBITS TO PETITION FOR WRIT OF MANDATE OR OTHER
APPROPRIATE RELIEF; MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF SHARON J. ARKIN**

on the interested parties in this action by hand-delivering them to each identified person below at the Santa Barbara County Courthouse, 1100 Anacapa Street, Santa Barbara, CA

Superior Court of California
County of Santa Barbara
1100 Anacapa Street
Santa Barbara, CA 93121-1107

Respondent

Real Parties in Interest:

See attached list

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 23, 2011, at Brookings, Oregon.

Bryan Hale/Simona Farrise

PARTY	COUNSEL
VOLKSWAGEN GROUP OF AMERICA	Craig L. Winterman or Tara-Jane Flynn or Charles Finberg or L. Dean Smith Herzfeld & Rubin, LLP
FORD MOTOR CO.	Steven D. Smelser or Patricia Ball or James Yukevich or Julia Romano Yukevich Calfo & Cavanaugh
NISSAN NORTH AMERICA	Susan Vargas or John Eberlein or Stephen Faulk Bowman & Brooke or Michael A. Brown Miles & Stockbridge
Pneumo Abex	Timothy Bouch Leath, Bouch Or Jennifer Judin or Eileen Spadoni or David Armanini or Salin Ebrahamian