SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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JOSEPH RAKOFSKY and
RAKOFSKY LAW FIRM, P.C.,

Plaintiffs,

-against-

THE WASHINGTON POST COMPANY, *et al*.

Defendants.
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PLAINTIFFS' REPLY TO DEFENDANTS' MEMORANDA OF LAW IN OPPOSITION TO PLAINTIFFS' CROSS-MOTION FOR LEAVE TO AMEND THE AMENDED COMPLAINT

Civil Action
Index No.: 105573/11

PLAINTIFFS' REPLY TO DEFENDANTS' MEMORANDA OF LAW IN OPPOSITION TO PLAINTIFFS' CROSS-MOTION FOR LEAVE TO AMEND THE AMENDED COMPLAINT

Plaintiffs, Joseph Rakofsky and the Rakofsky Law Firm, P.C., submit this Reply to Defendants' Memoranda of Law in Opposition to Plaintiffs' Cross-Motion for Leave to Amend the Amended Complaint.

INTRODUCTION

As this Court well knows, leave to amend is freely given pursuant to CPLR 3025(b) in the absence of unfair surprise or prejudice. That said, the arguments made by any one group of defendants are frequently repeated by other defendants (although not all defendants opposed Plaintiffs' Motion for Leave to Amend the Amended Complaint). To avoid contributing to any unnecessary duplication of efforts of any of the parties or this Court and thereby, wasting precious resources of this Court, we use this Reply to respond to all of the defendants who have asserted a particular argument once. That said, we now reply to the statements made in the following defendants' opposition documents.

Jamison Koehler, Koehler Law, Mirriam Seddiq, Seddiq Law, Maxwell S. Kennerly and The Beasley Firm, LLC:

What Attorney Brickman has done is an insult, not to Mr. Rakofsky, but to this Court and to the legal profession. What purports to be a "Memorandum in Opposition" to Plaintiffs' Motion to Amend the Amended Complaint is nothing more than worthless pap, lacking any substance. If a lawyer cannot present an argument, he should file nothing. If Plaintiffs are wrong, let him show how and why they are wrong. If they are right, they have an absolute right to have their day in Court.

Turkewitz Defendants:

Counsel for the Turkewitz Defendants have partaken of the hair of the dog that bit them when they were concocting their Memorandum of Law in Support of their Motion to Dismiss the Amended Complaint. Specifically, they regurgitate their arguments *ad hominem*, which predominate over their legal arguments, which are plentiful and variegated. They repeat their

discredited argument, such as their argument that plaintiffs charged them with defamation for their opinions, notwithstanding their acknowledgment that plaintiffs forswore any allegations of defamation based upon opinions, basing their charges of defamation upon factual misstatements on the two main issues -- the email sent by Mr. Rakofsky to Adrian Bean, his former investigator, based upon the forgery of that document by the Washington Post and, of greater relevance in light of the Court hearing on Friday, April 1, 2011, the circumstances leading to the mistrial in the *Deaner* case – except now they presumptuously purport to speak for "the defendants," not merely those defendants whom they represent.

This Court cannot hope to understand the issues that led to the motion for a second amended complaint on which the arguments of counsel for the Turkewitz Defendants are framed without referring to the events of the preceding day, Thursday, March 31, 2011. It was on Thursday, March 31, 2011, that the mistrial actually was determined by Judge Jackson, which was completely precipitated by **Mr. Rakofsky's motion to withdraw**. The only reason the mistrial was not formally set forth on the record on that day was Judge Jackson's apparently laudable action in seeking to give the defendant, Dontrell Deaner, an opportunity to "sleep on" the decision he communicated to Judge Jackson on Thursday, March 31, 2011 when he confirmed to Judge Jackson the conflict announced by Mr. Rakofsky in his motion to withdraw as lead counsel for Deaner and, obviously more important to Judge Jackson, acknowledged his understanding that he would have no claims of Double Jeopardy in the event of a retrial by the prosecution – albeit one that never occurred.

That was the ostensible reason Judge Jackson put the matter over to Friday, April 1, 2011, a day that he had earlier assured AUSA Bryant that there would be no proceedings. Whether Judge Jackson dissembled in his statement of the reason for putting the matter over for

April 1 or thought further on what had transpired on Thursday, March 31 overnight, no one other than Judge Jackson could possibly know. However, when April 1 came, Judge Jackson had obviously framed an agenda that included the interposition of remarks that cast discredit upon Mr. Rakofsky. Whatever the facts, those remarks, which plaintiffs have not failed to acknowledge, were entirely non-germane to the stated purpose of the hearing on April 1 when it was conceived by Judge Jackson on Thursday, March 31. Why Judge Jackson said what he did, no legal professional could possibly know or say. Therefore, we have not attempted and do not attempt to do so.

Suffice it to say that Judge Jackson, to his credit, did not attempt to connect his personal views of Mr. Rakofsky to the mistrial, other than, perhaps, when he concocted his hypothetical scenario of a jury verdict finding the defendant guilty of the conduct charged after a full trial under circumstances that convinced Judge Jackson that he should order a new trial for Manifest Necessity – something he had quite clearly and expressly negated and excluded on the record on Thursday, March 31. Of course, that scenario could not have been spawned by the proceedings that preceded and led to the mistrial, since it occurred while the first substantive witness of the prosecution was still on the stand, the defense not even having begun to put on its case.

Turning to the proposed second amended complaint, its most significant allegations are those causes of action relating to the intentional interference with Plaintiffs' business activities, *i.e.*, their law practice. That those allegations go beyond existing contracts in which they represented clients, it is obvious and understandable, since a direct, foreseeable and intended consequence of these defendants' blogs libeling plaintiffs was the total destruction of Plaintiffs' law practice – a purpose that, from a business point of view, was masterfully, though tortiously, achieved by defendants. Surely, defendants cannot be permitted to get away with what they have

done. That is the overriding purpose of Plaintiffs' proposed second amended complaint. Whether that purpose be achieved based upon a theory of prima facie tort or another cause of action is hardly the point. Just as is whether an ostensibly new form of action for Internet Mobbing or a well-known pre-Internet law of Conspiracy is used to describe the cause of action alleged by Plaintiffs. Quite simply, as Plaintiffs have stated in their various memoranda of law in opposition to defendants' motions to dismiss their existing amended complaint, the so-called "Blogosphere" as far as the legal community is concerned is merely a 21st Century expression for persons acting in combination and concert to achieve a mutually-advantageous destruction of the rights of Plaintiffs by tortious means: the tort, of course, being Defamation and Internet Mobbing.

Counsel for the Turkewitz Defendants would suggest that Mr. Rakofsky is paranoid; indeed, they have done as much. However, paranoia lies in the mind of a victim. What Plaintiffs have demonstrated in their Memoranda of Law in Opposition to Defendants' Motions to Dismiss depicts the actions of the inhabitants of the "Blogosphere." We refer, of course, to the Link Network that includes most, if not all, of those defendants. Their linking, one with others and others with one, was not an accident. It was, we submit, a calculated means of forming what in olden days and perhaps other circumstances would be an old-fashioned lynch mob. In the 21st Century, we have been told by a now-sitting United States Supreme Court Justice that there is such a thing as "high-tech lynching," whether it actually occurred in connection with the nomination of that Justice we cannot say, but the links among members of the Link Network in the case at bar, have been and will be further demonstrated by expert testimony. So, too, has been and will be the purpose underlying the linking, which is to advance the position of the linking defendants in the hierarchy of recipients of emails from prospective clients ordained by

Google (or other search engines). In sum, the linking defendants linked in this case in order to gain business advantage over others with whom they compete for the scarce commodity of clients and to do so over the dead bodies and destroyed legal practice of Plaintiffs. It is difficult to conceive of a scenario that better fits the concept of tortious interference with the business interests of another. It is not paranoia on the part of Mr. Rakofsky, but shrewd foresight on the participants of the Link Network combined with a willingness to use tortious means to achieve their goals.

True to form, Attorney Randazza will say absolutely anything if it means his clients could evade liability for their tortious acts. We will not attempt to respond to each one of his false and specious arguments, although, we will respond to several.

On page 1 of his Memorandum of Law in Opposition to Plaintiffs' Cross-Motion to Amend the Amended Complaint, he states that "the defendants" would be subjected to "extreme prejudice" if Plaintiffs are permitted to Amend their Amended Complaint. As Mr. Randazza should well know, he has an option to have his motion applied to the existing pleading or to the proposed new pleading. Thus, there is no "extreme prejudice" (or any prejudice) if he should choose to file a new motion.

Further, Mr. Randazza states that there would be additional expense to oppose a new pleading. Does he not realize that the new pleading will reduce the number of allegations each of his clients must answer by separating the libels and the injurious falsehoods one defendant at a time? Did he not read that the new pleading was designed to address the alleged deficiencies in the first amended complaint?

Mr. Randazza would have this Court believe that "Internet Mobbing" is not recognized at law. However, the Rule contemplating frivolous conduct allows novel theories – such as

"Internet Mobbing." All that is required of a litigant is a reasonable argument for the extension, modification, or reversal of existing law. *See* 22 NYCRR § 130-1.1(c)(1). The cause of action for "Internet Mobbing" is presented as a cause of action for *prima facie* tort. Contrary to Randazza's statements to this Court, *prima facie* tort has long been recognized in New York. The textbook formula for *prima facie* tort is as follows: (1) malicious intent to harm plaintiff; (2) without excuse or justification; (3) by act or a series of acts that would otherwise be lawful; and (4) resulting in special damages.

Further, *prima facie* tort is rightly used as a platform for "Internet Mobbing," which has *led to suicides* in a number of states. "When you read the book you will recognize that mobbing can often result in the death of the victim, either due to illness, accident or suicide." *Sousa v. Roque*, 578 F.3d 164, 2007 U.S. Dist. LEXIS 26674. Mobbing has been defined as "a process of abusive behaviors inflicted over time. It begins insidiously, and soon gains such momentum that a point of no return is reached." *Id*. (citing Noa Davenport, Mobbing: Emotional Abuse in the American Workplace 38 (2d ed. 2002)).

In *The New Playground Bullies of Cyberspace: Online Peer Sexual Harassment*, 51 How. L.J. 773, it states with respect to cyber-bullying, "Anonymity is a 'potent ingredient' necessary to elicit aggression on the Internet… It is hard to identify cyberbullies…they do not fear being punished for their actions…cyberbullies exploit technology to control and intimidate others."

"[P]eople in groups tend to do things that they would not normally do if they were alone…" *Id*. [I]n the circumstances of cyberbullying, when a group of online friends begins harassing an individual in the "out-group," their actions will become increasingly more negative and hurtful. Although, as individuals, they would not say or do anything to this extreme, when

they come together as a group, the negative aspects of their words and actions are far more degrading, inappropriate, and damaging." *Id*.

In addition, *prima facie* tort should be viable because certain defendants expressly stated their purpose was to inflict harm. Internet Mobbing clearly does not fit any of the other torts that were alleged.

On page 2, counsel states that the proposed second amended complaint is an "exercise in futility." However, in *Lucido v. Mancuso*, 49 A.D.3d 220 (2008), the Court held that the Court does not delve into the merits of a proposed cause of action unless it is immediately obvious that it cannot survive.

Obviously, Plaintiffs did not "abuse joinder," as counsel disingenuously state. *See* page 2 of Turkewitz's Memorandum of Law in Opposition to Plaintiffs' Cross-Motion to Amend the Amended Complaint. Undoubtedly, there are common questions of fact and law that join the defendants (even though some defendants have differing issues as defenses). It is unclear as to whose rights Mr. Randazza is seeking to vindicate when he seeks severance of all defendants except the lead defendant. Is it the rights of the lead defendant? Is it the rights of all of the defendants other than his own clients?

On page 3, Mr. Randazza and Mr. Turkewitz state that Plaintiffs should be required to buy separate index numbers for each defendant. While severance is permitted, it must make sense. *See* CPLR 1003. Separate index numbers would cost $16,800 to $21,000, and flood the Court with 80 to 100 separate, but very similar, cases. Either this is yet another example of Mr. Randazza's inability to think, or it demonstrates his utter indifference to notions of judicial economy. Either way, it is, of course, complete nonsense.

On Page 3, counsel state, “The Amendment, Filed More than One Year after the Original and Amended Complaints, is Untimely and Would Cause Undue Prejudice to the Defendants Because of the Delay.” Pursuant to CPLR Section 203(f), Plaintiffs rely on one series of transactions and occurrences, which are all very similar in nature.

In another example of Mr. Randazza and Mr. Turkewitz trying to pull the wool over this Court’s eyes, they state that plaintiff “tried twice to do a second amended complaint and twice was denied…” As counsel well know, but prefer not to reveal, lest they, for once, offer a reliable statement to this Court, the prior denials had to do only with the stay then in place and not the merits of the pleadings.

On page 5, counsel state that costs and fees must be taxed to Rakofsky. Evidently, they prefer to ignore the American Rule: Each party pays its own expenses, including attorneys’ fees, unless a statute, Court Rule, or contract provides for fee-shifting. *See Alyeska Pipeline Service Co. v. Wilderness Society*, SCOTUS 1975 and *A.G. Ship Maintenance Corp. V. Lezak*, 69 NY2d 1 (1986).

On page 6, counsel state: “The fact that it took Rakofsky 435 paragraphs to allege 32 claims for defamation…” When one engages in simple arithmetic, one discovers that 435 divided by 32 is approximately 13 paragraphs per cause of action. Indeed, each cause of action is succinct and to the point.

Counsel argue that limited-purpose public figures “have thrust themselves into the forefront of particular public controversies…” <u>Plaintiffs did not seek the limelight</u>; the defendants thrust him into the public eye by publicly defaming him, for which they now claim an advantage.

Further, on page 10, counsel wrongly assert that Mr. Rakofsky sought to make himself a public figure by engaging the media on numerous occasions. That is <u>another</u> patently false statement made by Mr. Randazza. Mr. Rakofsky stated quite clearly in his affidavit that he had never offered any interviews to any media organization for any of his cases, ever.

In <u>another</u> completely invented and patently unsupported charge made by Mr. Randazza, he states on page 13 that "one ground of [the mistrial] was Rakofsky's incompetence – a condition underlying Deaner's desire to replace Rakofsky as his attorney…" Deaner did not deem Mr. Rakofsky to be incompetent; he merely wanted Mr. Rakofsky to ask questions that Mr. Rakofsky felt he was unable to ask, as they were against Mr. Deaner's interests, hence, a conflict arose between attorney and client.

On page 30, does Mr. Randazza not shoot himself in the foot when he says that there are other torts available to plaintiffs, so they cannot use *prima facie* tort? Mr. Randazza, of course, also maintains that none of them are viable. Might this be yet <u>another</u> example of Mr. Turkewitz's and Mr. Randazza's willingness to deceive this Court?

Counsel cherry-pick statements made by Judge Jackson on April 1, 2011, the day after Mr. Rakofsky moved to withdraw as counsel because of a conflict that existed between him and Mr. Deaner. It is true that Judge Jackson made some of the statements presented by the Turkewitz Defendants on page 15. However, unlike some of the Turkewitz Defendants, Judge Jackson was not trying to put Plaintiffs out of business forever.

With respect to Plaintiff's Intentional Infliction of Emotional Distress claim, even assuming, *arguendo*, that Mr. Rakofsky embodied a limited-purpose public figure status, the comments made by the Turkewitz Defendants were specifically designed to inflict distress upon Mr. Rakofsky and some of the defendants expressly so stated.

With respect to Plaintiffs' Injurious Falsehood claims, counsel do not seem to understand this cause of action. Injurious Falsehood is not solely used for property; it is used for business interests, like those of Plaintiff Rakofsky Law Firm, which does not seek damages for defamation because defamation is available only to humans.

We do not address the specific cases cited by counsel for the Turkewitz Defendants, because they do not address 21st century concepts of either a so-called "Blogosphere" or Internet search engines. They address actions that went on in centuries prior to the present one. This court, we respectfully submit, should and must interpret the principles of law as they apply to the facts of economic law. We respectfully submit that, if this Court does not do so, there surely must be higher courts that will use 21st Century concepts to punish 21st Century wrongdoers.

The Washington Post Company Defendants:

To the extent that the objection of the Washington Post Company to the granting of plaintiffs' motion for leave to file a second amended complaint may be deemed to extend to the provision therein that provides for adding as a defendant W.P. Company, LLC, that objection is inconsistent with the representation of Washington Post Company in its Motion to Dismiss the Amended Complaint that W.P. Company, LLC is the owner and publisher of Washington Post newspaper, and, should, therefore, be disregarded.

ABA Defendants:

The ABA Defendants circulated to just about every lawyer in their database (tens of thousands, if not hundreds of thousands, of lawyers across the United States) defamatory statements made by them about Plaintiffs. Delighted with the attention they received from the first defamatory article they published about Plaintiffs, for which they now seek protection for having published, they then went back to the well and circulated a second article, this one,

containing statements by actual and potential competitors of Plaintiffs, who, again, use the second ABA article as an opportunity to defame Plaintiffs further. The ABA Defendants utterly failed to lift a finger to conduct any research whatsoever as to what actually occurred during the *Deaner* trial and preferred instead, to rely on statements made by individuals who are not, in fact, journalists or members of the media or press and were not present at the *Deaner* trial.

As a direct result of the ABA Defendants' actions (and inaction), Mr. Rakofsky's career has been decimated. The utter annihilation of Mr. Rakofsky's reputation at the hands of the ABA Defendants cannot be disputed. Yet, the ABA now asks for this Court to find that "Plaintiffs' action is plainly frivolous."

It is difficult to imagine a more disingenuous assertion than that put forth by counsel for the ABA Defendants. Indeed, such a statement signals to all who would read it that counsel lack any credibility whatsoever and even they do not expect to have their statements to this Court be taken seriously.

On Page 8, counsel accuses Plaintiffs of failing to rebut an inapposite defense they wish to assert on behalf of their clients. To the extent they should expect Plaintiffs to "rebut the ABA Defendants' argument" in a Second Amended Complaint bespeaks the fantastic universe in which counsel find themselves and, it would seem, would wish to remain when litigating this matter. Plaintiffs, rightly, do not use the Second Amended Complaint to "rebut." Instead, it has been used to clarify allegations and should, therefore, be permitted by this Court.

The Washington City Paper Defendants:

As clearly stated and diagrammed in Plaintiffs' earlier filings, Washington City Paper's April 4 article contains a link to the Washington Post article, which clearly does business in New York. Further, their article and website is replete with advertisements, which link to the websites

of each respective advertiser (for example, Amazon.com, Urban Essentials, etc.). Such companies, also, do or transact business in New York.

The Washington City Paper states on page 6 that Mr. Rakofsky failed to address their specific statement that he “lacked the knowledge to continue," which, of course, Judge Jackson never did say. Instead, Mr. Rakofsky argued that what the Washington City Paper Defendants said in their entire sentence is wholly untrue.

Judge Jackson said, and may have thought, that Mr. Rakofsky was not a competent counsel, but if he did, that had nothing to do with the mistrial any more than that Judge Jackson declared a mistrial “partially” because of Bean's charge, which, of course, he did not. His mere repeating that Judge Jackson was granting the motion (Mr. Rakofsky’s, the only motion made) after mentioning the Bean document is clearly not the same as his granting the mistrial *because* of the Bean document.

And Judge Jackson didn't grant a new trial as they argue on page 6. That was something he said he might have done in a case that had gone to a guilty verdict, which the *Deaner* case patently had not prior to the mistrial. Their bringing in the Bean "motion" is egregious given what he said, merely that it “raises ethical issues.”

O’Halleran Defendants:

In the Alayon Affidavit, it is clearly stated in each of the 7 diagrams that: “Because of the extraordinary amount of links in the Defendants’ ‘Link Network,’ this diagram represents only a small fraction of the commercial benefits bestowed upon both, the New York-resident Defendants and non-resident Defendants as a result of participating in the Link Network.” Further, the O’Halleran Defendants’ article is included as Exhibit 32 to the Rakofsky Affidavit and, as such, clearly demonstrates that the O’Halleran Defendants created links to both, their own website and to the Washington Post article. Accordingly, they enjoyed commercial benefits

from the visibility their article and their law practice received as a result of republishing the defamatory statements.

Counsel is incorrect when he argues on page 8 that Deaner's request for a new lawyer called for a "new trial." It was Mr. Rakofsky's motion to withdraw as counsel, which Dontrell confirmed, with his desire to ask his own questions of the witness, that resulted in a mistrial (not a new trial, which is quite different), there never having been a completed trial. Further, co-counsel, Sherlock Grigsby, could have easily continued as counsel without requiring any mistrial. More to the point, Judge Jackson never tied that mistrial to any incompetence on the part of Rakofsky, even though his remarks on Friday, April 1 may have suggested doubt on his part. He certainly did not make any finding of it. Thus, the O'Halleran Defendants' "report" is not substantially accurate. Judge Jackson clearly stated that it was Mr. Rakofsky's motion that would lead and did lead to the mistrial. *See* Rakofsky Affidavit, Exhibit 5.

In Note 10, counsel attempts to convince this Court to discontinue the action against everyone, except for the Washington Post. Such an effort does not jibe with the facts or with the law. It was the O'Halleran Defendants' unilateral decision to republish the defamation. They, of course, did no research. It is well-settled that a republisher of defamation is just as liable as the original defamer. See *Cianci v New Times Pub. Co*., 639 F2d 54, 61; *Restatement, Second Torts* § 578 (1977).

Doudna Defendants:

Counsel for the Doudna defendants requests sanctions, but the Doudna defendants removed their website after they were sued. Plaintiffs, of course, do not have a copy. Counsel disingenuously state that plaintiffs possess a copy, when they clearly do not. This is because Doudna spoliated evidence. Obviously, the Doudna Defendants should not be permitted to destroy evidence and then request sanctions for having been sued.

Yampolsky Defendants:

Counsel for the Yampolsky Defendants state that the cause of action for *prima facie* tort is not properly pled." This is not accurate. Accepting the allegations of the proposed Second Amended Complaint as true and construing the inferences that may be drawn therefrom in Plaintiffs' favor, the Second Amended Complaint sufficiently alleges a claim of *prima facie* tort, namely: (1) the intentional infliction of harm, (2) resulting in special damages, (3) without excuse or justification, and (4) by an act or series of acts that would otherwise be lawful (*see Burns Jackson Miller Summit & Spitzer v Lindner*, 59 N.Y.2d 314, 332, 451 N.E.2d 459, 464 N.Y.S.2d 712 [1983]).

Reuters America Defendants:

Defendant Slater may have relied on the Post article and done no original research, but he made outrageously defamatory and conclusory statements that appear absolutely nowhere in the Washington Post's article and go well beyond what the Washington Post published. One example is their "Young and Unethical" headline, which plainly was neither a fair nor a true report, either actually or substantially, of the proceedings before Judge Jackson and thus, was not protected by Section 74 of the New York Civil Rights Law. Reuters created new defamation that was found nowhere in the Washington Post's article.

On May 16, 2011, all defendants were served with an Amended Complaint and an Amended Summons. Even though <u>all</u> other defendants were served with the Amended Complaint and Amended Summons and <u>all</u> other defendants moved to dismiss the Amended Complaint (as opposed to the original complaint), apparently, counsel for Reuters would have this Court believe that Plaintiffs treated the Reuters Defendants unlike the rest of the defendants and failed to serve them the Amended Complaint. In other words, despite being served with the Amended Complaint only 5 days after the original complaint was served, communicating with

counsel for approximately 60 defendants and Plaintiffs' counsel for a period of more than 14 months, appearing before this Court several times and communicating with various law secretaries of this Court through email, counsel for Reuters now say they "didn't know" that an Amended Complaint existed. In any event, the Affidavit of Service affirming service to Reuters clearly states that Reuters was served timely.

Reuters now claim that Plaintiffs neglected to allege special damages for its *prima facie* tort allegation. In Plaintiffs' proposed second amended verified complaint, in paragraph 1214, Plaintiffs state: "As a direct result of the conduct of Defendants, plaintiff Rakofsky was caused to have special damages, including, but not limited to, loss of income from clients that terminated their contracts, a loss of income for clients that sought reimbursement for work already performed, out-of-pocket losses, investigation expenses, attorney fees, and court costs, now and into the future."

Last, counsel argues that Defendant Slater would be prejudiced if the proposed Second Amended Complaint would be granted. However, counsel acknowledges that leave to amend under CPLR 3025(b) "shall be freely given." Therefore, counsel should have expected that the possibility existed that Plaintiffs' pleading would need to be amended. That they failed to plan for this eventuality, we respectfully submit, cannot be grounds for a refusal to permit Plaintiffs to amend their Amended Complaint.

CONCLUSION

For all of the foregoing reasons, respectfully, this Court should grant Plaintiffs' cross-motion for leave to amend the amended complaint.

Dated: New York, New York
June 24, 2012

Respectfully Submitted,

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