

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF ALEXANDRIA

HADEED CARPET CLEANING,)
INC.)
3206 Duke St.,)
Alexandria, VA 22314)

Plaintiff,)

v.)

Case No. CL12003401

JOHN DOE #1)
Whereabouts unknown)

JOHN DOE #2)
Whereabouts unknown)

JOHN DOE COMPANY)
Whereabouts Unknown)

Defendants.)

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**HADEED’S REQUEST FOR THE COURT TO OVERRULE YELP’S OBJECTIONS TO
THE SUBPOENA, IN SUPPORT OF THE HEARING
PURSUANT TO § 8.01-407.1 OF THE VIRGINIA CODE;
ALTERNATIVELY, MOTION TO COMPEL DISCOVERY**

Plaintiff Hadeed Carpet Cleaning, Inc. (“Hadeed”) requests an order that overrules non-party Yelp, Inc.’s (“Yelp”), objections to identifying John Doe #1, John Doe #2 and John Doe Corporation (collectively, “Defendants”), and requires Yelp to produce the requested materials within one business day. In support of its request, Hadeed states as follows:

I. STATEMENT OF PROCEDURE

This case comes before the court pursuant to Va. Code § 8.01-407.1. This code provision modifies Rule 4:9A(g) of the Supreme Court of Virginia when a litigant seeks the identity of

persons communicating over the internet. In such cases, section 8.01-407.1 requires the following procedure:

1. At least thirty days before the disclosure is sought, the party seeking the information must make a filing that: 1) attaches a copy of the subpoena, 2) provides supporting material showing that tortious communications were made, 3) the legitimate good faith basis for contending that the party is a victim, 4) a copy of the communications, 5) that other reasonable efforts to identify the anonymous communicator have proven fruitless, 6) the identity of the anonymous communicator is centrally needed to advance the claim, or is directly relevant to a claim or defense, 7) that no dispositive motion is pending, 8) that the entity subpoenaed is likely to have responsive information. *See* Va. Code § 8.01-407.1(A)(1).

2. Two copies of the subpoena are served on the subpoenaed entity, along with required notices. The subpoenaed entity will then send one copy to the anonymous communicator. *See* Va. Code § 8.01-407.1(2), (3).¹

3. Seven days prior to the return of the subpoena, either the anonymous communicator, or the subpoenaed entity may file with the court, a detailed 1) objection, 2) motion to quash, or 3) motion for protective order. *See* Va. Code § 8.01-407.1(4), (5).

4. The filed objection or motion shall state “all grounds” relied upon for denying the disclosure and shall also address i) whether the identity of the anonymous communicator has been disclosed in any way beyond its recordation in the account records, ii) whether the subpoena fails to allow a reasonable time for compliance, iii) whether the subpoena requires

¹ To comply with this provision, Yelp was required to identify the anonymous communicators using its own resources. Yelp has not raised any inability to communicate with the anonymous communicators as an issue, thus, the Court may presume that Yelp knows exactly who they are.

disclosure of privileged or other protected matter and no exception or waiver applies, or whether (iv) it submits the subpoenaed party to an undue party. *See* Va. Code § 8.01-407.1(5).

5. If an objection or motion is filed, then compliance with the subpoena is deferred until the appropriate court issues an order ruling on the objection, motion to quash or motion for protective order. *See* Va. Code § 8.01-407.1(6).

6. If an objection, motion to quash or motion for protective order is filed, then “any interested person” may “notice” the matter for a hearing. *See* Va. Code § 8.01-407.1(6).

7. While the statute is unclear on this point, we presume that if the court orders compliance, the subpoenaed entity could only appeal the order if it refuses to comply and is ultimately held in contempt.

II. STATEMENT OF MATERIAL FACTS

1. Yelp is a Delaware corporation with its principal place of business in California. Yelp operates www.yelp.com, a social networking site that allows users to review businesses all over the country and search for such reviews. www.yelp.com has approximately 54 million unique visitors.

2. As of June 29, 2012, Yelp maintains two files that relate to Hadeed on www.yelp.com: Hadeed Rug Cleaning and Hadeed Oriental Rug Cleaning. A true and accurate copy of the search for Hadeed is attached as **Exhibit 1**. True and accurate copies of screenshots of the files that relate to Hadeed Rug Cleaning and Hadeed Oriental Rug Cleaning are attached as **Exhibit 2** and **Exhibit 3** respectively.

3. Although Yelp invites users to post their real names and other identifying information in creating an account on www.yelp.com, Yelp states in its privacy policy that it does not require users to provide anything other than a valid email address during registration. A true and

accurate copy of Yelp's privacy policy as it appeared on July 27, 2012, is attached as Exhibit 4.

Upon information and belief, most of Yelp's users write reviews under pseudonyms or "screen names," in effect rendering their posts anonymous.

4. Upon information and belief, between December 2011 and April 2012, John Doe #1, John Doe #2 and John Doe Company, representing themselves as customers of Hadeed, anonymously wrote a series of negative reviews of Hadeed on www.yelp.com. A copy of Defendants' reviews and user profiles, as of, July 27, 2012, is attached as Exhibit 5.

5. The reviews in Exhibit 5 can be accessed and viewed by anyone with an Internet connection, even those who are not registered users of www.yelp.com. In fact, Yelp states in its privacy policy that reviews on its site are intended to be public. As of July 27, 2012, these reviews were under the "Hadeed Rug Cleaning" listing at www.yelp.com.

6. After conducting an independent investigation in an attempt to match the negative reviews contained in Exhibit 5 with customers on the Hadeed customer database, Hadeed determined that it simply had no record that the negative reviewers were ever actually Hadeed customers. Consequently, Hadeed believes that the reviews contained in Exhibit 5 are not the opinions of its customers, but were made by Defendants falsely representing themselves as customers of Hadeed.

7. The negative reviews in Exhibit 5 are false and defamatory. For example, user "Bob G." from Oakton allegedly relates how he was in a desperate need of emergency carpet cleaning and was ripped off. User "Chris H." from Washington, reported that his precious rugs were shrunk. User "JS." from Falls Church, reports that he was charged for work never performed. User "YB." from Fairfax, reports that unauthorized work was performed and his rug was stained. One user, "Aris P." from Haddonfield, N.J., reports that the price was double the quote and that

Hadeed was once bankrupt. Many of the negative reviews report that the price was double what was charged. After combing its customer records, Hadeed was at a loss to find records of these allegations. Regarding Aris P., in particular, Hadeed conducts no business in New Jersey.

Not only was Hadeed unable to find any evidence that the negative reviewers were ever Hadeed customers, but many of the negative reviewers use the same theme. For example, negative reviewers Bob G., YB, and Aris P. use the theme that Hadeed doubled the price. Negative reviewers Bob G., Chris H., MP., Mike M., and Aris P. criticize Hadeed's advertising.

8. The negative reviews in Exhibit 5 allege or imply that Hadeed is dishonest, unprofessional, and/or takes advantage of its customers, which would tend to prejudice Hadeed in its profession or trade of cleaning rugs. Good customer service, honesty and fair dealing are crucial to Hadeed's business. Such statements are therefore "defamatory per se" under Virginia law, and are presumed to cause damage to Hadeed's business and reputation.

9. Consequently, Defendants are liable to Hadeed for defamation under Virginia law if they were not in fact customers of Hadeed, and determining whether or not Defendants were customers of Hadeed is centrally necessary for Hadeed to advance any defamation claim.

10. On June 5, 2012, Hadeed, by counsel, emailed to Yelp a list of alleged customers who had submitted negative reviews that Yelp had published, and requested the identity of these alleged customers. A copy of the email is attached as Exhibit 6.

11. On June 6, 2012, Yelp responded and refused to disclose the identities of the alleged customers, citing its privacy policy.

12. Yelp's privacy policy states that it retains certain information it may collect for a period of five years. This information includes, but is not limited to, a user's full name, gender, birth date, email address and location. Further, Yelp states that it is entitled to collect certain kinds of

information about its users, including their IP addresses, and requires a valid e-mail address from those who register on its website.

13. Since Yelp stores the information stated above, and given the dates on which the reviews in Exhibit 5 were posted, there is a strong and reasonable likelihood that Yelp has such information regarding Defendants.

14. Even if Yelp does not have the actual names of the anonymous communicators, Yelp's records, could be used to identify Defendants. Defendants' IP addresses in particular would allow Hadeed to identify one or more of the Defendants' internet service providers, such as Comcast or Verizon ("ISPs"). An IP address is a unique number code typically owned and assigned to customers by an ISP. If Hadeed acquires Defendants' IP addresses, it would be able to issue subpoenas on Defendants' ISPs, who would most likely be able to identify Defendants. Absent an IP address, Hadeed lacks knowledge of Defendants' ISPs and therefore has no basis for issuing a subpoena on them.

15. On July 2, 2012, Hadeed filed suit against the anonymous communicators, and immediately issued its first subpoena to Yelp.

16. In a letter dated July 19, 2012, Yelp objected to the subpoena, noting in part that Hadeed had failed to comply with Va. Code § 8.01-407.1. A true and accurate copy of Yelp's objections, which were not filed with the court, is attached as Exhibit 7.

17. In response, Hadeed's counsel exchanged e-mails with Aaron Schur, counsel for Yelp, as well as Paul Alan Levy, who at the time represented himself as counsel for at least one of the Defendants. A true and accurate copy of these e-mails is attached as Exhibit 8.

18. In response Yelp's objection as to service on its registered agent, Hadeed sent Yelp a report from the Boyd-Graves Conference, a Supreme Court of Virginia committee, that

concluded that service of a subpoena duces tecum on a foreign non-party's Virginia Registered Agent was proper and in accordance with Virginia law. A true and accurate copy of this report is attached as Exhibit 9.

19. Counsel for one of the defendants, Paul Levy, asserted that "what information [Yelp] [has]" about each of its users can be seen on their user profiles, notwithstanding that Yelp's privacy policy states the only account information publicly available on www.yelp.com is a user's first name and last initial. See Exhibit 8. As a result of that representation, Hadeed, through counsel, logged onto Defendants' profiles in an attempt to collect identifying information. However, Hadeed was unable to view any information beyond each Defendant's location, so it is unclear why Hadeed was sent on this wild goose chase.

20. Thereafter, on July 30, 2012, Hadeed's counsel issued a new subpoena, in compliance with Va. Code § 8.01-407.1, by first filing the required disclosure with this Court on the same day, Court's docket # 11, and confirmed service on Yelp's registered agent by filing an affidavit of service on August 6, 2012. Court's Docket #12. The subpoena sets a return date of September 13, 2012 at 9:00 am.

21. As shown on docket #11, the subpoena makes two requests for each of the following seven anonymous communicators, Bob G., JS, Chris H., YB, Mike M., Aris P., MP, :

- Yelp's document(s) that contains the full name, gender, birth date, IP address or email address of [each anonymous communicator].
- [The anonymous communicator's postings] that relate, in any way, to Hadeed Carpet Cleaning, Inc.

22. On September 5, 2012, Yelp timely filed an objection to the subpoena. Court's Docket #13. No anonymous communicator has filed any objection.

23. Yelp's objections are summarized as follows:

1. Hadeed cannot subpoena Yelp's records by serving a subpoena on Yelp's registered agent in Virginia. Alternatively, even if Virginia allows service of a *subpoena duces tecum* on Yelp's registered agent, allowing such service violates constitutional due process because "principles of federalism and state sovereignty call for Virginia to respect California's authority."
2. Alternatively, Hadeed agreed to arbitrate this "dispute" with Yelp in California.
3. Hadeed has not met the legal requirements for obtaining information about Yelp's anonymous internet users.
4. The subpoena is overbroad to the extent it seeks all documents that "relate in any way" to Hadeed.

III. **ANALYSIS**

Each of Yelp's objections is discussed below:

A. **Hadeed Can Subpoena Yelp's Records by Serving a Subpoena on Yelp's Registered Agent in Virginia.**

Hadeed served its subpoena on Yelp's registered agent in Virginia. Assuming a *subpoena duces tecum* constitutes "process," then any "process" may be served upon Yelp's registered agent in Virginia. In fact, this issue was addressed by the Boyd Graves Conference, as shown on Exhibit 9. The report concludes that, "the law of Virginia supports the validity of such service, and it is the usual practice of Virginia lawyers . . . to serve subpoenas in this way as well." *Id.*, p. 9. In support of their conclusion, they relied upon *Bellis v. Commonwealth*, 241 Va. 257, 402 S.E.2d 211 (1991) from which one may conclude that a *subpoena duces tecum* constitutes "process," *Id.*, p. 5, and Virginia Code § 8.01-301(1) which states that "process" may be served on a foreign corporation's registered agent. *Id.*, p. 4.

In response, Yelp contends that this state of affairs is unconstitutional. While it cites no authority for this proposition,² the fact is that Yelp conducts business over the internet in Virginia, and is present through its registered agent.³ It was served in Virginia. Thus, Virginia courts have personal jurisdiction over Yelp for the purpose of resolving the subpoena. *E.g.*, *Moore v. Lindsay*, 1989 U.S. Dist. Lexis 18042 (W.D. Va. 1989) (personal jurisdiction was found over a defendant who was served while visiting Virginia). If Yelp does not want to do business or be served with Virginia subpoenas in Virginia, it should cancel its registered agent.

B. Hadeed Did Not Agree to Arbitrate the Validity of a Virginia Subpoena

Yelp contends Hadeed agreed to arbitrate this “dispute” because it entered into an advertising agreement with Yelp. Arbitration is the process of settlement of controversies and is expressly allowed by the Federal Arbitration Act, 9 U.S.C. § 1, *et seq.*, and the Virginia Arbitration Act, Va. Code § 8.01-577, *et seq.* Arbitration deprives the court of jurisdiction over a particular controversy. 2A Michie’s Jurisprudence (“M.J.”), § 4. Moreover, a party cannot be required to arbitrate any controversy that he or she has not agreed to arbitrate, and thus, whether a dispute must be arbitrated is for the court to decide. *Id.*, citing *Gibbs. v. PFS Invs., Inc.*, 209 F. Supp. 2d 620 (E.D. Va. 2002). Finally, while arbitration agreements are generally favored in

² Virginia does not consider a subpoena for the identity of anonymous persons who make defamatory statements to implicate the First Amendment: “The tort complained of here is an intentional wrong to the property rights of another, accomplished by words, not defamatory in themselves, but employed in pursuance of a scheme designed wrongfully to enrich the speaker at the expense of the victim. The law provides a remedy in such cases, and the constitutional guarantees of free speech afford no more protection to the speaker than they do to any other tortfeasor who employs words to commit a criminal or a civil wrong.” *Am. Online, Inc. v. Nam Tai Elecs., Inc.*, 264 Va. 583, 595 (2002) (citing *Chaves v. Johnson*, 230 Va. at 122, 335 S.E.2d at 103 (1985)).

³ In *Am. Online, Inc. v. Nam Tai Elecs., Inc.*, 264 Va. 583, 595 (2002) the Virginia Supreme Court found no problem, constitutional or otherwise, with enforcing a *subpoena deuces tecum* issued via a California court to discover the identity of an anonymous poster of defamatory comments on a Yahoo! Internet board.

Virginia, they may be waived. *Carrico v. Empire Today, LLC*, 80 Va. Cir. 395 (Fairfax 2010). And, a party seeking to enforce them may only do so when not guilty of dilatory conduct, and when the party has not substantially utilized the litigation machinery.

The Court should overrule Yelp's objection for several reasons. First, Yelp did not fully detail this objection as required by Va. Code § 8.01-407.1, so it is waived. Additionally, Yelp has participated in the discovery process for several months, and only raised arbitration as a dilatory objection after receiving two subpoenas, and without providing any real detail. Yelp merely raises arbitration now as a form of trench warfare.

In any case, Hadeed's advertising agreement with Yelp is attached as **Exhibit 10**.

The Advertising Agreement states that,

“These Advertising Terms and Conditions (the “Terms”) are entered into by and between [Yelp] and [Hadeed], and govern the terms of [Hadeed's] participation in Yelp's advertising program on the Yelp website (the “Site”).

Id., p. 1 of 6.

Article IX of the Advertising Agreement states,

(a) Any claim, controversy or dispute arising out of or relating to the Terms, the Site or Merchant's relationship with Yelp (“Claim”) will be governed by California law consistent with the Federal Arbitration Act without regard to conflict of law provisions or giving effect to any principles that may provide for the application of the laws of another jurisdiction.

(b) All claims must be exclusively resolved and settled by final and binding arbitration . . . in San Francisco Notwithstanding the foregoing, any dispute as to the enforceability of this . . . provision . . . shall be adjudicated by a [court in San Francisco].

Federal law bars Hadeed from suing Yelp for posting false negative reviews about Hadeed. *E.g.*, 47 U.S.C. § 230. Thus, Hadeed has no dispute whatsoever with Yelp regarding the content of what Yelp posted on its Site, nor could Hadeed ever have such a claim against Yelp.

A simple reading of this agreement leads one to conclude that this arbitration agreement does not pertain to every dispute that Hadeed might have with Yelp, of any kind whatsoever. It only pertains to Hadeed's disputes with Yelp that might arise out of the advertising relationship.

The present "dispute" between Yelp and Hadeed simply revolves around the identities of third parties and whether or not Yelp will identify those third parties. The dispute does not apply to the Terms of the Advertising Agreement, Hadeed's advertising on the Site, the Site itself, or Hadeed's advertising relationship with Yelp. Yelp simply has information concerning the identity of the John Doe parties. Thus, the arbitration agreement is not implicated in this discovery dispute over a state court *subpoena duces tecum*, in any way.

Next, even if one stretched the arbitration agreement to include a discovery dispute between a non-party and a party, such an agreement would not be valid, would be void against public policy, or would be unconstitutional. As for validity, Hadeed does not believe that an arbitration clause that purported to require arbitration of a discovery dispute between a litigant and a non-party would be valid, but has found no authority, in either direction, regarding this proposition. As for being void against public policy, it simply seems strange that any court would surrender its role in the discovery process due to the demand of a third party that some discovery dispute should be arbitrated. Thus, even if this arbitration agreement could be read to require arbitration in San Francisco of a discovery dispute in a Virginia courtroom between a party and a non-party, the arbitration agreement should be void against public policy. Finally, while the Federal Arbitration Act is also silent on this point, applying that Act, in any way, to a state court's exercise of its own procedural rules and Virginia procedural statutes, would be unconstitutional because the act, as applied, would lie outside of Congress' power under the

Commerce Clause. 2A M.J. Arbitration and Award, § 4. A state court's enforcement power over its own subpoenas is a core governmental function and is not interstate commerce.

C. Hadeed Has Met the Legal Requirements for Obtaining Information about Yelp's Anonymous Internet Users.

The legal requirements for obtaining information about Yelp's anonymous internet users are set forth in Virginia Code § 8.01-407.1. Specifically, Hadeed must show it was the victim of a tortious internet statement, that other reasonable means of identifying the user have proven fruitless, the identity of the communicator is "centrally needed to advance the claim, relates to a core claim or defense, or is directly and materially relevant to that claim or defense."

Under Virginia law, a plaintiff claiming defamation must prove by a preponderance of the evidence that the defendant (1) published (2) an actionable statement with (3) the requisite intent. *See Gazette, Inc. v. Harris*, 229 Va. 1, 15, 325 S.E.2d 713, 724-25 (1985). Words that are actionable as defamation per se include words which prejudice a person in his business, profession or trade. *Tronfeld v. Nationwide Mut. Ins. Co.*, 272 Va. 709, 713, 636 S.E.2d 447, 449-50 (2006).

Without objecting to anything specific, Yelp complains generally that Hadeed needs to come forward with evidence sufficient to make out a prima facie claim.⁴ But, Hadeed has provided the exact statements published by the anonymous internet communicators on

⁴ Moreover, Yelp cites *In re Subpoena Duces Tecum to America Online, Inc.*, 52 Va. Cir. 26, 37 (Va. Cir. Ct. 2000) for the conclusion that there must be a "good evidentiary reason to believe that Hadeed's defamation claim can be successful," (Objection to Subpoena) while the actual language of that case states that Hadeed needs only "a legitimate, good faith basis to contend that it may be the victim of conduct actionable in the jurisdiction where suit was filed." Furthermore, the court denied the motion to quash when the plaintiff only provided allegations that "the John Does published in Internet chat rooms certain defamatory material, misrepresentations, and confidential material," far less than provided here.

www.yelp.com, attached the statements to both the Complaint, and to its subpoena. Yelp did not object to the authenticity of the statements, or complain about them in any way, so they may be presumed to be authentic. From a review of the statements, it is plainly obvious that the seven internet users claim to be Hadeed customers; they assert specific instances of how they received bad service, or worse, were defrauded by Hadeed. Thus, if these anonymous communicators are not Hadeed customers, their statements constitute defamation per se.⁵

In its Complaint, and in the subpoena, Hadeed asserted that it reviewed its own detailed customer files and can find no evidence that these specific seven persons were ever Hadeed customers. Yelp never objected to these assertions, and for the purposes of this motion, and deciding whether Hadeed has a legitimate good faith belief that it has a defamation claim, the Court should deem these assertions as truthful.

In summary, the Defendants published specific statements about Hadeed's bad service and/or fraud, on Yelp, while asserting that they were Yelp customers. Not only has Hadeed done its own investigation, but it also followed down the wild goose chase lead provided by Yelp's counsel. Thus, Hadeed met the Virginia requirements.

⁵ Accordingly, even were the court to disregard Virginia law and adopt the standard set forth in New Jersey by *Dendrite Int'l, Inc. v. John Doe No. 3*, 342 N.J. Super. 134, 775 A.2d 756 (2001). as urged by Yelp, the court must still overrule Yelp's objections. *Dendrite* required the plaintiff to state a prima facie case, which Hadeed has done. *Id.* ("First, the plaintiff must make an effort to notify the anonymous poster that he or she is the subject of a subpoena or application for a disclosure order, giving a reasonable time for the poster to file opposition. Second, the plaintiff must set forth the specific statements that are alleged to be actionable. Third, the plaintiff must produce sufficient evidence to state a *prima facie* cause of action."). Hadeed, in compliance with Virginia law, has done all three.

D. The Subpoena is Not Overbroad to the Extent It Seeks All Documents that “relate in any way” to Hadeed.

Hadeed’s second request was:

[The anonymous communicator’s postings] that relate, in any way, to Hadeed Carpet Cleaning, Inc.

Yelp objects to this request as overbroad. A “posting” is some statement that is posted publicly on the internet for all to see. Yelp’s only detailed objection is that the request might also require the production of private messages. Hadeed does not see how anyone could interpret the request in that fashion.

IV. CERTIFICATE

I hereby certify that I attempted in good faith to resolve this request/motion before placing it on the court’s docket.

V. CONCLUSION

While our political leaders have decided to grant immunity to Yelp itself, the question remains whether Yelp is performing a public service, or whether, it is actually the greatest vehicle ever devised for one business to slander another. However, this Court need not answer that question, it must only decide whether Yelp is required to produce the information that Hadeed seeks. Upon learning the names of the anonymous communicators, Hadeed can immediately know whether they were customers or not. If the anonymous communicators were customers, Hadeed intends to investigate and take corrective action, if warranted. But, if they were not customers, Hadeed intends to go down a different road.

None of the anonymous communicators have filed objections to Yelp’s production of the information requested. Yelp’s interest in objecting to the subpoena is simply to make it as painful as possible for Hadeed, or other businesses, to try to learn the identities of the anonymous

communicators. Yelp obviously knows who they are and can produce the information immediately. None of Yelp's objections have any merit. Therefore, this Court should simply overrule Yelp's objections, and enter an Order requiring Yelp to provide the information requested within one business day.

WHEREFORE, HADEED CARPET CLEANING, INC., by counsel, respectfully requests the Court to enter an order compelling Yelp to comply with the subpoena.

Respectfully Submitted,

HADEED CARPET CLEANING, INC.
By Counsel

A large black rectangular redaction box covers the signature area of the document.

Raighne C. Delaney, VSB No. 38787
Bean, Kinney & Korman, P.C.
2300 Wilson Blvd.
Seventh Floor
Arlington, VA 22201
(703) 525-4000
(703) 525-2207 [fax]
rdelaney@beankinney.com
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2012, a true and accurate copy of this pleading was emailed and mailed, first class mail, postage prepaid to:

Paul Alan Levy
Public Citizen Litigation Group
1600 20th St., NW
Washington, D.C. 20009
plevy@citizen.org

Raymond D. Battocchi, Esq.
Raymond D. Battocchi, P.C.
35047 Snickersville Turnpike
Round Hill, Virginia 20141
battocchi@aol.com



Raighne C. Delaney