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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

D.G., by Next Friend G. Gail )  
Stricklin, et al., for themselves )  
and those similarly situated, )  
 )  
Plaintiffs, )  
 )  
V. ) No. 08-cv-074-GKF-FHM  
 )  
C. BRAD HENRY, in his official )  
capacity as Governor of the )  
State of Oklahoma, et al., )  
 )  
Defendants. )

REPORTER'S TRANSCRIPT OF PROCEEDINGS  
HAD ON MAY 5, 2009  
MOTION HEARING - AN EXCERPT

BEFORE THE HONORABLE GREGORY K. FRIZZELL, Judge

APPEARANCES:

For the Plaintiffs: Mr. Paul DeMuro  
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Tulsa, Oklahoma 74103  
  
Ms. Marcia Lowry  
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1 (APPEARANCES CONTINUED)

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5 For the Defendants: Ms. Donna M. De Simone  
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11 Ms. Catherine A. O'Leary  
 12 Department of Human Services  
 Assistant General Counsel  
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 13 Tulsa, Oklahoma 74135  
 - - - - -

14 PROCEEDINGS

15 May 5, 2009

16 THE COURT: Be seated please. Before the Court is  
 17 plaintiffs' Motion For Class Certification found at document  
 18 number 4 in the Court's docket. The Court having reviewed the  
 19 pleadings of the parties and having heard argument of counsel  
 20 finds as follows:

21 The named plaintiffs in this case are eight children  
 22 in foster care in Oklahoma. They have sued the nine members of  
 23 the Oklahoma Commission for Human Services - the body  
 24 responsible for formulating the policies and adopting the rules  
 25 and regulations for the administration of the Oklahoma

1 Department of Human Services - and the director of DHS himself  
2 in their official capacities. Plaintiffs allege policies and  
3 practices of DHS regarding the state's foster care program  
4 violate their 14th Amendment right to substantive due process,  
5 their Fifth and Fourteenth Amendment rights to procedural due  
6 process, and liberty and privacy interests protected by the  
7 First, Ninth and Fourteenth Amendments.

8 Plaintiffs seeks certification of the following class:

9 All children who are or will be in the legal custody  
10 of the Oklahoma Department of Human Services, number one, due  
11 to a report or suspicion of abuse or neglect, or two, who are  
12 or will be adjudicated deprived due to abuse or neglect.

13 Plaintiffs in their Statement of Relief Sought found  
14 at document number 241 seek seven remedies summarized as follows:

15 Number one, caseloads: Limits on the caseloads of all  
16 case carrying workers and supervisors based on standards for  
17 accreditation of public child welfare agencies set by the  
18 Council on Accreditation, the COA, and professional standards  
19 set by the Child Welfare League of America, the CWLA. The CWLA  
20 standards call for a caseload size for family foster care  
21 social workers of between 12 to 15 children per worker, and for  
22 supervisors to supervise no more than five social workers. The  
23 COA recommends that caseloads generally not exceed 18 children  
24 or eight children with special therapeutic needs.

25 Number two, education and training: The imposition of

1 educational qualifications requirements for caseworkers and  
2 supervisors and implementation of comprehensive pre-service and  
3 in-service training programs for caseworkers, supervisors,  
4 foster parents and adoptive parents based on standards for  
5 training established by the COA and CWLA.

6           Number three, availability of necessary resources for  
7 placement of children: An assessment by qualified professionals.  
8 to determine, number one, the need for additional placements to  
9 provide the necessary range of placement options for children  
10 in the custody of DHS; number two, the time period during which  
11 these placements will be developed; and number three, the steps  
12 necessary to develop these placements.

13           Number four, monitoring the safety of children in  
14 placement: Implementation of mandatory schedules for DHS  
15 workers to visit all children in placement and their foster  
16 parents, in accordance with COA standards. Mandatory  
17 compliance with regulations of the Oklahoma Administrative  
18 Code, the OAC, for investigating complaints of abuse and  
19 neglect of children in placement, and mandatory compliance with  
20 OAC standards and processes for the approval, screening,  
21 oversight and utilization of all placement types that house  
22 foster children.

23           Number five, outcomes for children: An order  
24 requiring DHS shall meet the outcome measures set by the U.S.  
25 Department of Health and Human Services, the DHHS, including,

1 for example, DHHS measures aimed at protecting foster children  
2 from abuse and neglect, ensuring permanency and stability in  
3 their living situations and preserving the continuity of family  
4 relationships and connections.

5           Number six, quality assurance data: An order  
6 requiring DHS to ensure that it has a quality assurance system  
7 consistent with the standards of the COA and CWLA that is  
8 capable of measuring the quality of treatment and services  
9 provided to children in DHS custody.

10           And finally, number seven, monitoring and enforcement:  
11 Plaintiffs seek Court appointment of a neutral monitor to  
12 monitor the provisions of any Court order entered pursuant to  
13 Rule 65(d)

14           Now under Rule 23 of the Federal Rules of Civil  
15 Procedure the Court may certify a class if the purported class  
16 meets four requirements set out in subsection (a) of the rule  
17 and also meets the requirement of one of the types of classes  
18 described in subsection (b) of the rule. The requirements of  
19 Rule 23(a) are numerosity, commonalty of questions of fact or  
20 law between the named plaintiffs and the class, typicality of  
21 named plaintiffs' claims and defenses to those of the class,  
22 and adequacy of the named plaintiffs and their attorneys as  
23 class representatives. The particular type of class plaintiffs  
24 seek to certify is set forth in Rule 23(b) (2), that is,  
25 plaintiffs assert that defendants have acted or refused to act

1 on grounds that apply generally to the class so that final  
2 injunctive relief or corresponding declaratory relief is  
3 appropriate respecting the class as a whole.

4 Plaintiffs, as the parties seeking certification, bear  
5 a strict burden of proving all the requirements of Rule 23(a)  
6 have been met. Rex v. Owens ex rel, Oklahoma 585 F.2d 432 at  
7 435, Tenth Circuit 1978.

8 The Court, in its analysis, must accept the  
9 substantive allegations of complaint as true. Shook vs. El  
10 Paso County, 386 F.3d 963 at page 968, Tenth Circuit 2004.

11 Whether a case should be allowed to proceed as a class  
12 action involves intensely practical considerations, most of  
13 which are purely factual or fact intensive. Reed vs. Brown,  
14 849 F.2d 1307 at 1309, Tenth Circuit 1988.

15 Each case must be decided on its own facts on the  
16 basis of practicalities and prudential considerations. Reed  
17 vs. Brown again.

18 The class determination generally involves  
19 considerations that are enmeshed in the factual and legal  
20 issues comprising the plaintiffs' cause of action. General  
21 Telephone Company of the Southwest vs. Falcon, 457 U.S. at 147  
22 at page 160, 1982.

23 Therefore, while the Court is not to decide the case  
24 on its merits, it should make whatever factual and legal  
25 inquiries are necessary under Rule 23. Castano vs. American

1 Tobacco Company, 84 F.3d 734 at 744, Fifth Circuit 1996, and  
2 Sazbo, S-A-Z-B-O vs. Bridgeport Machines, Inc., 249 F.3d, 672  
3 at page 676, Seventh Circuit, 2001.

4 Further to the point, the Court stresses that its  
5 decision today is in no way to be construed as a decision on  
6 the merits. In keeping with the law cited above the Court has  
7 made factual inquiries only to the extent necessary to comply  
8 with the Rule 23 requirements for class certification. A  
9 decision on the merits of plaintiffs' claims lies somewhere  
10 down the road after discovery, motion practice and trial are  
11 complete.

12 The Court makes the following findings regarding the  
13 elements of 23(a):

14 Numerosity: Plaintiffs allege the class of children  
15 in foster care due to abuse or neglect numbers in excess of  
16 10,000. Defendants do not dispute the size of the class meets  
17 the numerosity requirement. The Court finds, therefore, that  
18 the numerosity element set forth in Rule 23(a)(1) is satisfied.

19 Commonality: Plaintiffs have asserted that there are  
20 nine questions of fact and five questions of law common to all  
21 of the children in the class. A finding of commonalty requires  
22 only a single issue of fact or law common to the class. J.B.  
23 vs. Valdez, 186 F.3d 1280 at page 1288, Tenth Circuit, 1999.  
24 However, mere allegations of systemic failures of an agency  
25 such as DHS will not suffice. J.B. vs. Valdez at pages 1288

1 and 1289. The Tenth Circuit will not allow plaintiffs, quote  
2 "to broadly conflate a variety of claims to establish  
3 commonalty via an allegation of systemic failures." End quote.  
4 Also J.B. vs. Valdez at the same pages.

5           The class that plaintiffs seek to represent is quite  
6 diverse. It's members range in age from infants to teenagers.  
7 The reasons they end up in the foster care system vary widely.  
8 Their placements range from emergency shelters to institutions,  
9 to group homes, to placement with relatives, to placement with  
10 unrelated foster care providers. Their needs vary widely.  
11 Their lengths of stay in the foster care system are similarly  
12 diverse. The ultimate outcome goals for these children vary.  
13 Reunification with their birth families is the goal for some  
14 while adoption is the goal for others. Their physical,  
15 educational, and emotional needs are divergent. Many are  
16 Native American children and thus special laws apply to them.  
17 Some have been adjudicated not only as deprived, but as  
18 juvenile delinquents.

19           Suffice it to say, as a result of the diversity of the  
20 group, many of the questions of fact and law plaintiffs allege  
21 to be common do not appear to be, in fact, common. A clear  
22 example of this is the question of whether DHS has a policy or  
23 practice of failing to arrange for and facilitate plaintiffs'  
24 family relationships causing significant harm and risk of harm  
25 to plaintiffs' health and well-being. Clearly, this is not

1 that fact issue common to all children in foster care because  
2 the goal for many children is to terminate parental rights of  
3 the biological family and place these children for adoption.  
4 Similarly, the question whether DHS has a policy or practice of  
5 subjecting plaintiffs to unreasonably frequent moves from  
6 placement to placement causing significant harm and risk of  
7 harm to plaintiffs' health and well-being is not common to all  
8 children because many, perhaps the majority, of children in  
9 foster care are not subjected to frequent moves.

10           However, the court finds at least one common issue of  
11 fact: Whether DHS has a policy or practice of failing to  
12 adequately monitor the safety of plaintiff children causing  
13 significant harm and risk of harm to plaintiff children's  
14 safety, health and well-being.

15           With respect to the adequate monitoring of foster  
16 children's safety, the Court finds, based on evidence submitted  
17 by the parties, that this is a fact issue common to all  
18 children in the proposed class. The Court is not making any  
19 finding that these children are all subjected to harm as a  
20 result of DHS's monitoring practices. The Court is simply  
21 finding that the issue of whether the monitoring practices  
22 compromise the safety of foster children is an issue common to  
23 the entire proposed class.

24           Additionally, it appears to the Court that this common  
25 factual issue also raises at least one common legal issue,

1 specifically whether the alleged policies or practices violate  
2 plaintiffs' right to be reasonably free from harm and imminent  
3 risk of harm while in state custody. See Yvonne L. vs. New  
4 Mexico Department of Human Services, 959 F.2d 883 at page 892  
5 to 893.

6 Therefore, the Court finds the commonalty element set  
7 forth in Rule 23(a) (2) has been met.

8 Typicality: Rule 23(a) (3) requires the claims of the  
9 named plaintiffs to be typical of the claims of the class.  
10 Obviously, issues of commonalty and typicality are closely  
11 related, and as with the commonalty requirement, differing fact  
12 situations of class members do not defeat typicality under Rule  
13 23(a) (3) so long as the claims of the class representatives and  
14 class members are based on the same legal or remedial theory.  
15 Adamson vs. Bowen, 855 F.2d 668 at 676, Tenth Circuit 1988.

16 In a civil rights action such as this one typicality  
17 does not require that the interest and the claims of the named  
18 plaintiffs and the class members to be identical. Anderson vs.  
19 City of Albuquerque, 690 F.2d 796 at page 800, Tenth Circuit,  
20 1982.

21 As long as the class representatives' claims are not  
22 significantly antagonistic to a class, typicality is established.  
23 In re: Williams Companies ERISA Litigation, Northern District  
24 of Oklahoma 2005.

25 While each named plaintiff and each potential class

1 member has his or her own unique background, story and  
2 problems, the Court finds that the interests of the named  
3 plaintiffs and the class member are not significantly  
4 antagonistic.

5 Therefore, the typicality requirement of Rule 23(a)(3)  
6 is satisfied.

7 Rule 23(b)(2) and Rule 65(d): Plaintiffs seek class  
8 certification under Rule 23(b)(2), asserting that DHS has acted  
9 or refused to act on grounds that apply generally to the class,  
10 so that final injunctive relief or corresponding declaratory  
11 relief is appropriate respecting the class as a whole. Rule  
12 23(b), in turn, implicates Rule 65(d) which provides that every  
13 order granting an injunction must state the reasons why it  
14 issued, state its terms specifically, and describe in  
15 reasonable detail, and not by referring to the complaint or  
16 other documents, the act or acts to be restrained or required.  
17 The tension between Rule 23(b)(2) and Rule 65(d) was examined  
18 at length by the Tenth Circuit in the Tenth Circuit's recent  
19 Shook II decision found at Shook vs. Board of County  
20 Commissioner of County of El Paso, 543 F. 3d 597, Tenth  
21 Circuit, 2008.

22 The Tenth Circuit stated in Shook II that Rule  
23 23(b)(2) imposes two separate but related requirements: First,  
24 the defendants' actions or inactions must be based on grounds  
25 generally applicable to all class members. Second, the final

1 injunctive relief must be appropriate for the class as a whole.  
2 The Tenth Circuit said that quote, "put differently, Rule  
3 23(b) (2) demands a certain cohesiveness amongst class members  
4 with respect to their injuries, the absence of which can  
5 preclude certification." End quote. Found at page 604. The  
6 court described the cohesiveness as follows: First, the class  
7 must be sufficiently cohesive that any class-wide injunctive  
8 relief can satisfy the limitations of Rule 65(d), namely the  
9 requirement that it state its terms specifically and describe  
10 in reasonable detail the act or acts restrained or required.  
11 Second, a class action may not be certified under Rule 23(b) (2)  
12 if relief specifically tailored to each class member would be  
13 necessary to correct the allegedly wrongful conduct of each  
14 defendant.

15           The court's ruling in Shook II cautions that  
16 individual issues cannot be avoided simply by formulating an  
17 injunction at a stratospheric level of abstraction, and  
18 injunctions simply requiring defendants to obey the law are too  
19 vague to satisfy Rule 65. The bottom line is that, at the  
20 class certification stage where we are now, the injunctive  
21 relief sought must be described in reasonably particular detail  
22 such that the Court can at least conceive of an injunction that  
23 would satisfy the requirements of both Rule 65(d) and Rule  
24 23(b) (2). Shook II at pages 605 and 606.

25           Defendants argue that none of plaintiffs' proposed

1 remedies meet the requirements of Rule 23(b) (2) and Rule 65(d)  
2 because they are too vague, unmanageable and/or inappropriate.  
3 The Court agrees with defendants at least with respect to many  
4 of the proposed remedies. Without ruling definitively the  
5 Court can state that this Court is disinclined to enter an  
6 injunction generally requiring DHS to obey Oklahoma statutes  
7 and regulations because such an order would run afoul of Rule  
8 65 and the Tenth Circuit's directives. The Court will also be  
9 reluctant to order any type of relief incapable of description  
10 in a sufficiently objective way that both the defendant and the  
11 Court can determine whether the defendant is complying.

12           However, at least one remedy requested by plaintiffs  
13 appears to pass the test set out in Shook II. Plaintiffs seek  
14 an injunction setting limits on the caseloads of caseworkers  
15 and their supervisors. While the Court does not necessarily  
16 accept the propositions that the caseloads should be based on  
17 standards set by the COA and the CWLA, as proposed by  
18 plaintiffs, the injunctive relief is set forth in enough  
19 concrete manageable detail that the Court can at least conceive  
20 of an injunction that would satisfy the requirements of both  
21 Rule 23(b) (2) and Rule 65(d). Plaintiffs assert in this  
22 lawsuit that excessive caseloads are harming or putting at risk  
23 of harm all children in the class. Imposition of caseload  
24 limits would apply to the entire class. Thus, Rule 23(b) (2)'s  
25 cohesiveness requirement is met. The Rule 65(d) requirement is

1 also met because an injunction setting caseload limits would  
2 provide sufficient specificity and detail to escape the  
3 vagueness prohibition.

4 In this vein, the Court would like to address an  
5 argument raised by defendants in their briefing and in argument  
6 today. Defendants take the position that plaintiffs must show  
7 actual injury in order to seek injunctive relief and that a  
8 determination must be made that each and every plaintiff in the  
9 class must show actual injury before they are entitled to an  
10 injunction. In support of these propositions defendants cite  
11 the Vallario vs. Vandehey decision at 545 F.3d 1259, at page  
12 1268 note 7, Tenth Circuit 2009, and Tandy vs. City of Wichita,  
13 380 F.3d 1288 at page 1283, Tenth Circuit 2004. The defendants  
14 are mistaken in two respects. First, under Tandy, in order to  
15 establish standing named plaintiffs must show an injury in fact  
16 that is actual or imminent. However, in Tandy the court said  
17 that if plaintiffs seek prospective relief as opposed to  
18 retrospective relief, the plaintiffs must show they are  
19 suffering a continuing injury or be under a real and immediate  
20 threat of being injured in the future. Further, the court held  
21 in Tandy that quote, "Past wrongs are evidence bearing on  
22 whether there is a real and immediate threat of repeated  
23 injury." End quote. Found at 380 F.3d at 1283. Moreover,  
24 while named plaintiffs must show standing in order to proceed,  
25 neither Vallario nor Tandy stand for the proposition that each

1 and every class member must go through the same process at this  
2 point in this case, that is, in order to meet the requirements  
3 for class certification.

4 Applying this test, six of the remaining eight  
5 plaintiffs C.S., J.B. A.P., J.P., R.J., and G.C. allege  
6 physical abuse, sexual abuse, and/or injury due to unsafe  
7 conditions while in custody of DHS. The remaining two  
8 plaintiffs, J.A. and K.T., do not actually allege physical  
9 injury due to abuse or neglect in DHS custody, although I  
10 believe in Ms. Lowry's argument today she asserted that K.T.  
11 has in fact been subject to physical abuse. J.A., a 5-year old  
12 boy, alleges that during the one year he had been in custody  
13 before this suit was filed he had been shuffled through nine  
14 different placements including institutional facilities, which  
15 has led to a lack of adequate stability, treatment or care.  
16 K.T., a 16 year old girl, alleges she has suffered from  
17 developmental delays from being housed in inappropriate, unsafe  
18 and poorly monitored emergency shelters and group homes.

19 The Court concludes that the allegations of the  
20 remaining named plaintiffs satisfy the requirement regarding  
21 injury in fact and imminent risk of injury and, therefore, the  
22 Court must reject defendants' standing argument.

23 The question remains, given the Court's determination  
24 as to allegation of shuffled placement doesn't meet the  
25 commonalty requirement, whether J.A. should remain a member of

1 the class, but I'll leave that to you to suggest how to  
2 proceed. And of course we're proceeding with discovery so I  
3 don't know that it precludes discovery on the issue, but that  
4 remains an issue to be wrestled with.

5           Examining the remedies proposed by plaintiffs, it is  
6 clear that at least the caseload limit remedy meets the  
7 requirements of Rule 23(b)(2) and Rule 65(d), that is, it  
8 applies to the proposed class in a cohesive manner which would  
9 not require the Court to look at each class member individually,  
10 and at the same time it is specific and detailed enough that it  
11 escapes the vagueness defect. In this case, in contrast to the  
12 facts presented in Shook II, plaintiffs have given content to  
13 what it would mean to provided adequate caseload staffing.  
14 Thus, for purposes of today's hearing, plaintiffs have  
15 satisfied Rule 65(d) by showing that caseload limits are  
16 ultimately capable of description in a sufficiently objective  
17 way that both the defendants and the Court can determine if the  
18 defendants are complying.

19           Similarly, while this Court would be disinclined to  
20 order DHS to quote, "obey the law," end quote, regarding  
21 visitation and monitoring of foster children by caseworkers,  
22 the Court can conceive of an injunction regarding visitation  
23 and monitoring, if warranted by the evidence in a trial on the  
24 merits, that would meet the cohesiveness mandate of Rule  
25 23(b)(2) and still be specific enough to satisfy Rule 65(d).

1           The Court is less convinced that the remaining  
2 requests for relief meet the requirements of Rule 23 and Rule  
3 65. However, the Court makes no conclusive rulings about  
4 remedies today other than that with respect to plaintiffs'  
5 class certification motion, the remedy dealing with caseload  
6 limits and the remedy dealing with monitoring of children in  
7 foster care, appear to meet the requirements of these two  
8 rules. Therefore, this Court concludes that certification of  
9 the class requested by plaintiffs is appropriate.

10           For these reasons, plaintiffs' motion to certify,  
11 document number 4, is granted and the Court hereby certifies  
12 under Rule 23 the following class:

13           All children who are or will be in the legal custody  
14 of the Oklahoma Department of Human Services (1) due to a  
15 report or suspicion of abuse or neglect, or (2) who are or will  
16 be adjudicated deprived due to abuse or neglect.

17           Counsel, if you-all would approach.

18           (Off-the-record sidebar conference out of hearing of  
19 open court and the court reporter.)

20           THE COURT: Ms. Lowry, with regard to exhibits?

21           MS. LOWRY: Yes. Your Honor, I neglected to ask the  
22 Court to receive the dispositives that I used during the  
23 argument and so I would ask that they be made a part of the  
24 record.

25           THE COURT: Very well. And how are those marked?

1 MS. LOWRY: They are numbered 1 through 11.

2 THE COURT: Very well. Any objection?

3 MR. NANCE: No, Your Honor.

4 THE COURT: Very well, Plaintiff's 1 through 11 are  
5 admitted.

6 In addition, the Court needs to make the following  
7 conclusion with regard to Rule 23(a)(4), and I apologize for  
8 reading the order, but it's necessary to satisfy the legal  
9 requirements that are set forth by the Tenth Circuit, and  
10 there's one additional matter that the Court needs to touch  
11 upon. Rule 23(a)(4) requires a two-part inquiry. Number one,  
12 do the named plaintiffs and their counsel have any conflicts of  
13 interest with other class members; and number two, will the  
14 named plaintiffs and their counsel prosecute the action  
15 vigorously on behalf of the class? See Rutter & Wilbanks  
16 Corporation vs. Shell Oil Company, 314 F.3d 1180, at pages 1187  
17 to 1188, Tenth Circuit, 2002. In this case there appears to be  
18 no dispute regarding those two matters regarding counsel, as to  
19 conflict of interest or their ability to prosecute the action  
20 vigorously. Is there anything further?

21 MS. LOWRY: Not from plaintiffs, Your Honor.

22 THE COURT: Mr. Nance.

23 MR. NANCE: No, Your Honor. You are entering a  
24 written order in keeping with what you said or is this the  
25 ruling?

1 THE COURT: Well, this would be the ruling. The  
2 question may arise whether or not we ought to simply rewrite  
3 what I just read. You can certainly get it from Glen here.  
4 Basically it would not differ whatsoever from what I just read,  
5 so I think it's been adequately set forth on the record. There  
6 may be some debate about that but...

7 MR. NANCE: Thank you, Your Honor. And nothing  
8 further from us.

9 THE COURT: Very well. If there's nothing further  
10 we'll be adjourned.

11 (Recess.)

12

13 A TRUE AND CORRECT TRANSCRIPT.

14

15 CERTIFIED: s/ Glen R. Dorrough  
16 Glen R. Dorrough  
United States Court Reporter

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