

04-1144

IN THE
Supreme Court of the United States

KELLY A. AYOTTE, Attorney General of the State of
New Hampshire, in her Official Capacity,

Petitioner,

—v.—

PLANNED PARENTHOOD OF NORTHERN NEW ENGLAND, CONCORD
FEMINIST HEALTH CENTER, FEMINIST HEALTH CENTER OF PORTSMOUTH,
and WAYNE GOLDNER, M.D.,

Respondents.

ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE FIRST CIRCUIT

SUPPLEMENTAL BRIEF FOR RESPONDENTS

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Attorneys for Respondents

Pursuant to Supreme Court Rule 25.5, Respondents submit this Supplemental Brief to “present late authorities . . . not available in time to be included in” their initial brief. These materials – Protocols approved by the Supreme Court of New Hampshire – were referred to by the State, for the first time in its Reply brief, and are relevant to the operation of the judicial bypass provision of the Parental Notification Prior to Abortion Act (the “Act”). N.H. Rev. Stat. Ann. § 132:26 (2003) (Joint Appendix 18-20).

In its Reply Brief, Petitioner states, “The judicial bypass allows for an immediate abortion in the case of medical emergency.” Pet. Reply Br. at 11. In support of this claim, Petitioner states:

The New Hampshire Supreme Court may develop protocols⁵ which give access to judges’ home telephone numbers to hospital emergency rooms and to medical providers who perform abortions so that there is no delay in locating a judge in order to obtain immediate approval for an emergency abortion.

⁵ It is the State’s understanding that the Supreme Court was in the process of developing protocols and was close to finalizing them before the Act was declared unconstitutional . . . two days before the Act’s effective date.

Id. at 12 & n.5.

Subsequent to the filing of Petitioner’s Reply Brief, the Director of the Administrative Office of the Courts of the State of New Hampshire sent to the New Hampshire Governor’s

Legal Counsel copies of the Protocols to which Petitioner referred. *See* Memorandum to Katherine Hanna from Donald D. Goodnow, Esq. (Nov. 18, 2005) (hereinafter “Memo”) and attachments thereto, attached hereto at A1-24.¹ The Memorandum accompanying the Protocols explains that they had, in fact, been approved by the New Hampshire Supreme Court. *See id.* at A2 (“The Administrative Council recommended these materials and the Supreme Court approved them.”). Before receiving a copy of the Memo, Respondents were unaware of the existence of these Protocols.

Contrary to Petitioner’s suggestion, these Protocols establish that the judicial bypass does not allow for prompt access to a judge in medical emergencies. Rather, the Protocols make clear that no action will be taken on a bypass petition filed after regular court hours, on weekends, or on holidays until the next regular court business day. The Protocols state:

[People are instructed] to deliver a petition to a trial court and ask for a hearing date. In the alternative, because the statute requires that the courts provide access 24 hours per day, 7 days per week for these matters, a person may FAX a petition to the Domestic Violence Protective Order Registry (DVPOR) FAX line (271-8485) after regular court hours, on

¹ The memo is addressed to Katherine Hanna, Memo, A1, who is the Governor’s Legal Counsel, *see* Brief of the Honorable John H. Lynch, Governor of the State of New Hampshire as *Amicus Curiae* in Support of the Respondents. The Memo states that the Director of the Administrative Office of the Courts sent the Memo to the Governor’s Counsel at the request of Eileen Fox, Memo, A1, who is the Clerk of the Supreme Court of New Hampshire, *see, e.g.*, http://www.courts.state.nh.us/supreme/new_appellate_process.htm (explaining Court’s appellate process, and advising readers to address questions to “Eileen Fox, Clerk, NH Supreme Court”).

weekends, or on holidays. The DVPOR data entry person (Peg Paveglio or Pam Livingston) will forward the petition to the court designated by the petitioner as soon as she comes into work on the next regular court business day. The information for Minors also instructs the petitioner to deliver to the trial court a paper copy of the FAXED petition on the next regular court business day.

Court Procedure Bulletin, A8-9, referring to Information for Minors, A5 (same). In the case of a FAX petition, the minor “must also call [the] court on the next regular court business day to ask for [a] hearing date” Judicial Branch: Information for Minors, A5.

These Protocols thus confirm that the judicial bypass will not allow for immediate abortions in medical emergencies.

Respectfully submitted,

November 23, 2005

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APPENDIX

APPENDIX

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The State of New Hampshire

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MEMORANDUM

TO: Katherine Hanna

FROM: Donald D. Goodnow, Esq.
Director /s/ D.D.G.

DATE: November 18, 2005

RE: Parental Notification Procedures and Forms

Eileen Fox asked that I provide you with copies of the procedures and forms that were developed by the Judicial Branch to implement RSA 132:26, the Parental Notification Prior to Abortion Law.

I enclose copies of the following documents:

1. Information for Minors;
2. Court Procedure Bulletin;
3. Petition for Waiver of Parental Notice for Abortion;
4. Order on Petition for Waiver;

5. Guidelines for Judges;
6. Certificate of Lower Court Decision;
7. Draft Letter to the New Hampshire Medical Society.

These forms were developed by representatives of the three established trial courts. The Administrative Council recommended these materials and the Supreme Court approved them.

Please let me know if I can provide you with additional materials or information in connection with Judicial Branch efforts to prepare for implementation of the Parental Notification Legislation.

The State of New Hampshire

JUDICIAL BRANCH

INFORMATION FOR MINORS REQUEST FOR A WAIVER OF PARENTAL NOTIFICATION TO HAVE AN ABORTION PERFORMED

A law has been passed requiring a doctor to notify at least one of your parents or a guardian before performing an abortion if you are under the age of eighteen years. You may believe that neither of your parents nor a guardian should be notified before an abortion is performed because (a) you believe you are mature and capable of giving your consent to an abortion, or (b) you believe it would not be in your best interests to notify one of your parents or a guardian prior to an abortion. In either situation, you have the right to ask a judge to let a doctor perform an abortion without notifying anyone. You also have the right to have a lawyer help you in court, free of charge. All court forms related to this request and the hearing will be confidential.

Court form needed

If you want to ask a judge to allow you to have an abortion without telling one of your parents or a guardian, you will need to fill out a form called a petition. You can get this form from any court or from the internet at www.courts.state.nh.us. Follow the link to either the Superior Court, District Court, Probate Court, or Family Division Pilot Project home pages.

Then follow the link on the left side to “Forms”. The name of the form is “Petition for Waiver of Parental Notice for Abortion Requested by a Minor” and the form number is AOC-340-2348.

You should fill in all the blanks on the petition as well as you are able. The more information you can provide to the judge about your circumstances, the better. This form and any court hearing will be confidential. You will have to prove to the judge, in your own words, (a) that you are mature or old enough to give your informed consent to have an abortion performed without notifying your parents or a guardian or (b) that it would be in your best interests to have an abortion without notifying either of your parents or a guardian. You will also need to show the judge some kind of identification, such as a school identification card, a driver’s license, a report card from school, or a paycheck stub if you are working.

Where and when to file form

The statute says you can file your petition in “a court of competent jurisdiction.” You or your lawyer must decide in which court you will file your petition. If you are not sure what courts you may consider filing in, you may consult the judicial branch web site, www.courts.state.nh.us and click on “Find Your Court.” You may find it helpful to go to the bottom of that page and use the alphabetical list of towns that shows the courts that serve each town in New Hampshire.

It is best if you or your lawyer bring your petition to the trial court you have chosen between 8:30 AM and 4:00 PM on a regular court business day and ask that a

hearing date be set for your case.

You may file your petition by FAX after 4:00 PM and before 8:30 AM on regular court business days or on a weekend or holiday at 271-8485. If you file your petition by FAX, you must deliver a signed paper copy of your petition to the court you have chosen on the next regular court business day. If you file your petition by FAX, you must also call your court on the next regular court business day to ask for your hearing date and to ask that a lawyer be appointed to help you, if you want a lawyer and do not already one. You will find the telephone numbers for all New Hampshire courts on the judicial branch website at www.courts.state.nh.us; click on "Find Your Court."

Your right to have a lawyer

As mentioned earlier, if you do not yet have a lawyer, you may ask the court to appoint a lawyer to represent you. You do not have to pay for the lawyer. You can talk to your lawyer and he or she will represent you in this process. In addition, the court may appoint a Guardian at Litem. If appointed, this person will represent your best interests to the court, not necessarily what you want.

Court hearing

The court will schedule a hearing on your petition very soon after you file it. You must attend that hearing. The only people who will be present during your hearing will be you, a judge, your lawyer, a court security officer, a person who will record your hearing, and if appointed, a Guardian ad Litem. You may also

bring your doctor, nurse, family planning counselor, or anyone else you want at the hearing. The judge will decide whether any one you bring can come into the courtroom during the hearing.

After reading what you have written on the form, the judge will ask you questions. The judge will be trying to determine if (a) you are mature or old enough to give your consent to an abortion without telling either of your parents or a guardian or (b) it is in your best interests to have an abortion performed without telling either of your parents or a guardian. After your hearing, the judge will write an order that will tell you what the judge has decided and you will be given a copy of that order.

If the judge decides that you may have the abortion without telling one of your parents or a legal guardian, you do not have to notify your parents or guardian. You will be given two copies of a "Certificate of Lower Court Decision to Allow Abortion Provider to Perform an Abortion without Notifying a Minor's Parents or Guardian." One copy will have a court seal and should be given to your medical provider.

If the judge decides you cannot have an abortion without telling one of your parents or a legal guardian, you have the right to appeal to the New Hampshire Supreme Court. Your lawyer will also help you with this process.

Appeal to NH Supreme Court

If you decide to appeal the judge's decision that you cannot have an abortion without notifying a parent or

legal guardian, you must file a Notice of Appeal with the New Hampshire Supreme Court within 30 days of the trial court clerk's notice of decision. You must send a copy of the Notice of Appeal to the clerk of the trial court.

You may deliver your Notice of Appeal to the Supreme Court during regular business hours or mail it to the New Hampshire Supreme Court, 1 Noble Drive, Concord, New Hampshire 03301. The telephone number of the clerk's office is (603) 271-2646.

If you decide to file your appeal during non-business hours, you may send it by FAX to the Supreme Court clerk's office. The Supreme Court's FAX number is (603) 271-8900. If you send your appeal by FAX, you must also call the clerk of the Supreme Court at 1-877-877-9014 to advise the clerk that an appeal has been filed by FAX. You should also contact the Supreme Court clerk's office on the next business day to confirm that it has received your appeal. If you send your notice of appeal to the Supreme Court by FAX, you must deliver or mail the original notice of appeal form to the Supreme Court by the next business day. You may file a memorandum of law and an appendix of relevant documents with your notice of appeal or within two days of filing the appeal. For more information review Supreme Court Rule 7-B.

The Supreme Court will review your notice of appeal, the recording of the trial court proceedings, and the judge's written decision. It will issue a ruling on the appeal within 7 days of docketing. All documents and proceedings related to the appeal will be confidential.

The State of New Hampshire

COURT PROCEDURE BULLETIN

RELATIVE TO: Petition for Waiver of Parental Notice
for Abortion

Requested by a Minor Pursuant to RSA 132:26

1. Petitioner will obtain the "Petition for Waiver of Parental Notice for Abortion Requested by a Minor" form from a court, her health care provider, or the internet.
2. The statute allows a minor to file a petition in "a court of competent jurisdiction," without defining that term. The petitioner, or her lawyer, must choose which court to file in.

The Information for Minors instructs people to deliver a petition to a trial court and ask for a hearing date. In the alternative, because the statute requires that the courts provide access 24 hours per day, 7 days per week for these matters, a person may FAX a petition to the Domestic Violence Protective Order Registry (DVPOR) FAX line (271-8485) after regular court hours, on weekends, or on holidays. The DVPOR data entry person (Peg Paveglio or Pam Livingston) will forward the petition to the court designated by the petitioner as soon as she comes into work on the next regular court business day. The information

for Minors also instructs the petitioner to deliver to the trial court a paper copy of a FAXED petition on the next regular court business day.

3. There is no filing fee for this petition.
4. These cases are confidential; hearings will be closed. Cases shall be docketed in the superior court in the Equity Division with a filing type code of "WPN;" in the district courts in the Juvenile Division with a case type code of "WPN;" in the probate courts in the Confidential Division with a case type code of "WPN;" and in the family division pilot project in the Juvenile Division with a case type code of "WPN."
5. The court must schedule a hearing on a date that will allow the judge to rule within 7 calendar days from the date the petition was filed. Note that a FAXED petition is considered filed when the FAX is received at the DVPOR; the trial court may have a very short time in which to hold a hearing and issue an order.
6. If the petitioner has indicated that she wants a lawyer, assign a lawyer to the case. The court may also assign a Guardian ad Litem for the petitioner.
 - a. Select an attorney from the list of attorneys available to represent minors in cases under this statute.
 - b. Attorney rates will be \$60/hour with a \$1,000 maximum.
 - c. Bills should be submitted to the judge for review and approval and sent to the AOC for payment.

7. Enter the hearing information on the bottom of the petition, enter the docket number on the top, and give a copy to the petitioner while she is at the court to file the petition. If necessary, call the petitioner to advise her of the time, place and lawyer assigned if she has indicated that she wants a lawyer. Copies of the petition must also be given to the attorney and the Guardian ad Litem, if either has been appointed.
8. Petitioner should provide some sort of identification at the hearing.
9. The petitioner may be accompanied by a doctor, nurse, or family planning counselor. The court will determine whether these people will be allowed to attend the court hearing.
10. All hearings conducted in these matters shall be recorded on audiotape or on digital compact disc to ensure the lower court is able to immediately deliver a copy of the recording to the Supreme Court, in the event a minor appeals an order denying her petition.
11. The court must rule on the petition within 7 calendar days from the time the petition was filed. Again, note that a FAXED petition is considered filed when the FAX is received at the DVPOR; the trial court may have a very short time in which to hear the petition and issue an order. The judge must make written specific factual findings and legal conclusions supporting the decision. The Order on Petition for Waiver of Parental Notice for

Abortion Requested by a Minor should be used for this order.

If the judge grants the minor's petition, a staff member shall prepare a "Certificate of Lower Court Decision to Allow Abortion Provider to Perform an Abortion Without Notifying a Minor's Parents or Guardian." It is a template form found in your WORD directories under FILE-NEW in the following template directories: superior court "Civil and Equity;" district court "Civil;" probate court "Probate General;" and family division pilot project "Juvenile."

Give the minor a copy of the Certificate and the original Certificate which must bear an original signature and an original court seal; keep a copy of the Certificate for the court file. The minor will give the original Certificate to her health care provider to evidence the court's authorization to perform an abortion and to satisfy RSA 132:27.

12. If the judge denies the minor's petition, staff must give the minor a copy of the order. The petitioner may file an expedited confidential appeal to the New Hampshire Supreme Court.

An order authorizing an abortion without notification is not subject to appeal.

Supreme Court Appeal Procedure

13. A petitioner seeking to file an appeal must file a notice of appeal form with the Supreme Court. The petitioner must send a copy of the notice of

appeal to the clerk of the trial court.

If the notice of appeal is filed during business hours, it must be delivered or mailed to the clerk's office. When a notice of appeal is delivered or mailed to the Supreme Court, the date of receipt shall be considered the docketing date for purposes of RSA 132:26, II(c).

A petitioner may file the notice of appeal during non-business hours by sending the notice of appeal form to the clerk of the Supreme Court by FAX (271-8900), which will provide 24 hours a day, 7 days a week access to the courts. If the notice of appeal is sent to the FAX number, the petitioner must also contact the clerk of court by telephone (1-877-877-9014) to advise the clerk of the FAX transmission. When a notice of appeal is sent by FAX, the date that the documents is received in the clerk's office shall be considered the docketing date for purposes of RSA 132:26, II(c).

14. There is no filing fee for such an appeal.
15. Upon receipt of the copy of the Notice of Appeal, the clerk of the trial court shall arrange for immediate transfer of the recording of the proceedings before the trial court to the clerk of the Supreme Court and all exhibits filed and considered in the trial court.
16. All documents and proceedings related to an appeal of a trial court decision on a petition for waiver of parental notification for abortion shall be confidential.

17. A decision on the appeal must be issued within 7 calendar days of docketing of the appeal. The Supreme Court clerk's office shall send a copy of its decision by FAX to the clerk of the trial court. The Supreme Court clerk shall issue the mandate in accordance with Supreme Court Rule 24 on the same date as the decision and shall send a copy of the mandate by FAX to the clerk of the trial court.

The State of New Hampshire

Court _____ Docket Number: _____
(For Court Use)

In Re: _____
(Your Name)

**Petition for Waiver of Parental Notice for Abortion
Requested by a Minor (RSA 132:26)**

1. Name of person requesting waiver _____
Mailing address _____
Date of birth _____
Telephone number where you can be reached by court

2. Where are you living now? _____
3. Have you talked to an adult about your pregnancy?
___ Yes ___ No
If yes, who? _____
4. What doctor, nurse or family planning counselor have
you talked to about your pregnancy? _____

5. The following statements are true: (Check all that
apply.)
___ I am pregnant
___ I am _____ years old.
___ I wish to have an abortion to end my pregnancy.
___ I do not want either one of my parents or legal
guardian to be notified of my abortion.
___ I understand I am entitled to have the court appoint a
lawyer to represent me in this matter free of charge.

___ I want a lawyer. ___ I do not want a lawyer.

6. I ask the court to allow my doctor to perform an abortion on me without notifying either of my parents or my legal guardian for one of the following reasons: (Complete section a. or b.)

a. I believe I am mature and capable of giving my informed consent to an abortion because _____

b. I believe it is in my best interests to have an abortion without notifying either of my parents or a legal guardian because _____

Date: _____

Petitioner signature

YOU MUST CALL THE COURT TO ASK FOR INSTRUCTIONS ON THE NEXT REGULAR BUSINESS DAY AFTER YOU FILE YOUR PETITION.

HEARING INFORMATION - TO BE COMPLETED BY THE COURT

A hearing on this matter will be held at the following time and place:

Date _____ Time _____

Court name _____ Telephone number _____

Court address _____

Your court appointed lawyer is: _____

Address _____

Telephone number _____

Guardian ad litem (optional) _____

Address _____

Telephone number _____

The State of New Hampshire

Court: _____ Docket Number: _____

In Re: _____

**ORDER
ON PETITION FOR WAIVER OF PARENTAL NOTICE
FOR ABORTION
REQUESTED BY A MINOR
RSA 132:26**

_____ of _____
Name Address

petitioned this court for a waiver of parental notice prior
to abortion. A confidential hearing on this matter was
held on _____.

The petitioner ___ was *or* ___ was not represented by
counsel.

A guardian ad litem ___ was *or* ___ was not
appointed for petitioner.

Complete Section I or Section II or Section III

Section I

___ The petitioner claims to be mature and the court
finds the petitioner is mature and capable of giving

informed consent to the proposed abortion. Specific factual findings and legal conclusions supporting this decision are as follows:

__ Accordingly, the petition is granted. The court authorizes an abortion provider to perform the abortion without parental notification.

Section II

__ The court finds the petitioner lacks the necessary maturity or does not demonstrate the necessary maturity to give informed consent to the proposed abortion. The court further finds, however, that it is in the best interests of the petitioner to authorize an abortion for the petitioner without notification of her parent or guardian. Specific factual findings and legal conclusions supporting the court's decisions relative to the maturity of the petitioner and the best interest of the petitioner are as follows:

__ Accordingly, the petition is granted. The court authorizes an abortion provider to perform the abortion without parental notification.

Section III

__ The court finds the petitioner lacks the necessary maturity or does not demonstrate the necessary maturity to give informed consent to the proposed abortion. The court further finds that it is not in the best interests of the petitioner to authorize an abortion for the petitioner without notification of her parent or guardian. Specific factual findings and legal conclusions supporting the court's decisions relative to the maturity of the petitioner and the best interests of the petitioner are as follows:

__ Accordingly, the petition is denied. The court does not authorize an abortion provider to perform the abortion without parental notification.

SO ORDERED

Date: _____ Judge _____

The State of New Hampshire

Petition for Waiver of Parental Notice for Abortion Requested by a Minor (RSA 132:26)

Guidelines for Judges

Questions when Assessing Maturity
--

Support questions

1. Who supports you?
2. Do you go to school?
3. Do you have a job?

Independence questions

1. Whom have you talked to about your pregnancy?
2. Who is your doctor or do you go to a clinic?
3. Have you discussed this situation (pregnancy?) with the father of the baby?
4. Have you discussed pregnancy with a counselor or friend?

Personal relationships

1. Why do you want to end this pregnancy?
2. Why don't you want to tell your parents?
3. Why do you feel you are mature enough to decide to have an abortion?

**Issues to consider when determining Best
Interests**

1. Emotional state of minor
2. Medical condition
3. Home life
4. Financial considerations
5. Negative consequences of parental involvement if they receive notice

The State of New Hampshire

Court _____

In Re: _____

Docket Number: _____

**Certificate of Lower Court Decision to Allow
Abortion Provider to Perform an Abortion Without
Notifying a Minor's Parents or Guardian**

Minor name: _____

Date of Order: _____

This document certifies that on the above date a judge of this court signed an order that allows an abortion provider to perform an abortion on the above-named minor without first notifying the minor's parents or guardian, pursuant to NH RSA 132:6. This certificate is valid only if it bears the original signature of a court official and an original seal of the court.

Date

Title

Affix Seal

The State of New Hampshire
ADMINISTRATIVE OFFICE OF THE COURTS

Donald D. Goodnow, Esq.
Director

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Date

Palmer P. Jones
Executive Vice President
New Hampshire Medical Society
7 North State Street
Concord, NH 03301

Dear

A new law, RSA 132:26, governing the procedures for a minor to obtain an abortion without parental notice will go into effect December 31, 2003. The Judicial Branch has developed forms and procedures to comply with the portions of the new law related to court procedures. Copies of the new law and the forms and procedures are attached and are also available on our website at: www.courts.state.nh.us

Please disburse this information as you feel is appropriate to the NH medical community. If you have any questions, please contact this office.

A23

Sincerely,

Donald D. Goodnow
Director

DDG:rc

Enclosures