State Bar of Michigan

Negligence Law Section Quarterly

The Official Newsletter of the State Bar of Michigan Negligence Law Section

Summer 2008

From the Chair

Thomas M. Peters
Vandeveer Garzia, PC

It has been a summer of firsts for the Negligence Section of the State Bar of Michigan. For many years, we have been trying to move our monthly meetings to other jurisdictions so that we could communicate with our section members in other regions of the state. We wanted to let them know what we were doing to earn their yearly dues to our section.

We finally scheduled a reception in Traverse City and traveled there to discuss our goals and objectives with those members of our section who primarily work in the northern part of Michigan. We were pleased to have in attendance Justice Weaver from the Michigan Supreme Court, as well as the president of the State Bar of Michigan and representatives of the Michigan Association of Justice and the Michigan Defense Trial Council. We also had a number of judges from the Michigan Court of Appeals and other circuit courts in that area.

We are hoping to continue this tradition in the western part of the state and certainly to Flint, which has provided strong support to the council in the more recent years by its representatives who serve the Section so well (José Brown and Tom Waun).

We are still hopeful of progress to be made relative to assistance from the Michigan legislature in addressing the difficult problem that both defense and plaintiff attorneys have in handling automobile cases and the current definition of serious impairment.

We have our annual meeting coming up in September at the Dearborn Hyatt Regency on Friday, September 19, 2008 at 2 p.m. We are hopeful that many of you will have an opportunity to stop by and participate in the election of officers and our meeting, which hopes to focus on this election year. See you there.

Tom Peters

Ownership Issues in Litigation Involving Uninsured Motor Vehicles

By Thomas W. Waun
Wascha Waun & Parillo PC

When an uninsured motor vehicle is involved in an accident resulting in personal injury, a number of potential financial penalties can be imposed on the "owner" under Michigan's no-fault act, MCL 500.3101 et seq. The most notable of the penalties are: (1) if the owner is injured in the accident, the owner is not entitled to PIP benefits pursuant to MCL 500.3113(b); (2) if the owner was operating the uninsured vehicle in the accident and sustained injuries as a result of the negligence of another driver, "the owner is prohibited from recovering non-economic damages from the negligent driver pursuant to MCL 500.3135(2)(c); and (3) an uninsured owner may be responsible for reimbursing a no-fault carrier that has paid benefits arising out of the use of the uninsured motor vehicle and may lose his or her operator's license if they do not reimburse the benefits pursuant to MCL 500.3177.

Ownership is defined in MCL 500.3101(2)(g). MCL 500.3101(2)(g)(i) is the "gray area" that most often involves litigation following an accident involving an uninsured motorist. MCL 500.3101(2)(g)(i) includes as an "owner:"

> (i) A person renting a motor vehicle or having the use thereof, under a lease or otherwise, for a period that is greater than 30 days.

If an injured party was either occupying or operating an uninsured vehicle, and the injured party had used the vehicle on more than one occasion over a period greater than 30 days, litigation to attempt to establish that party's ownership should be expected.

The two primary published cases interpreting MCL 500.3101(2)(g)(i) are *Ardt v Titan Insurance Company*, 233 Mich App 685 (1999) and *Twichel v MIC General Insurance Corporation*, 469 Mich 524 (2004).

In *Ardt*, the plaintiff lived with his mother and was driving an uninsured truck titled in his mother's name when an accident occurred. There was conflicting testimony about how often the plaintiff would use the truck. One witness indicated that he was a regular user of the truck in excess of 30 days and another witness indicated that he only used it occasionally over a period in excess of 30 days. The issue in the case was framed by the Court as follows at 233 Mich App 690:

> This case requires that we decide whether any degree of usage for more than 30 days satisfies the statutory definition of "owner" as defendant and the trial court maintain, or whether the definition requires something more.

In finding that there had to be something more than occasional permissive use, the Court of Appeals interpreted the statutory definition as follows at 233 Mich App 690-691:

> … we hold that "having the use" of a motor vehicle for purposes of defining "owner" MCL 500.3101(2)(g)(i) means using the vehicle in ways that comport with concepts of ownership...The indications

> imply that ownership follows from *proprietary* or *possessory* usage, as opposed to merely incidental usage under the direction or with the permission of another. (Emphasis added.)

In *Twichel*, the plaintiff's decedent, Brady Sies, had purchased a vehicle from a friend by paying $300 down with an agreement to pay a second $300 to complete the transaction. The friend refused to transfer title to Mr. Sies until he received the second $300 payment. Mr. Sies was given the vehicle and the keys and complete possessory control of the vehicle after he made the first $300 payment. He died in an accident involving this vehicle five days after the first $300 payment was made, but before the second payment was made and title was transferred. The issue before the Supreme Court was whether Mr. Sies actually had to have used the vehicle for a period of 30 days or more before he became an owner since he wasn't yet the titled owner of the vehicle. Relying on *Ringewald v Bos*, 200 Mich App 131 (1993), the Supreme Court held that Mr. Sies didn't have to actually have possession of the vehicle for 30 days as long as it was contemplated that he would have the vehicle for 30 days. Justice Young stated as follows at 469 Mich 530-532:

> … the focus must be on the nature of the person's *right* to use the vehicle. …
>
> Accordingly, if the lease or other arrangement under which the person has use of the vehicle is such that the *right* of use will extend beyond 30 days, that person is the "owner" from the inception of the arrangement, regardless of whether a 30-day period has expired…. It is the nature of the *right* to use the vehicle – whether it is contemplated that the *right* to use the vehicle will remain in effect for more than 30 days – that is controlling, not the actual length of the time that has elapsed. (Emphasis added.)

An unpublished case from the Court of Appeals, *Vucinaj v Amerisure Insurance Company*, docket number 264933 (2006), extended the concept of ownership far beyond the bounds prescribed by *Ardt* and *Twichel.* Mr. Vucinaj was the titled owner of two separate vehicles, a Jeep Cherokee and a Ford Escort, both of which were uninsured. Mrs. Vucinaj primarily drove the Escort. On the date of her accident, Mrs. Vucinaj was injured while driving the Cherokee. Since there was no insurance available in the household, Mrs. Vucinaj sought PIP coverage through assigned claims pursuant to MCL 500.3172. As far as the Cherokee was concerned, Mrs. Vucinaj's testimony was that she had only driven the vehicle on 10 occasions over a 2 ½-year period (approximately 1 time every 3 months) and that she would also move it in the driveway if it blocked her car. Additionally, Mr. Vucinaj testified that there was a second set of keys available to his wife and that she didn't have to ask for permission if she wanted to use the vehicle. Under this set of facts, the Court of Appeals found Mrs. Vucinaj to be an owner **as a matter of law** citing *Twichel* and without mentioning *Ardt*.

Vucinaj, despite being unpublished, has become a primary tool of the defense bar in ownership cases. Under *Vucinaj* it is argued that when an individual has access to a set of keys, does not have to ask permission to use the vehicle and uses the vehicle more than once over a period in excess of 30 days, that individual then becomes an owner.

A number of potential ownership scenarios illustrate the problems inherent in *Vucinaj*. Each of these examples assume that the owner made a set of keys available with standing permission to use the vehicle. If several employees use an employer-owned vehicle occasionally over a period of time exceeding 30 days, each of these employees could arguably be an owner of the employer's vehicle. If parents allow their teenager to drive their vehicle occasionally over a period longer than 30 days the teenager is arguably an owner. If a college student allows her roommates to occasionally use her vehicle over a time period in excess of 30 days these roommates are arguably all owners. The above examples demonstrate the potential absurdity inherent in *Vucinaj* when it ignores *Ardt's* requirement of a showing of proprietary or possessory usage of the vehicle to establish ownership. *Ardt* is still good law. *Twichel* did not reverse *Ardt. Ardt* has been cited with favor in subsequent Court of Appeals opinions. See, e.g., *Iqbal v Bristol West Insurance Group*, 278 Mich App 31 (2008); *Burnett v Farmers Insurance Exchange*, docket number 278647 (2008).

In *Twichel*, Justice Young uses the term "right" several times when describing the type of use necessary to establish ownership. *Webster's Third New International Dictionary, Unabridged*, defines "right" in a property context as follows:

> (1) a power or privilege vested in a person by the law to demand action or forbearance at the hands of another; a legally enforceable claim against another that the other will do or will not do a given act; a capacity or privilege the enjoyment of which is secured by law. (2) a claim recognized and delimiting by law for the purpose of securing it.

Justice Young's use of the term "right" consistently throughout his opinion in *Twichel* is entirely consistent

Continued on next page

Ownership Issues...
Continued from page 3

with the *Ardt* holding "that ownership follows from proprietary or possessory usage." In *Twichel*, Brady Sies had a legally enforceable right to his vehicle as he was purchasing it under an installment sales contract. In *Ringewald*, the case relied on by Justice Young in writing the *Twichel* opinion, the owner of the vehicle had already fully purchased the vehicle and simply had not transferred title and clearly had an enforceable right to the vehicle.

In contrast, none of the individuals discussed in the examples above had any legally enforceable "right" to use the vehicles. If the employer decided to sell the vehicle or deny permission to its employees to use it, the employees have no enforceable right to the contrary. If the parents deny use of their vehicle to their teenager, again, the teenager has no legally enforceable right to use that vehicle. If the college student decided that she didn't want her roommates to use her vehicle, she could deny and, again, they would have no enforceable right to use the vehicle.

In summary, *Twichel* and *Ardt* provide both practitioners and trial courts with a good basis to analyze factual situations involving whether an untitled user of a motor vehicle is that vehicle's "owner." To be an owner, an individual has to have a "right" to use the vehicle and his or her usage of the vehicle has to be "possessory and proprietary" in nature. It is submitted that *Vucinaj* should be limited strictly to the facts of that case ,and to the extent that it conflicts with *Ardt* it should be disregarded by the trial courts pursuant to MCR 7.215(C). This analysis would serve to avoid potentially absurd and harsh results.

Thomas W. Waun
Wascha Waun & Parillo PC
10683 S Saginaw St
Ste D
Grand Blanc, MI 48439
P:(810) 695-6100
F: (810) 695-7884
E: teewaun@aol.com

About the Author

Tom Waun is a partner at Wascha Waun & Parillo, PC, located in Grand Blanc. He has specialized in personal injury and insurance litigation for the past 25 years. The current focus of his practice involves representing primarily plaintiffs in various matters including motor vehicle accidents, medical malpractice, legal malpractice and commercial litigation. Mr. Waun has been a member of the Negligence Section Council since 2005.

Trial Practice Book Available

About the Author

David R. Parker is a shareholder in the firm of Charfoos & Christensen, P.C. He is an appellate specialist who became associated with the firm in 1983. In his present role with the firm, he has primary responsibility for appeals in the Michigan Supreme Court, the Michigan Court of Appeals, the United States Sixth Circuit Court of Appeals, and the United States Supreme Court. He also heads the firm's research department, assists in briefing dispositive motions in trial court, and prepares seminar material. Parker's keen interest in the art of writing briefs and his strong presentational skills have earned him the well-deserved respect of the state legal community.

Parker assisted in researching, drafting, and editing the widely used book *Personal Injury Practice: Technique and Technology*, which he updates periodically for the publisher. His other works include *Starting the Case in the 90's: A Current Manual of Michigan Complaints, Michigan Medical Malpractice Cases Annotated: 1987-1993, Still Starting the Case-2001: An Updated Collection of Michigan Complaints, The Works: Medical Malpractice 1993-1997*, and *The Works Part II: Medical Malpractice Cases 1998-2003*.

David R. Parker
Charfoos & Christensen, P.C.
5510 Woodward Ave
Detroit MI 48202
(313) 875-8080 -- Phone
(313) 875-8522 -- Fax
drparker@c2law.com

"The Negligence Law Section's Trial Handbook is concise, yet useful. This book is a great resource for both new and experienced lawyers."

D. Andrew Portinga
Miller, Johnson, Snell & Cummiskey, P.L.C.
Chair of the Young Lawyers Section, 2004

"A handy primer that will benefit the new practitioner as well as the seasoned trial lawyer."

Robert June
Law Offices of Robert June, P.C.
Chair of the Litigation Section, 2004

Cost: Section Members $26
Non-Members $36

To order your copy of the Negligence Law Section – Trial Practice Book, send your name, firm, and mailing address, along with your check made payable to the **State Bar of Michigan**, to:

Madelyne C. Lawry
Negligence Law Section
PO Box 66
Grand Ledge MI 48837

Medicare Subrogation Update: Water Gets Rougher

By Jules Olsman, Olsman Mueller, PC

On December 29, 2007, the president signed into law the Medicare, Medicaid, and SCHIP Extension Act of 2007. The statute amends 42 USC §1395y(b) by adding the following requirement:

1. Insurers (including self-insureds) are required to determine the Medicare entitlement of all claimants to the secretary of Health and Human Services.
2. Penalty for noncompliance of $1,000 per day for each day that the insurer is not in compliance.

The "elephant in the room" known as Medicare has now invaded the defense end of personal injury litigation.

Determining whether a plaintiff in a personal injury matter has received Medicare is a matter of simple discovery in the form of an interrogatory or request to produce documents. It is unknown what the "driving force" of this particular provision is, other than to say that Medicare certainly is looking to recover every possible dollar that it can for monies spent as a result of third-party negligence.

Putting Medicare's Name on the Check

A prominent defense law firm in Michigan recently sent a letter to a number of plaintiff attorneys advising that it would adopt a policy of putting "Medicare" on every settlement draft as a payee and cited Medicare regulations as the basis for the statement. This writer vehemently disagrees that Medicare imposes any duty whatsoever on an insurance carrier or any other entity to place its name on the check as a payee. There is absolutely no regulation that this writer could find or locate that comes close to imposing such a requirement. To allow this would create an insurmountable burden on the part of plaintiff and plaintiffs' counsel to get this type of check cashed or negotiated. Simply put, it should not and will not happen. Any law firm that encounters this situation should seek immediate judicial relief from this type of conduct.

If defense counsel is worried about Medicare's lien, then a court order requiring the establishment of an escrow should be entered and the money set aside in an interest-bearing account pending receipt of information from Medicare and resolution of the subrogation claim. A simple hold harmless and identification agreement has continued to be an effective means of resolving this problem. Plaintiff and defense counsel need to work together to deal with Medicare, not work to make the problem more complicated.

Getting the Information

Getting information from Medicare continues to be an enormous problem. At a recent AAJ conference dealing with Medicare reimbursement issues, the overwhelming consensus of the speakers was that the best way to

obtain information from Medicare is by *calling* the COB (Coordination of Benefits) contractor at (800) 999-1118. Use of the website *www.mymedicare.gov* also may provide relief in terms of obtaining the amount of Medicare's reimbursement.

The hospital's and physicians' bills should also provide a substantial basis on which to reasonably determine the amount of Medicare's claimed reimbursement. Determining what is relevant to the injury is a different issue. However, for the purpose of a gross number, the bill should at least tell a substantial part of the story.

Jules B. Olsman is the president of Olsman Mueller, PC in Berkley, Michigan. He is the vice chair of the Negligence Law Section Council.

Jules B. Olsman
Olsman Mueller, PC
2684 11 Mile Rd
Berkley, MI 48072

P: (248) 591-2300
F: (248) 591-2304
E: jbolsman@olsmanlaw.com

Negligence Law Section's Summer Meeting, Traverse City– July 21, 2008

Judge Robert Columbo, Judge Paula Manderfield, Richard Kaufman, and David Mittleman

Tom Peters and Jules Olsman

Les Martens, SBM president Ron Keefe, and Brian Einhorn

Justice Elizabeth Weaver

Janice Yates, Judge Tom Powers, Judge Kurt Wilder, and Judge Christopher Yates

Ron Keefe, David and Leslie Christensen

Robert Schaffer, MDTC President

MAJ President Judy Susskind and Robert Schaffer, MDTC President

Judy Susskind, MAJ President

Judge Charles Nelson and Jody Aaron

Judge Christopher Yates and Justice Elizabeth Weaver

Thank You to Our Sponsors

of the July 21 Golf Outing and Reception

Lauren Bienenstock
BienenstockCourt Reporting & Video
www.bienenstock.com

Todd Tennis
Capitol Services, Inc.
www.capitolservices.org

David Mittleman
Church Wyble, PC
www.ckwlawyers.com

Jose' Brown
Cline, Cline & Griffin, PC
www.ccglawyers.com

Steven Galbraith
Galbraith, Gordon & Penzien, PC
www.glabraithpc.com

Henry Maher
Henry J. Maher

Michael Janes
Martin, Bacon & Martin, PC
www.martinbacon.com

Martin Waldman
Martin G. Waldman, PC
www.waldmanlegal.com

Jody Aaron
McKeen & Associates PC
www.mckeenassociates.com

Jane Bailey
Michigan Association for Justice
www.michiganjustice.org

David Christensen
Michigan Auto Law
www.michiganautolaw.com

Douglas Shapiro
Muth & Shapiro, PC
www.muthshapirolaw.com

Jules Olsman
Olsman Mueller PC
www.olsmanlaw.com

Paul Manion
Rutledge, Manion, Rabaut, Terry & Thomas, PC
www.rmrtt.com

Daniel Makarski
Secrest, Wardle, Lynch, Hampton, Truex & Morley, PC
www.secrestwardle.com

Gerald Padilla
Siemion, Huckabay, Bodary, Padilla, Morganti & Bowerman, PC
www.siemion-huckabay.com

Jennifer Blanzy
Structured Financial
www.sfainc.com

Thomas Peters
Vandeveer Garzia
www.vandeveergarzia.com

Thomas Waun
Wascha & Waun, PC
www.waschalaw.com

Legislative Update

The *Kreiner* Fix and the Coup That Wasn't

By Todd N. Tennis

Since the Supreme Court significantly changed Michigan's auto no-fault system by severely limiting third-party liability in the *Kreiner* decision, a coalition of attorney groups, health care organizations, and victims' advocates have worked furiously to amend the law to "fix" the high court's findings. The Coalition to Protect Auto No-Fault includes such diverse groups as the Michigan Association for Justice (formerly the MTLA) and the Michigan State Medical Society. Their work resulted in the introduction of House Bill 4301, sponsored by Representative Paul Condino (D-Southfield). This bill seeks to make amendments to Michigan's no-fault auto insurance law that proponents feel would restore the standard for "serious impairment of bodily function" to pre-*Kreiner* levels. The bill passed the House over a year ago, but has stagnated in the Senate Judiciary Committee ever since.

Governor Granholm and her Democratic allies in the Michigan legislature have attempted to tie the "Kreiner Bill" (as it has come to be known) to just about any issue they could think of in efforts to entice Senate Republicans to allow a vote on the Senate floor. During last year's tense budget negotiations that resulted in an increase to the Michigan income tax (along with a number of other reforms), there was a seeming understanding that the Senate would take some action on the *Kreiner* issue in 2008. That understanding, combined with the fact that House Democrats were refusing to take action on a number of Senate Republican bills until the *Kreiner* issue was resolved, made the continuing lack of movement in the Senate more and more frustrating.

On June 19, something happened that once again catapulted the issue into prominence. As Senate session began that morning, Democratic leaders observed that there were a number of Republicans absent. At least two would not be attending session that day at all: Senator Tony Stamas (R-Midland) was in Russia picking up his new adopted child, and Senator Bill Hardiman (R-Grand Rapids) was in Washington, D.C., for a meeting. A third, Senator John Pappageorge (R-Troy) had not yet arrived in the chamber. With Lt. Governor Cherry presiding, an opportunity presented itself.

In fact, the previous evening Senator Bruce Patterson (R-Canton) had a discussion with Senate Democratic leaders over the fact that at least two of his colleagues would be absent from session the following day. Senator Patterson had supported passing a fix to the *Kreiner* issue, and had also been at odds with Senate Majority Leader Mike Bishop (R-Rochester) on a package of local government annexation bills that Patterson desperately wanted passed. A plan was hatched to attempt to obtain a vote on the *Kreiner* issue as well as the annexation legislation important to Patterson. As session began, Senator Patterson was granted the floor by Lt. Governor Cherry, and he moved that three bills be discharged from committee: Senate Bill 124 (Patterson's own version of a *Kreiner* fix) and House Bills 5779 and 5859 (bills dealing with the annexation issue). Republican leaders were caught with their pants down as Lt. Governor Cherry stated, "Without objection so ordered."

Senator Gretchen Whitmer (D-East Lansing) then moved for the three bills to be placed on the Order of Third Reading. Again, the motioned passed without objection. When Senator Mark Schauer (D-Battle Creek) moved that the bills be placed at the head of the Third Reading calendar, Republican leaders realized what was happening and moved to put a stop to it. However, since they were missing three members, they were down to an 18-17 advantage over the Democrats. When Senator Patterson committed the cardinal sin of voting against his party on a procedural motion, Senator Whitmer's motion prevailed 18-17.

Republican leaders then made three separate attempts to recess session, but because of their absent members, Senator Patterson was able to tip the scales in the Democrats' favor and force session to proceed each time. The Republicans then left the floor to go into their caucus room in an attempt to deprive the chamber of a quorum. The Democrats responded by passing a motion for a Call of the Senate, which mandates that members be escorted by the sergeants (and the state police if necessary) into the Senate chamber. Senate Majority Floor Leader Alan Cropsey (R-DeWitt) argued that such a motion required a majority of those present and serving (20 votes) and

that there were insufficient votes to pass it. Lt. Governor Cherry ruled from the chair that the Call of the Senate motion required only a simple majority, and therefore, it took effect.

Things were going swimmingly for the Democratic usurpers until two things happened. One, Senator Pappageorge arrived, granting his party nominal control of the chamber again. Two, the motion to suspend the rules to vote directly on the *Kreiner* bill does indeed require 20 votes, and even with Senator Patterson's help, the Democrats could not muster that number. Since Senator Patterson was the only member of his caucus to break ranks, the effort was effectively doomed.

The big question is how this episode will impact future efforts to pass *Kreiner* legislation this year. Some observers admired the Democrats' ability to fight for what many consider their number one legislative goal. Others likened the move to whacking a hornets' nest.

Some immediate backlash was dished out the following week by Senate Majority Leader Bishop. Senator Schauer was stripped of his membership on the Senate Campaign and Election Oversight Committee. Senator Whitmer lost her position on the Senate Judiciary Committee, which will go from seven to six members. For his part, Senator Patterson was taken off the Senate Government Operations Committee, and had his vice chairmanship of the Senate Health Policy Committee handed to Senator Jason Allen (R-Traverse City).

Long-term effects of the brief Senate takeover are unclear. It certainly ensured that the *Kreiner* issue will not be taken up until fall, but there did not seem to be much chance of that in any case. More and more proponents are losing faith that the Senate leadership intends to do anything on the issue at all. At best, the June 19 mini-revolution points out serious divisions in the Republican caucus and may encourage Senator Bishop to finally take action on the *Kreiner* issue. At worst, the Coup that Wasn't may have given him an excuse to continue to sit on the issue until the legislation dies at the end of the year. Only time will tell.

Todd N. Tennis has been a lobbyist with Capitol Services, Inc., a multi-client lobbying firm that specializes in representing nonprofit organizations, since 1995. Before becoming a lobbyist, Todd earned a degree in political science from the University of Michigan and worked as a staff representative for former State Senator Fred Dillingham. He has represented the Negligence Law Section of the State Bar since 1999. Todd lives in Lansing.

Todd N. Tennis
Capitol Services Inc.
526 Townsend Lansing, MI 48933
P: (517) 372-0860 F: (517) 372- 0723
E: ttennis@capitolservices.org

Negligence Law Section Mission

The Negligence Law Section of the State Bar of Michigan provides education, information and analysis about issues of concern through meetings, seminars, its website, public service programs, and publication of a newsletter. Membership in the section is open to all members of the State Bar of Michigan. Statements made on behalf of the Section do not necessarily reflect the views of the State Bar of Michigan.

The Negligence Law Section has as its purpose the study of the procedures, rules, and statutes that embody the law of negligence to promote scholarship among its members and to unwaveringly promote the fair, equitable, and speedy administration of negligence litigation in the Michigan trial and appellate courts.

Role and Responsibilities

The Negligence Law Section is the largest single section of the Bar composed of over 4,300 litigators. The section is governed by a council composed of 14 representatives (this includes the officers and ex officio) of the plaintiff and defense bar who are elected in equal numbers to serve three-year terms. The representatives and officers of the council are dedicated to serving its members by improving the quality of legal services through:

- Publication of the NLS Monthly Bulletin of case summaries of all reported state and federal court matters pertaining to the practice of its membership;
- Providing continuing legal education in the form of written commentary, articles, and formal seminars;
- Representation of its membership before public bodies with respect to legislation and proposed court rule changes; and,
- The endowment of scholarships to worthy law students at each of the accredited law schools in the state of Michigan.

SBM
STATE BAR OF MICHIGAN
MICHAEL FRANCK BUILDING
306 TOWNSEND STREET
LANSING, MI 48933-2012
www.michbar.org

NON-PROFIT
U.S. POSTAGE PAID
LANSING, MI
PERMIT NO. 191

Table of Contents