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Table of Contents

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■ Bits and Bytes from the Section	1
■ State Bar of Michigan Information Technology Law Section Mission Statement.....	2
■ Decision of Interest: <i>Federal Trade Commission v. Wyndham Worldwide Corp.</i>	3
■ IT Law Section - Writing Competition! ...	4
■ Recent Developments in Information Technology Law	5
■ Michigan Pro Bono Patent Project.....	6
■ IT Law Section – 2015 Annual Meeting Minutes – DRAFT	8

Michigan IT Lawyer is published every other month. Previously published issues of the Michigan IT Lawyer, and its predecessor the Michigan Computer Lawyer, are available at <http://connect.michbar.org/itlaw/newsletter/newsletters>. If you have an article you would like considered for publication, send a copy to:

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Bits and Bytes from the Section

By Michael Gallo, 2014-2015 Chairperson,
Information Technology Law Section

October 2015 appears to have brought an early blast of cold weather. Winterizing the yard, turning on the furnace, and pulling cold weather wear from the back of the closet has occurred a bit earlier than I would prefer, but experiencing the change in seasons should be expected by anyone living in Michigan.

About this time of year, the Information Technology Law Section also undergoes changes. During the annual membership renewal with the State Bar of Michigan, decisions are made whether to renew membership in the IT Law Section. The Annual Information Technology Law Seminar presents a slate of interesting topics. During the Annual Section meeting, a handful of Council members are approved for a three year term. At the September Council meeting, new Section Officers are approved, efforts begin for the upcoming fiscal year.

On September 20, 2015, at the **8th Annual Information Technology Law Seminar**, sponsored by **Privacy Associates International LLC, Dykema and BejinBieneman PLC, Mark Malven**, leader of Dykema's Technology and Outsourcing Transactions practice, served as Seminar Moderator for the following speakers and topics:

- *Charles Bieneman*: Basics of IP Protection for Software
- *Christopher J. Falkowski*: Open Source Software Licensing: Opportunities and Pitfalls
- *Vincent J. Wilk; Donald M. Crawford; Jonathan M. Boguth*: Technology Buyers Panel
- *Erin Fonté*: X-Commerce: Understanding the Changing Landscape and Legal Issues in Payments
- *Keith Cheresko; Vincent I. Polley; Jeffrey A. Ingalsbe (Moderator: Robert L. Rothman)*: Privacy Panel: Privacy and Data Protection is Not Just for Clients
- *Lawrence Harb*: Technology and "Cyber" Insurance

Over 90 persons registered for this year's seminar, which justified the months of effort expended identifying speakers, developing presentation content, and managing the logistical planning and communication plans for the event. Lessons learned this year have been incorporated into a planning guide for 2016's seminar, as the Council seeks to continuously improve the process, and works to provide attendees with a great experience!

During the Seminar luncheon, the Section renewed *Christopher Mourad* as a Council member, and approved *Adam Rubin, Joellen Shortley* and *Michael McCann*





2015-2016

Information Technology Section Council

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 Chair-Elect ■ Christopher J. Mourad
 Secretary ■ Donna K. Mallonee
 Treasurer ■ Keith A. Cheresko

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NEWSLETTER EDITOR

Michael Gallo

*denotes deceased member

Bits and Bytes . . .

Continued from page 1

dish as new Council members! Minutes later, during the Council meeting, nominations for the Officer positions were reviewed and approved:

- **Chairperson**, *Susanna C. Brennan*
- **Chairperson-Elect**: *Christopher J. Mourad*
- **Secretary**: *Donna Mallonee*
- **Treasurer**: *Keith Cheresko*

Only a few weeks into their new terms, the Officers have already begun walking through their roles, planning the next year's slate of Section and Council meetings, reviewing a budget for proposal to the Council, and considering ways to incorporate more people into Section activities.

For me, the past four years serving as a Section Officer have been rewarding, instructive, and productive. The most lasting memory for me will be of the dozens of people I met within the Section and the *State Bar of Michigan*. Attending the *Bar Leadership Forum* provided an opportunity to participate in numerous forums and meet leaders from across Michigan. Working on the annual IT Law Seminar provided an opportunity to witness the best in volunteerism, both of those responsible for planning, and of the dozen people who took the stage to share knowledge and insights of the IT law industry. I learned that for a Section to be successful, there is an army of *State Bar of Michigan* staff available to assist with financial matters, communications, event planning, issue presentation, membership development, and leveraging technology offerings such as the web site, listserv, and teleconference capabilities.

So, to close this column, thank you to all who made the past year eventful, in a good way! ■

State Bar of Michigan Information Technology Law Section Mission Statement

The purposes of the Section are to review, comment upon, and appraise members of the State Bar of Michigan and others of developments in the law relating to information technology, including:

- (a) the protection of intellectual and other proprietary rights;
- (b) sale, leasing, distribution, provision, and use of, hardware, software, services, and technology, including computer and data processing equipment, computer software and services, games and gaming, information processing, programming, and computer networks;
- (c) electronic commerce
- (d) electronic implementation of governmental and other non-commercial functions;
- (e) the Internet and other networks; and
- (f) associated contract and tort liabilities, and related civil and criminal legal consequences.

The Information Technology Law Section's bylaws can be viewed by accessing <http://connect.michbar.org/itlaw/council> and clicking the 'Bylaws' link.

Decision of Interest: *Federal Trade Commission v. Wyndham Worldwide Corp.*

By Adam Rubin, Senior Vice President of Legal Affairs, PrizeLogic

In June 2012, the Federal Trade Commission (“FTC”) filed suit against Wyndham Worldwide Corporation (“Wyndham”), an international hotel conglomerate, claiming that Wyndham violated Section 5 of the FTC Act because it “unreasonably and unnecessarily exposed consumers’ personal data to unauthorized access and theft.” (FTC v. Wyndham, United States Court of Appeals, 3rd Cir.; No. 14-3514, <http://www2.ca3.uscourts.gov/opinarch/143514p.pdf>, p. 8). Congress granted the FTC broad authority to regulate commerce pursuant to the FTC Act, and Wyndham challenged that such authority does not extend to data security matters. The U.S. Court of Appeals for the Third Circuit ruled in favor of the FTC, holding that the FTC’s authority to regulate commerce extends to cybersecurity. (Wyndham, at 46). The recent decision provides guidance for businesses and practitioners on how regulators and courts will assess cybersecurity practices.

Wyndham’s Potential Security Blunders

The FTC action against Wyndham resulted from three separate security breaches occurring between 2008 and 2009. The FTC alleged hackers were able to obtain payment card information from over 619,000 consumers causing at least \$10.6 million in fraud loss. *Id* at 11. In the first attack, hackers were able to break into Wyndham’s network and use a brute-force method (i.e., repeatedly guessing users’ login IDs and passwords) to access administrator accounts; in the second attack,

hackers used an administrative account to scrape consumer data from Wyndham’s network undetected for approximately two months; and in the third attack, hackers were able to access property management servers of multiple hotels through the use of an administrative account that was not setup using least privileged access principles. *Id*.

The FTC relied on the following cybersecurity practices to support its claim against Wyndham:

1. Wyndham stored payment information unencrypted or in “clear readable text.”
2. It allowed the use of easy to guess passwords.
3. It failed to limit access between management systems and other networks through readily available security measures such as firewalls.
4. It failed to implement adequate information security policies and procedures, including the use of non-updated operating systems, allowing default user IDs and passwords, and not having sufficient devices to identify the source of the attacks.
5. It failed to adequately restrict third-party vendor access to its network.
6. It failed to employ reasonable measures to detect and prevent unauthorized access to its network or to conduct security investigations.

Continued on next page



7. It failed to follow proper incident response procedures.

Additionally, the FTC alleged that, contrary to Wyndham's privacy policy, its cybersecurity practices did not use encryption, firewalls, and other commercially reasonable methods for protecting consumer data. *Id.* at 8-10. The FTC claims that this failure to follow its own privacy policy is directly relevant to whether Wyndham's conduct constituted unfair and deceptive practices violating Section 5 of the FTC Act.

Key Takeaway

Data security and privacy are vital to the success of any organization. Whether monitoring your own privacy practices or vetting your vendor's privacy practices, dedicated personnel should be continuously monitoring and updating your company's information security program. Your privacy policy must accurately describe your cybersecurity practices to avoid a similar unfair or deceptive claim as Wyndham. Also, make sure your organization is prepared by employing reasonable security measures, including encryption of sensitive data, implementing and enforcing security policies and procedures, conducting frequent security awareness training with all personnel, and testing your incident response procedures. A common industry saying is that "it's not if but when"

a security incident will occur. When a breach occurs, the ability to identify the incident, respond promptly, and demonstrate reasonable security measures were implemented could be the difference between a manageable problem and a severe reputational and monetary loss, or worse. ■

About the Author

Adam Rubin is Senior Vice President of Legal Affairs at PrizeLogic. Adam specializes in advertising, promotions, commercial transactions and data privacy and security. As a former Assistant Attorney General for the State of Michigan, he developed a unique practice in highly regulated industries and consumer protection. Adam's regulatory enforcement background contributes to his conservative approach and commitment to providing PrizeLogic and its clients the highest quality service in the marketplace. Locate Adam on LinkedIn at <https://www.linkedin.com/in/adamsrubin> and on Twitter at @adamsrubin.

The opinions and comments expressed herein are my own and do not necessarily represent those of PrizeLogic. This is intended for general informational purposes only and not legal advice. Readers should not act upon this information without seeking professional counsel.



IT Law Section - Writing Competition!

Each year the IT Law Section seeks student essays for Edward F. Langs Writing Awards. A total of up to \$3,000 is available for distribution for up to six award winning essays that contribute to the knowledge and understanding of information technology law, which are published in the Section's newsletter, the Michigan IT Lawyer. Please share this opportunity with law school faculty, staff and students who may be interested!

2016 Edward F. Langs Writing Award Essay Competition Rules

1. Awards will be given to up to six student essays, which in the opinion of the judges make the most significant contribution to the knowledge and understanding of information technology law. Factors to be taken into consideration include: originality; timeliness of the subject; depth of research; accuracy; readability; and the potential for impact on the law.
2. Essay must be original, deemed to be of publishing quality, and must not have been submitted to any other contest within the previous 12 months.
3. Essay must be typed, double spaced, at least ten pages in length, must contain proper citations listed as either endnotes or footnotes, and must have left, right, top, and bottom margins of one inch.
4. Essay must include the submitter's name, email address, mailing address, telephone number, and school attended.
5. A total of up to \$3,000 in US dollars is available for distribution between the award winning essays, and all rights to award winning essays shall become the property of the State Bar of Michigan.
6. The Information Technology Section of the State Bar of Michigan reserves the right to make editorial changes, and to publish award winning essays in the Section's newsletter, the Michigan IT Lawyer. (Previous issues of the Michigan IT Lawyer can be accessed at <http://connect.michbar.org/itlaw/newsletter/newsletters/>)
7. Essay must be submitted as a Microsoft Word document, postmarked by June 30, 2016, and emailed to dsyrowik@brookskushman.com. ■

Recent Developments in Information Technology Law

By David R. Syrowik, Brooks Kushman PC

PATENTS – Case Law – U.S. Supreme Court

As reported at 90 BNA's PTCJ 2470, on June 22, 2015, the Supreme Court ruled that the patent expiration rule in *Brulotte v. Thys Co.* which said that "a patentee's use of a royalty agreement that projects beyond the expiration date of the patent is unlawful per se" remains intact. The court said that "the intersection of two areas of law: property (patents) and contracts (licensing agreements)" creates a "superpowered form of *stare decisis*," requiring "a superspecial justification to warrant reversing *Brulotte*." *Apotex Inc. v. UCB, Inc.*

As reported at 90 BNA's PTCJ 2164, on May 26, 2015, the Supreme Court ruled that a belief that a patent is invalid isn't a defense to a charge of induced infringement. Reversing the Federal Circuit, the Court holds that Cisco Systems Inc. couldn't overturn a \$63.8 million jury award based on its argument that it believed Commil USA LLC's Wi-Fi related patent claims were invalid as indefinite, not enabled and lacking adequate written description support. *Commil USA, LLC v. Cisco Systems, Inc.*

PATENTS – Case Law – U.S. Courts of Appeal

As reported at 90 BNA's PTCJ 2463, on June 23, 2015, the U.S. Court of Appeals for the Federal Circuit ruled that preserving user-entered data on Internet forms while the user goes back and forth in a web browser isn't an idea eligible for a patent under Section 101 of the Patent Act. *Internet Patents Corp. v. Active Network, Inc.*

As reported at 90 BNA's PTCJ 2386, on June 11, 2015, the U.S. Court of Appeals for the Federal Circuit ruled that online retail operator Amazon.com successfully kicks out OIP Technologies' patent on computer-implemented methods for "pricing a product for sale" under 35 U.S.C. § 101. *OIP Techs., Inc. v. Amazon.com, Inc.*

As reported at 90 BNA's PTCJ 2388, on June 16, 2015, an *en banc* U.S. Court of Appeals for the Federal Circuit ruled that the "strong" presumption that a court should not invoke means-plus-function analysis when a claim lacks the word "means" is not so strong any more. In a revised opinion, the court says that its prior standard had "shifted the balance struck by Congress in passing 35 U.S.C. § 112, para. 6, and has resulted in a proliferation of functional claiming untethered to § 112, para. 6 and free of the strictures set forth in the statute." Nonce words, like

"module" here, are more likely to indicate means-plus-function analysis. *Williamson v. Citrix Online LLC.*

As reported at 90 BNA's PTCJ 2157, on May 22, 2015, the U.S. Court of Appeals for the Federal Circuit ruled that the voice-recognition software of Microsoft doesn't infringe a patent owned by Allvoice Development. The Federal Circuit also says that certain claims of the patent were invalid because they "merely claimed software instructions." *Allvoice Developments US, LLC v. Microsoft Corp.*

As reported at 90 BNA's PTCJ 2083, on May 18, 2015, the U.S. Court of Appeals for the Federal Circuit took \$382 million off of a \$930 million jury verdict for Apple and against Samsung in their long-running war on smartphone intellectual property. The appeals court reverses the district court's decision that iPhone features were protectable under trade dress principles. *Apple Inc. v. Samsung Elecs. Co.*

As reported at 90 BNA's PTCJ 1915, on May 6, 2015, the U.S. Court of Appeals for the Federal Circuit ruled that EON patent asserted against smartphone firms affirmed invalid for indefiniteness for failure to disclose an algorithm corresponding to a software function. *Eon Corp. IP Holdings LLC v. AT&T Mobility LLC.*

As reported at 90 BNA's PTCJ 2539, on July 6, 2015, the U.S. Court of Appeals for the Federal Circuit ruled that a software "brain" managing content of a website based on user data wasn't an inventive concept, and thus didn't make the abstract idea of customizing website content patent-eligible. *Intellectual Ventures I LLC v. Capital One Bank (USA), N.A.*

As reported at 90 BNA's PTCJ 2540, on June 30, 2015, the U.S. Court of Appeals for the Federal Circuit ruled that SpeedTrack's online product search patent can't be infringed by customers using an application sold by Oracle under the Kessler doctrine. *SpeedTrack, Inc. v. Office Depot, Inc.*

As reported at 90 BNA's PTCJ 2626, on July 9, 2015, the U.S. Court of Appeals for the Federal Circuit backed a Patent Trial and Appeal Board decision that Versata Software's patent on software for pricing products was ineligible. The decision is good news for SAP America, but an even bigger win for the PTAB and its definition of challengeable business method patents. *Versata Dev. Grp., Inc. v. SAP Am., Inc.*

related to its software – instead of the software itself – dooms an infringement claim. *AStar Grp., Inc. v. Manitoba Hydro*.

PATENTS – Case Law – U.S. District Courts

As reported at 90 BNA's PTCJ 1930, on May 1, 2015, the U.S. District Court for the Northern District of California ruled that Apple loses bid to overturn jury's verdict that Golden Bridge patent not invalid for obviousness. *Golden Bridge Tech., Inc. v. Apple, Inc.*

As reported at 90 BNA's PTCJ 2549, on July 7, 2015, the U.S. District Court for the Eastern District of Texas awarded Apple a new trial over a \$533 million patent damage award over its iTunes software. *Smartflash LLC v. Apple Inc.*

As reported at 90 BNA's PTCJ 2765, on July 27, 2015, the U.S. District Court for the Western District of Washington ruled that Amazon.com successfully knocks out a 1994-filed patent on an enhancement in e-commerce. The court holds that under *Alice v. CLS Bank*, six asserted patents “describe nothing more than what buyers and sellers have done since the dawn of commerce,” only using a generalized computer function. *Teledbuyer, LLC v. Amazon.com*.

COPYRIGHTS – Case Law – U.S. District Courts

As reported at 90 BNA's PTCJ 2711, on July 16, 2015, the U.S. District Court for the Central District of California ruled that an internet broadcaster of live television might be entitled to a compulsory license. Granting a motion for summary judgment,

the court says that FilmOn was a “cable system” entitled to a compulsory license under the Copyright Act's definition, because the company operated a facility that received broadcast signals, reformatted those signals and retransmitted them to the viewing public. *Fox Television Stations, Inc. v. AereoKiller*.

TRADEMARKS – Case Law – U.S. District Courts

As reported at 90 BNA's PTCJ 3037, on August 21, 2015, the U.S. District Court for the Eastern District of Michigan ruled that submitting a mobile application to Apple Inc.'s App Store wasn't sufficient to establish its use in commerce. The decision also clarifies that app stores such as Apple's or Google's aren't distributors for trademark law purposes, because they do not purchase and resell apps. *Kelly Servs., Inc. v. Creative Harbor, LLC*.

TRADEMARKS – U.S. Patent and Trademark Office

As reported at 90 BNA's PTCJ 1786, on April 21, 2015, the Trademark Trial and Appeal Board (TTAB) ruled that “Buy Auto Parts” is generic and adding “.com” doesn't make the phrase distinctive. *Meridian Rack & Pinion, In re*

As reported at 90 BNA's PTCJ 2707, on July 17, 2015, the Trademark Trial and Appeal Board ruled that a Pennsylvania Internet radio service's failure to prosecute its opposition to a trademark registration attempt precluded it from pursuing a cancellation petition. The board says that the final judgment in the opposition proceeding was preclusive, even though it had been based on a procedural, rather than substantive, finding. *Urock Network, LLC v. Sulpasso*. ■



IT Law Section – 2015 Annual Meeting Minutes – DRAFT

Following is a draft of the Information Technology Law Section's Annual Section Meeting Minutes from September 20, 2015. Please review and provide feedback to michael@gallo.us.com by July 30, 2016.

A revised version of these minutes will be presented for approval at the IT Law Section's next annual meeting, which is targeted for September 2016, during the luncheon at the 9th Annual Information Technology Law Seminar!

**State Bar of Michigan
Information Technology Law Section
Annual Section Meeting Minutes
September 10, 2015 - DRAFT
The Inn at St. John's, Plymouth, Michigan**

Call to Order

With Michael Gallo, Chair, presiding, a quorum of Section Members was confirmed and the meeting was called to order at 12:50 PM. A list of attendees is attached as 'Exhibit A'.

Approval of September 2014 Annual Section Meeting Minutes

After a motion to approve the September 24, 2014 Annual Section Meeting Minutes was made and seconded from the floor, the motion passed unanimously.

Officer Reports

Donna Mallonee reported that to date, the Section has a net income of approximately \$9,801.56 for the current fiscal year, and a total fund balance of \$58,257.14. The exact net income for 2014-2015, and total fund balance, will be impacted by the financial results of the 8th Annual Information Technology Seminar.

Election of Slate of Council Members

Mr. Gallo identified the following nominated slate of council members for a three year term from 2015-2018:

- Christopher J. Mourad – P68011
- Adam Rubin – P71941

- Joellen Shortley – P46136
- Michael McCandlish – P74858

After a motion to approve the slate of nominations was seconded from the floor, the motion passed unanimously.

New Business

None.

Adjournment

The meeting was adjourned at 12:53 PM following a motion made and seconded from the floor.

Exhibit A - 2015 Information Technology Law Annual Meeting - Section Members Attendees

P47098, Karen P. Agacinski, Oakland County Corp Counsel
P76646, Matthew Jan Baciak, Blue Cross Blue Shield of Michigan
P33230, Steven D. Balagna, Balagna & Associates PLLC
LS094397, Jeffrey M. Barker
P72074, Stephanie L. Barr, ITC Holdings Corp
P75443, Bradley W. Bidwell, The Dow Chemical Company
P66755, Charles A. Bieneman, Bejin Bieneman PLC
P57725, Jeremy D. Bisdorf, Jaffe Raitt Heuer & Weiss PC
P73325, Jon Boguth, Hall Render Killian Heath & Lyman PLLC
P67018, Susanna C. Brennan, Kelly Law Registry
P67501, William T. Casey, Hewlett-Packard Company
P32663, Keith A. Cheresko
P50203, Donald M. Crawford
P77455, Matthew Jon DeKoekkoek, Steelcase Inc
P76514, Michael Thomas Ezzo
P57019, Christopher J. Falkowski, Falkowski PLLC
P54858, Linda S. Furlough, Meritor Inc
P73271, Michael Vincent Gallo
P72284, Mary Kathryn Griffith

Continued on next page

P37210, Suzanne M. Johnson
P64656, Paul A. Justin, TD Auto Finance LLC
P72513, Michelle M. LaLonde, Wayne State University Law School
P69631, David Linehan, Jackson National Life Insurance Company
P68649, Donna Kae Mallonee, Heritage Legal Services PLLC
P67203, Mark G. Malven, Dykema Gossett PLLC
P74858, Michael James McCandlish, Bejin Bieneman PLC
P72373, Kyle Patrick McLaughlin, Dept of Attorney General
P70561, Heather Brenneman Miles, Wright Beamer PLC
P73527, Raymond J. Miller, Jr., Stefanini
P68011, Christopher J. Mourad, Stefanini Inc
P35425, Karen G. Mucha, United Physicians
P72021, Ravi Kumar Nigam, Law Offices of Ravi K Nigam PC
P36176, Kathryn L. Ossian, Ossian Law PC
P73260, Erica Denise Partee, FCA US LLC
P67644, Carla M. Perrotta, General Motors Legal Staff
P75755, Tammy Tiffany Jones,
P38571, Vincent I. Polley, KnowConnect PLLC
P74249, Brian Daniel Popeney, WorkForce Software LLC
P23651, Robert L. Rothman, Privacy Associates International LLC
P71941, Adam Satovsky Rubin, PrizeLogic
P78030, Christopher W. Schneider, Oakland Law Group PLLC
P46136, Joellen Shortley, Oakland County Corp Counsel
P73747, Gautam Bir Singh, Singh Law Firm PLLC
P71975, Isaac T. Slutsky, Brooks Kushman PC
P43580, Anthony A. Targan, ProQuest
P35723, John L. Tatum, John L. Tatum PC
P59317, Dean B. Watson, Dean B. Watson Esq
P72253, Jeanne M. Whalen, Dykema Gossett PLLC
P77736, Craig Allen Whitt, Jr., WorkForce Software LLC
P33171, Cynthia F. Wisner, Trinity Health
P74220, John Wright, John Wright Law PLLC ■