



IN THIS NEWSLETTER:

[Cases & Resolutions](#)

[News & Initiatives](#)

[IAM Pro Bono Update](#)

[Update on Home Foreclosures](#)

[Cases Worth Noting](#)

Dear Friends and Colleagues,

This edition of Dispute Resolution Update features recent mediation-related court decisions, as well as news describing dispute resolution initiatives in this country and throughout the world. The information has been summarized by Keith L. Seat, a respected mediator and Editor of the International Academy of Mediator's newsletter.

SAVE THAT DATE!
Annual CLE/CME Training Event
Friday, September 20, 2013

Each fall, Associates in Dispute Resolution welcomes litigators, mediators and professionals from around the region to attend our seminar and enhance their dispute resolution techniques. The focus is placed on mastering mediation issues, learning new skills and assessing our self-awareness and methods in dealing with conflict.

This year, our annual one-day continuing legal education event will be held in our traditional conferencing facility located at 212 SW 8th Avenue, Lower Level, Topeka, Kansas. In response to past concerns we have arranged for free parking for registrants at the City of Topeka parking facility, Crosby Place, located just one block East of our facility on 8th Avenue.

We are seeking approval for six (6) hours of CLE/CME credit in Kansas and Missouri, including 1.0 hours of ethics.

Please reserve the date of Friday, September 20, 2013, to attend this informative seminar. An early-bird registration announcement will be forthcoming within the next two weeks. For further information, please contact us at info@adrmediate.com.



Distinguished Fellows
of the International Academy of Mediators



2008-2012 Super Lawyers

*Larry Rute, Licensed to Practice in
Kansas & Missouri*

MEDIATION QUOTE:

"[P]eople who have a vested self-interest in a situation have difficulty approaching the situation without bias, even when they view themselves as honest. . . . [T]his bias extends to the observation of others: that is, if you are motivated to turn a blind eye to someone's unethical behavior, you won't see it. The term *motivated blindness* describes the common failure of people to notice others' unethical behavior when seeing that behavior would harm the observer."

- Max H. Bazerman & Ann E. Tenbrunsel, *Blind Spots: Why We Fail to Do What's Right and What to Do About It* (Princeton University Press, 2011) at 81.

CASES & RESOLUTIONS

Mediated Settlement in Class Action Upheld Based on Term Sheet, After Determining Inapplicability of California's Confidentiality Law

Mediation in California resulted in the parties reaching an agreement, signing a term sheet and reporting success to the federal court in Utah where class action litigation was pending. But the parties were unable to agree on a detailed settlement agreement and defendants withdrew their intention to settle. The Utah court: applied conflict of laws principles to determine that California's strict mediation confidentiality law was trumped by Utah's statute; determined that the mediation

confidentiality agreement making inadmissible all statements prior to "complete settlement" did not apply to the term sheet, even though the parties intended to prepare a more detailed settlement agreement; and applied contract law principles to conclude that the essential terms of the contract were present in the term sheet. Thus, the Utah court concluded that the mediation agreement was enforceable.

[Miller v. Basic Research, LLC](#), No. 2:07-CV-871 TS (U.S.D.C. D. Utah, March 22, 2013)

Indiana Supreme Court Rejects Exception to Mediation Confidentiality

In a strongly worded opinion in support of mediation confidentiality, the Indiana Supreme Court vacated the appellate court's opinion and reversed the exception to mediation confidentiality that the appellate court allowed by permitting evidence from mediation to be admitted for "another purpose," such as determining whether a mediated settlement agreement should be modified due to mistake. The Supreme Court clarified that admissibility for other purposes was limited to collateral matters unrelated to the mediated dispute. The Supreme Court was unmoved by the appellate court's assertion that its holding was consistent with the Uniform Mediation Act because Indiana has not adopted the UMA. [Horner v. Carter](#), No. 34S02-1210-DR-582 (Ind., February 12, 2013)

Refusal to Make Offer at Mediation Not Bad Faith

Plaintiffs sought sanctions against defendant for refusing to make any offer in mediation while its motion for summary judgment was pending, arguing that defendant should have provided notice that the mediation would be futile. The court denied sanctions, noting that defendant had sent an out-of-state representative to the mediation with full settlement authority, so there was no bad faith. Defendant was helped by the facts that plaintiffs were also mediating an underlying state case with another party in the same mediation, so it was not a wasted process, and that defendant prevailed on its motion for summary judgment. The court noted in passing that what transpired in the mediation was not supposed to be revealed under the confidentiality agreement signed by the parties.

[Kline v. State Farm Fire and Casualty Co.](#), No. 12-CV-00955WJ/RHS (U.S.D.C. D.N.M., April 19, 2013)

After Blocking Mediation, Party Cannot Use Lack of Mediation to Prevent Arbitration

In confirming a foreign arbitral award, a federal court concluded that the question whether the parties' dispute resolution clause required mediation prior to arbitration was a procedural one for the arbitrator. The court found that the arbitrator properly decided that mediation did not need to actually occur, since the clause merely stated that the parties "would seek" to mediate prior to arbitration. That obligation was satisfied by the prevailing party sending a letter requesting mediation, which the other side prevented by obstacles and stalling tactics, so that moving on to arbitration was appropriate.

[Universal Forum of Cultures Barcelona 2004 v. Council for a Parliament of the World's Religions](#), No. 12-CV-3542 (U.S.D.C. N.D. Ill., March 21, 2013)

NEWS & INITIATIVES

New Jersey Establishes Mediation Program for Storm Sandy Claims

New Jersey has announced a mediation program to quickly and inexpensively resolve disputes between insurers and property owners over homeowner, automobile and commercial claims

resulting from Hurricane Sandy. The American Arbitration Association has been selected to administer the New Jersey mediation program (as well as the similar program in New York). While the program is optional for claimants, if they wish to mediate insurance companies are required to participate and pay for the mediation. State regulated insurers must notify those with open claims of their option to mediate and how to file a mediation request.

[Insurance & Financial Advisor](#) (March 4, 2013); [NJ.Com](#) (March 28, 2013)

Connecticut Proposes Insurance Mediation Program for Catastrophes

Pending state legislation proposed by the Connecticut insurance department would permit consumers to mediate with their insurance carriers over real or personal property claims (other than motor vehicles) following any major catastrophe in which the governor of Connecticut declares a state of emergency. Mediation would be optional for consumers but mandatory for insurers, which would be required to cover the costs of mediation.

[Insurance Journal](#) (March 8, 2013)

Kansas Supreme Court Launches Appellate Mediation Program

The Supreme Court of Kansas has begun a pilot program for appellate mediation in the state. The first appellate case the Court sent to mediation is a contentious school finance case that is said to implicate

half the state's budget. The state attorney general sought mediation after losing on the constitutionality of cuts to the state's education budget, which may require additional expenditures of \$500 million. Any agreement reached in mediation will have to be approved by the state legislature, so counsel are working to bring key legislative leaders into the mediation process. Fifteen states now have formal appellate mediation programs.

[LJWorld.Com](#) (March 4, 2013)

Ohio Expanding Mediation to Resolve Property Value Disputes

To streamline the complaint process over changes in property values, the Board of Revisions of Franklin County, Ohio is working with the Ohio Supreme Court to establish a mediation program. This is the first mediation project in which the Ohio Supreme Court has worked with a public entity other than a court; Supreme Court officials hope it will be a model for the rest of the state. Property owners bringing property value complaints may choose whether to mediate and, if doing so, whether to meet in person or by telephone. Mediators will be outside contractors and will receive property tax focused training. In its first year the program is expected to cost \$780,000 and resolve up to 5,000 cases.

[The Columbus Dispatch](#) (March 4, 2013)

Bankruptcy Court Adopts Loss Mitigation Mediation Program

The U.S. Bankruptcy Court for the South District of Florida adopted a loss mitigation mediation program to minimize litigation, reduce costs for participants and allow debtors to reorganize their debts involving real property. Loss mitigation options include mortgage modification and surrender of real property. Mediations are limited to two sessions of no more than one hour each, but may be extended with agreement of the parties. Mediation fees are divided between the debtor (unless a pro bono case) and lender. The effective date of the mediation program is April 1, 2013.

[In re Implementation of Loss Mitigation Mediation Program](#), Admin. Order 13-01 (U.S. Bankr. Ct. S. D. Fla., February 26, 2013)

Maryland Tweaks New Mediation Confidentiality Act

Maryland's legislature has amended the Maryland Mediation Confidentiality Act, which was enacted less than a year ago, in order to broaden the general coverage of mediation confidentiality even if the mediator fails to make a statement in writing. The legislation is awaiting the governor's signature; if signed, the amendments take effect October 1.

[Maryland Mediation Confidentiality Act Amendments](#), HB 697, SB 409 (March 2013)

Minnesota Legislators Working to Establish New Dispute Resolution Office

A group of Minnesota legislators, seeking to support peaceful, efficient and lasting solutions to conflict, has introduced legislation to create an Office of Collaboration and Dispute Resolution that would be housed in the Bureau of Mediation Services. The new office would promote use of dispute resolution and provide grants for dispute resolution to nonprofits and other entities, along with offering technical assistance, best practices and public education.

[Minn Post](#) (March 15, 2013)

WIPO Increases Dispute Resolution

The World Intellectual Property Organization's (WIPO's) Arbitration and Mediation Centre handled nearly 2,900 cybersquatting cases in 2012 - a new record high. The internet domain name disputes involved WIPO panelists from 48 countries and resolutions in 13 languages. In a separate survey conducted by WIPO of nearly 400 respondents from 60 countries, parties in technology agreements increasingly are turning to alternative dispute resolution due to concerns over the cost and time spent in formal processes. Finding business solutions was an important factor for respondents choosing mediation.

[Intellectual Property Watch](#) (March 28, 2013); [Global Times](#) (March 29, 2013).

Ontario Insurance Regulator Reducing Mediation Backlog

A backlog in mediations sought by claimants in disputes with insurers before Ontario's insurance regulator, the Financial Services Commission of Ontario (FSCO), is being eased by toughening the procedures for rescheduling mediations and by sending up to 2,000 cases a month to an outside mediation provider. In 2012, the mediation backlog exceeded 17,000 matters and the average wait was over 400 days, even though mediation within 60 days is required by law.

[Canadian Underwriter](#) (March 12, 2013)

International Mediation Developments

- **Peru** is increasing mediation efforts and relying less on repressive police tactics in dealing with disputes over mining and energy projects; 24 people have died in social conflicts in the last two years. [Euronews](#) (April 24, 2013)
- **Trinidad and Tobago** launched a court-annexed mediation pilot project in which 200 randomly selected Civil High Court matters will be referred to mediation. [Newsday](#) (March 7, 2013)
- The International Institute for Conflict Prevention & Resolution (CPR), supported by the Brazilian-American Chamber of Commerce, will hold its first business mediation conference in **Brazil**. [Brazilian-American Chamber of Commerce](#) (April 19, 2013).
- A constitutional crisis between judges and the Government in **Ireland** has been defused by agreement on mediation to address disputes over pay cuts and reforms that had become increasingly bitter. [Irish Examiner](#) (April 17, 2013)
- The **U.K.** Intellectual Property Office has modernized its Mediation Service to help small businesses and others resolve IP disputes. [Fresh Business Thinking](#) (March 21, 2013); [Economia](#) (March 22, 2013)
- Disputes between public authorities and private parties are excluded from the **E.U.** Mediation Directive, so mediation programs for such disputes differ from country to country and must be encouraged at the national level. [Public Service Review: Europe - Issue 25](#) (April 16, 2013)
- **South Africa** is proposing mandatory court mediation and is increasing pressure on parties to mediate, which is drawing more mediation expertise and programs into the country, including mediation of construction and property disputes. [Bizcommunity](#) (April 17, 2013)

- The Supreme Commercial Court of **Russia** is continuing to seek approval of its court mediation initiative, which in addition to mediators would use retired judges as court "reconciliators." [Rapsi News](#) (April 5, 2013)
- The **Bahrain** Chamber for Dispute Resolution is providing trainings in commercial mediation to help position Bahrain as a leading provider of alternative dispute resolution in its region. [AME Info](#) (April 10, 2013); [Bahrain News Agency](#) (April 24, 2013)
- **Pakistan** is working with the International Finance Corporation to establish mediation in the Islamabad region in order to help boost contract enforcement. [The News International](#) (April 16, 2013)
- Mediation committees in Mumbai and Karachi have been proposed to resolve grievances of importers and exporters between **India** and **Pakistan**. [The International News](#) (April 17, 2013)
- **Sri Lanka** is relying on traditional mediation boards to address the significant rise in commercial and financial disputes as business recovers from 26 years of civil war; areas affected by the war are adding mediation boards to the 309 that exist in the country, which have resolved over 2 million disputes in the past two decades. [The Diplomat.Com](#) (March 30, 2013)
- The six main telecommunications service providers in **Hong Kong** have joined a Customer Complaint Settlement Scheme, using mediation to keep service disputes out of the judicial system. [Cellular-News](#) (April 3, 2013)
- The **Philippines** has enacted a Mandatory Conciliation-Mediation Law, which provides that all labor and employment issues are subject to mandatory conciliation-mediation unless a party opts out. [Weekend Balita](#) (April 28, 2013)
- The Department of Trade and Industry in the **Philippines** is using mediation to address consumer complaints, with a goal of resolution within seven days. [Sun Star](#) (March 16, 2013)

UPDATE ON HOME FORECLOSURE MEDIATION

Update on Home Foreclosure Mediation

- The **Illinois** Attorney General has awarded \$5 million in grants to establish new mortgage foreclosure mediation programs in Illinois counties that need them. The grants will go to three regional projects which are working with law schools, nonprofits and circuit judges to begin mediation programs. The funds are from Illinois's share of the \$25 billion national foreclosure settlement with the largest bank mortgage servicers. [LoanSafe](#) (April 25, 2013)
- The **Illinois** Supreme Court expanded its requirements for judicial districts that establish mortgage foreclosure mediation programs. While there is some flexibility for differing conditions, all programs must demonstrate their plan's feasibility and sustainability. [Court ADR Connection](#) (March 4, 2013)
- Lenders who challenged ordinances in Springfield, **Massachusetts**, establishing a foreclosure mediation program and requiring a bond for foreclosure on vacant properties lost in federal district court and appealed. The parties voluntarily entered into mediation of the appeal and reached a resolution that will preserve the city's foreclosure mediation program as long as the city eliminates the bond requirement. [Just ADR](#) (March 14, 2013)
- As in St. Louis County, the recently-passed foreclosure mediation ordinance of St. Louis City, **Missouri**, has been frozen by a circuit judge issuing a temporary restraining order

prohibiting enforcement, although the court noted that voluntary participation in foreclosure mediation is permitted. Opponents of the foreclosure mediation ordinances have also been successful in advancing state legislation to prevent local governments from regulating real estate loans, which caught foreclosure counselors by surprise. [St. Louis Beacon](#) (March 6, 2013); [St. Louis Public Radio](#) (March 5, 2013); [St. Louis Post-Dispatch](#) (April 29, 2013)

- The **Oregon** Senate has passed a bill to expand the mortgage foreclosure legislation that the state enacted last summer by covering judicial foreclosures as well as non-judicial foreclosures. The bill is now being considered by the House. Over 400 homeowners sought mediation under the 2012 law, but only eight mediations occurred because most lenders shifted to judicial foreclosures or declined to mediate with at-risk homeowners. [Statesman Journal](#) (April 18, 2013)
- Legislation to extend the mortgage mediation program in **Delaware** by four years has passed both the Delaware House and Senate without opposition and awaits the governor's signature. Since the Delaware program began in January 2012, 80% of the 150 mediations have resulted in non-foreclosure resolutions, such as loan modifications and short sales. [WDEL News](#) (April 24, 2013)
- Legislation has been introduced in the **North Carolina** Senate to establish a foreclosure mediation program modeled on those in Connecticut and Washington state. [News Observer](#) (April 4, 2013)

CASES WORTH NOTING

OTHER CASES WORTH NOTING

Landmark Survey of Fortune 1000 Counsel Reveals Shift from Arbitration to Mediation

A detailed survey of ADR usage by Fortune 1000 in-house counsel reveals, among many other things, that while binding arbitration has declined for most kinds of disputes, corporate counsel are increasingly relying on mediation and other approaches to maintain control in achieving mutually satisfactory settlements. Comparing results with a similar survey 15 years ago, corporate counsel are increasingly sophisticated in managing conflict, especially in its early stages, and have reduced expectations about outcomes. [Living with ADR: Evolving Perceptions and Use of Mediation, Arbitration and Conflict Management in Fortune 1,000 Corporations](#), Thomas J. Stipanowich & J. Ryan Lamare (February 19, 2013); [Mediate.com](#) (April 2, 2013)

Corporate Counsel and Managers Surveyed on Mediation Views

The International Mediation Institute (IMI) addressed selected mediation issues in a recent survey of in-house counsel and senior managers in North America and Europe. Among other results, most respondents prefer both arbitrators and judges to encourage parties to use mediation during arbitration or litigation, with nearly half agreeing that mediation should be a mandatory step in commercial disputes, in both arbitration and litigation. A large proportion of respondents prefer mediators to be proactive in proposing solutions and settlement options, rather than purely facilitative. Respondents also favor independent assessment of mediator competence, which would help them in mediator selection. [Lexology](#) (April 16, 2013); [IMI Survey](#)

AAA Launches Mediation.org

The American Arbitration Association is increasing its focus on mediation with a new division called Mediation.org, seeking to be a comprehensive mediation resource for both mediators and users of mediation. Mediation.org plans a broad educational module, along with a database of best

mediation practices. In addition to having a robust directory and helping parties find the right mediator, Mediation.org intends to be a resource for non-legal matters, including social work and family disputes. Online dispute resolution is available for a flat \$200 fee for cases in which claims or counterclaims do not exceed \$10,000. Mediation.org services will be offered worldwide. [Fort Mill Times](#) (April 4, 2013); [Mediation.org Website](#)

Proposal to End Compulsory Mediation in U.S. and Adopt English Approach

Noting that party self-determination has suffered from the spread of court-connected mediation and the pressure to settle, a law professor proposes that mandatory mediation should be changed to require consent to mediate, but with economic incentives like the English system, in which an unreasonable refusal to mediate during litigation can result in the imposition of costs and attorneys' fees. [Fordham University](#) (April 2013)

English Court of Appeal Suggests Need for Mandatory Mediation

In pro se dispute between former business partners, the England and Wales Court of Appeal notes the great value of mediation, expresses regret that mediation cannot be imposed on parties too stubborn to voluntarily agree to it, and suggests that it may be time to shift to mandatory mediation. [Wright v. Michael Wright Supplies, Ltd.](#), [2013] EWCA Civ 234 (March 27, 2013)

Congress and Justice Department Ordered to Mediate

A federal judge ordered mediation in litigation by the House Oversight and Government Reform Committee to obtain records from the Department of Justice relating to Operation Fast and Furious, the flawed gun-tracking operation in Phoenix. The Attorney General was found in contempt by the House for refusing to turn over documents from the program.

[Washington Post](#) (March 18, 2013)

Other Items of Interest

- Informative law review article on mediation articles by judges. [JudicialReviews: What Judges Write About When They Write About Mediation](#) (March 11, 2013)
- Men and women bring different strengths as mediators, with a common goal of resolving disputes; women are underrepresented as mediators, but are gaining momentum in the marketplace. [ADR Times](#) (April 3, 2013)
- Joint sessions should not be skipped or minimized in mediations, especially when clients desire them. [Lawyers Weekly](#) (April 5, 2013)
- A study from Northeastern University and Harvard University indicates that mediation training may make participants more compassionate. [Vancouver Sun](#) (April 8, 2013)

NOTABLE NEWS

- An outside mediator is being brought into Colorado to help work out conflicts between Colorado's Medicaid program and its new health exchange, which is supposed to open to consumers by October 1. [Health Policy Solutions](#) (April 19, 2013)
- A Task Force on Commercial Litigation in the 21st Century for the New York State Supreme Court made over 20 recommendations to keep the state's commercial division competitive, including a pilot project to send one out of five cases to mediation. [Thomas Reuters News & Insight](#) March 26, 2013.
- New York's Department of Financial Services selected the American Arbitration Association to provide mediation for Hurricane Sandy claimants and their insurance companies. AAA recruited hundreds of experienced mediators, provided an orientation/training webinar and began mediation under the program in April. [DNA Info](#) (April 11, 2013); [The Chief](#) (April 22, 2013)

IAM PRO BONO PROGRAM UPDATE:

Az Du Rebbe Zocht (As the Rabbi Says): My Experience with the IAM Pro Bono Mediation Initiative

By Jan Frankel Schau (ADR Services, jfschau@schaummediation.com)

Many of us have conducted pro bono mediations for courts or other agencies, but for me this was the first where the lawyers representing the defendant were also pro bono and everyone knew that any potential settlement could not be monetary - whether or not there was liability and no matter how high the damages.

As pure as many of us wish mediation was, we generally are chosen to mediate cases where monetary stakes are high and our value is clear. In this case I was chosen through IAM's new Pro Bono Mediation Initiative, and everyone knew that both I and the major Los Angeles law firm representing the defendant were handling the case gratis. And, given the situation, we really had to look for ways to settle the lawsuit that went beyond or were not primarily monetary.

The case involved an Israeli school teacher who was fired from her job as a kindergarten aide after twenty-two years. The new principal (who had been a student in the teacher's classroom at age five!) thought she spoke with too thick an accent and simply did not renew her yearly contract. The articulated reason was that she was not sufficiently proficient in English grammar to carry out the new reading curriculum.

When the teacher initially approached the Head of School, a Chasidic Rabbi with whom she'd had a close, friendly relationship for many years, he avoided the uncomfortable confrontation. The door to the Rabbi's study was literally and metaphorically closed for the first time in all those years. What was worse, after she threatened to sue the school, the Rabbi refused to accept her calls and never attempted to meet with her to explain the termination. Litigation commenced. The mediation - a year later - was the next time they saw one another. In that year, the teacher had suffered the death of both her parents and welcomed the birth of a grandson, while the Rabbi had celebrated the wedding of his eldest daughter, whom the teacher had known since birth.

The joint session was the stuff of a mediator's dreams: heartfelt emotions, explanations, apologies, and even exchanges of photographs on cell phones of weddings and new grandchildren! After at least an hour, the lawyers and clients (and of course their trusted mediator) were weepy as all agreed that the hardest part of this mediation was surely behind us. The stated objective of opening up the door to the Rabbi's study again had surely been accomplished.

When we broke into separate caucuses, we began generating a host of appealing and creative non-monetary options for resolving the dispute. The Rabbi suggested that perhaps the teacher could return and work as a commission-based fundraiser for the strapped religious school. The plaintiff's lawyer suggested that he might forego his attorney's fees in exchange for a letter acknowledging a handsome contribution to the school for which he could take a tax deduction.

Once the terms were decided, there was another emotional moment when we had to break for the day. There were still tax issues to consider on the attorney's donation, so we knew we couldn't sign the settlement agreement that evening, but as a gesture of "solidarity" the Rabbi inquired

when the last time was that the plaintiff's attorney had laid *tefillin* (a traditional prayer by Jewish Orthodox men). He believed it was at age 13, when he celebrated his *bar mitzvah*. The Rabbi invited him to lay *tefillin* with him at that moment - to symbolically seal the deal - and the two men prayed together, wrapped in leather straps on heart and head. A powerful symbol of accord between accuser and accused.

It was a powerful image that I will not soon forget. But the following day the deal threatened to fall apart when defense counsel determined that the tax deduction would not be *kosher*. Fortunately, after a series of phone calls, settlement was reached and all parties acknowledged that IAM had done a *mitzvah* - a good deed. As for this pro bono mediator, as with so many acts of charity, I certainly got more than I gave. Indeed, pro bono is good for the soul!

[IAM Pro Bono Mediation Initiative Update](#) (May 2013). For more information, contact Mike Young at 310-989-2463 or Mike@MikeYoungMediation.com



www.adrmediate.com

Offices in Topeka and Lawrence, Kansas,
and Kansas City, Missouri

Main Office--Topeka, Kansas

212 SW 8th Ave., Suite 102, Topeka, KS 66603

e-mail: info@adrmediate.com

785-357-1800 785-357-0002 (fax)

Kansas City, Missouri

1600 Genessee, Suite 838, Kansas City, Missouri 67102

Lawrence, Kansas

5200 Bob Billings Pkwy., Suite 302, Lawrence, Kansas 66549

Dispute Resolution News Update

Editor: Larry Rute, larry@adrmediate.com

Assistant: Dawn Dawson, dawn@adrmediate.com

FOR A PRINTABLE VERSION OF THIS E-MAIL: [Click Here](#)

STAY IN TOUCH



123 Street Name City, ST - 555.555.5555

[Forward this email](#)



This email was sent to info@adrmediate.com by info@adrmediate.com | [Update Profile/Email Address](#) | Instant removal with [SafeUnsubscribe™](#) | [Privacy Policy](#).

ADR, LLC | 212 SW 8th Avenue | Suite 102 | Topeka | KS | 66603



THIS IS A TEST EMAIL ONLY.

This email was sent by the author for the sole purpose of testing a draft message. If you believe you have received the message in error, please contact the author by replying to this message. Constant Contact takes reports of abuse very seriously. If you wish to report abuse, please forward this message to abuse@constantcontact.com.