## IN THE CIRCUIT COURT OF ST. LOUIS COUNTY MISSOURI

In Re the Matter of:	3
MATTHEW R. GRANT,	)
Petitioner,	) Case No. 12SL-DR03959-02
V.	) Division 13
C.M.G. et al,	)
Respondent.	)

PETITIONER'S SECOND VERIFIED MOTION FOR CHANGE OF JUDGE AND TO DISQUALIFY JUDGE HILTON AND THE ENTIRE 21st CIRCUIT FOR CAUSE AND/OR DUE TO THE APPEARANCE OF IMPROPRIETY, DUE TO PERVASIVE JUDICIAL, LAWYER, GURARDIAN AD LITEM, AND COURTRHOUSE PERSONNEL CORRUPTION, AND FOR TRANSFER TO THE MISSOURI SUPREME COURT FOR THE APPOINTMENT OF A NEW TRIAL JUDGE WITHOUT A POTENTIAL CONFLICT OF INTERESTS

COMES NOW, Petitioner, Matthew R. Grant, ("Petitioner") and respectfully requests that, pursuant to Missouri Supreme Court Rules 51.05 and 51.15 and the inherent powers of the Court, that Presiding Judge Hilton follow *mandatory* Missouri Supreme Court precedent and take no further action in this matter other than to transfer it to the Missouri Supreme Court for its selection of a new circuit court judge from *far outside* of the St. Louis area, and opposite the eastern half of the State, for the further handling of this matter. As Petitioner will explain in future filings, he requests that the next Circuit Judge be one that was appointed to the bench by a Democratic Governor of the State of Missouri.

As detailed below and in the supplemental briefing that Petitioner will submit after this filing ("Motion to DQ Due to Corruption" or "Motion to DQ due to Corruption and Transfer to Mo. Sup. Ct.").

In support of this Motion to DQ due to Corruption and Transfer to Mo. Sup. Ct.,

# Petitioner states:1

- Petitioner presents the Missouri Supreme Court with the opportunity to tackle and address the long-suspected and locally known corruption within the 21<sup>st</sup> Circuit of the State of Missouri.
- 2. This Motion is only the first verified filing and is intended to act to strip Presiding

  Judge Hilton of Jurisdiction of this matter in advance of the hearing in this matter set

  for February 28, 2025, at 9:00 a.m.<sup>2</sup>
- 3. As will be noted below, the hearing tomorrow involving a Motion noticed for hearing by one of Presiding Judge Hilton's former law partners, Lawrence Gillespie. Mr. Gillespie represents Petitioner's sister and she is a danger to the Children in this case and it is no coincidence that she was directed Mr. Gillespie for representation.<sup>3</sup>

<sup>&</sup>lt;sup>1</sup> Petitioner files this Second Motion to correct a few embarrassing typos, add a few items, and to offer a second notarization.

<sup>&</sup>lt;sup>2</sup> The amount of evidence that Petitioner has collected is astounding. He possesses legal, one-party recordings of many of the individuals mentioned in this Motion. He possesses a litany of images. He possesses video footage. All of it has been copied and shared with others for Petitioner's safety. No matter what happens, this corruption will be exposed.

<sup>&</sup>lt;sup>3</sup> Petitioner notes that Mr. Gillespie entered his appearance long before this matter was transferred to Presiding Judge Hilton. That is more telling than anything.

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#### Information and Products by this Speaker



Hon. Bruce Hilton Circuit Judge Div 13 21st Judicial Circuit

Bruce Hilton was appointed circuit judge in June 2017

Before his appointment to the bench, Judge Hilton was engaged in the private practice of lay. He worked for: Leritz, Relient & Durse PC, from 1989; Charles P. Todi & Associates, from 1989 to 1991 Eisen, Gillespie, Brown & Hilton, LLC, Join 1991 to 1995; Hilton, Gillespie & Kiesewetter, LLC from 1995 to 2001: Hilton & Kiesewetter, LLC, from 2001 to 2003, Hilton & Harford, LLC, from 2005 to 2011 and Hilton Parmity Law Group, LLC, from 2011

Judge Hilton serves on the board of the Meacham Park Neighborhood Improvement Association and the Kirkwood Library, He is a member of The Bar Association of Metropolitan St. Louis, St. Louis County Bar Association (past president), The Lawyers Association of St. Louis, and Mound City Bar

Judge Hilton was chair of the 21st Judicial Circuit Judicial Evaluation Committee from 2008 to 2013, In 1992, he received the Good Citizen's Award from the Grand Jurors Association. He also serves as a volunteer judge for the student encouragement program.

Judge Hilton received his B.A. in history from St. Louis University in 1980 and his J.D. from Saint Louis University School of Law in 1980

- 4. This Motion to DQ due to Corruption and Transfer to the Mo. Sup. Ct. will cite and describe a portion of the evidence that Petitioner possesses that Petitioner holds and has secured to others for his own protection.
- 5. Petitioner welcomes the Missouri Supreme Court to set this matter for hearing so that he can be sworn and testify before this Court as to the full extent of his knowledge.
- The situation in the 21<sup>st</sup> Circuit shocks the conscious and must be presented.
- 7. Petitioner is confident that evidence of the corruption has not been presented to the Missouri Supreme Court. He makes that statement because he knows for a fact that the corruption is not limited to the 21st Circuit. Petitioner has also reported Circuit Judge Erin Burlison from the 11th Circuit.
- 8. The corruption runs deep in the St. Louis area, and it runs wide.
- 9. As discussed below, Petitioner has reported, Maia Brodie, a Special Representative of the Office of the Chief Disciplinary Counsel for Region X, to the Office of the

Chief Disciplinary Counsel of the Missouri Supreme Court.

- 10. No action.
- 11. What conclusion will the Missouri Supreme Court draw from that inaction?
- 12. Petitioner reported a *sitting Commissioner*, Mary W. Greaves, in the 21<sup>st</sup> Circuit, to the Presiding Judge of that same Circuit, Honorable Bruce Hilton, and yet she still sits on the bench even *after she recused* to avoid a formal ruling on her unethical and inappropriate *ex parte* judicial communications with Ms. Brodie and other corrupt behavior.
- 13. For reasons to be explained below, Petitioner reported the sitting Presiding Judge,
  Honorable Bruce Hilton, to the Office of the Chief Disciplinary Counsel. <u>Exhibit A</u>
  (to be submitted electronically).
- 14. Again, no action has taken place.
- 15. But here is what is most telling. There has been no action taken against Petitioner either.
- 16. If Petitioner were <u>not</u> 100% correct in his allegations, wouldn't the Office of Chief Disciplinary Counsel immediately interview him and suspend his license if his mental abilities were not fully intact?
- 17. If Petitioner had not entered his appearance in his own child custody and child support case, and if he had *not* himself *actually uncovered* family law corruption in the 21<sup>st</sup> Circuit, the Chief Disciplinary Counsel would have acted immediately and without reluctance to address the Petitioner. This fact cannot be ignored or resolved.
- 18. The Chief Disciplinary Counsel would have sent an unbiased representative to interview the Petitioner and, if his allegations were baseless, the Chief Disciplinary

- Counsel would have taken some action. It would have likely ordered a mental evaluation of the Petitioner.
- 19. Well, that is exactly the angle the corrupt individuals have been planning for Petitioner and what they wanted others to think. They have been planning to portray him as anything but the rationale, thoughtful and strategic practitioner that he is. As will be briefed at a later time, they have attempted to develop false evidence that Petitioner is somehow mentally defective. Nothing is further from the truth.
- 20. Petitioner is so capable that he has outsmarted the army of corrupt individuals that have sought to stop him and prohibit the Missouri Supreme Court from reading this Motion and the court docket in the underlying case.
- 21. To jump right into it, Petitioner called the Office of Chief Disciplinary Counsel on December 31, 2024, at 12:55 p.m. and left a voicemail.<sup>4</sup>



<sup>&</sup>lt;sup>4</sup> Petitioner personally took the images in this brief. He hereby lays their foundation, authenticates them and this filing is verified.

22. Petitioner received a call back at 1:46 p.m. that same day and he spoke for 11 minutes with a Chief Disciplinary Counsel representative. During that call he explained the internal conflict of interest relating to Maia Brodie, the Special Representative for that very office, and that he would be submitting a report about Commissioner Mary W. Greaves. Petitioner noted that his research revealed that since Honorable Mary W. Greaves was a commissioner and not a judge, she should be report to the same office as Ms. Brodie.



- 23. Petitioner submitted numerous additional reports and updates through the Chief Disciplinary Counsel portal throughout the month of January. **Exhibit B.**
- 24. Petitioner even submitted reports to the United States Department of Justice via email to Assistant United States Attorney Derek Wiseman. Exhibit C.
- 25. Actual notice. Painted in red.

- 26. Nothing. No response from anyone.
- 27. Petitioner begs the Missouri Supreme Court to consider what that means.
- 28. Is Petitioner correct in his allegations, or, is he mentally defective and he is wrong?
- 29. How expansive is the corruption?
- 30. Petitioner comes to the Missouri Supreme Court with objective proof of corrupt behavior in an attempt to empower the Missouri Supreme Court with objective evidence to recognize and address these serious matters once and for all.
- 31. It was long ago that the corrupt judges, lawyers and the Guardian *ad litem* ("GAL") conspired to create a false and inaccurate, including attempts to influence Petitioner's mental well-being and bring it into question.
- 32. Their flawed strategy flies in the face of evidence to the contrary.
- 33. Petitioner is willing to provide the Missouri Supreme Court an unredacted copy of Dr. Voorhees' report of his mental evaluation of the Petitioner in this matter that took place on August 29, 2024, for this Court's *in camera* review. Petitioner has nothing to hide.
- 34. This case contains evidence of his disability alcoholism and his struggles this past Spring, a recent temporary struggle for which he acknowledged, for which he went to rehab, and due to which he continues to recognize and address like so many other licensed attorneys in this state. Petitioner's story is one of recovery and success, not one of failure.
- 35. The corrupt co-conspirators' flawed strategy is so unbelievable that Petitioner will not delve into all of the extreme measures they have taken and the things he has suffered in this Motion.

36. Just a few of the attempts at documenting false mental unsteadiness that the corrupt individuals planned to argue the Petitioner allegedly suffered, includes Our Family Wizard (OFW) messages from the Respondent such as this one:



- 37. Next, the Guardian Ad Litem filed a Motion for Drug Testing to which Petitioner agreed but requested it also apply to Respondent. What a surprise .... Presiding Judge Hilton denied it over Petitioner's consent.
- 38. As Petitioner will address in a future brief, he scheduled to appear and argue an *ex* parte Temporary Restraining Order through Judge Hilton's clerk Veronica Gipson, and when he presented the Motion for TRO to Judge Hilton he read it and refused to entertain it, or, allow it to be placed on file. When this Court reads it, it will become clear why.
- 39. What's more, Petitioner's own prior counsel Matt G. Eilerts refused to allow his signature block on his Motion for Change of Judge relating to Commissioner Greaves because he and his firm, including Presiding Judge Hilton's former law partner

- Richard Eisen, had to distance themselves and fight Petitioner and try everything to keep him from exposing the very corruption in which they all took part.
- 40. Critically important is the fact that Petitioner's former counsel Mat G. Eilerts, is a member of the law firm that represented Petitioner. That law firm is Growe *Eisen* Karlen Eilerts. Petitioner has made it clear that he intends to sue that firm and each member individually.
- 41. Correct. The same Richard Eisen that is Presiding Judge Hilton's former law partner and the same Richard Eisen that trained Mr. Eilerts when he was associate.
- 42. Petitioner knows these facts because all three of them (Petitioner, Eisen and Eilerts) practiced together *at the same* at the firm now known as Husch Blackwell LLP.

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#### Information and Products by this Speaker



Hon. Bruce Hilton
Circuit Judge Div.13 21st Judicial Circuit

Bruce Hilton was appointed circuit judge in June 2017.

Before his appointment to the bench, Judge Hilton was engaged in the private predict of law. He worked for Lentz, Reinert & Duree PC, from 1984 to 1989; Charles P, Todt & Associates, from 1989 to 1990; Eisen, Gillespic, Brown & Hilton, LLC, from 1991 to 1995; Hilton, Gillespic & Kiesewetter, LLC, from 1995 to 2001; Hilton & Kiesewetter, LLC, from 2001 to 2005; Hilton & Hardord, LLC, from 2001 to 2017.

To 2017.

Judge Hillon serves on the board of the Meacham Park Neighborhood Improvement Association and the Kirkwood Library. He is a member of The Bar Association of Metropolitan St. Louis, St. Louis County Bar Association (past president), The Lawyers Association of St. Louis, and Mound City Bar Association.

Judge Hillton was chair of the 21st Judicial Circuit Judicial Evaluation Committee from 2008 to 2013. In 1992, he received the Good Citizen's Award from the Grand Jurors Association. He also serves as a volunteer judge for the student encouragement program.

Judge Hilton received his B.A. in history from St. Louis University in 1980 and his J.D. from Saint Louis University School of Law in 1986.

43. Petitioner has personal knowledge that Richard Eisen taught Mat Eilerts everything he knows. Petitioner just had no idea it was how to be an unethical and corrupt lawyer.

- 44. Mr. Eilerts was not the only former counsel to attempt to dissuade Petitioner from filing the Motion to Disqualify Commissioner Greaves. His other co-counsel C. Curran Coulter did as well.
- 45. Mr. Coulter played an even more important role.
- 46. When Mr. Eilert's and Mr. Coulter's efforts to dissuade Petitioner from filing his Motion for a Change of Judge for cause from Commissioner Greaves, they first convinced Petitioner to wait and file the Motion so that it would be heard by incoming Presiding Judge Bruce Hilton. Notably, Attorney C. Curran Coulter was the primary source of that advice.
- 47. Mr. Coulter, who's communications are not privileged or protected due to the crime fraud exception, advised Petitioner that Circuit Judge Ott could not realistically hear his motion before the first of the year, and that Judge Hilton was the best option as he had been elected by the other judges to "clean up the courthouse."
- 48. Mr. Coulter even stated that Judge Hilton used to work for legal services and that he was the perfect audience for Petitioner's Motion that sought to expose *ex parte* judicial communication and corruption. Petitioner now knows that Judge Hilton was a family law practitioner and part of this very problem, a *far cry* from the good souls that work at legal services.
- 49. But when Petitioner filed his Motion for Change of Judge on December 17, 2024, some mysterious and *notable* court personnel held it up and didn't allow it to be processed.
- 50. When Petitioner updated it and added all the detailed case numbers to each exhibit, and refiled it on December 24, 2024, the Motion sat in "submitted" form in the

- court's system until January 3, 2025. See Court Docket.
- 51. Thereafter, both of Petitioner's counsel/co-counsel moved to withdraw and made it appear on the record that they had other reasons to disagree with Petitioner's strategy.
- 52. Mr. Eilert's put his incredible explanations in various emails.
- 53. But Petitioner was putting together knew *part* of what was really going on. So, he digitally recorded his own lawyer. He even recorded the GAL as far back as August 2024 as the GAL was clearly not being truthful when he denied a deal between the parties that he personally negotiated.
- 54. Not to be outdone, the corrupt Commissioner Greaves recused from the case so that Judge Hilton didn't have to rule on her corrupt behavior.
- 55. Then, by statute and local rule, Petitioner's case was reassigned to another Family Court judge. *See* Court Docket.
- 56. Petitioner realized that he had grounds to move to disqualify the new family court judge and requested that this matter be transferred to the Missouri Supreme Court and that is precisely what Petitioner did.
- 57. The corrupt judges and lawyers surely did not expect that.
- 58. So when Petitioner appeared before Presiding Judge Hilton, the same judge he thought was perfect for his case based upon his former counsel's advice, he was taken aback when Presiding Judge Hilton offered to keep and try the case himself.
- 59. This deception was successful as Petitioner was blinded by the fact that Mr. Coulter, an Eagle Scout, had *directed him*, also an Eagle Scout, to the very judge in a position to protect and preserve the entire corrupt system.
- 60. It was Judge Hilton who alerted Petitioner that Mr. Coulter's \$21,000+ fee bill for

- preparing for and taking the 3-hour deposition of a fact witness was obvious overbilling.
- 61. It was Judge Hilton who alerted Petitioner to the fact that Mr. Eilert's failing to argue and obtain a court order allowing him more than 1 overnight with his children each week was the result of corruption.
- 62. As the evidence in the record will show, Petitioner had a moment of weakness and his alcoholism took over and he relapsed during a particularly difficult time.
- 63. Petitioner, on his own, went to a qualified rehab in California on March 17, 2024.
- 64. Petitioner graduated from the thirty (30) program.
- 65. Petitioner voluntarily started regular Soberlink breathalyzer tests.
- 66. He has passed 100% of these tests up to this day. They now total more than 1,130.
- 67. On June 11, 2024, Petitioner underwent a hair sample analysis that was negative across the board.
- 68. On August 29, 2024, Petitioner underwent a mental evaluation that showed no issues for concern.
- 69. Yet now, almost one year after he regained his sobriety, he still only has his children 1 overnight per week.
- 70. What's worse, the Respondent has now sought a final ruling reducing his overnights with his Children down to 2 overnights *per month*!
- 71. The fix is in.
- 72. The rumors are all true.
- 73. The scam is to pilfer the bank accounts of all the parents that have any amounts of money, and even those that don't. And while the money is taken the painful

- experience is intended to break the spirit of the parents involved to make them settle and just accept closure.
- 74. The scam is to keep each parent in litigation that drags out so that the lawyers can keep billing in cases that should be over in a matter of weeks or a few months.
- 75. In this very case, Judge Hilton just set this matter for trial at the end of June, 2025.
- 76. That is the punishment he handed out to Petitioner for not settling and playing ball.
- 77. The record demonstrates that Petitioner will not go quietly.
- 78. Petitioner is a member of the Missouri Bar.
- 79. The corrupt lawyers and judges in this case trifled with the wrong lawyer and father.
- 80. Petitioner will not allow this corruption to continue.
- 81. By exposing this corruption Petitioner assumes more risk to his personal safety and he is expecting go sacrifice more time with his Children for some time longer.
- 82. That is the leverage Judge Hilton held and still holds in his hand. He did not deny Petitioner's Motion to Vacate the very Consent Order that kept from going back to 50/50 joint legal and physical custody.
- 83. That ruling could be appealed and the Presiding Judge knows it. The Petitioner pointed it out loudly for all to hear.
- 84. Petitioner is standing up against powerful and corrupt lawyers, judges, commissioners, GAL's and even the Office of Disciplinary Counsel. Even politicians are likely to be involved.
- 85. Petitioner has the truth on his side and, humbly, seeks relief from the Missouri

  Supreme Court separate and apart from the conflicted system he has encountered to date.

#### **LEGAL AUTHORITY**

- 1. While it is obvious that this Motion should be granted, Petitioner notes the ethical cannons in the Missouri Code of Judicial Conduct that are applicable:
  - 2-2.2 | Impartiality and Fairness
    - (A) A judge shall uphold and apply the law, and shall perform all duties of judicial office promptly, efficiently, fairly and impartially.
    - (B) A judge may make reasonable efforts, consistent with the law and court rules, to facilitate all litigants, including self-represented litigants, being fairly heard.

Comment: [I] In disposing of matters promptly and efficiently, a judge must demonstrate due regard for the rights of the parties to be heard and to have issues resolved without unnecessary costs or delay. To ensure impartiality and fairness to all parties, a judge must be objective and openminded.

Rule 2-2.2 and comment (emphasis added).

- 2-2.3 Bias, Prejudice, and Harassment
  - (A) A judge shall perform the duties of judicial office without bias or prejudice.
  - (B) A judge shall not, in the performance of judicial duties, by words or conduct manifest bias or prejudice, or engage in harassment, including but not limited to bias, prejudice, or harassment based upon race, sex, gender, gender identity, religion, national origin, ethnicity, disability, age, sexual orientation, or marital status, and shall not permit court staff, court officials, or others subject to the judge's direction and control to do so.

Rule 2-2.3 (A)&(B) (emphasis added).

- 2-2.8 Decorum, Demeanor, and Communication with Jurors
  - (A) A judge shall require order and decorum in

proceedings before the court.

(B) A judge shall be patient, dignified, and courteous to litigants, jurors, witnesses, lawyers, court staff, court officials, and others with whom the judge deals in an official capacity, and shall require similar conduct of lawyers, court staff, court officials, and others subject to the judge's direction and control.

Rule 2-2.8 (emphasis added).

#### 2-2.11 Recusal

- (A) A judge shall recuse himself or herself in any proceeding in which the judge's impartiality <u>might reasonably be questioned</u>, including but not limited to the following circumstances:
- (1) The judge has a **personal bias** or prejudice concerning a party or a party's lawyer or knowledge of facts that are in dispute in the proceeding that would **preclude the judge from being fair and impartial.**

Comment: [1] Under this Rule 2-2.11, a judge should recuse whenever the judge's impartiality might reasonably be questioned, regardless of whether any of the specific provisions of paragraphs (A)(l) to (5) apply.

Rule 2-2.11 (emphasis added).

2. The Missouri Supreme Court addressed this general issue in Anderson v.

State, when it stated:

Rule 2-2.11(A) sets the standard for when a judge should recuse in a proceeding. Rule 2-2.11(A) provides that "[a] judge shall recuse himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned." This includes situations where "[t]he judge has a personal bias or prejudice concerning a party ... or knowledge of facts that are in dispute...." Rule 2-2.11(A)(I). The rule is not limited to actual prejudice and also requires recusal when "a reasonable person would have factual grounds to find an appearance of impropriety and doubt the impartiality of the court"

Anderson v. State, 402 S.W.3d 86, 91 (Mo. 2013) (citations omitted) (emphasis added).

- There can be no doubt that the legal standards have been met for the disqualification of the entire 21<sup>st</sup> Circuit in this matter and the assignment of new trial judge in this matter.
- As Petitioner will explain by supplement, Petitioner requests that the Missouri Supreme Court select a Circuit Judge appointed by a Missouri Governor from the Democratic party.

# IMMEDIATE LACK OF JURISDICTION AND LIMITED POWER ONLY TO TRANSFER THIS MATTER TO THE MISSOURI SURPREME COURT

 As Petitioner has made clear numerous times now on the record in this case, the filing of this Motions strips Presiding Judge Hilton of any power to take any action other than to transfer this matter to the Missouri Supreme Court for further handling.

See Matter of Buford, 577 S.W.2d 809 (Mo. banc 1979).

WHEREFORE, Petitioner prays that the Missouri Supreme Court enter an Order disqualifying Presiding Judge Hilton and the 21<sup>st</sup> Circuit from this matter for cause, and selection and appointment of a new trial judge for further handling of this matter as detailed herein, and for such further relief as the Court deems just and proper.

Respectfully submitted,

By: \_

Matthew R. Grant

Petitioner

1625 Mason Knoll Rd.

St. Louis, MO 63131

T: (314) 412-9112

mattgrant.stl@gmail.com

### NOTARY ACKNOWLEDGEMENT

State of Missouri )

County of St. Louis )

On this 28<sup>th</sup> day of February, 2025, before me, the undersigned notary, personally appeared Matthew R. Grant, proved to me through identification documents (a Missouri Driver's license), to be the person whose name is signed on the preceding or attached document, and acknowledged to me that he signed it voluntarily for its stated purpose.

(official signature and seal of notary)

lula Min fext

COLLEEN MARIE REITER
Notary Public - Notary Seal
St Louis County - State of Missouri
Commission Number 24626140
My Commission Expires Jul 22, 2028

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was served in accordance with Rule 103.08 of the Missouri Rules of Civil Procedure, through the electronic filing system of the State of Missouri, this 28<sup>th</sup> day of February 2025 to:

Maia Brodie
Elizabeth Carthen
Brodie Law
8909 Ladue Road
St. Louis, Missouri 63124
(314) 726-6242
(314) 726-5155 (Fax)
mbrodie@brodielawstl.com
lbiscan@brodielawstl.com
Attorneys for Respondent

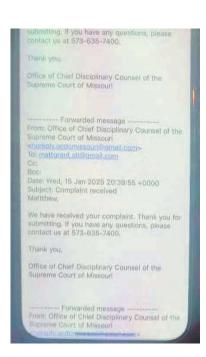
John R. Fenley
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2016 South Big Bend Blvd.
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(314) 333-4140
(314) 754-2701 (Fax)
john@rhflegal.com
Guardian Ad Litem

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Exhibit A Case No. 12SL-DR-03959-02





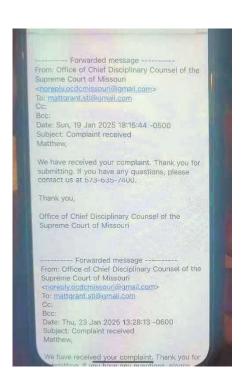
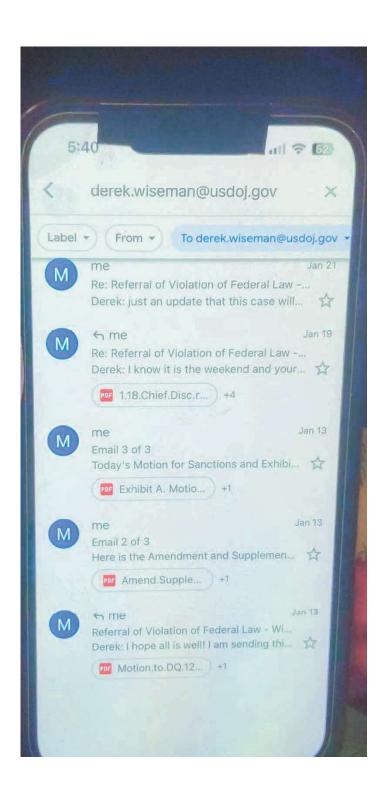




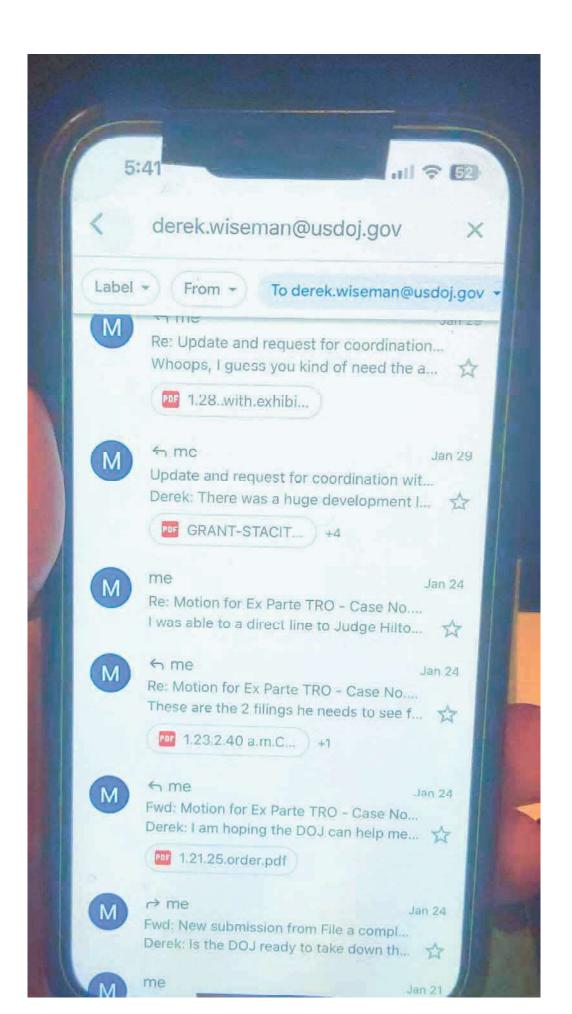


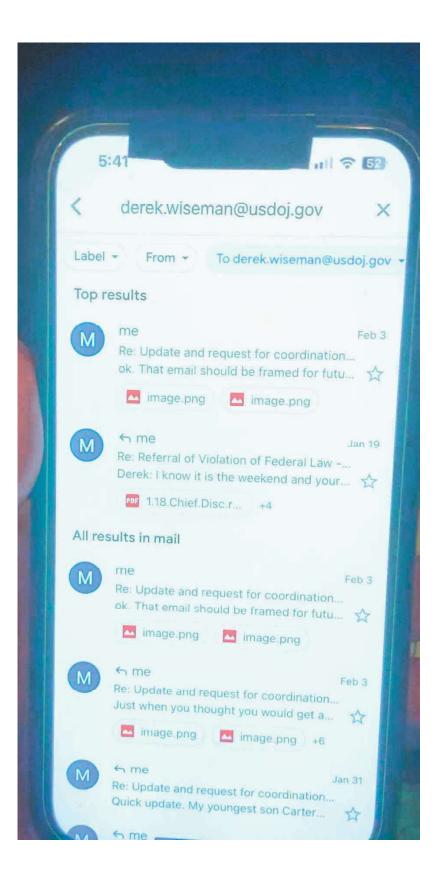
Exhibit B

Case No. 12SL-DR03959-02



Exhilbit C Case No. 12SL-DR03959-02





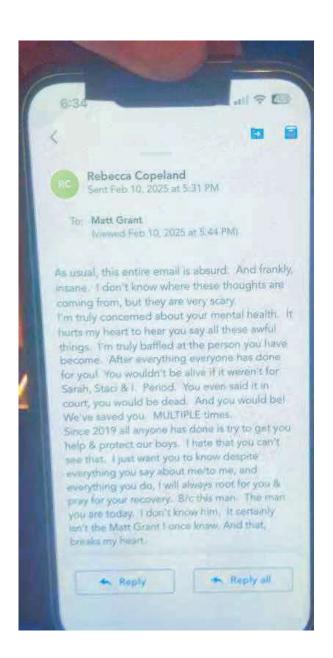


Exhibit D

Case No 12SL-DR03959-02