Filed
D.C. Superior Court
10 Dec 17 P01:21
Clerk of Court

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

MARC FIEDLER,	:	
	:	
Plaintiff,	:	
	:	
v.	:	**Civil Action No. 2010 CA 001788**
	:	**Judge Edelman**
LUCY WEBB HAYES NATIONAL TRAINING SCHOOL FOR DEACONESSES AND MISSIONARIES Conducting SIBLEY MEMORIAL HOSPITAL,	:	
	:	
Defendant.	:	

PLAINTIFF'S MOTION TO COMPEL DEFENDANT TO DESIGNATE A RULE 30(b)(6) SPOKESPERSON FOR DEPOSITION

Pursuant to Superior Ct. R. Civ. P. 37(a)(2), Plaintiff Mark Fiedler moves to compel the Defendant Sibley Memorial Hospital to designate a corporate spokesman who can testify about the hospital's knowledge and views about the injury Mr. Fiedler suffered that is central to this case. Superior Ct. R. Civ. P. 30(b)(6) entitles Mr. Fiedler to this deposition, but Sibley has refused to provide a designee in compliance with Mr. Fiedler's Notice of Deposition Pursuant to Rule 30(b)(6), which was filed on September 28, 2010. (Ex. 1).

Mr. Fiedler now turns to the Court to compel Sibley to comply with its corporate obligations under Rule 30(b)(6). Mr. Fiedler is entitled to depose a Sibley spokesperson who can testify to the hospital's knowledge and views about the formation of a decubitus ulcer on his buttocks while he was an inpatient at Sibley. Sibley's objections to designating a corporate representative have been repeatedly rejected by the courts in other similar settings. Therefore, the Court should compel Sibley to designate a Rule 30(b)(6) spokesperson.

Please see the Memorandum of Points and Authorities in Support of Plaintiff's Motion to Compel Defendant to Designate a Rule 30(b)(6) Spokesperson for Deposition, and Plaintiff's Proposed Order. Plaintiff requests a hearing in this matter.

Respectfully submitted,

/s/ Daniel C. Scialpi
Patrick A. Malone, Bar No. 397142
Daniel C. Scialpi, Bar No. 997556
PATRICK MALONE & ASSOCIATES
1331 H Street, N.W., Suite 902
Washington, D.C. 20005
(202) 742-1500
202) 742-1515 (facsimile)

Counsel for Plaintiff

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

MARC FIEDLER,	:	
	:	
Plaintiff,	:	
	:	
v.	:	**Civil Action No. 2010 CA 001788**
	:	**Judge Edelman**
LUCY WEBB HAYES NATIONAL TRAINING SCHOOL FOR DEACONESSES AND MISSIONARIES Conducting SIBLEY MEMORIAL HOSPITAL,	:	
	:	
Defendant.	:	

MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL DEFENDANT TO DESIGNATE A RULE 30(b)(6) SPOKESPERSON FOR DEPOSITION

Plaintiff Marc Fiedler is entitled to a corporate deposition of Sibley, to find out the hospital's position about the severe decubitus ulcer that was discovered on Mr. Fiedler's skin shortly after his discharge from Sibley in April 2007.

I. Background

A. Mr. Fiedler Suffered a Pressure Ulcer While Admitted to Sibley

The Plaintiff Marc Fiedler is a 55-year-old attorney who practices here in the District of Columbia. Mr. Fiedler has been quadriplegic since 1975 but has lived independently and successfully since that time, using a wheelchair and other aids. From March 27, 2007, through April 9, 2007, Mr. Fiedler was an inpatient at Sibley for rotator cuff surgery on his right shoulder and recovery from that procedure. Mr. Fiedler's medical records from Sibley's Renaissance Unit

document the hospital's knowledge of skin lesions on Mr. Fiedler's buttocks as early as March 31, 2007. On the evening of April 8, 2007, Mr. Fiedler was notified by a nurse that there was a mark on his buttocks, and the nurse told Mr. Fiedler that a wound care specialist would perform an examination the next morning before Mr. Fiedler's scheduled discharge. No such examination took place. Mr. Fiedler was unable to examine the mark himself. Sibley did not follow up, or give Mr. Fiedler proper instructions regarding skin breakdown.

On or about April 11, 2007, Mr. Fiedler's visiting nurse noticed a wound with significant black eschar (dead tissue) on Mr. Fiedler's left buttock. Mr. Fiedler immediately called the office of his physiatrist, Dr. Pamela Ballard, and scheduled an appointment for the next day. On April 12, 2007, Dr. Ballard noted in Mr. Fiedler's records that the wound was "Stage II-III," and recommended that he go to the emergency room. That same day, Mr. Fiedler was again admitted to Sibley Memorial Hospital, where it was discovered that he had a stage 3 decubitus ulcer with eschar that was within several millimeters of reaching the bone. He had to undergo surgery with grafting to fix the problem and underwent a prolonged period of rehabilitation.

Mr. Fiedler has never suffered a decubitus ulcer on his buttock prior to this episode. He brings this lawsuit asserting that with ordinary proper care at Sibley, he would not have suffered the ulcer at issue here.

B. Mr. Fiedler Seeks Sibley's Knowledge and Views About the Cause of His Decubitus Ulcer and His Treatment While at Sibley

On September 28, 2010, Mr. Fiedler noted a Deposition Pursuant to Rule 30(b)(6). (Ex. 1). Mr. Fiedler requested that Sibley, pursuant to Rule 30(b)(6), designate a corporate representative to testify about several issues, including how a decubitus ulcer was allowed to

form on Mr. Fiedler's left buttock while he was under Sibley's care, and why Mr. Fiedler was discharged without any notice or instructions for treatment of that wound.

On October 29, 2010, Defense counsel sent Plaintiff's counsel a letter raising a number objections to designating a corporate spokesperson. (Ex. 2). Sibley objected to the Notice of Deposition on numerous grounds, arguing that:

- A Rule 30(b)(6) deposition will result in duplicative discovery, because Mr. Fiedler has asked Sibley's designee to be familiar with certain topics that have been touched upon in Sibley's responses to Interrogatories and Document Requests.

- Because Sibley disagrees with the basic factual premise of Mr. Fiedler's case – that he was discharged from Sibley on April 9, 2007, with a decubitus ulcer – it does not need to provide a designee who is knowledgeable about the events that led to the formation of the ulcer; when why and how the ulcer formed; and the hospital's position on why Mr. Fiedler was discharged without being examined by a wound care specialist or being given notice that he had a decubitus ulcer.

- The information sought by Mr. Fiedler is protected by peer review, work product, and attorney-client privilege doctrines.

- A Sibley representative that is knowledgeable in the areas Mr. Fiedler requests will not have personal knowledge of Mr. Fiedler's case.

- Mr. Fiedler's Notice of Deposition is asking Sibley to prematurely produce an expert witness.

- Sibley does not understand the term "meta-data" in Mr. Fiedler's request that Sibley's representative be knowledgeable about the meta-data of his medical records.

On November 16, 2010, Plaintiff's counsel responded that while it could accommodate some of Sibley's concerns, the courts have routinely rejected objections such as the ones Sibley raised. (Ex. 3). On December 1, 2010, Sibley reiterated its objections to designating a Rule 30(b)(6) designee. (Ex. 4). On December 15, 2010, counsel for the parties met in person, but

were unable to resolve this dispute. Mr. Fiedler now moves to compel Sibley to comply with Plaintiff's Notice of Deposition Pursuant to Rule 30(b)(6).

II. Argument

Sibley is required to identify a corporate spokesperson in compliance with Rule 30(b)(6). Sibley has raised a number of objections informally for why it will not comply with this Rule. (Ex. 2). Objections just like Sibley's have been regularly rejected by the courts, and are not valid reasons for refusing to designate a corporate spokesperson.

A. Sibley is Obligated to Designate a Spokesperson who can Testify to Matters that Might be Touched upon in Other Discovery

Sibley objects to Mr. Fiedler's Notice of Deposition, in part, because it seeks information that Sibley claims is duplicative of other discovery. Sibley claims that because it has provided Mr. Fiedler with a list of his treating healthcare providers, and their supervisors, as well copies of Sibley's policies and procedures relating to the treatment of pressure wounds, and the types of beds Mr. Fiedler was on, in response to Plaintiff's Request for Production of Documents, and Interrogatories, Sibley's representative does not need to be knowledgeable in these areas.

Mr. Fiedler is not simply asking for a recitation of the information that has been provided via other discovery methods. Instead, Mr. Fiedler wishes to depose a Sibley representative who is knowledgeable about the topics enumerated in Mr. Fiedler's Notice, and who can provide more detailed information about these topics than has already been provided. For example, Sibley's Answers to Interrogatories provides a list of over 30 individuals who treated Mr. Fiedler while he was at Sibley. (Ex. 5). Rather than depose all of them, Mr. Fiedler would first like to inquire about the basic subject matter each knows so that more intelligent and focused discovery can be performed.

When served with a Rule 30(b)(6) Notice of Deposition:

> It is… the duty of the corporation to name one or more persons who consent to testify on its behalf and these persons must testify as to matters known or reasonably available to the corporation. Not only must the organization designate a witness, but it is responsible also to prepare the witness to answer questions on the topics identified and present the organization's knowledge on those topics.

8A Charles Alan Wright & Arthur R. Miller, Federal Practice and Procedure § 2103 (2d ed. 1987) (citation omitted).

Additionally, Rule 30(b)(6) does not limit a party to questioning a corporate designee only about information which is otherwise unknown to that party. Rule 30(b)(6) simply requires that the information sought be reasonably known or available to a corporation.

In *In re Vitamins Antitrust Litig.*, the court rejected an argument that a 30(b)(6) deposition was duplicative of other discovery. 216 F.R.D. 168, 174 (D.D.C. 2003). The court noted that the production of documents and a Rule 30(b)(6) deposition are not equal forms of discovery, because written responses "constitute admissions by [the defendant]," while a Rule 30(b)(6) deposition "is a sworn corporate admission that is binding on the corporation." *Id.* The court explained that a Rule 30(b)(6) deposition is a vital compliment to written discovery, because "if there are conflicts among [the defendant's] employees regarding facts in the submissions or there are other explanations or interpretations that [the defendant] has regarding the submissions, Plaintiffs are entitled to them." *Id.*

Mr. Fiedler is entitled to question a Sibley representative who is able to testify about, among other things, who treated Mr. Fiedler, when they treated him, who supervised those healthcare providers, what beds Mr. Fiedler was placed on, and what policies Sibley had for treating and preventing pressure wounds. At deposition, Plaintiff's counsel could ask the

designee for more nuanced information than a written list can supply. Plaintiff's counsel could ask about who made individual entries into medical records and what care they specifically provided to Mr. Fiedler if they did not make such entries. Plaintiff's counsel could also ask for details about how Sibley's routine wound care procedures were applied generally, and in the case of Mr. Fiedler. These are all topics that are reasonably known to Sibley.

Not only is Mr. Fiedler entitled to question Sibley's corporate designee about the identity of his healthcare providers and their supervisors, but such questioning is necessary to properly investigate why Mr. Fiedler developed a decubitus ulcer and was subsequently discharged without proper care or treatment.

B. Sibley Must Produce a Designee Even if it Disagrees with Mr. Fiedler's Contention that he was Discharged from Sibley with a Decubitus Ulcer

Sibley objects to producing a representative who can testify to the hospital's knowledge regarding the formation of Mr. Fiedler's decubitus ulcer, because it contends that Mr. Fiedler did not form such an ulcer while he was at Sibley. For the same reason, Sibley objects to producing a representative who will testify about when, why, and how the decubitus ulcer formed, and why Mr. Fiedler was discharged without being examined by a wound care specialist or without notification that he had a decubitus ulcer on his buttocks. Sibley additionally objects that it will be impossible for its designee to have "all knowledge" of the facts of Mr. Fiedler's case.

First, Mr. Fiedler notes that, pursuant to Rule 30(b)(6), Sibley's representative will only be expected to be familiar with what the hospital knows or is reasonably available to the hospital. Additionally, Sibley's corporate designee is free to testify that Mr. Fiedler did not have a decubitus ulcer when he was discharged from Sibley, if that is the hospital's position on the matter. But Sibley cannot avoid designating a 30(b)(6) representative simply because Sibley

disagrees with Mr. Fiedler's assertions; otherwise depositions of an adverse party would never take place. Mr. Fiedler was discharged from Sibley on April 9, 2007. Three days later, on April 12, Mr. Fiedler was readmitted to Sibley for treatment of a stage 3 decubitus ulcer on his buttocks. Mr. Fiedler has a right to investigate how this occurred. If Sibley's position is that Mr. Fiedler left the hospital on April 9, 2007, with no signs or symptoms of a decubitus ulcer, then Sibley is obligated to put forth a representative who will testify to that effect.

C. Sibley Cannot Hide Discoverable Information Behind Claims of Peer Review and Work Product Doctrine

Sibley argues that it does not have to designate an individual who can testify to: (1) Sibley's knowledge regarding the formation of Mr. Fiedler's decubitus ulcer; (2) when, why, and how the decubitus ulcer formed; and (3) why Mr. Fiedler was discharged without being examined by a wound care specialist or given notice that he had a decubitus ulcer, on the basis that obtaining such knowledge will require Sibley to "perform an otherwise privileged internal peer review investigation, and then disclose to Plaintiff the results." (Ex. 2).

Mr. Fiedler is not asking for the results of any peer review investigation that has been conducted. However, Mr. Fiedler is entitled to question Sibley's corporate designee about matters that might have been also delved into by a separate peer review investigation.

The District of Columbia Code concerning hospital peer review specifically allows for such discovery, stating "primary health records and other information, documents, or records available from original sources shall not be deemed non-discoverable or inadmissible merely because they are a part of the files, records, or reports of a peer review body." D.C. Code § 44-805(b).

This issue was squarely decided in the plaintiff's favor in *Wilson v. Lakner*, a case that concerned a foreign object left inside the plaintiff after a surgery at Shady Grove Adventist Hospital. 228 F.R.D. 524 (D. Md. 2005). In that case, Judge Messitte explained:

> The work product doctrine provides no shield to the hospital in this regard. While counsel's own investigation into the facts of the case is substantially protected by the doctrine, and while the proceedings of any investigation conducted for purposes of risk assessment or peer review may be privileged by reason of the Maryland statute, the fact remains that a designated witness or witnesses must still be prepared to respond to the 30(b)(6) notice. If that preparation means tracking much the same investigative ground that counsel and the risk management/peer review committee have already traversed, but independently of that investigation, so be it . . . .

228 F.R.D. at 529.

In *Haywood v. Medstar-Georgetown Medical Center, Inc.*, 2009 CA 009656 , Judge Ramsey Johnson granted the plaintiff's Motion to Compel, over the defendant's objections that any investigation by a corporate designee would intrude upon the peer review process. (Ex. 6).

The case law and the D.C. Code both establish that Sibley cannot shield information from Mr. Fiedler by claiming that information overlaps with the peer review process. The Court should order Sibley to prepare its representative to answer questions on the topics identified by Mr. Fiedler, and present the organization's knowledge on those topics, regardless of whether this process covers the same grounds as a peer review investigation.

Sibley also objects to designating a representative who can testify about reports not located in Mr. Fiedler's hospital record, as well as the steps taken to produce documents requested in Mr. Fiedler's Request for Production of Documents, on the basis that this information is protected by attorney-client privilege, work product doctrine, and peer review privileges.

Sibley cannot shield otherwise discoverable information behind these doctrines. A party "is obligated to produce one or more 30(b)(6) witnesses who [are] thoroughly educated about the noticed deposition topics with respect to any and all facts known to [a party] or its counsel, regardless of whether such facts are memorialized in work product protected documents or reside in the minds of counsel." *In re Vitamins Antitrust Litig.*, 216 F.R.D. at 172.

To be clear, Mr. Fiedler does not seek any information legitimately protected under these doctrines. However, as with the peer review doctrine, Sibley cannot categorically hide areas of knowledge and views by claiming that they are protected by attorney client privilege or work product doctrine.

D. Sibley's Corporate Designee Does not Need Personal Knowledge to Testify

Sibley also refuses to designate a corporate designee because that person will not have personal knowledge of relevant facts, arguing that it is not an "appropriate" method of discovery for Sibley to have a representative investigate the cause of Mr. Fiedler's decubitus ulcer.

The very purpose of Rule 30(b)(6) is to allow a party to discover a corporation's collective knowledge and views on a matter beyond just the fragmented knowledge and views of its individual members. Sibley's corporate designee does not need personal knowledge about Mr. Fiedler's treatment and care in order to qualify under Rule 30(b)(6). "The duty to present and prepare a Rule 30(b)(6) designee goes beyond matters personally known to that designee or to matters in which that designee was personally involved." *U.S. v. Taylor*, 166 F.R.D. 356, 361 *aff'd,* 166 F.R.D. 367 (M.D.N.C. 1996).

"A deponent under Rule 30(b)(6) has an affirmative obligation to educate himself as to the matters regarding the corporation." *Concerned Citizens of Belle Haven v. Belle Haven Club*,

223 F.R.D. 39, 43 (D. Conn. 2004). "The designee must not only testify about facts within the corporation's knowledge, but also its subjective beliefs and opinions. . . The designee, in essence, represents the corporation just as an individual represents him or herself at a deposition." *Taylor,* 166 F.R.D. at 361; *See also Rainey v. Am. Forest & Paper Ass'n, Inc.*, 26 F. Supp. 2d 82, 94 (D.D.C. 1998).

It is not only appropriate for Sibley to designate a spokesperson who will investigate matters beyond his personal knowledge, but Sibley is obligated to designate such a representative. Sibley's spokesperson will not speak for himself, but for the hospital as a whole. Mr. Fiedler is entitled to discover the knowledge and views of the organization itself, and not just its individual members. That is the obligation that Rule 30(b)(6) imposes on any corporation.

Sibley has offered that Mr. Fiedler should individually depose his health care providers from Sibley rather than a corporate designee. While Mr. Fiedler may depose individual healthcare providers, Rule 30(b)(6) was specifically designed to prevent "'bandying,' the practice in which people are deposed in turn but each disclaims knowledge of the facts that are clearly known to persons in the organization and thereby to the organization itself." Fed.R.Civ.P. 30(B)(6) Advisory Committee Notes, 1970 Amendment, as quoted in *Myrdal v. District of Columbia,* 248 F.R.D. 315, 317 (D. D.C. 2008).

Rule 30(b)(6) is designed to allow a party such as Mr. Fiedler to discover the knowledge and views of an organization such as Sibley, as a entity. Rule 30(b)(6) prevents the bandying about of multiple fact witnesses and their individual views as a substitute for a true corporate representative. Mr. Fiedler is entitled to depose an individual who can speak for the hospital as a whole. If Mr. Fiedler is forced to depose only the individual hospital employees who treated him

- potentially dozens of witnesses - he will not get a cohesive and binding position from the Defendant, Sibley, that Rule 30(b)(6) entitles him to.

E. Mr. Fiedler is not Asking Sibley to Prematurely Present an Expert Witness

Sibley further objects to Mr. Fiedler's Notice of Deposition because it argues that the Notice prematurely requires Sibley to put forward an expert witness to testify on matters such as when, why, and how a decubitus ulcer formed on Mr. Fiedler's buttocks. (Ex. 2).

Mr. Fiedler is not asking Sibley's representative to form an expert opinion on the cause of his decubitus ulcer. But, "The corporation must provide its interpretation of documents and events," including "its subjective beliefs and opinions." *Taylor*, 166 F.R.D. at 361.

Mr. Fiedler is asking Sibley's representative to provide the hospital's interpretation of the documents and events relevant to this case. If Sibley has formed an opinion about how and why Mr. Fiedler developed a decubitus ulcer, Sibley should reveal this opinion and its basis. Sibley's representative will not himself be questioned as an expert, but will be questioned about what, if any, opinions have been formed by Sibley about why Mr. Fiedler developed, and was discharged from Sibley with a decubitus ulcer. Sibley's representative will be free to testify that Sibley has no such opinion if that is the case, or that Sibley believes that Mr. Fiedler did not have a decubitus ulcer when he was discharged from the hospital.

However, if Sibley asserts that Mr. Fiedler did not have a decubitus ulcer when he was discharged, it will have to defend this view. Rule 30(b)(6)'s requirement that a party give its interpretation of events "is necessary in order to make the deposition a meaningful one and to prevent the 'sandbagging' of an opponent by conducting a half-hearted inquiry before the deposition but a thorough and vigorous one before the trial. This would totally defeat the purpose

of the discovery process." *United States v. Taylor*, 166 F.R.D. 356, 362 *aff'd,* 166 F.R.D. 367 (M.D.N.C. 1996). If Sibley "wishes to assert a position based on testimony from third parties, or their documents, the designee still must present an opinion as to why the corporation believes the facts should be so construed. The attorney for the corporation is not at liberty to manufacture the corporation's contentions. Rather, the corporation may designate a person to speak on its behalf and it is this position which the attorney must advocate." *Id.* at 361-62. Therefore, Sibley's representative must present the basis for its opinion that Mr. Fiedler did not have a decubitus ulcer when he was discharged from Sibley.

In the District of Columbia, there is no shield against a medical defendant being required to give his opinion about what happened to the plaintiff. *See Abbey v. Jackson,* 483 A.2d 330, 333 - 34 (D.C.1984). A doctor can be questioned closely about the facts of a case just like any other adverse witness. *Id.*

In *Abbey,* the Court of Appeals overturned the trial court's grant of summary judgment, which was based in part on the fact that the plaintiff had not identified any expert witnesses to support her claim of medical malpractice. *Id.* at 332. The court ruled that the plaintiff could rely on the testimony of the defendant doctor, and the defendant's experts, to support her claim. *Id.* at 334. The court explained, "[T]he physicians who were participants or eyewitnesses in the events leading to this cause of action cannot refuse to testify on pertinent and relevant issues merely because their information is the result of professional training." *Id.*

A corporate medical defendant like Sibley should be treated no differently than an individual medical defendant would be. Sibley should not be allowed to shield the opinions of its employees simply because it employs many healthcare providers. Therefore, Mr. Fiedler does

not have to wait for the Rule 26 deadlines to ask these witnesses, or in this case their employer's corporate representative, about their opinions concerning Mr. Fiedler's treatment. If Mr. Fiedler's healthcare providers – including those employed by Sibley who treated him after he was readmitted on April 12, 2007 – have formed opinions about when, why, and how a decubitus ulcer formed on Mr. Fiedler's buttocks, Sibley's representative is obligated to present such information as part of Sibley's knowledge and views. These opinions are part of the hospital's knowledge, and are thus discoverable.

F. The Definition of Meta-Data is Clear

Finally, Sibley objects to producing a designee who is familiar with the "meta-data" of Mr. Fiedler's hospital records, on the basis that this term is unclear. (Ex. 2). Plaintiff's counsel clarified in his November 16, 2010 letter, (Ex. 3), that "meta-data" refers to "data that provides information about other data." Merriam-Webster's Collegiate Dictionary, 11th ed., 2008. In regards to any electronically created or stored information, meta-data refers to any information concerning the creation, storage, size, alterations, and any other additional information about a document not contained within the document itself. In hospital parlance, another term for meta-data is "audit trail," which is a document in the hospital's electronic system that shows when each entry in a patient's electronic medical record was created and by whom. Sibley should be compelled to designate a witness who is familiar with this information.

ORAL HEARING REQUESTED

Respectfully submitted,

/s/ Daniel C. Scialpi

Patrick A. Malone, Bar No. 397142
Daniel C. Scialpi, Bar No. 997556
PATRICK MALONE & ASSOCIATES
1331 H Street, N.W.
Suite 902
Washington, D.C. 20005
(202) 742-1500
202) 742-1515 (facsimile)

Counsel for Plaintiff

CERTIFICATE OF Rule 12-I and 37 (a) GOOD FAITH EFFORTS

I HEREBY CERTIFY that on December 15th, 2010, I met in person with Steven Hamilton, Esq., and Karen Karlin, Esq., to try to resolve the disputed issues raised in this motion. Additionally, counsel exchanged correspondence regarding this matter. (Ex. 2 -4). Despite these good faith efforts, the parties were unable to resolve the issues in dispute.

/s/ Daniel C. Scialpi
Daniel C. Scialpi, Bar No. 997556

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of December 2010, a copy of the foregoing was sent via e-service to:

Steven Hamilton, Esquire
Karen Karlin, Esquire
Hamilton Altman Canale & Dillon, LLC
4600 East-West Highway, Suite 201
Bethesda, Maryland 20814

/s/ Daniel C. Scialpi
Daniel C. Scialpi, Bar No. 997556