CLASS: BABY BAR REVIEW

LOCATION: REMOTE

04/19/2022

>> Good evening welcome to tonight’s baby bar series I hope you are doing well and I want to point out the sessions are recorded. If you want to go back and listen to a session you can go to Taft's student section and log in and everything is there listed for you under the baby bar miniseries any handouts such as the checklist that was sent out the to you will be there for your convenience as well. If you have questions place them in the chat and I will answer in any way I can. Primarily what we will look at is subject matter of torts what I do in regards to the review I give an idea how the concept is tested. You should know the black letter law what we will go over is areas theories and nuances so we have a better understanding and more prepare for the essay and multiple-choice questions. Remember in order to do well you need to have a checklist. No matter how hard you fight it the checklist is going to help you in regards to identifying issues and when it becomes exam day, we have a tendency because of the time to get in a hurry and we don't practice to reading in detail and break things apart and the checklist is going to trigger other issues for you. It is important if you don't have a checklist develop one if you have one use it. That is the main purpose to identify issues and also the checklist and inner checklist should be the organization of how you write an exam.

An example. When I tutor student in the past I say where is res ipsa. It is a concept that comes under breach and under negligence I establish a duty and show action of breech and I need to show res ipsa the breach. You need to know where everything fits and how I am going to address the issue. Another issue that could come up. Say plaintiff. You need to know where it fit. If you look at the checklist and inner checklist that is proximate cause issue. That is the key. That is the benefit of having a checklist that is very important. Also, you can use the checklist for multi‑states and I can't believe how many people don't refer back to the checklist. If you don't know where you are at look at the checklist and it will narrow down and you can see the area as to the concept that is being tested and that is important. First area we are going to focus on is intentional torts. We have actual intent and the other area we get lost on is substantial certainty or desired result. If I have a substantial certainty to do an act such as swing my tennis racket and hit somebody equivalent to a --. I didn't mean to hit the person you but I acted in certainty of doing the conduct. You have to pay attention and a lot of times people will take the substantial certainty test and find it is a negligent act when it is a deliberate act. (Indistinct) likelihood f of hitting somebody is quite high. Does the result. The intended result and you have the transferred intent doctrine. Remember the transfer intent doctrine works two ways and testable on the essay as well as multiple choice question you can transfer the intent from the intended tort. Such as assault to the actual tort which could be battery or from the intended victim to the actual victim. I meant to hit Mary and I hit Bob. I can transfer that intent and these are good concepts you want to make sure you understand and have inure mind set in order to get the correct answer choice.

Now the first intentional tort we are going to look at is battery. Sorry assault. Now assault obviously is intentional. Creation of an imminent apprehension. The imminent is important. Remember words alone are not enough. I am going to hurt you that is not enough. You want to make sure you look the to the elements and see if it is supported based on the facts, we have a tendency to jump on something and it is not supported as to each and every element. Again (Indistinct) actionable and like the to test in regards to the imminent see. Got to be now. Can't be if you do this, I am going to harm you tomorrow. No imminent there and that is the area they like to test for assault. Battery intentional touching of another. You want to look for the extension of one self. If I get mad at you can and jump in the car and kicking the heck out of your car you can argue that is a battery to the extent of one’s self. Or knocking the I phone out of your hand or place something to that affect that would be an extension to one’s self and we would find that to be touching. Other thing with battery. People feel it has to be a physical touching and that is not the case. Someone blows smoke in your face that is equivalent to a battery.

The more I can get you to practice essays and multiple-choice questions and have a good understanding of how the concepts are tested it is not going to make awe second guess yourself. A lot of times if we don't know the concept, they are going to test something so close you are going to vacillate. Example today I was reading an exam with a test and of course I accept your offer through a text. Mailbox rule and I had to look it up and make sure it applies to text. I know it applies to e‑mails and never ugh thought about text. Yes, most jurisdictions follow it. If I second guess myself. I am not sure and I will pick the wrong answer choice. That is why it is beneficial to you to take a step back and understand how the concepts are tested and how you see it in a testing format that will help you. Love false imprisonment. People don't do well with it. Cup of things to be aware of words alone are not sufficient. Do you need to be aware of the imprisonment? The answer is yes or if you are damaged by it. If I am unaware but sustain damage I can recover for false imprisonment. Right? You want to look to threats. Threats can cause confinement. If you come out of the door, I will beat the crap out of you. That will trigger confinement and I am aware in the case as far as actually damage and had they will test that and I want you pay attention and understand that.

Tress pass to land remember you don't need to know it is your land. If I am in a car and car breaks down and walking to get gas, I didn't know it was yours. Doesn't matter. You acted with what? The di sired result offal walking on the grass that is equivalent for intent. For intentional torts you don't have to have actual damages and you can go to punitive and the court is mean the to do that in this case. Again, the examiners test differently and don't care and want to make sure you understand the concept. Verses trespass to channels. You look to see if there is an interference verses a complete destruction. There is a difference between trespass and your conversion.

First five I went over. Assault. Battery. False imprisonment. Tress pass to land. Tress pass to channels or what we call the five writs of tress pass. Those five the transfer intent doctrine work for. The transfer intent doctrine does not work for conversion or intentional infliction of emotional distress. I would learn the two that the transfer intent doctrine doesn't learn and I don't have to learn the other five as to which it works for.

With conversion you look to complete destruction or substantial interference and that is the better answer choice verses tress pass to channels and intentional affliction and I emotional distress what do you look for? Distress you can't hide that. You need to show intent and some emotional distress. It is not that hard.

When you see intentional tort exam, I want to make sure you identify as many torts as can you find in the facts. The checklist. Again, we don't want to leave 2, 3, 4. A lot of times you see intentional tort exam you have 2 or 3 per lawsuit. Example here. Tommy is angry at Pete while driving to store to get milk Tommy saw Peter walking along the road Tommy jumped out f of the car and pushed Peter down and stood over him in the ally. And a lot of people say he pushed him down. That is a battery. You are standing over. And I could say it is apprehensive and it could be argument for false imprisonment. You want to look for as many as you can based on the checklist. Again, whether you are looking for intelligence tort remember you have to break apart the elements. Causation exists in every tort and look to damages and defenses. Don't shortcut it. A lot of times on multistate with intentional torts they test the issue of the approximate cause. On essays most of us don't talk about it unless it is an issue. A lot of times it is not and we shortcut ask don't talk about it. The tort. Say it is battery. Show the intent. Show harmful or offensive touching of another. And causation. Damages. And defenses. So that is your set up. Okay?

In and out, remember once you find intentional tort don't short cut and look and see if there are applicable defenses and memorize those. Self‑defense. Defense of others. A lot of time. Necessity whatever it may be. We don't remember the intentional tort defenses and we grab onto the wrong one or grab onto a Crim law one and you can't do that. Intentional tort again is easy to confuse on the multi‑states between crimm law and torts and you want to make sure you pay attentions to the call of the question. That is important negligence an area you better know. It is not a hard concept. You got the duty. Special duty. Violation of statute. Guest statute. Omission to act. Invitee. License. Trespasser. Trespasser. Attractive nuisance. Be aware of changing status. These are all things you want to know and understand. Negligence is highly testable and they like to test the statute because people do not go through the elements to see if the statute works and you look to the intent to the legislature. Are you a member of the class? Did you sufficient aur type of injury? You got to break the elements apart and if general rule is you start off if the facts support special duty and it fails you fall back on a general duty. Very important and again you always start off with a special duty and then you fall back on a general if the special duty doesn't work. General duty be careful of the (Indistinct) Anderson people bring that up all of the time and a lot of times it doesn't apply. What I can tell you is remote plaintiff. If it is remote plaintiff. It is a (Indistinct) pron. How remote plaintiff come ins play. I drive down the street and hit John in the car. By stander who saw the issuing me. That is a remote plaintiff wasn't involved in the crash itself. But was a bystander and sue me based on many I conduct.

Breach and you have general and res ipsa. It has not been tested for a while on the essay. They used to give you a hint by the language. There is no evidence of. So, I know it was a res ipsa problem and they got smarter and realize people pick it up. The reason it is triggered is I don't know how the person; you are that breached their duty and how it occurs and had say it is a doctor and goes to surgery. Who left the sponge in you? I don't know. You argue res ipsa. I don't have anything to show the doctor did it or the nurse or other ‑‑ whoever. I don't know who did it. That is for res ipsa. It is out of fairness to shift the to the other side to show they didn't do it. It is circumstantial proof of the actual brief.

Causation comes up always. An area to know. Successive tort main one they like to test other than the but for. Excessive conduct. Two negligent acts that cause a result. Member with successive they are independent on their own that cause a result.

So, I cause a car accident that made Mary get injured and had Mary is taken to the hospital and given the wrong medication and severely ill. That is successive tort. Mary is suing me and not only my conduct but the doctor giving the wrong medication. For the go negligent wrong acts she wouldn't have been as severely sick or injured and that is the successive tort. I don't see successive factor come up too much in regards to concurrent. Concurrent is basically two independent people. They have two independent acts that cause a negligent result. On their own they are okay. And the I always say washing my driveway with gasoline. Stupid. Right? But not negligent on its own but if someone throws a match now, we have a problem.

Proximate cause. Huge. Need to know proximate cause. It is test and had we need to know it. With proximate cause I always use the inner checklist. What do I mean? I ask myself first of all if this is a direct act and if it is it foreseeable? Joe hits Mary’s car and causes injury. That is direct act. That is foreseeable. If you walk through the steps, you will always look like you know what you are talking about. If Joe's car hits Mary and Mary is taken to the hospital but in the ambulance the car runs a red light and severely damages the ambulance including Mary and the car and you are suing for the driver hitting the ambulance is that a direct act or indirect? It is indirect because the first car that hit her and put her in the ambulance the first-place cause it had injury. Is it dependent or independent? The ambulance came into play because of the person causing the accident. It would be dependent. Is it foreseeable or unforeseeable? Someone running a red light. It is foreseeable therefore you are liable. The original driver who put the chain in motion will been responsible for these acts and if you break apart that way it looks like what? I understand what I am talking about. I look like again I fully understand proximate cause. Go to damages and look for defenses.

Now the key thing in regards to defenses. I say defenses. Singular verses plural. You always want to argue two or more. Now I know if it says what defense will contribute to comparative are basically just the difference of jurisdiction and I know I have assumption of the risk without reading the facts and based on the call and look and see if it is triggered and that is an area you know without needing the exam going in and we break apart in that matter. Negligence is highly testable and student its is don't do well. It is something I would look at past exams and get it done and see how do I see in regards to violation of statute. How do I see occupier and they change their status and proximate cause problem? You want to know that before you go into the exam. Okay?

Strict liability. Strict liability of two areas m cos up one in regards to animals and they have tested currently on the baby bar and I don't know why I don't think it is a hard concept. They had one with an ape and sheep. Cross breed of sheep and goats and animals trigger what? Strict liability. With animals you need to show it is the propensity. Necessary sense in if regards to dog bite ls. Right? But what a cat or what about a cow? Right? You want to know the propensity. Cows and horse are known for tress pass and you want to look to the propensity. You see strict liability of animals and see if there is causation and damages and we are cone and defenses. And other strict liability you can come up with abnormally dangerous activity this is an area they like to mess with you especially in the proximate cause area for explosives. They will tell you I have explosive materials in this these containers and a security guard out there and unusual lightning storm that hits one of the cans and cause as explosion. Strict liability and liabilities as a fault and in regard you got the proper containment and the stuff like that. Is it foreseeable in if I jump to proximate cause that you have a lightning storm and hit one of the cans and cause an explosion? I guess where you are at. Most likely act of God is foreseeable. These are areas they are going to play with you.

Remember if you have an answer choice on the multiple-choice questions. Between strict liability and negligence strict liability is always a better answer choice it is liability regardless of fault. Very important.

Now another thing we learn is if I see strict liability on the land what else should I look for? There are cross overs. And you have maybe provides nuisance and that is something I would look for. If I see strict liability on the land, I am looking for private nuisance and these are things to help me identify and break that apart in order to do well in regards to seeing the issues on the examination.

Product ss huge. I haven't done my predictions yet. But products were not tested on the last baby bar and meaning it is ripe for testing. Why? Because student haves a hard time with products and liability. You have four different theory Battery. Negligence. Warranty and strict liability and the Court. If you see a liability exam. And the call is a general call what theory is a liability? You know you have three theory’s the to address. You have got negligence. Merchantability. And strict liability and tort. You don't need the fact pattern and know the three issues are something I must address. Battery you are going to know based on the facts and you have to have knowledge. One they did a while back where the (Indistinct) in mu the allergy medication could cause blindness and that is a battery and you didn't disclose it. Of course, negligence. You got a duty to let me know right?

Remember in regards to the products liability there is a different duty as a manufacturer it is not a duty as a reasonable prudent person. It is a reasonable duty to inspect discover and disclose of any known dangers in regards to product and your breach is a type of defect. Manufacturing warrantying and design. General rule on an essay and look for two or more defects. Not just one. Two or more and see what triggered itself and you have causation which is the same we learned through the other theories and your damages and then your defenses and then go to the warranty and see which ones are an issue. With express warranty. You see express. Implied warranty of fitness goes with it and those two have a relationship

You will see applied warranty merchantability if it is a general call and look for a representation itself. Usually with representation you are going to see on a product. Safe. Wholesome. Will last any crash. Those are representations on the product itself. So, the issue is representation verses puffery will make you gorgeous. That is a puffery and of course if you find it is not puffery you will argue your warranty itself.

The general rules when have you an expressed warranty as I point you had out talk about the implied warranty of fitness with particular purpose and if it is a general call what theory’s must we address? Negligence. Implied warranty merchantability. And strict liability and tort. And remember the call will dictate and they did have a baby bar where a little girl took a banana peel and bit into it and through on the ground and a shopper tripped over it and slip over it and off duty police officer fell. And if you read the question, they told you the lawyer brought the cause of action under strict liability. That narrowed to the particular product issue strict liability and tort and you have to break apart and go through it.

Remember the call does dictate. But if it is a general call, we know we have three theories’ right off of the bat. Okay? If you are (Indistinct) product liability it can't be an endorser. If you have an endorser, you are suing that endorsed a product has to be under the theory of misrepresentation and negligence. You see people endorse products all of the time. What is it ratios or whatever? That is an endorser. If it is a defective product you can't sue for product defect you sue for as well as negligence.

Another theory that is very important is vicarious liability. People have a tendency to overlook this. You have to see through vicarious liability are im (Indistinct) you have to see an employer employee relationship. Such as restaurant and the waiter drop astray of hot food on you. Well, because you are going to sue the restaurant because they got the pockets and you have you to bring up the employer, employee relationship. Shows within the course of the scope. Verses if it is an independent contractor and obviously things change. Remember too you have certain tasks that are nondelegable. If they are not, you are not escaping liability.

For example, if I hire someone to come and take out a tree that is an independent contractor. He has the tools and dictate it is time he gets there. Takes it out and hauls it out and everything else. If the tree is cut and falls on the neighbor’s house, I am not responsible. Remember I have a remedy. I can see indemnity against the person I hired like it is not fair. But why should the neighbor have to worry about who did you hire and how do I go after them. They put the burden on the home owner and same thing in regards to maintenance to the car brakes fixed and had didn't do it right and you crash into somebody you are still responsible to the party itself.

Bailiff bailee I have seen come up based on the relationships and they have gotten clever how they test. They say it is a hotel and the person supposed the to be monitoring the front desk decides to go upstairs and visit a friend and now the front desk is unmonitored and had a thief comes and stands behind the front desk and can a woman comes to check in her jewelry to put in safe for the night and give her a fake ticket and leaves with the jewelry the hotel is responsible they create it had relationship based on the negligence as to the person that is suppose it had to be there but not at the front desk.

Nuisance. In regards to the nuisance I would say it does come up if you see strict liability. It is private verses public and does come up every once in a while, on the multiple choice and look to see if you have harm different and kind you don't have standing and it is a standing issue the to bring the public nuisance.

I haven't seen defamation tested in a while. A couple of things. Students don't write this properly. Why? You want to make sure you break apart the elements. (Indistinct) the statement. Was it published intentionally or innocently? Third party who understood and reliable slander and break the elements apart in regards to communication and it should be at least 2 or 3 paragraphs right there. You don't want to lump it all in one or you won't do well.

If you see defamation in and of it unless the call again dictates have, you’re a cross over with false in the public eye and if you look at the publication if it is done intentionally, I know I have intentional infliction of emotional distress.

Knowing how certain issues can cross over with each other that can help (Indistinct) miss things. And that is important. In look to go regards to defamation remember look to facts verses opinions. Opinions are what? Nonaction actionable. I think she is a liar and it is my opinion. You want to make sure is it a fact verse opinion. A lot of times to make sure you what? Break apart the statements and a lot of times they give multiple statements and we want it all in one. No. Mary lied to employer and stole money. You are going to break the two statements apart. Right? She is a liar one. Stole money from the employer there is two. Right? The fact she is a liar can go either way. The fact she stole money if that is wrong. It is a falsity that could be a defamatory statement. Again, break it apart when you can.

The other area they like to the zest was it understood. So, the person has to know it is the family (Indistinct) meanings. Published and has to be published third party and test a lot of times with an e‑mail. Send a defamatory e‑mail and look at the facts and your mother read it. Whoops. If I didn't know that you lived with your mother and of course I plight get away with it. Verses the fact if I knew susceptibility and did it anyway. Might be the publication itself.

There is a difference between liable and slander and liable is what? Written. And slander is what you hear. And this is important for you to determine because our damage is going to be presume or not. Okay?

In regards it is to if it is liable general damages are presumed if you want special prove them up. If it is slander you are going to have to do what? Show general damages as well as what?

If I can get a special category as to slander per se? The general damages will what? He presumes and had again, that is why it is important.

You always find there is defamation. Look for defenses and tun we love. Two areas qualified privileges and constitutional privileges W. the constitutional privileges remember this has to be a what? A media defendant. Right? A media defendant. The news. The press. Okay?

In regards to qualified privilege break that apart. Do I have a right to disclose this information? What information are you disclosing? To a previous employer or something to that effect. It is based on good faith it can qualify as a qualified employer itself.

All right. Remember if you do see defamation, you shall look for the crossover of what? False light in public eye. Have you your invasion. Invasion of privacy tort. With an invasion of privacy torts during testimony especially you see with defamation they like the o toast on the multiple-choice questions because people don't really understand these.

False in public eye you are portraying somebody falsely to the public. Intrusion upon seclusion if you are coming too close you are in my servitude. My privacy. Public disclosure of private facts speaks for itself. What is a private fact? And appropriation likeness. The two in the multistate like the to favor is public disclosure of private facts and likeness. What is a private fact? You were arrested. Now you can disclose to people. That is not a private fact even though it was hard to find someone is arrested that is not a private fact and that is what they are going to test.

Appropriation likeness and they like this one. I take your paragraph and sell it. Or take a famous person's photograph and sell it. Is that appropriation in likeness is and the answer is no it is not. How that tort works is you have to be using for your own commercial gain and that means I take the pictures and look who eat at my establishment. Then that is appropriation of name or likeness. Use your voice so you think. What happened to bet mid ler and obviously trying to sell cars and everybody think it is her. That is appropriation of likeness you are trying to make money from her voice people think she is endorsing your product and that is a problem.

This is torts and far and few and interference with contract. That is intentional and intentional ‑‑ that is an intentional tort too. Interference with contract you know there is an existing contract. Verses the perspective advantage. There is no contract but someone has a relationship and you interfere with it those are business torts and proper litigation torts those are more bar. Abusive process. And prosecution and you can argue wrongful institution of civil litigation.

And misrepresentation. Your misrepresentation ss what? Fraud. Negligent. Negligent misrepresentation and innocent misrepresentation itself. How can I see these come up? You know based upon the representation. The one area in which they haven't tested in a while is cross overs. If I see someone basically and they are entering into a contract and make as representation. Right? That is a defense to contract. Suspect it? And it is also a tort. If I see that I am going to talk about both. And I am going to talk about the contract issue and bring up the tort aspect and again the call will dictate and that is a cross over and reason I do that is once you get to remedies you will learn it is better to sue under the tort especially for intentional fraud because your remedy is better.

These are the primaries in regards to the torts and key thing is to really hit home what? Negligence. Right and within negligence proximate cause is testable. Have a good understanding. How intentional torts come up. They will be on the multistate ls. Defamation I want to be aware of. Something that could be test and had doesn't come up always and I want to be aware of it. And products liability. And I should have had my products liability cold. So, when I go in there I am prepare and had all I have to do is insert the facts and that is something that you actually can have what we call canned. If I see this and this is how I set it up and all I have to do is worry about inputting the facts. Tying the actual facts in and of itself. Okay?

Now torts you know basically and how it is tested it is not a hard subject and it is very elemental. And it is tested based on the elements but the key thing to remember is make sure you break apart those elements pursuant to facts and make sure they are supported. Because that is where they get it. Especially on the multi‑states and in regards to this case. Let's say they basically tell you that I hit Mary and she was so scared that she went and ran into the wall. Well, gee. Was there intent? Sure. Harm? Did I cause damage? If you break apart the tort and elements you are going to see it is not always there. That is important in and of it otherwise I get it wrong and that is why they have two correct answer choices and one is better than the other.

What I recommend in regards to the perpetration and I know we just started I would take my checklist and I am going to map out my study. So, on my checklist I have torts and negligence and I am going to ma map that out. Say I work full time and to have an hour today I am going to go through the intentional torts and I will not read in gill betters I will take a sit back on the outline I create and had say what is the intentional torts. Assault battery. Etc. Can I, yeah battery is intentional (Indistinct) another. Do I have a good concept on how to test the battery it? I know it isn't physical touching it could be smoke. And go through that with all of the torts. Intentional torts and then at that point I p pull out the multistate. Such as my fins and just do multi‑states in the intentional tort area.

Now the reason I am doing this is I need to find my weakness. If I do 15, 20 in the intentional tort area. I miss half I know I am not strong in many the area and better go back and review a little bit more. And you don't want to just do the reading. Because that is not beneficial. So, if we just sit there and read the outlines, we are not going to learn anything. You got to learn by doing and understand I do that with the intentional torts I now am going to negligence and doing the same thing and you should have implemented key facts from the (Indistinct) or multiple-choice question and plug into the checklist. Still to the very day you say to me exam the whole fact pattern pops back in the head as to what occurred in regards to the glass and diamond and little boy was injured on it. A couple of keywords should trigger and you are going back through the multistate whether you realize or not and learning the concept. More I do that and understand how it is tested I should be in better shape and break apart negligence next on the checklist might be strict liability or product liability and will go through and it once you get all torts done and have broken apart by section and done multiple choice all of the way and got through the sections and at that point when you are do own with torts you should have a good idea where your weakness is.

I want to spend more time on the weakness than I do on my strength and at that point when I am done with torts what that mean? I can do multi‑states now and go within the next subject within the case say it is contracts. Create add study schedule and other thing with study we get frustrated and feel we didn't accomplish anything. If you look at the inner checklist and multistate and that is going to start to rebuild the positive. Affirmation here and that is what we need to do. For some reason when we study, we beat ours up. Any questions in regards to torts or black letter law? Not a hard subject. Very rule orient and had what you need to work on is how we test the concepts and they are going to test the nuances we didn't go over and that is going to be frustrating.

At this point you are sent an essay question on Friday as well as 33 multiple choice what I want you to do is at least outline the essay question. So, we have an idea in regards to am I getting this or not. And other thing is if you have questions on its e‑mail it and let me see it before the lecture to go over it. If you write it e‑mail it and I will take a look at it. And you will be given 33 multiple choice questions and obviously you can read those. I mail me if you have a question. We can talk about. A lot of times you will see what you missed so did somebody else and there are problems that are consistent. And take advantage of that. All right and go over the material so you are prepared the to do well. When you miss a multiple-choice question remember I want to you to go over the why. If we don't if figure it out, we are going to be many this same boat. Didn't fix the problem. Go to fix the problem and break it apart.

Now during the preparation if you have questions shoot me an e‑mail at jolly at Taft dot EDU I am happy to help in any way I can. Sf if you need essay questions, we have a few on the web site and if you want t to shoot an e‑mail. I will see what I have and send your way. We want t to work on our weaknesses and want to understand.

Someone is asking if you want to form a study group for the June 2022 first year examination. If you want to do that feel free. Sometimes it helps student ins regards to accountability. Or I don't know I feel better it is funny if I knew someone else was studying, I didn't feel bad. Or if I work late, I am the only one here. But if someone else is working late I don't feel odd. Sometimes if you can talk to somebody else about it. Yeah, I feel the same way. You are normal and chatting with somebody that makes as difference and if it helps is recommended it as well. Okay anybody have any questions?

Next week we will go overs say question e‑mailed out to you as well as 33 multiple choices and if anything comes up reach out to me and I want you to have success and my e‑mail is jolly at Taft dot EDU anything comes up let me know otherwise I will wish you a great rest of the night. Good night. #