

No. 2022-44525

DR. MARY TALLEY BOWDEN,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
v.	§	
	§	HARRIS COUNTY, TEXAS
THE METHODIST HOSPITAL, d/b/a	§	
Houston Methodist Hospital, and	§	
MARC L. BOOM,	§	
	§	
Defendants.	§	151ST JUDICIAL DISTRICT

**DEFENDANTS' EVIDENCE OF FEES AND COSTS
AND MOTION FOR ENTRY OF JUDGMENT**

On January 31, 2023, the Court granted Defendants' Motion to Dismiss Under Tex. Civ. Prac. & Rem. Code Chap. 27 ("TCPA"). When an action is dismissed under the TCPA, the statute mandates an award of court costs and reasonable attorney's fees to the moving party. TEX. CIV. PRAC. & REM. CODE §27.009(a)(1). The Court's Order dismissed the entirety of Plaintiff's suit, awarded Defendants their court costs and reasonable attorney's fees, and required Defendants to submit evidence of their attorney's fees and costs.

In accordance with the Court's order, Defendants The Methodist Hospital ("Houston Methodist") and Dr. Marc L. Boom hereby submit their evidence of attorney's fees and costs and respectfully request that the Court award Defendants: (1) their reasonable and necessary attorney's fees of \$93,032.28; (2) conditional appellate fees as set forth below; and (3) court costs in the amount of \$24.00. Because the determination of fees and costs will resolve all remaining issues in the case, Defendants further request that the Court enter final judgment.

ARGUMENTS AND AUTHORITIES

The Texas Supreme Court has held that the “TCPA requires an award of reasonable attorney’s fees to the successful movant.” *Sullivan v. Abraham*, 488 S.W.3d 294, 299 (Tex. 2016) (emph. added). The award is mandatory, not discretionary. *Id.* Unlike claims for attorney’s fees under the Texas Declaratory Judgment Act, the TCPA’s attorney fee standard does not “include considerations of justice and equity.” *Id.* “A reasonable attorney’s fee is one that is not excessive or extreme, but rather moderate or fair.” *Id.* (cites and quotes omitted). The determination of what amount is “reasonable” rests “within the court’s sound discretion.” *Id.*

“[T]o secure an award of attorney’s fees from an opponent, the prevailing party must prove that: (1) recovery of attorney’s fees is legally authorized, and (2) the requested attorney’s fees are reasonable and necessary for the legal representation, so that such an award will compensate the prevailing party generally for its losses resulting from the litigation process.” *Id.* The Texas Supreme Court recently reaffirmed that “the lodestar method . . . applies for determining the reasonableness and necessity of attorney’s fees in a fee-shifting situation” such as this one. *See Rohrmoos Venture v. UTSWDVA Healthcare, LLP*, 578 S.W.3d 469, 501 (Tex. 2019) (quoting *Perdue v. Kenny A.*, 559 U.S. 542, 553-54 (2010)); *see also Iola Barker v. Hurst*, 632 S.W.3d 175, 186 (Tex. App. – Houston [1st Dist.] 2021, no pet.) (applying the lodestar analysis to the TCPA context).

The lodestar method involves two steps. “[T]he fact finder must first determine a base lodestar figure based on reasonable hours worked multiplied by a reasonable hourly rate.” *Rohrmoos Venture*, 578 S.W.3d at 501. Second, the fact finder must determine whether “evidence of other considerations overcomes the presumption and necessitates an adjustment to reach a

reasonable fee.” *Id.* “[T]here is a strong presumption that the base lodestar figure is reasonable . . .” which may be overcome in only “rare circumstances.” *Id.* at 502 (quotes and cites omitted).

The Texas Supreme Court’s decision in *Arthur Andersen & Co. v. Perry Equip. Corp.*, 945 S.W.2d 812, 818 (Tex. 1997), identifies a “non-exclusive” list of “relevant considerations that may justify an adjustment,” including (1) “the time and labor required,” (2) “the novelty and difficulty of the questions involved,” (3) “the skill required to perform the legal service properly,” (4) “the fee customarily charged in the locality for similar legal services,” (5) “the amount involved,” (6) “the results obtained,” (7) “the time limitations imposed by the client or by the circumstances,” (8) “the experience, reputation, and ability of the lawyer or lawyers performing the services,” (9) “whether the fee is fixed or contingent on results obtained,” and (10) “the uncertainty of collection before the legal services have been rendered.” *Rohrmoos Venture*, 578 S.W.3d at 494, 501. (quoting *Arthur Andersen*, 945 S.W.2d at 818). Importantly, however,

the base lodestar calculation usually includes at least the following considerations from *Arthur Andersen*: the time and labor required, the novelty and difficulty of the questions involved, the skill required to perform the legal service properly, the fee customarily charged in the locality for similar legal services, the amount involved, the experience, reputation, and ability of the lawyer or lawyers performing the services, whether the fee is fixed or contingent on results obtained, the uncertainty of collection before the legal services have been rendered, and results obtained.

Id. at 500 (quotes and cites omitted). For that reason, the Texas Supreme Court has warned that “[t]hese considerations therefore may not be used to enhance or reduce the base calculation to the extent that they are already reflected in the reasonable hours worked and reasonable hourly rate.”

Id. Courts may, however, “look at the entire record, the evidence of reasonableness, the common knowledge of the participants, the amount in controversy, and the relative success of the parties.”

Hawxhurst v. Austin's Boat Tours, 550 S.W.3d 220, 233 n.5 (Tex. App.—Austin 2018, no pet.).

ARGUMENT AND AUTHORITIES

I. Defendants' Attorney's Fees and Costs Are Reasonable.

In this matter, the *Arthur Andersen* factors warrant no adjustment of the lodestar amount because the relevant considerations are either already incorporated into the lodestar calculation or do not meaningfully change it.

A. Defendants' Fees are Presumptively Reasonable Based on the Lodestar.

“[E]vidence of (1) particular services performed, (2) who performed those services, (3) approximately when the services were performed, (4) the reasonable amount of time required to perform the services, and (5) the reasonable hourly rate for each person performing such services” is “sufficient” to establish the lodestar amount—*i.e.*, “reasonable hours worked multiplied by a reasonable hourly rate.” *Rohrmoos Venture*, 578 S.W.3d at 498 (cites omitted). “When the record includes evidence that is adequate to address the five factors outlined above, trial courts may presume the multiplication step of the analysis has produced a figure that reflects a presumptively reasonable fee.” *Toledo v. KBMT Operating Co., LLC*, 581 S.W.3d 324, 330 (Tex. App.—Beaumont 2019, pet. denied) (citing *Rohrmoos Venture*, 578 S.W.3d at 498).

Although contemporaneous billing records are not required, they are “strongly encouraged” because they can serve as evidence of the reasonableness and necessity of fees when those elements are contested. *Rohrmoos Venture*, 578 S.W.3d at 502. Here, Defendants have included their contemporaneous billing records. Ex. 1. Defendants first learned of Plaintiff’s intended litigation through a press conference on July 25, 2022. LeRoy Decl. ¶8. Defendants’ counsel quickly became involved, with the first billing entry on July 25, 2022 reflecting analysis of “TCPA application and motion.” *Id.*; Ex. 1 at 2 (billing records). Yetter Coleman has since created monthly invoices reflecting contemporaneous billing records through January 31, 2023,

when the Court granted the TCPA motion. Ex. 1. Those bills contain detailed entries for the first three factors listed above: (1) particular services performed, (2) who performed those services, and (3) approximately when the services were performed. Additionally, they list the actual hourly rates for each person performing the services.

Defendants also have also attached an expert declaration from Tracy N. LeRoy, the lead lawyer for Defendants in this matter from Yetter Coleman LLP. LeRoy Decl. Ms. LeRoy's Declaration states that she has reviewed the billing entries in detail and opines on the reasonable amounts of time required to perform the services and the reasonable hourly rates for each person performing such services. She further opines that the requested fees reflect a reasonable number of hours worked times reasonable hourly rates. *Id.*

In an effort to further demonstrate the reasonableness and necessity of the requested fees, Defendants have omitted from the lodestar calculation any fees that were not specifically incurred in defending against this legal action. *Id.* at ¶10; Ex. 1 (showing omitted fees as gray redactions). For this matter, Defendants' counsel have further applied a blanket 12% reduction to their standard rates across the board, regardless of timekeeper or task. With this segregation and self-imposed reduction, the fees requested are undoubtedly reasonable.

1. The Requested Hours are Reasonable Because the Time, Labor, and Skill Required Were Significant.

Defendants were sued for \$25 million dollars by Dr. Mary Talley Bowden in a highly publicized defamation matter. *See* Plaintiff's Original Petition. Hard-fought motion practice ensued, and Defendants ultimately prevailed on their motion to dismiss. As detailed below, the fees incurred in that defense were reasonable and necessary.

Plaintiff's Counsel. Plaintiff employed counsel, Steven Biss, a member of the Virginia state bar, who is well-known for handling high-profile defamation matters. LeRoy Decl. ¶13. In fact,

Mr. Biss represented to the Court at the TCPA hearing that he has handled over 300 defamation cases. *Id.*

Plaintiff also employed Madhu Sekharan, a local attorney with twenty-five years of experience in numerous areas of the law. *See* <http://attorneymadhusekharan.legal/>.

TCPA Motion. The Court is familiar with the facts of this case. Plaintiff made a series of public statements sharing misinformation regarding COVID-19. These statements prompted Houston Methodist to respond on Twitter providing accurate facts about the disease and attempting to limit harm to the public. Plaintiff filed suit for defamation.

The allegations clearly supported a TCPA motion seeking dismissal of the claims. Recognizing opposing counsel's significant experience in defamation matters, Defendants drafted a thorough 22-page brief, then sought and attached compelling evidence, including 66 exhibits, to support their position. *See generally* Defs' TCPA Mot. Ultimately, Defendants spent roughly 85 hours preparing the TCPA motion, including research, strategy, drafting, and collecting exhibits, which was a reasonable time to spend on this task. LeRoy Decl ¶16; Ex. 1 (billing records).

Reply. Shortly before the hearing on the TCPA motion, Plaintiff filed a lengthy, 26-page memorandum in opposition, accompanied by a 19-page declaration from Plaintiff and 155 pages of records in support of her arguments. This response was the first opportunity that Defendants had to view Plaintiff's purported evidence and many of the legal arguments in response to the motion. Ultimately, Defendants spent 40 hours preparing its Reply brief, which was a reasonable time to spend on this task. LeRoy Decl. ¶17 and Ex. 1 (billing records). Defendants also spent approximately four hours to prepare a motion to strike Plaintiff's defective declaration, which the Court granted. LeRoy Decl. ¶19 and Ex. 1 (billing records).

Hearing. Recognizing that Plaintiff would be represented by able counsel at the hearing, and bearing in mind the intense public interest in the case, Defendants' counsel prepared accordingly, including review of all records submitted by Plaintiff and the relevant caselaw cited by both sides. After a hotly contested oral hearing, the Court granted Defendants' motion. Ultimately, Defendants spent roughly 19 hours preparing for the TCPA hearing, which was a reasonable time to spend on this task. LeRoy Decl. ¶18; Ex. 1 (billing records).

2. The Requested Hourly Rates Are Reasonable.

Defense counsels' hourly rates are reasonable given the amount and quality of the legal services counsel provided. Defendants billed \$814.00 per hour for lead partner Tracy LeRoy; \$1320.00 per hour for Paul Yetter; \$695.20 per hour for senior counsel Elizabeth Wyman; \$594.00 per hour for associate Shayna Goldblatt; and \$299.20 per hour for paralegals Courtney Smith and Samantha Richey. LeRoy Decl. ¶10; Ex. 1 (billing records). These rates reflect a 12% reduction as to all timekeepers' typical rates.¹ LeRoy Decl. ¶11; Ex. 1 (billing records). The range of actual billing rates for partners at the Firm in 2023 is \$825.00 to \$1,600.00; and for associates and senior counsel, from \$550.00 to \$815.00. LeRoy Decl. ¶10. These rates are well within the range normally charged by attorneys and staff of comparable skill, expertise, and reputation in the Houston area. *Id.* The specific rates that the Firm charged Defendants are largely at the low end of the Firm's rates. *Id.* Fees that were not specifically incurred in defending against this legal action have not been included in the fee application or calculation of lodestar amount. *Id.*

¹ Yetter Coleman's billing records are attached as an exhibit to the Declaration of Tracy LeRoy. The timekeepers are identified as follows: Tracy LeRoy ("TNL"), Paul Yetter ("RPY"); Elizabeth Wyman ("EAW"), Shayna Goldblatt ("SGP"), Courtney Smith ("CBS"), and Samantha Richey. The timekeepers' typical rates were used to calculate a subtotal each month, which was then reduced by 12% across the board, effectively reducing all hourly rates. LeRoy Decl. ¶11. Fees not specifically incurred in defending against this legal action were redacted in light gray. *Id.* Redactions for attorney-client or attorney work product privilege appear in black. *Id.*

The reputations and abilities of Defendants’ Yetter Coleman attorneys support the reasonableness of the hourly rates used here. Success in this high-profile litigation required a legal team that could perform efficiently and strategically, prepare high-quality briefing, respond to discovery requests and a discovery motion, and effectively advocate before the Court. *Id.* ¶13. Defendants’ lead attorney, Ms. LeRoy, is a commercial trial litigation partner at Yetter Coleman. *Id.* ¶1. Ms. LeRoy’s professional honors include “Best Lawyers in America” for First Amendment Litigation 2010-2023; Chambers USA: America’s Leading Business Lawyers in Texas Commercial Litigation, 2022; and “Texas Super Lawyer” in Business Litigation, Thomson Reuters, 2018-2022. *Id.* ¶2. She is a *cum laude* graduate of Northwestern University’s Pritzker School of Law and has practiced law for over 20 years. *Id.* ¶2.

Ms. LeRoy was assisted in this matter by Yetter Coleman Partner R. Paul Yetter. He graduated from Columbia Law School and clerked for the Honorable John R. Brown of the U.S. Court of Appeals for the Fifth Circuit. He is board certified by the Texas Board of Legal Specialization in Civil Trial law and has prosecuted and defended lawsuits and arbitrations as lead counsel around the country. He has received numerous professional honors, including the 2021 Inaugural Harry M. Reasoner Justice for All Award of the Texas Access to Justice Commission and the 2019 Karen H. Susman Jurisprudence Award of the Anti-Defamation League.

Ms. LeRoy was also assisted by senior counsel Elizabeth Wyman. *Id.* ¶4. Ms. Wyman is a *magna cum laude* graduate of New York University School of Law and a former prosecutor with the New York County District Attorney’s Office. *Id.* She has practiced with Yetter Coleman on commercial litigation matters for the past ten years and has extensive experience with motion practice in Texas state courts. *Id.*

Ms. LeRoy was also assisted by associate Shayna Goldblatt. *Id.* ¶5. Ms. Goldblatt graduated *magna cum laude* from the University of Houston Law Center. *Id.* Ms. Goldblatt is a former clerk for the United States Court of Appeals for the Eighth Circuit and the United States District Court for the Southern District of Texas. *Id.*

When practical, Defendants’ counsel used the services of legal assistants or paralegals. *Id.*¶6. The paralegals who chiefly assisted Defendants’ counsel in this matter, Courtney Smith and Samantha Richey, are qualified through education, training, and work experience to perform substantive legal work traditionally performed by an attorney. *Id.* Ms. Smith has been a paralegal for approximately ten years. *Id.* Ms. Richey has been a paralegal for 11 years. *Id.* Both Ms. Smith and Ms. Richey have extensive experience supporting attorneys in a variety of matters including assisting attorneys with pleadings and motions. *Id.*

Yetter Coleman is widely recognized for its reputation and ability. In 2023, Yetter Coleman received 18 national and state rankings in the 2023 edition of “Best Law Firms” survey, a collaboration between Best Lawyers® and U.S. News & World Report, including recognition on the national and Houston lists for Litigation – First Amendment as well as numerous other practice areas. Chambers USA ranked the firm as Band 1 for Texas for commercial litigation for 2022. The firm has been named to the National Law Journal’s “Litigation Boutiques Hot List” and “Appellate Hot List,” received Honorable Mention for The American Lawyer’s “Litigation Boutique of the Year,” and was awarded Texas Lawyer’s “Midsize General Litigation Department of the Year,” among other awards. *Id.* ¶7.

3. The Lodestar Figure

Having established the reasonableness of the hours worked and the hourly rates charged, Defendants can now calculate the lodestar figure itself. *See Rohrmoos Venture*, 578 S.W.3d at 498

(requiring courts to calculate an attorney’s fee award using the lodestar method required the trial court to determine “the reasonable hours worked multiplied by a reasonable hourly rate”). The following chart demonstrates the required multiplication for each timekeeper for which Defendants request fees:

Timekeeper	Reasonable Hours Worked	Reasonable Hourly Rate (including discount)	Lodestar Amount
Tracy N. LeRoy	29	\$814.00	\$23,606.00
Paul Yetter	1.3	\$1320.00	\$1,716.00
Elizabeth A. Wyman	56.4	\$695.20	\$39,209.28
Shayna Goldblatt	30.1	\$594.00	\$17,879.40
Courtney Smith	31.4	\$299.20	\$9,394.88
Samantha Richey	4.1	\$299.20	\$1,226.72
Lodestar Figure = \$93,032.28			

B. Non-Duplicative Arthur Andersen Factors

Fee awards should be proportional to the degree of success. *Smith v. Patrick W.Y. Tam Trust*, 296 S.W.3d 545, 547-48 (Tex. 2009). Here, Defendants obtained a total victory on Plaintiff’s defamation claims at a fraction of the cost of Plaintiff’s estimated \$25 million of dollars in damages. Original Petition, ¶2. Therefore, the amount involved and the results obtained in this case are significant.

II. Defendants Request Conditional Appellate Fees.

Defendants also request that the Court award appellate fees to Defendants. When a trial court dismisses a legal action under the TCPA, Section 27.009 requires the award of reasonable attorney’s fees, and “it does not distinguish between the award of trial and appellate attorney’s fees.” *DeAngelis v. Protective Parents Coal.*, 556 S.W.3d 836, 864 (Tex. App. Fort Worth 2018, no pet.) (citing Tex. Civ. Prac. & Rem. Code Ann. §27.009). Therefore, “[i]f trial attorney’s fees are mandatory under [the statute], the appellate attorney’s fees are also mandatory when proof of

reasonable fees is presented.” *Urquhart v. Calkins*, 2018 WL 3352919, *5 (Tex. App. – Houston [1st Dist.] 2018, no pet.).²

Defendants request that the Court award \$73,458.00 in conditional appellate fees if Plaintiff appeals to an intermediate court and Defendants are successful, an additional \$17,820.00 if Plaintiff files a petition for review in the Texas Supreme Court, and a further \$73,458.00 if the Texas Supreme Court requests full merits briefing. LeRoy Decl. ¶22. These rates are reasonable in comparison with those customarily charged in the Houston Market for comparable quality services and in light of the time and labor required, the novelty and difficulty of the questions involved, and the skill required to perform the legal service properly. *Id.* ¶22.

The estimates above assume that any appeal Plaintiff might bring to an intermediate appellate would require:

- 75 hours of Ms. Goldblatt’s time for researching and briefing the legal issues;
- 30 hours of Ms. LeRoy’s time for preparing for oral argument; and
- 15 hours of Delonda Dean’s³ time for paralegal support.

² Other courts have implicitly recognized the propriety of appellate attorney’s fee awards under the TCPA. *E.g.*, *State ex rel. Bestv. Harper*, 562 S.W.3d 1, 20 (Tex. 2018) (sovereign immunity does not protect the state from appellate fees and costs awarded to prevailing party under the TCPA); *McGibney v. Rauhauser*, 549 S.W.3d 816, 828 (Tex. App.—Fort Worth 2018, pet. denied) (overturning a conditional award of appellate attorney’s fees under the TCPA because the condition rewarded the unsuccessful party on appeal instead of the prevailing party); *Sullivan*, 488 S.W.3d at 299 (remanding for redetermination of reasonable attorney fees from case’s inception to remand by Texas Supreme Court and noting that trial court is not restricted “from considering or awarding . . . conditional attorney’s fees should further appeal from the redetermination be necessary”).

³ Ms. Dean is a Yetter Coleman paralegal who specializes in appeals. She is qualified through education, training, and work experience to perform substantive legal work traditionally performed by an attorney. Ms. Dean has been a paralegal for over 24 years. Her experience includes supporting appellate attorneys by ensuring compliance with all applicable rules of appellate procedure, local rules, and rules of form as well as maintaining extensive and up-to-date knowledge of the e-filing and service rules and procedures applicable in each of the many state and federal appellate courts across the country in which Yetter Coleman’s appellate attorneys practice. LeRoy Decl. ¶24. Ms. Dean’s hourly rate is the same as Ms. Smith’s: \$299.20. *Id.*

Id. ¶23. The estimates above also assume that any petition for review to the Texas Supreme Court would require:

- 30 hours of Ms. Goldblatt’s time for responding to Plaintiff’s petition for review;
- 75 hours of Ms. Goldblatt’s time for merits briefing in the event that the Texas Supreme Court requested it;
- 30 hours of Ms. LeRoy’s time for oral argument preparation; and
- 15 hours of Ms. Dean’s time for paralegal support.

Id. For the same reasons discussed above regarding the reasonableness and necessity of the hours and rates underlying the request for fees for services related to the TCPA motion, and based on the additional evidence in the record, the contingent appellate fees requested are presumptively reasonable. *Rohrmoos Venture*, 578 S.W.3d at 502 (“[T]here is a strong presumption” that the resulting figure “represents] reasonable and necessary attorney’s fees.”). The following chart reflects the lodestar calculation relevant to these requested fees:

Timekeeper	Reasonable Hours Worked	Reasonable Hourly Rate (including discount)	Lodestar Amount
Tracy N. LeRoy	60	\$814.00	\$48,840.00
Shayna Goldblatt	180	\$594.00	\$106,920.00
Delonda Dean	30	\$299.20	\$8,976.00
Lodestar Figure = \$164,736.00			

Furthermore, as with the related request for fees for services related to the TCPA motion, none of the non-duplicative *Arthur Andersen* considerations justify adjusting the loadstar figure for the contingent appellate fees upward or downward.

III. Defendants Request Their Court Costs.

Section 27.009(a)(1) of the TCPA also entitles a successful movant to court costs. Defendants incurred \$24.00 in court costs in this matter. LeRoy Decl. ¶21 and Ex. 1. Defendants request that the court award those costs to Defendants.

IV. Defendants Request a Final Judgment.

The Court's order on the motion to dismiss resolved the entirety of the Plaintiff's lawsuit, and the Court's determination of Defendants' fees and costs is the only remaining issue. Accordingly, Defendants request that the Court determine the amount of their reasonable fees and costs and reflect them in a final judgment.

CONCLUSION

For the foregoing reasons, Defendants respectfully request that the Court award the attorney's fees and costs and sign a final judgment.

Dated: February 17, 2023

Respectfully submitted,

/s/ R. Paul Yetter

R. Paul Yetter

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CERTIFICATE OF SERVICE

I certify that on February 17, 2023, a copy of the foregoing was served on counsel of record via the Court's electronic filing system.

/s/ Tracy N. LeRoy

Tracy N. LeRoy

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

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