Pastors Ask Court if State or Fed. Law Should Control Religious Freedom Case

By Ellen Bardash

Of the DLW

Two Delaware pastors have taken their opposition to Gov. John Carney’s pandemic restrictions on religious services to the Court of Chancery, asking for a decision on whether state or federal law applies.

If their requests are granted, it would mark the first time a court has issued guidance on the scope of Delaware’s constitutional provision banning government interference in religion, said Thomas Neuberger, who represents a pastor in one of the cases.

“It’s all about what test is going to be applied in the future,” Neuberger said. “We need a judicial interpretation, not a promise from the governor.”

The two complaints were filed the same day and are nearly identical aside from details about the different plaintiffs and their respective churches. Both criticize Carney’s restrictions on church services while Delaware was under a state of emergency from March 2020 until July of this year, focusing on religious worship in churches having been capped at 10 people while all other designated essential businesses were permitted to keep operating at full capacity.

That’s a violation of Delawareans’ religious rights, argue attorneys with The Neuberger Firm and Cousins Law, representing Rev. David W. Landow, and Jacobs & Crumplar and Martin D. Haverly, representing pastor Alan Hines.

Neuberger said the complaints essentially offer three ways the court could determine religious rights were violated. The first would be to apply a 128-word section of Article I, Section I of the Delaware Constitution that addresses religious freedoms.

With Delaware adopting a Bill of Rights of its own just months after the U.S. Constitution was signed and years before a similar set of rights became protected at the federal level, Neuberger said the Delaware provision is more absolute than the protections under the First Amendment; based on precedent in other Delaware cases, when a Delaware provision differs from the federal Constitution, the state reserves the right to apply protections beyond those granted federally.

The plaintiffs’ follow-up preference if the court decides the provision isn’t absolute, Neuberger said. It would be for the previously used tests set out in Sherbert v. Verner and Wisconsin v. Yoder to be restored as the standard for evaluating a compelling state interest. Short of that, the complaints argue, the facts of the case still meet the threshold set out in the tests currently used to weigh First Amendment violations.

It’s not the first time during the pandemic the same group of attorneys has...
**NEWS IN BRIEF**

**Young Conaway Partner To Receive DSBA Award**

William D. Johnston, a partner in Young Conaway Stargatt & Taylor’s corporate litigation and counseling section, has been selected by the Delaware State Bar Association to receive the 2020 Daniel L. Herrmann Professional Conduct Award.

Named in honor of the late chief justice of the Delaware Supreme Court, the award is presented to a member of the Delaware Bar who has “demonstrated those qualities of courtesy and civility which, together with high ability and distinguished service, exemplifies the Delaware lawyer.”

Johnston is the fifth Young Conaway partner to have received this award since its inception. Previous award winners included one of the firm’s founders, William F. Taylor (1994), retired managing partner Sheldon A. Weinstein (2003), former Young Conaway partner Ben T. Castle (2008), and personal injury partner Richard A. DiLiberto (2015). Johnston served as the judicial law clerk to Chief Justice Herrmann upon graduating from law school.

The awards ceremony was set to occur during a special luncheon at noon Tuesday at the Hyatt Place/Riverfront Events.

**Delaware ACLU Set to Hold Reproductive Rights Webinar**

The ACLU Delaware is set to hold a webinar titled, “Access for All: What’s Next for Reproductive Rights & Justice.”

With multiple cases pending at the U.S. Supreme Court, state legislatures across the nation taking aim, and local munici- palties weighing in on bans, access to abortion is entering a new phase. Beyond the uncertainty of what may be next, Delaware recently protected the right to abortion and ended antiquated criminalization laws.

National and state experts are scheduled to speak on the latest news from the courts and where reproductive rights stand in Delaware. This panel discussion will also include ideas for how state and local leaders can expand access to abortion, as well as address economic, environmental, and societal issues that impact reproductive justice.

Panelists and presenters include: Lorie Chaiten, senior staff attorney, ACLU National; Nick Beard, chair, Delaware NOW (National Organization for Women); Ruth Lytle-Barnaby, president/CEO, Planned Parenthood of Delaware; Shânè Darby, founder, Black Mothers In Power; and Javonne Rich, policy and advocacy director, ACLU Delaware.

The webinar is scheduled to be held from 7 to 8 p.m. Thursday via Zoom and livestreamed on Facebook.

**Morris Nichols Donation Aids Homelessness Organization**

Morris, Nichols, Arsht & Tunnell announced its $20,000 donation to Family Promise of Northern New Castle County in support of its efforts to address family homelessness in the Delaware community.

FP Delaware serves over 44% of all families experiencing homelessness in Delaware. As the holiday season approaches, Morris Nichols embraces the spirit of giving to make a positive impact in the community, according to Bill Lafferty, chair of Morris Nichols’ executive committee.

Family Promise of Northern New Castle County helps local communities coordinate their compassion to address the root causes of family homelessness. With a holistic approach, the organization taps existing local resources to empower families toward economic stability.

Families come to FP Delaware in crisis, and the organization helps them rebuild their lives with new skills and ongoing resources. Morris Nichols’ support will assist in ensuring that every family in Delaware has access to safe shelter, warm meals, case management, and the resources necessary to securing permanent housing. The organization envisions a community in which every family has a home, a livelihood, and the resources for lasting independence.
Potter Anderson Elects Partners From Litigation, Corporate Counseling Groups

By Ellen Bardash

Of the DLW

Two attorneys who began their legal careers with Potter Anderson & Corroon are set to be made partners at the beginning of 2022.

The firm last week announced its election of Jesse L. Noa and Alyssa K. Ronan, associates in Potter Anderson’s general litigation and transactions and corporate counseling groups, respectively.

“Jesse and Alyssa are outstanding additions to our partnership,” Potter Anderson Chair Kathleen Furey McDonough said. “They both began their legal careers at Potter Anderson so it is especially gratifying to see them reach this milestone. With Alyssa’s expertise as a go-to transactional adviser and Jesse’s reputation as a standout litigator, together they exemplify our full-service approach to helping clients with their most sophisticated and complex matters in Delaware.”

Noa, chair of the Delaware State Bar Association’s labor and employment section, represents both businesses and individuals in Delaware’s state and federal courts, working on cases involving complex commercial matters, bankruptcy, employment and real estate litigation, and he counsels clients in areas including regulatory compliance, cybersecurity and information governance.

A graduate of Rowan University and Villanova University School of Law, Noa served on active duty for the U.S. Marine Corps prior to going into law. He mediates for the Justice of the Peace Court on a volunteer basis and sits on Delaware Lawyer’s editorial board.

Ronan represents Delaware corporations and other business entities in corporate advisory matters and those involving transactions and corporate governance, as well as advising companies and their boards and investors and writing opinions and advice on topics relevant to the Delaware General Corporation Law. She recently represented the conflicts committee on MGM Growth Properties’ $17.2 billion sale to VICI Properties.

In addition to advising private, public and special purpose acquisition companies on M&A matters, Ronan, a graduate of American University and Rutgers University School of Law, actively participates in the American Bar Association’s Business Law section and frequently addresses topics on corporate law.

Noa and Ronan are set to become partners Jan. 1.

Ellen Bardash can be contacted at ebadash@alm.com.

DELAWARE BUSINESS COURT INSIDER

News and analysis on the most important developments in the Delaware Business Courts

The Delaware Business Court Insider, a weekly electronic newsletter distributed every Wednesday, provides the latest news, analysis, case summaries and hard-hitting reporting on the most important developments in Delaware corporate law.

Each issue includes:

» News stories and analysis written by experts in the field
» Key decisions and cases from the Delaware Chancery Court, Delaware Bankruptcy Court and the Delaware Supreme Court
» Federal court opinions on Delaware corporate law
» Case summaries
» Coverage of new statutes and regulations, Q&A’s with leading attorneys and judges

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Pennsylvania Tax Handbook
by Stewart M. Weintraub, Jennifer Weidler Karpchuk, and Adam M. Koelsch, of Chamberlain Hrdlicka

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represented a pastor: in May 2020, a federal suit was filed on behalf of Rev. Dr. Christopher Bullock, asserting violations similar to those now alleged in the Court of Chancery. That case settled in November 2020.

Earlier this year, the U.S. Supreme Court weighed in on comparable pandemic restrictions on religious services in New York and California, finding that if other public places such as stores and restaurants can be open, the same standard should apply to houses of worship based on the federal law.

Representatives from the governor’s office did not respond for comment on the cases.

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Third Circuit 54 times. Both Delaware Sens. Tom Carper and Chris Coons referenced less than 2% of Stark’s opinions having been reversed during his time on the bench.

Carl Tobias, Williams Chair in Law at the University of Richmond, said Stark’s history on one of the nation’s busiest patent courts makes him well suited to the position and he expects the Senate to confirm Stark in early 2022 easily.

“I thought that Judge Stark had one of the best hearings I have seen in more than a decade of watching federal judicial nominee hearings. He exhibited all of the attributes that a superior appeals court nominee should have,” Tobias said. “The judge’s testimony also demonstrated that he will be respectful of precedent, apply the law to the facts in every case, treat fairly and respectfully all litigants, carefully resolve disputes, be collegial, which is critical on a court that operates with three-judge panels, and exercise balanced judicial temperament."

Democratic committee members’ questions and comments centered primarily on patent litigation, while some Republican members asked Stark to comment more broadly. Sen. John Kennedy, R-Louisiana, asked Stark to describe the Chevron doctrine and his thoughts on the concept of ambiguity and how he approaches it as a judge, while Sen. Marsha Blackburn, R-Tennessee, asked several questions on First and Second amendment cases.

Sen. Patrick Leahy, D-Vermont, raised during the hearing concerns about trends in patent litigation, including a high percentage of cases being filed before one Western District of Texas judge and a possible lack of consistency in the Federal Circuit.

“I worry that sometimes, in the Federal Circuit more than other courts of appeals, outcomes can be widely influenced based on who’s on the panel,” Leahy said. “Would you work with others to make sure that you had some predictability out of the Federal Circuit? Because if we don’t have some idea of predictability, I think the Federal Circuit is not serving its purpose.”

Both Committee Chair Dick Durbin, D-Illinois, and ranking GOP member Chuck Grassley, R-Iowa, posed a question relating to an article Stark wrote praising the judicial approach of Third Circuit Judge Walter Stapleton, for whom Stark clerked at the beginning of his career. Stark said he learned from Stapleton the process he uses today to apply binding precedent to the cases before him.

As a Biden nominee, Stark is not only the first Delawarean to be nominated to the Federal Circuit, but the first to be nominated by another Delawarean.

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The court found that the plaintiffs were unable to show a manifest injustice or extraordinary circumstance, plaintiffs could not now re-litigate the issue.

**TOXIC TORTS**

**Negligence • Pleading Requirements • Increased Risk of Illness**


**Counsel:** Kimberly Ann Evans, Kyle John Mcgee, Kelly L. Tucker, Grant & Eisenhofer, P.A., Wilmington, DE; Frank M. Petosa, Marcio W. Valladares, Michael Ram, Rene F. Rocha, T. Michael Morgan, Morgan & Morgan, Fort Lauderdale, FL for plaintiff; Kenneth J. Nachbar, Miranda N. Gilbert, Morris Nichols Arsh & Tunnell LLP, Wilmington, DE; Xi-Ziang Shen, Delaware Department of Justice, Wilmington, DE; Athena D. Dalton, Stephen A. Swedlow, Quinn Emanuel Urquhart & Sullivan, LLP, Chicago, IL for defendant.

The court held that plaintiffs failed to state a cause of action for tort claims because they were unable to plead that they had received an injury from defendant's allegedly negligent leaking of a known carcinogen around where plaintiffs lived.

Defendant owned a Delaware chemical plant that emitted a known carcinogen into the neighborhood surrounding the plant. The plant and the surrounding neighborhood were in Delaware. Plaintiff lived in that neighborhood; she brought this class action suit with her neighbors against defendant, sounding in negligence and strict liability. Defendant moved to dismiss plaintiffs' complaint because there were no allegations of plaintiffs being injured.

First, the court analyzed whether Delaware or New Jersey law would apply. Plaintiffs argued that New Jersey law should apply because defendant was headquartered in New Jersey. Furthermore, it was likely that decisions about this dangerous chemical were made in New Jersey. Defendant argued that Delaware should apply since the plant was located in Delaware. The court looked at which state had the "most significant relationship" to the tort. Pa. Emp., Benefit Tr. Fund v. Zeneca, Inc., 710 F. Supp. 2d 458, 467 (D. Del. 2010) and agreed with defendant that Delaware had the most significant relationship with the tort since the chemical plant was in Delaware.

Next, the court determined that plaintiffs failed to state an injury in their complaint. Plaintiffs alleged that they suffered an increased risk of illness because of what defendant did. Defendant argued that an increased risk of illness did not suffice to state a claim in negligence in Delaware. The court found that, although Delaware law did not say explicitly that it does not accept increased risk of illness as an injury, the signals from dicta in other cases pointed to the trend in Delaware case law to reject "increased risk of illness" theory of injury. For instance, in United States v. Anderson, the court held that plaintiffs bringing medical malpractice claims could recover for increased risk when that risk was tied to a physical injury. 669 A.2d at 78. Plus, Delaware tort law presupposed that plaintiffs would bring suits after they suffer physical symptoms, not before. Therefore, the court held, in the case at bar, the class cannot recover damages for increased risk of illness.
Bankruptcy court could hold adversary proceeding defendants in civil contempt for failure to comply with the court’s preliminary injunction order requiring a detailed accounting and enjoining defendants from dissipating or otherwise transferring their assets, after defendants’ accounting was woefully deficient and defendants expressly stated their intention to transfer funds.

Plaintiff Urban Commons Queensway, LLC moved for civil contempt against defendants EHT Asset Management, LLC, Taylor Woods, and Howard Wu. Plaintiff had commenced an adversary proceeding against defendants to recover $2.4 million in damages plaintiff had sustained from defendants’ fraudulent scheme to obtain a PPP loan on behalf of plaintiff. The court ultimately entered a summary judgment against defendants and also issued an injunction precluding defendants from dissipating their assets and requiring defendants to furnish the court with a detailed accounting.

Defendants filed a preliminary accounting, which failed to identify the PPP loan funds or explain how they were being preserved pursuant to the court’s injunction. Defendants further advised the court that they intended to transfer $100,000, in violation of the court’s order precluding defendants from dissipating their assets and requiring defendants to furnish the court with a detailed accounting.

The court granted plaintiff’s motion and found defendants in contempt of the court’s injunction. The court found that defendants had failed to comply with the injunction, concluding that the accounting furnished by defendants was plainly not in compliance with the court’s order and noting that defendants had expressly stated their intention to transfer funds despite being ordered by the court not to do so. The court ordered an evidentiary hearing to determine the least coercive sanctions necessary to ensure defendants’ compliance with the injunction.

Defendants are appealing the court’s order. On June 28, 2021, plaintiff served a §220 demand upon defendant, stating that it considered itself a stockholder of the preferred stock. Defendant asserted that plaintiff would need to execute a joinder agreement to complete the conversion, which plaintiff refused to sign as it believed the conversion had already occurred. Defendant accordingly denied plaintiff’s §220 demand, concluding that it lacked standing as it was not a stockholder of record.

Plaintiff then filed the present action. Defendant opposed the demand for inspection of books and records, relying on the fact that plaintiff was not listed as a stockholder on defendant’s stock ledger, as caselaw under §220 entitled a corporation to rely on its ledger to determine the status of a purported stockholder.

However, the court ruled that examination of the extrinsic record beyond the stock ledger was warranted under the circumstances. Specifically, the court held that defendant’s communications with plaintiff constituted a concession that plaintiff became a stockholder of the company on June 28, 2021. The court rejected defendant’s reliance on its stock ledger, which it did not update because plaintiff had not executed the joinder agreement, noting that the agreement was not required by the agreements plaintiff had signed upon making its investment. Instead, the court noted that the note purchase agreement expressly stated that plaintiff’s notes would automatically convert upon the maturity date.

**DELAWARE SUPERIOR COURT**

**ADMINISTRATIVE LAW**

**Unemployment Benefits • Major Policymaking Position**

**Delaware River & Bay Auth. v. Minor, DEFAX Case No. D69633 (Del. Super. Nov. 19, 2021), Rennie, J. (9 pages).**

**Counsel:** Adria B. Martinelli, Lauren E.M. Russell, Barry M. Willoughby, Young Conaway Stargatt & Taylor, LLP for appellant. Frank Minor, pro se appellee.

The court held that the decision by Unemployment Insurance Appeal Board finding that the position held by appellee was not designated as a major policymaking position was supported by substantial evidence. Board’s decision affirmed.

The Board found that appellee’s former position was not designated as a major policymaking position such that appellee was entitled to unemployment benefits, relying mainly on two documents produced by defendant. Defendant appealed the Board’s decision. The Board relied upon two documents that designated appellee’s position from its inception. Neither document mentioned policymaking duties. The tasks designated in the documents were operational and managerial. The Board considered and weighed all of the evidence in the record. The Board relied upon two key documents. In its review of the appellate record, the court found no legal error or mistake in law. Therefore, because the scope of review by the court of the Board’s decision was narrow, the court affirmed the decision of the Board because it was supported by substantial evidence.
Ambiguity of Terms • Summary Judgment • Appeal from Unemployment Ins. Appeal Brd.


The court held that because plaintiff and defendant produced plausible interpretations of the term at issue, it made the contract ambiguous and not appropriate for summary judgment. Additionally, because the parties agreed that the contract was valid and controlled their relationship, a claim for unjust enrichment could not stand. Defendant’s motion for summary judgment denied for the breach of contract claim and granted for the unjust enrichment claim.

Plaintiff was a Delaware corporation who provided webhosting services. Defendant was also a Delaware corporation who was an advertising technology firm. The parties entered into a service agreement where plaintiff provided web hosting services. The suit arose out of defendant’s opting out of the agreement. Plaintiff agreed that Centro properly exercised its option. However, plaintiff asserted that defendant owed an amount equal to one year of service charges. Defendant asserted that no additional monthly fee should be charged.

Centro motioned the court for summary judgment, arguing that the applicable contract provision was unambiguous. Regarding the breach of contract claim, the court determined that the issue was the interpretation of the opt out provision in the service agreement and that whether a contract term was ambiguous was a question of law. However, being that both plaintiff and defendant produced plausible interpretations of the contract term at issue, the court held that the contract was therefore ambiguous. Finding that the contract term was ambiguous, the court denied defendant’s motion for summary judgment on the breach of contract claim.

Regarding the unjust enrichment claim, defendant argued that an unjust enrichment claim cannot stand when there is an enforceable contract governing the parties’ relationship, which there was here. Both parties agreed that the detailed agreement controlled their relationship. The court held that the existence of the contract eliminated the unjust enrichment claim.

CORPORATE GOVERNANCE

Derivative Suit Settlement • Girsh Factors • Attorneys’ Fees


The court found the settlement in this derivative action to be fair and reasonable where the balance of the Girsh factors favored settlement. Settlement approved.

The court considered the nine factors from Girsh v. Jepson, 521 F.2d 153, 157 (3d Cir. 1975). Regarding the first factor, the likely expense and duration of litigation favored settlement. Second, that there were no stockholder objections to the settlement weighed in favor of settlement. Third, because the settlement was produced through an experienced mediator and because both sides made concessions, the stage of litigation factor weighed in favor of settlement.

The fourth and fifth factors examined the risks and rewards of settling or waiting. Plaintiffs faced numerous obstacles in proving demand futility. This circumstance weighed in favor of settlement. The sixth factor, maintaining a class, was not a concern. The seventh factor, a defendant’s ability to withstand a greater judgment, weighed in favor of settling because there was a monetary element to the settlement and the company had to indemnify the directors and officers.

The eight and ninth factors, settlement’s range of reasonableness in light of the best possible recovery and litigation risks, weighed in favor of settlement.

The court next determined whether attorneys’ fees were allowable, which involved a two-step inquiry: 1) whether plaintiff was entitled to attorneys’ fees and 2) if so, what was the appropriate method for calculating those fees. Plaintiffs’ counsel argued that under the “substantial benefits” doctrine, they were entitled to fees since the corporation was required to implement corporate governance reforms. The court found, by analyzing each proposed reform, that some reforms had a minimal benefit, some had a neutral benefit and others had a sizable benefit. However, being that there were weaknesses in plaintiffs’ claims, the court found that settling the action for the overall benefits that were received satisfied the standard for awarding attorneys’ fees. The court was required to use the lodestar method for calculating reasonable attorneys’ fees because the settlement had no monetary aspect. Since it was a weak case that recovered nothing monetary for the plaintiffs, the court used a lodestar of 1.04.

INSURANCE LAW

Corporate Securities Liability Coverage • Denial of Defense Costs • Anticipatory Breach


Plaintiffs were entitled to advancement of defense costs in underlying securities class action where claims in
the underlying action did not implicate either of the provisions listed in a policy endorsement that limited coverage for defense costs.

Defendant insurers moved to dismiss the action filed by plaintiffs, or alternatively for a stay of the action under McWane. Plaintiffs cross-moved for partial summary judgment. The corporate plaintiffs were engaged in oil refining and fuel transportation. Plaintiff Carl Icahn served as chairman of the corporate plaintiffs, while plaintiff David Lamp was a director and the successor general partner, also serving as president and CEO. Defendants issued executive and corporate securities liability insurance policies to the corporate plaintiffs.

The corporate plaintiffs were subject to two putative class action lawsuits that alleged plaintiffs improperly used a call right to buy out the public common unit holders and manipulated the stock price to call those units at an artificially depressed price. Plaintiffs gave notice of the action to defendants. Ultimately, defendants concluded that coverage might not be available in the underlying securities class actions, asserting that the damages sought were based solely on contractual obligations and that Icahn was not being sued in his capacity as an insured person. When the underlying actions proceeded to mediation, plaintiffs requested that defendants confirm coverage.

Instead, defendants filed suit in Texas federal court. Plaintiffs then filed the present suit, alleging anticipatory breach of contract and breach of the implied covenant of good faith and fair dealing. Plaintiffs moved for partial summary judgment on their claim that defendants had a duty to advance defense costs to several of the plaintiffs. Defendants moved to dismiss or for a stay of the action. Defendants further argued that plaintiffs’ partial summary judgment motion was procedurally deficient because it was based on a claim not pleaded in the complaint.

The court first rejected defendants’ procedural challenge to plaintiffs’ partial summary judgment motion. The court noted that the claim was based on plaintiffs’ allegation that defendants were obligated under the insurance policies to advance defense costs. The court also noted that the complaint alleged that no provision of the policy barred coverage for defense costs.

The court granted the motion for partial summary judgment. Although defendants argued that an endorsement of the policy limited coverage to the underlying securities class action, the court found that the underlying actions did not implicate either of the circumstances explicitly listed in the endorsement.

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**The Legal Intelligencer**

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