



# FEDERAL CIVIL PRACTICE

The newsletter of the Illinois State Bar Association's Section on Federal Civil Practice

## Why you might use stick pins when thinking about statutory coverage

By Ambrose V. McCall, Hinshaw & Culbertson LLP, Peoria

Some current artists use stick pins as media to create portraits and other works. Many attorneys use the same tool to hold up maps when focusing on the citizenship of potential parties. In its most recent ruling addressing the potential extraterritorial reach of Congressional legislation, one might read the Supreme Court's analysis as calling for the use of additional stick pins to post the legislative framework on our walls for easier viewing. In *Morrison v. National Australia Bank Ltd.*, 130 S. Ct. 2869 (2010), the Supreme Court framed the issue to be whether §10(b) of the Securities Exchange Act of 1934 gives foreign plaintiffs a cause of action to sue foreign and American defendants for misconduct related to securities traded on foreign exchanges. *Id.*, at 2875. In *Morrison*, the defendant

bank had no shares listed on any exchange in the United States. The defendant bank only had depositary receipts on the New York Stock Exchange, which exhibit a right to receive a specific number of the bank's shares. *Id.*

The *Morrison* plaintiffs' action arose from the valuation of mortgage servicing rights possessed by a Florida entity bought by the defendant bank. The plaintiffs alleged that from 1998 until 2001, the bank issued annual reports and other public documents describing the success of the Florida mortgage servicing business. *Id.* at 2875. In July 2001, however, the bank stated it was writing down the value of the Florida mortgage service company's assets, first by \$450 million, and then

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## Why state court practitioners need to know a little about federal civil practice

By Stanley N. Wasser of Feldman, Wasser, Draper & Cox, Springfield, IL.

You are representing an injured plaintiff in a state court negligence action. The liability seems clear given the evidence of OSHA violations. Your subpoenas promptly go out to the OSHA investigators. Within days you are in federal court. Why? Because of the federal removal statute, 28 U.S.C. §1442(a)(1), as we are reminded by the recent federal court opinion of District Judge Robert M. Dow, Jr. in *Ferto v. Fiedler*, 2010 WL 3168293 (N.D. Ill. August 5, 2010).

Section 1442(a)(1) of the federal removal statute provides that a "civil action ...commenced in

a State court" against the "United States or an agency thereof or any officer (or any person acting under that officer...for any act under color of office or in the performance of his duties" may be removed to federal court. This provision is commonly referred to as "federal officer jurisdiction." So when in a state court action you subpoena a federal officer or employee to testify, that officer or employee can remove your action to compel their testimony to federal court since the federal

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## Why you might use stick pins when thinking about statutory coverage

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by another \$1.75 billion two months later. *Id.* at 2875-76. The bank's explanation for the devaluation of the Florida mortgage servicing company assets was an inability to predict the decrease of prevailing interest rates along with other erroneous assumptions contained in its financial models, and the loss of good will. *Id.* at 2876. Plaintiffs, however, charged that the Florida mortgage service entity and certain senior executives manipulated the Florida company's financial models to render the rates of early repayment unrealistically low so as to cause the mortgage servicing rights to seem more valuable. *Id.* The plaintiffs' suit claimed that the bank and one of its senior executives were aware of the deception by July 2000, but failed to take action. *Id.* The three petitioners, all from Australia, bought the bank's shares in 2000 and 2001 before the writedowns. *Id.* The plaintiffs sued the Australian bank, the Florida mortgage servicing entity, the Australian bank's managing director and chief executive officer, and three of the Florida mortgage service company's executives in the U.S. District Court for the Southern District of New York, and alleged that defendants violated §10(b), 15 U.S.C. §§78(j)(b) and SEC Rule 10b-5. *Id.* & n. 2.

Defendants moved to dismiss under both Fed. R. Civ. P. 12(b)(1), for lack of subject matter jurisdiction, and under Rule 12(b)(6) based on plaintiffs' failure to state a claim. *Id.* at 2876. The district court dismissed the action based on the lack of subject matter jurisdiction. *Id.* The Second Circuit affirmed, finding that the acts performed in the U.S. did not "compris[e] the heart of the alleged fraud." *Id.*, citing, *Morrison v. National Australia Bank Ltd.*, 547 F.3d 167, 175-76 (2nd Cir. 2009).

The Supreme Court began its analysis by noting the district court's error in presuming that a determination of the extraterritorial reach of §10(b) requires resolving the issue of subject matter jurisdiction. The Court stressed that subject matter jurisdiction questions require deciding whether a tribunal holds the power to hear a case, and does not involve determining whether a statute at issue provides the relief a plaintiff seeks. *Id.* at 2876-77. Nevertheless, the Court saw no reason to remand since such action would only result in the district court fastening a

new Rule 12(b)(6) label for its same subject matter jurisdiction conclusion reached under Rule 12(b)(1). *Id.* at 2877, citing *Romero v. International Terminal Operating Co.*, 358 U.S. 354, 359, 381-84 (1959). Therefore, the Court found it was free to decide whether plaintiffs' complaint stated a cause of action. *Id.*

The statutory rule of construction standing at front and center is the Court's formula that unless Congress states a contrary intent, its legislation only applies within the territorial jurisdiction of the United States. *EEOC v. Arabian American Oil Co.*, ("Aramco"), 499 U.S. 244, 248 (1991), citing and quoting, *Foley Bros. v. Filardo*, 336 U.S. 281, 284-85 (1949). The *Morrison* Court began its analysis by citing the same statutory rule of construction. *Morrison*, 130 S. Ct. at 2877. In the *Aramco* decision, the Court explained the rationale for the cited rule of construction as seeking to prevent unintentional conflicts between laws of the United States and the laws of other nations which otherwise could produce international discord. *Aramco*, 499 U.S. at 248, citing, *McCulloch v. Sociedad Nacional de Marineros de Honduras*, 372 U.S. 10, 20-22 (1963). Yet in *Morrison*, the Court does not cite *McCulloch*.

Rather, in *Morrison*, the Court explains that its statutory rule of construction applies even if there is no risk of conflict between a Congressional statute and any foreign law. *Id.* at 2877-78, citing *Sale v. Hatian Centers Council, Inc.*, 509 U.S. 155, 173-74 (1993). The *Morrison* Court explains that under prior law, its rule of statutory construction simply creates a presumption about the meaning of the statute, and does not impose a limit on the power of Congress to legislate. *Morrison*, 130 S. Ct. at 2877, citing *Blackmer v. United States*, 284 U.S. 421, 437 (1932). Indeed, in *Morrison*, the Court specifically presumes that Congress typically acts with respect to domestic rather than foreign matters. *Id.*, citing *Smith v. U.S.*, 507 U.S. 197, 204, n.5 (1993). In the *Aramco* case, however, the parties conceded both that Congress possesses the authority to enforce its laws beyond the territorial boundaries of the United States, but against the backdrop of the Court's interpretive rule of construction that weighs against finding Congress legislates in an extraterritorial manner unless Congress clearly expresses

such an intent. *Aramco*, 499 U.S. at 244, citing and quoting, *Foley Bros.*, 336 U.S. at 285; *Benz v. Compania Naviera Hidalgo, S.A.*, 353 U.S. 138, 147 (1957). As *Morrison* sums up the statutory rule, "[w]hen a statute gives no clear indication of an extraterritorial application, it has none." *Morrison* at 6.

Armed with its interpretive rule, the Court then proceeds to criticize and detassel the Second Circuit's admittedly complex jurisdictional determinations regarding §10(b), which require evaluating whether the alleged wrongful conduct produced a sufficient effect on American securities, markets or investors or if significant alleged conduct occurred in the United States. *Id.* at 2877-79. The Court then expends some energy discussing the shortcomings of the predictability in application of the Second Circuit's conduct and effects test and emphasizes that while other Circuits have applied the same analysis, the results of their applications vary. *Id.* at 2880-81. While concurring in the judgment, Justice Stevens takes great issue with the Court's creation of an alleged new "transactional test" that sweeps aside a considerable body of Second Circuit case law created over the past 40 years. *Id.* at 2888-2895, (Stevens concurring).

The present discussion does not seek to vindicate or support the Second Circuit's analytical framework. What remains curious, however, is the majority's omitting any reference to a Court of Appeals opinion that employed a nearly identical analysis and found that the civil whistleblower protection provision contained in the Sarbanes-Oxley Act ("SOX"), 18 U.S.C. §1514A, does not apply in an extraterritorial manner. See *Carnero v. Boston Scientific Corp.*, 433 F.3d 1, 9-17 (1st Cir. 2006), cert. denied, 548 U.S. 906 (2006). Indeed, the *Carnero* Court cited the same case law relied upon by the *Morrison* Court for applying the statutory presumption against the extraterritorial application of the civil law whistleblower provision of SOX. *Carnero*, 433 F.3d at 7-8. But in *Carnero*, the First Circuit arguably did so in a more orderly step-by-step approach that counsel may track when addressing the same issue in their files. First, the *Carnero* court provided a comprehensive analysis of the pertinent provisions and framework of SOX to support its finding that

the civil whistleblower provision of SOX does not apply outside the United States. In doing so, the *Carnero* court noted that §1107 of SOX, amending 18 U.S.C. §1513, added a subsection providing for criminal sanctions for those who retaliated against anyone giving truthful information to law enforcement officers relating to the commission of a federal offense. *Carnero*, 433 F.3d at 10. The cited criminal law provision of SOX expressly provides for extraterritorial jurisdiction. See 18 U.S.C. §1513(d) ("There is extraterritorial Federal jurisdiction over an offense under this Section."), *cited and quoted in Carnero*, 433 F.3d at 10. In contrast, the civil whistleblower provision of SOX, §806 found at 18 U.S.C. §1514(A), has no such language providing for extraterritorial effect, and thereby undermines the contention that such application is in accord with Congressional intent. *Carnero*, 433 F.3d at 9-10. Granted, in *Morrison*, the Supreme Court does note in its rationale that a different provision of the Exchange Act, not at issue, does provide for extraterritorial coverage of certain persons transacting business in securities outside the United States, in violation of SEC regulations, so as to prevent "evasion" of the Exchange Act. *Morrison*, at 2883, *citing*, 15 U.S.C. §78dd(b). Yet for purposes of clarity and thoroughness, one may prefer to use the *Carnero* analytical framework since it is arguably more detailed, due to its delving into legislative history and regulatory purpose, while also applying the same statutory presumption in a more clearly marked and sequential manner. For example, the *Carnero* court explained that the legislative history of SOX exhibits no intent to apply the civil whistleblower protections in an extraterritorial manner. *Carnero*, 433 F.3d at 11-14. The *Carnero* Court also focused on the practical difficulties that would arise when a U.S. court or U.S. agency, in this instance the Department of Labor, would examine and intervene into the employment relationship between foreign employers and foreign employees, which further exhibited the absence of any extraterritorial intent because Congress would have likely more carefully considered such problems before enacting a law providing for extraterritorial enforcement. *Id.* at 15-16. Moreover, the absence of a venue provision specifically tailored for claims based on conduct occurring abroad additionally demonstrated the unlikelihood that Congress thought that the civil whistleblower provision covers the filing

of administrative complaints by foreign employees working abroad. *Id.* at 16-17. Finally, the *Carnero* court stressed the absence of any agency policy statement discussing the geographic scope of the civil whistleblower protection statute, which in totality, led the *Carnero* court to cite *Aramco* as support for its finding that all these factors reflected the absence of any balancing, much less intent, by Congress to apply an extraterritorial reach to a civil whistleblower provision contained in SOX. *Id.* at 17-18.

As a result, one might contend that when thinking about whether a statutory cause of action applies to foreign plaintiffs or defendants, or events that happen outside the United States, a more practical approach may start with *Morrison*, and its broadly stated statutory rule of construction, but continue with a comprehensive structural analysis of the type used and applied by the First Circuit in *Carnero*. As for the stick pins, when self-applied, they may aid one when reviewing regulations, policy statements and legislative history if Congress was silent on your issue of extraterritorial reach. ■



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## Why state court practitioners need to know a little about federal civil practice

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officer or employee "is entitled to raise a defense arising out of his official duties" *Arizona v. Manypenny*, 451 U.S. 232, 241 (1981) (federal removal statute enables the defendant to have the validity of an immunity defense adjudicated in a federal forum). In the case of a subpoena directed to a federal officer or employee, the defense is sovereign immunity.

Federal law, under 5 U.S.C. §301 authorizes a federal government agency to promulgate rules granting the agency discretion and authority to govern its internal affairs. Pursuant to this authority, federal agencies have promulgated rules prohibiting their employees from providing information acquired during the course of their official duties without prior approval by an appropriate agency official. If that authorization is not obtained or not given, then the federal officer or employee has a defense to an action to enforce a subpoena seeking to compel their testimony. This derives from the fact that the United States and federal employees acting within the scope of their employment are immune from state court suit unless Congress has consented to state jurisdiction. *Ferto* at \*2, citing *United States v. Sherwood*, 312 U.S. 584, 586 (1941).

This sovereign immunity extends to subpoena enforcement proceedings. *Edwards v. United States Dept. of Justice*, 43 F.3d 312, 316-17 (7th Cir. 1994) citing *United States ex rel Touhy v. Ragen*, 340 U.S. 462 (1951). This is what happened in the *Ferto* case. As *Ferto* notes [at \*1], the right to removal is triggered by a party seeking state judicial intervention to enforce the subpoena, not whether the state court has ruled on the request, citing *Dunne v. Hunt*, 2006 WL 1371445 at \*4 (N.D. Ill. May 16, 2006).

Moreover, as *Ferto* reminds us, "[t]he statutory authorization for removal by federal officers is independent of general removal jurisdiction and does not require that the federal court have original federal jurisdiction apart from the statute." *Ferto*, 2010 WL 3168293 at \*1.

So what happens after the case is removed to federal court and the court has before it the federal witness' motion to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(1)? *Ferto* reminds us that upon removal, the federal court's jurisdiction is derivative

of the state court's jurisdiction. [at \*2]. Thus, *Ferto* notes, if the state court had no jurisdiction to enforce the subpoena to compel the testimony of the federal witnesses, then the federal court likewise had no jurisdiction to enforce the subpoenas. [at \*2]. The federal judge in *Ferto*, therefore, granted the motion to dismiss. [at \*4].

But, as the *Ferto* opinion states, "[t]his does not end the inquiry..." [at \*3]. As Judge Dow noted, the proper method of review is under Section 702 of the federal Administrative Procedure Act, 5 U.S.C. § 702, which provides for judicial review of administrative agency decisions not to authorize the testimony of its employees. [at \*3] *Accord Adams v. U.S. Dept. of Justice Asset Forfeiture Div.*, 2007 WL 3085986 at \*4 (C.D. Ill., October 18 2007)

The federal court for the Southern District of Illinois has also recently made practitioners aware of the foregoing principles in *Miller v. Hill*, 2010 WL 2836299 (S.D. Ill., July 16, 2010) (quashing a state subpoena following removal to federal court).

Note, that although the subpoena issue is removed to federal court, the state court retains jurisdiction for the rest of the lawsuit.

See *Wisconsin v. Hamdia*, 765 F.2d 612, 615 (7th Cir. 1985).

Interestingly, the *Ferto* opinion references the fact that the Illinois Supreme Court in 1980, in *Marshall v. Elward*, 78 Ill. 2d 366 (Ill. 1980), applied Illinois law and enforced a subpoena issued to OSHA notwithstanding the court's recognition that there was a sovereign immunity issue. *Id.* at 370-72. In that case, the Illinois Supreme Court exercised its supervisory authority and held that the Illinois circuit court had jurisdiction to enforce its subpoena to obtain federal agency records. The testimony of federal officials was not at issue in that case. The result in that case may no longer be good law in that the federal agency rule at issue before the court has been changed to bar compliance with subpoenas without appropriate federal agency approval.

So what is the takeaway: If you need a federal official or employee as a witness, do your homework; get your request in early; and be prepared to possibly find yourself in a federal judicial review proceeding under the federal Administrative Procedure Act while you are litigating your state court case. ■

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## Resolution of discovery issues when a cutoff date becomes unattainable

By Peter LaSorsa

You are involved in a case and the District Court Judge issues a discovery order. The discover order seems reasonable and you and the other attorney start the discovery process. However, due to circumstances that arise the discovery cut-off dates are no longer manageable for either party so you appear before the Judge, explain the situation and he gives new discovery cut-off dates telling you that these are final discovery cut-off dates and they will not be extended.

Again, events appear and neither party is able to meet the cut-off dates. The events could be a state court has just bumped one of your state court cases for a two-week trial, people who are suppose to be deposed are out of the country or any other similar event. I recall a recent survey by the Illinois State Bar Association indicating 50 percent of all attorneys in Illinois are solo practitioners. When unforeseen events occur especially for a solo practitioner, the options for the attorney are limited.

So you and the other attorney appear before the District Court Judge and explain your new problem and how because of schedules you can no longer meet the new final discovery deadline. Unfortunately for you both the District Court Judge is not sympathetic and refuses to extend the discovery deadline—now what? As I see it you have two options. First do nothing and don't complete your discovery in which case one if not both of you may have a good issue on appeal if the case is lost. (of course you could file a motion to compel discovery on the other attorney and notice it up with the Magistrate Judge who has been hearing your discovery disputes, but if the other attorney has a two-week trial that just got pushed ahead on the black line in state court what is the Magistrate Judge going to do to him?). The other attorney can't be in two places at once and events do happen that are not in the control of attorneys.

A second option is for both parties to voluntarily consent to have the current Magistrate Judge conduct all further proceedings in the case. In order for the parties to do this they need to file a *Consent To Exercise of Jurisdiction By a United States Magistrate Judge* form pursuant to Title 28 U.S.C. § 636 (c). The form is available at the Magistrate Judge's clerk and is handwritten on the spot, allows the parties to designate the Magistrate

Judge they wish to have the case assigned to, is signed by both attorneys and given back to the clerk. The form is then filed by the Clerk (she will give you a file stamped copy on the spot) and sent to the original District Court Judge.

If things go smoothly, the original District Court Judge will sign a *Transfer of Case To The Executive Committee For a Reassignment of Magistrate Judge* in which the Judge recommends to the Executive Committee that the case be reassigned to the calendar of the Magistrate Judge pursuant to Local Rule 73.1. Again barring any unforeseen events, the Executive Committee will Order the case be reassigned. The Judges Transfer and the Order of the Executive Committee are on one document and will be electronically filed as one document.

Now before filing this form, it would be advisable to bring the discovery issues up with the Magistrate Judge and see if she is sympathetic to the issues and will allow more time for discovery. If the Magistrate

Judge will allow more time for discovery based on the current situation, I believe this is the best option. Obviously if the Magistrate Judge won't extend discovery were the case to be transferred to her, the consent to transfer would be a waste of time.

Now for some reason if the case is reassigned by the Executive Committee to a Magistrate Judge other than the Magistrate Judge designed by both parties pursuant to Local Rule 72, the parties may object within 30 days. If either party objects, the case will be reassigned back to the original District Judge.

Although the best option is for both parties to conform to the discovery deadlines set by the District Court Judge, sometimes events take place that make that impossible. In those instances, rather than risk a potential appeal issue for the other side or not being able to complete discovery properly a better course may be to voluntarily consent to have the Magistrate Judge conduct any and all further proceedings. ■



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**Tuesday, 1/4/11- Teleseminar**—Patent and IP Law for the Business Lawyer. 12-1.

**Thursday, 1/6/11- Teleseminar**—Business Planning for the New Health Care Law: What You Need to Know About the Year Ahead. 12-1.

**Friday, 1/7/11- Chicago, ISBA Regional Office**—2011 Family Law CLE Fest. Presented by the ISBA Family Law Section. TBD.

**Tuesday, 1/11/11- Teleseminar**—Restoration of the Estate & Gift Tax in 2011: Planning & Drafting Issues, Part 1. 12-1.

**Wednesday, 1/12/11- Teleseminar**—Restoration of the Estate & Gift Tax in 2011: Planning & Drafting Issues, Part 2. 12-1.

**Friday, 1/14/11- Chicago, ISBA Regional Office**—New Laws for 2010 and 2011. Presented by the ISBA Standing Committee on Legislation. 12-2.

**Tuesday, 1/18/11- Teleseminar**—Asset-Based Finance: Business Borrowing Against assets in a Tight Credit Environment, Part 1. 12-1.

**Wednesday, 1/19/11- Teleseminar**—Asset-Based Finance: Business Borrowing Against assets in a Tight Credit Environment, Part 2. 12-1.

**Friday, 1/21/11- Teleseminar**—Ethics in Representing Elderly Clients. 12-1.

**Friday, 1/21/11- Chicago, ISBA Regional Office**—The Health Care Reform Act- An Overview for the Health Care Attorney. Presented by the ISBA Health Care Section. 9-12.

**Friday, 1/21/11- Collinsville, Gateway Center- Mississippian Room**—Tips of the Trade: A Federal Civil Practice Seminar- 2011. Presented by the ISBA Federal Civil Practice Section. 8:30-11:45.

**Tuesday, 1/25/11- Teleseminar**—Alternatives for Financially Distressed Mid-Size Businesses, Part 1. 12-1.

**Wednesday, 1/26/11- Teleseminar**—Alternatives for Financially Distressed Mid-Size

Businesses, Part 2. 12-1.

**Friday, 1/28/11- Teleseminar**—Attorney Ethics in Social Media- Blogs, Facebook, Twitter, YouTube and More. 12-1.

**Tuesday, 1/31/11- Teleseminar**—Dangers of Using “Units” in LLC Planning REPLAY. 12-1.

### February

**Tuesday, 2/1/11- Teleseminar**—2011 Ethics Update, Part 1. 12-1.

**Wednesday, 2/2/11- Teleseminar**—2011 Ethics Update, Part 2. 12-1.

**Friday, 2/4/11- Bloomington, Bloomington-Normal Marriott**—Hot Topics in Agriculture- 2011. Presented by the ISBA Agriculture Law Section; co-sponsored by the ISBA Mineral Law Section. TBD.

**Tuesday, 2/8/11- Teleseminar**—Sophisticated Choice of Entity Analysis, Part 1. 12-1.

**Wednesday, 2/9/11- Teleseminar**—Sophisticated Choice of Entity Analysis, Part 2. 12-1.

**Friday, 2/11/11- Chicago, ISBA Regional Office**—ADR- Arbitration and Mediation Issues- 2011. Presented by the Civil Practice and Procedure Section. 9-4:15.

**Tuesday, 2/15/11- Teleseminar**—The New Normal of Buying and Selling Commercial Real Estate, Part 1. 12-1.

**Wednesday, 2/16/11- Teleseminar**—The New Normal of Buying and Selling Commercial Real Estate, Part 1. 12-1.

**Monday, 2/21/11- Chicago, ISBA Regional Office**—Advanced Worker’s Compensation- 2011. Presented by the ISBA Worker’s Compensation Section. TBD.

**Monday, 2/21/11- Fairview Heights, Four Points Sheraton**—Advanced Worker’s Compensation- 2011. Presented by the ISBA Worker’s Compensation Section. TBD.

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**Wednesday, 2/23/11- Teleseminar**—Asset Protection for the Middle Class, Part 2. 12-1.

**Thursday, 2/24/11- Peoria, Hotel Pere Marquette**—Family Law-Nuts & Bolts for Downstate 2011. Presented by the ISBA Family Law Section. TBD.

**Friday, 2/25/11- Chicago, ISBA Regional Office**—Developments in Wage and Hour Law and Employment of Foreign Workers. Presented by the Labor and Employment Section. 8:55-1:30.

**Friday, 2/25/11- Teleseminar**—Ethics in Negotiations. 12-1.

**Monday, 2/28/11- Teleseminar**—Family Feuds in Trusts REPLAY. 12-1.

### March

**Friday, 3/4/11 - Chicago, ISBA Regional Office**—Dynamic Presentation Skills For Lawyers. Master Series Presented by the Illinois State Bar Association. 12:30-5.

**Saturday, 3/5/11- Downer’s Grove, Double Tree**—DUI, Traffic and Secretary of State Related Issues. Presented by the Traffic Laws/Courts Section. 8:55-4:00.

**Monday, 3/7/11-Friday, 3/11/11- Chicago, ISBA Regional Office**—40 Hour Mediation/ Arbitration Training. Master Series Presented by the Illinois State Bar Association and the ISBA Alternative Dispute Resolution Section. 8:30-5:45 each day.

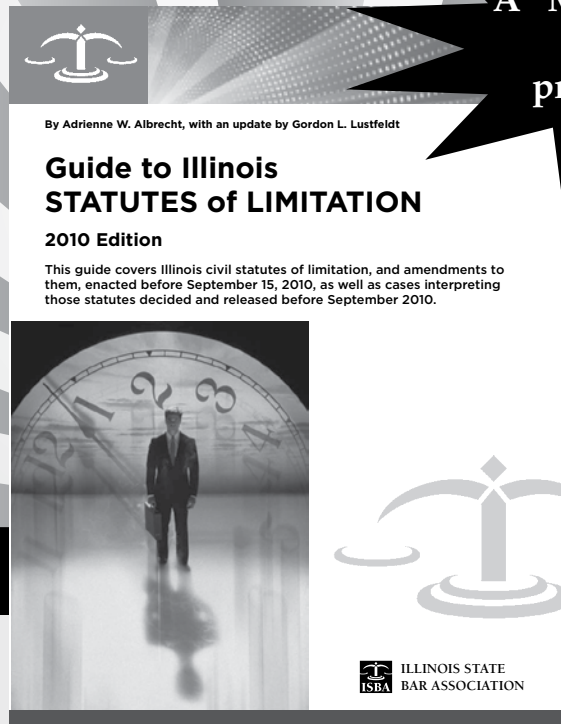
**Wednesday, 3/30/11- Chicago, ISBA Regional Office**—Why International Treaties Matter to Illinois Lawyers. Presented by the International and Immigration Committee. 12-2.

### April

**Friday, 4/1/11- Chicago, ISBA Regional Office**—Military family Law Issues. Presented by the ISBA Family Law Section and the ISBA Military Affairs Section. TBD.

**Friday, 4/8/11- Bloomington, Holiday Inn and Suites**—DUI, Traffic and Secretary of State Related Issues. Presented by the Traffic Laws/Courts Section. 8:55-4:00. ■

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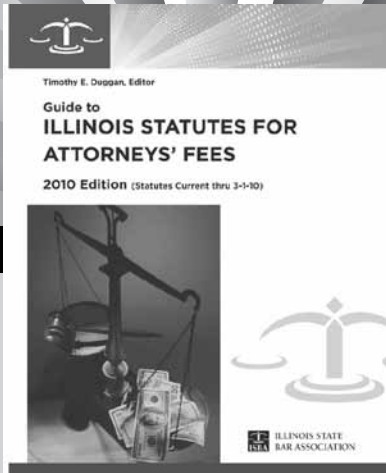
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