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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

12 FOOD & WATER WATCH, INC, et al.,
13 Plaintiffs,
14 v.
15 U.S. Environmental Protection Agency,
16 et al.,
17 Defendants.

Case No.: 17-cv-02162-EMC

ANSWER

19 Defendants United States Environmental Protection Agency and Scott Pruitt,
20 Administrator, in his official capacity, (collectively "EPA") hereby respond to the
21 correspondingly numbered paragraphs of the Complaint filed by Plaintiffs Food & Water Watch,
22 et al. ECF No. 1.

24 1. The allegations in Paragraph 1 characterize the Complaint, and no response is
25 required.

I. BACKGROUND

1
2 2. EPA admits that fluoride is added to some public drinking water supplies in the
3 United States. The remaining allegations of Paragraph 2 are too vague and ambiguous for EPA
4 to formulate a response.

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6 3. EPA admits the allegations in the first sentence of Paragraph 3. EPA is without
7 knowledge or information sufficient to form a belief as to the truth of the remaining allegations
8 set forth in Paragraph 3.

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10 4. EPA admits that the addition of fluoride to drinking water in the United States to
11 reduce the incidence of dental caries began in the 1940s. The remaining allegations of
12 Paragraph 4 are statements of opinion, rather than fact, and no response is required. If further
13 response is required EPA denies the remaining allegations of Paragraph 4.

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15 5. The allegations in the first sentence of Paragraph 5 purport to characterize an
16 unidentified statement by the Centers for Disease Control, which statement speaks for itself and
17 is the best evidence of its contents. To the extent Plaintiffs' characterizations are inconsistent
18 with the plain language, meaning, or context of the statement, they are denied. The allegations
19 of the first sentence of Paragraph 5 are also too vague and ambiguous for EPA to formulate a
20 response. The second sentence of Paragraph 5 is a statement of opinion, not a statement of fact,
21 and no response is required. If further response is required EPA denies the allegations of the
22 second sentence of Paragraph 5.

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24 6. The allegations in the first sentence of Paragraph 6 purport to characterize
25 unidentified statements by the National Academy of Science, which statements speak for
26 themselves and are the best evidence of their contents. To the extent Plaintiffs' characterizations
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1 are inconsistent with the plain language, meaning, or context of the statements, they are denied.

2 The allegations of the first sentence of Paragraph 6 are also too vague and ambiguous for EPA to
3 formulate a response. The second sentence of Paragraph 6 is a statement of opinion, not a
4 statement of fact, and no response is required. If further response is required EPA denies the
5 allegations of the second sentence of Paragraph 6.
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7 7. The allegations of Paragraph 7 are too vague and ambiguous for EPA to formulate
8 a response.

9 8. The first sentence of Paragraph 8 is a statement of opinion, not a statement of fact,
10 and no response is required. If further response is required EPA denies the allegations of the first
11 sentence of Paragraph 8. With regard to the second sentence of Paragraph 8, EPA admits that
12 ingestion of fluoride may cause dental fluorosis. The remaining allegations of the second
13 sentence of Paragraph 8 are too vague and ambiguous for EPA to formulate a response.
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15 9. The allegations in the first sentence of Paragraph 9 purport to characterize an
16 unidentified document produced by the Centers for Disease Control, which document speaks for
17 itself and is the best evidence of its contents. To the extent Plaintiffs' characterizations are
18 inconsistent with the plain language, meaning, or context of the document, they are denied. The
19 allegations of the first sentence of Paragraph 9 are also too vague and ambiguous for EPA to
20 formulate a response. The second sentence of Paragraph 9 is a statement of opinion, not a
21 statement of fact, and no response is required. If further response is required, EPA is without
22 knowledge or information sufficient to form a belief as to the truth of the allegations set forth in
23 the second sentence of Paragraph 9.
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1 10. The allegations in Paragraph 10 are too vague and ambiguous for EPA to
2 formulate a response. In addition, the allegations in the second sentence of Paragraph 10 are
3 statements of opinion, not statements of fact, and no response is required. If further response is
4 required, EPA is without knowledge or information sufficient to form a belief as to the truth of
5 the allegations set forth in the second sentence of Paragraph 10.
6

7 11. The allegations in Paragraph 11 are too vague and ambiguous for EPA to
8 formulate a response. In addition, the allegations in the second sentence of Paragraph 11 are
9 statements of opinion, not statements of fact, and no response is required. If further response is
10 required, EPA is without knowledge or information sufficient to form a belief as to the truth of
11 the allegations set forth in the second sentence of Paragraph 11.
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13 12. The allegations in Paragraph 12 are too vague and ambiguous for EPA to
14 formulate a response.
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16 13. The allegations in the first sentence of Paragraph 13 purport to characterize an
17 unidentified document produced by the National Research Council, which document speaks for
18 itself and is the best evidence of its contents. To the extent Plaintiffs' characterizations are
19 inconsistent with the plain language, meaning, or context of the document, they are denied.
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21 14. The allegations in Paragraph 14 purport to characterize unidentified documents,
22 which documents speak for themselves and are the best evidence of their contents. To the extent
23 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
24 documents, they are denied.
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1 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
2 document, they are denied. EPA denies the allegations of the second sentence of Paragraph 24.

3 25. EPA admits the allegations of Paragraph 25.

4 26. Paragraph 26 characterizes a statute, which statute speaks for itself. The
5 allegations of Paragraph 26 are also conclusions of law and no response is required. To the
6 extent further response is required, EPA denies the allegations of Paragraph 26.
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8 27. The allegations of Paragraph 27 are conclusions of law and no response is
9 required.

10 28. The allegations of Paragraph 28 are conclusions of law and no response is
11 required.
12

13 **III. PARTIES**

14 29. EPA lacks sufficient knowledge and information to form a belief as to the truth of
15 the allegations of Paragraph 29.
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17 30. EPA lacks sufficient knowledge and information to form a belief as to the truth of
18 the allegations of Paragraph 30.
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20 31. EPA lacks sufficient knowledge and information to form a belief as to the truth of
21 the allegations of Paragraph 31.
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23 32. EPA lacks sufficient knowledge and information to form a belief as to the truth of
24 the allegations of Paragraph 32.

25 33. EPA lacks sufficient knowledge and information to form a belief as to the truth of
26 the allegations of Paragraph 33.
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1 43. EPA lacks sufficient knowledge and information to form a belief as to the truth of
2 the allegations of Paragraph 43.

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4 44. EPA lacks sufficient knowledge and information to form a belief as to the truth of
5 the allegations of Paragraph 44.

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7 **IV. STATUTORY FRAMEWORK**

8 45. The allegations of Paragraph 45 characterize and quote a statute, which statute
9 speaks for itself and is the best evidence of its content. To the extent Plaintiffs' characterizations
10 or quotations are inconsistent with the plain language, meaning, or context of the statute, they are
11 denied.

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13 46. The allegations of Paragraph 46 characterize and quote a statute, which statute
14 speaks for itself and is the best evidence of its content. To the extent Plaintiffs' characterizations
15 or quotations are inconsistent with the plain language, meaning, or context of the statute, they are
16 denied.

17
18 47. The allegations of Paragraph 47 characterize and quote a statute, which statute
19 speaks for itself and is the best evidence of its content. To the extent Plaintiffs' characterizations
20 or quotations are inconsistent with the plain language, meaning, or context of the statute, they are
21 denied.

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23 48. The first sentence of Paragraph 48 is a conclusion of law to which no response is
24 required. The remaining allegations of Paragraph 48 characterize and quote a document, which
25 document speaks for itself and is the best evidence of its content. To the extent Plaintiffs'

1 characterizations or quotations are inconsistent with the plain language, meaning, or context of
2 the document, they are denied.

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4 49. The allegations of Paragraph 49 characterize a statute, which statute speaks for
5 itself and is the best evidence of its content. To the extent Plaintiffs' characterizations are
6 inconsistent with the plain language, meaning, or context of the statute, they are denied.

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8 **V. STATEMENT OF FACTS**

9 50. The allegations of Paragraph 50 characterize documents and a regulation, which
10 documents and regulations speak for themselves and are the best evidence of their content. To
11 the extent Plaintiffs' characterizations are inconsistent with the plain language, meaning, or
12 context of the document or regulation, they are denied.

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14 51. The allegations of Paragraph 51 characterize a document, which document speaks
15 for itself and is the best evidence of its content. To the extent Plaintiffs' characterizations are
16 inconsistent with the plain language, meaning, or context of the document, they are denied.

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18 52. The allegations of the third sentence of Paragraph 52 are too vague and
19 ambiguous for EPA to formulate a response. The remaining allegations of Paragraph 52
20 characterize a document, which document speaks for itself and is the best evidence of its content.
21 To the extent Plaintiffs' characterizations are inconsistent with the plain language, meaning, or
22 context of the document, they are denied.

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25 53. The allegations of Paragraph 53 characterize and quote a document, which
26 document speaks for itself and is the best evidence of its content. To the extent Plaintiffs'

1 characterizations and quotes are inconsistent with the plain language, meaning, or context of the
2 document, they are denied.

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4 54. The allegations of the first sentence of Paragraph 54 characterizes a document,
5 which document speaks for itself and is the best evidence of their content. To the extent
6 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
7 documents, they are denied. The remaining allegations of Paragraph 54 are too vague and
8 ambiguous for EPA to formulate a response.

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10 55. The allegations of Paragraph 55 are too vague and ambiguous for EPA to
11 formulate a response. The allegations of Paragraph 55 also characterize unidentified documents,
12 which documents speak for themselves and are the best evidence of their content. To the extent
13 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
14 documents, they are denied.

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16 56. EPA admits that fluoride is currently added to drinking water in some places in
17 the United States. The remaining allegations of Paragraph 56 are too vague and ambiguous for
18 EPA to formulate a response.

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20 57. The allegations of Paragraph 57 characterize an unidentified document, which
21 document speaks for itself and is the best evidence of its content. To the extent Plaintiffs'
22 characterizations are inconsistent with the plain language, meaning, or context of the document,
23 they are denied.

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25 58. The allegations of Paragraph 58 are too vague and ambiguous for EPA to
26 formulate a response. The allegations of Paragraph 58 also characterize and quote an

1 unidentified document, which document speaks for itself and is the best evidence of its content.
2 To the extent Plaintiffs' characterizations or quotations are inconsistent with the plain language,
3 meaning, or context of the document, they are denied.
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5 59. The allegations of Paragraph 59 are too vague and ambiguous for EPA to
6 formulate a response. The allegations of Paragraph 59 also characterize unidentified documents,
7 which documents speak for themselves and are the best evidence of their content. To the extent
8 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
9 documents, they are denied.
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11 60. The allegations of Paragraph 60 are too vague and ambiguous for EPA to
12 formulate a response. The allegations of Paragraph 60 also characterize unidentified documents,
13 which documents speak for themselves and are the best evidence of their content. To the extent
14 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
15 documents, they are denied.
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17 61. The allegations of Paragraph 61 characterize unidentified documents, which
18 documents speak for themselves and are the best evidence of their content. To the extent
19 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
20 documents, they are denied. The allegations of Paragraph 61 also contain statements of opinion,
21 not statements of fact, and no response to those statements is required. If further response is
22 required EPA denies the allegations of Paragraph 61.
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25 62. The allegations of Paragraph 62 are too vague and ambiguous for EPA to
26 formulate a response. The allegations of Paragraph 62 also characterize unidentified statements
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1 by unidentified individuals or contained in unidentified documents, which statements or
2 documents are the best evidence of their content. To the extent Plaintiffs' characterizations are
3 inconsistent with the plain language, meaning, or context of the statements or documents, they
4 are denied.
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6 63. The allegations of Paragraph 63 are too vague and ambiguous for EPA to
7 formulate a response. The allegations of Paragraph 63 also characterize unidentified statements
8 by unidentified individuals or contained in unidentified documents, which statements or
9 documents are the best evidence of their content. To the extent Plaintiffs' characterizations are
10 inconsistent with the plain language, meaning, or context of the statements or documents, they
11 are denied.
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14 64. The allegations of Paragraph 64 are too vague and ambiguous for EPA to
15 formulate a response.

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17 65. The allegations of Paragraph 65 are too vague and ambiguous for EPA to
18 formulate a response.

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20 66. The allegations of Paragraph 66 are too vague and ambiguous for EPA to
21 formulate a response. The allegations of Paragraph 66 also characterize unidentified documents,
22 which documents speak for themselves and are the best evidence of their content. To the extent
23 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
24 documents, they are denied.
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27 67. The allegations of Paragraph 67 are too vague and ambiguous for EPA to
28 formulate a response. The allegations of Paragraph 67 also characterize unidentified documents,

1 which documents speak for themselves and are the best evidence of their content. To the extent
2 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
3 documents, they are denied.
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5 68. The allegations of Paragraph 68 are too vague and ambiguous for EPA to
6 formulate a response. The allegations of Paragraph 68 also characterize unidentified documents,
7 which documents speak for themselves and are the best evidence of their content. To the extent
8 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
9 documents, they are denied.
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11 69. The allegations of Paragraph 69 are too vague and ambiguous for EPA to
12 formulate a response.
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14 70. The allegations of Paragraph 70 are too vague and ambiguous for EPA to
15 formulate a response.
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17 71. The allegations of Paragraph 71 are too vague and ambiguous for EPA to
18 formulate a response.
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20 72. The allegations of Paragraph 72 are too vague and ambiguous for EPA to
21 formulate a response.
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23 73. The allegations of Paragraph 73 are too vague and ambiguous for EPA to
24 formulate a response. The allegations of Paragraph 73 also characterize and quote unidentified
25 documents, which documents speak for themselves and are the best evidence of their content.
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1 To the extent the quotes or characterizations are inconsistent with the plain language, meaning,
2 or context of the documents, they are denied.

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4 74. The allegations of Paragraph 74 are too vague and ambiguous for EPA to
5 formulate a response. The allegations of Paragraph 74 also characterize unidentified documents,
6 which documents speak for themselves and are the best evidence of their content. To the extent
7 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
8 documents, they are denied.

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10 75. The first sentence of Paragraph 75 characterizes a document, which document
11 speaks for itself and is the best evidence of its content. To the extent Plaintiffs' characterizations
12 are inconsistent with the plain language, meaning, or context of the document, they are denied.
13 The second sentence of Paragraph 75 is a statement of opinion, not a statement of fact, and no
14 response is required. If further response is required, EPA denies the allegations of the second
15 sentence of Paragraph 75.
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18 76. The first sentence of Paragraph 76 characterizes unidentified documents, which
19 documents speak for themselves and are the best evidence of their content. To the extent
20 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
21 documents, they are denied. The second sentence of Paragraph 76 is a statement of opinion, not
22 a statement of fact, and no response is required. If further response is required, EPA denies the
23 allegations of the second sentence of Paragraph 76.
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25 77. The allegations of Paragraph 77 characterize unidentified documents, which
26 documents speak for themselves and are the best evidence of their content. To the extent
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1 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
2 documents, they are denied. In addition, Paragraph 77 contains statements of opinion, rather
3 than statements of fact, and no response to them is required. If further response is required, EPA
4 denies these allegations.
5

6 78. The allegations of Paragraph 78 are too vague and ambiguous for EPA to
7 formulate a response. The allegations of Paragraph 78 also characterize unidentified documents,
8 which documents speak for themselves and are the best evidence of their content. To the extent
9 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
10 documents, they are denied.
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12 79. The allegations of Paragraph 79 are too vague and ambiguous for EPA to
13 formulate a response. The allegations of the first sentence of Paragraph 79 also characterize
14 unidentified documents, which documents speak for themselves and are the best evidence of
15 their content. To the extent Plaintiffs' characterizations are inconsistent with the plain language,
16 meaning, or context of the documents, they are denied. The remaining allegations of Paragraph
17 79 are statements of opinion, not statements of fact, and no response is required. If further
18 response is required, EPA denies the remaining allegations of Paragraph 79.
19
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21 80. The allegations of Paragraph 80 characterize a document, which document speaks
22 for itself and is the best evidence of its content. To the extent Plaintiffs' characterizations are
23 inconsistent with the plain language, meaning, or context of the document, they are denied.
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25 81. The allegations of Paragraph 81 are too vague and ambiguous for EPA to
26 formulate a response.
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1 Paragraph 87. The allegations of Paragraph 87 are also too vague and ambiguous for EPA to
2 formulate a response.

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4 88. The allegations of Paragraph 88 are too vague and ambiguous for EPA to
5 formulate a response. The allegations of the first sentence of Paragraph 88 also characterize an
6 unidentified document, which document speaks for itself and is the best evidence of its content.
7 To the extent Plaintiffs' characterizations are inconsistent with the plain language, meaning, or
8 context of the document, they are denied. The allegations of the second sentence of Paragraph
9 88 are statements of opinion, not statements of fact, and no response is required. If further
10 response is required, EPA denies the allegations of Paragraph 88.
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13 89. The allegations of Paragraph 89 are too vague and ambiguous for EPA to
14 formulate a response. In addition, the allegations of the third sentence of Paragraph 89
15 characterize a document, which document speaks for itself and is the best evidence of its content.
16 To the extent Plaintiffs' characterizations are inconsistent with the plain language, meaning, or
17 context of the document, they are denied.
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19 90. The allegations of Paragraph 90 are too vague and ambiguous for EPA to
20 formulate a response.

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22 91. EPA lacks sufficient information to admit or deny the allegations of the first
23 sentence of Paragraph 91. With regard to the allegations of the second sentence of Paragraph 91,
24 EPA admits that community water fluoridation is recommended by a wide variety of
25 organizations and the Centers for Disease Control, and is used as such. The second sentence also
26 contains conclusions of law to which no response is required. The allegations of the third
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1 sentence of Paragraph 91 characterize unidentified documents, which documents speak for
2 themselves and are the best evidence of their contents. To the extent Plaintiffs' characterizations
3 are inconsistent with the plain language, meaning, or context of the documents, they are denied.
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5 92. The allegations of Paragraph 92 are too vague and ambiguous for EPA to
6 formulate a response. The allegations of Paragraph 92 also characterize unidentified documents,
7 which documents speak for themselves and are the best evidence of their contents. To the extent
8 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
9 documents, they are denied.
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11 93. The allegations of Paragraph 93 characterize unidentified documents, which
12 documents speak for themselves and are the best evidence of their contents. To the extent
13 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
14 documents, they are denied.
15

16 94. The allegations of Paragraph 94 are too vague and ambiguous for EPA to
17 formulate a response. The allegations of Paragraph 94 also characterize unidentified documents,
18 which documents speak for themselves and are the best evidence of their contents. To the extent
19 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
20 documents, they are denied.
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23 95. The allegations of Paragraph 95 are too vague and ambiguous for EPA to
24 formulate a response. The allegations of Paragraph 95 also characterize unidentified documents,
25 which documents speak for themselves and are the best evidence of their contents. To the extent
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1 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
2 documents, they are denied.

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4 96. The allegations of Paragraph 96 are too vague and ambiguous for EPA to
5 formulate a response.

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7 97. The allegations of Paragraph 97 are too vague and ambiguous for EPA to
8 formulate a response. The allegations of Paragraph 97 also characterize documents, which
9 documents speak for themselves and are the best evidence of their contents. To the extent
10 Plaintiffs' characterizations are inconsistent with the plain language, meaning, or context of the
11 documents, they are denied.

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13 98. The allegations of the first sentence of Paragraph 98 are statements of opinion, not
14 statements of fact, and thus no response is required. To the extent further response is required,
15 EPA denies the allegations of the first sentence of Paragraph 98. The remaining allegations of
16 Paragraph 98 characterize documents, which documents speak for themselves and are the best
17 evidence of their contents. To the extent Plaintiffs' characterizations are inconsistent with the
18 plain language, meaning, or context of the documents, they are denied.

19
20 99. The allegations of the first sentence of Paragraph 99 are statements of opinion, not
21 statements of fact, and thus no response is required. To the extent further response is required,
22 EPA denies the allegations of the first sentence of Paragraph 99. The allegations of the second
23 sentence of Paragraph 99 are too vague and ambiguous for EPA to formulate a response.

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26 100. The allegations of Paragraph 100 are too vague and ambiguous for EPA to
27 formulate a response.

VI. CAUSE OF ACTION

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3 101. The allegations of Paragraph 101 characterize a statute, which statute speaks for
4 itself and is the best evidence of its content. To the extent Plaintiffs' characterizations are
5 inconsistent with the plain language, meaning, or context of the statute, they are denied.

6
7 102. The allegations of Paragraph 102 characterize and quote a statute, which statute
8 speaks for itself and is the best evidence of its content. To the extent Plaintiffs' characterizations
9 or quotations are inconsistent with the plain language, meaning, or context of the statute, they are
10 denied.

11
12 105.² EPA admits that Plaintiffs submitted a petition to EPA, which was received by
13 EPA on November 23, 2016. The remaining allegations of Paragraph 105 characterize
14 documents, which documents speak for themselves and are the best evidence of their contents.
15 To the extent Plaintiffs' characterizations are inconsistent with the plain language, meaning, or
16 context of the documents, they are denied.

17
18 106. EPA admits that Plaintiffs' petition was denied on February 17, 2017. The
19 remaining allegations of Paragraph 106 are conclusions of law to which no response is required.
20 To the extent further response is required, EPA denies the allegations of Paragraph 106.

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22 107. The allegations of Paragraph 107 are conclusions of law to which no response is
23 required. The allegations of Paragraph 107 also characterize a statute, which statute speaks for
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27 ² The Complaint contains no Paragraph 103 or 104.

1 itself and is the best evidence of its content. To the extent Plaintiffs' characterizations are
2 inconsistent with the plain language, meaning, or context of the statute, they are denied.

3
4 **PRAYER FOR RELIEF**

5 EPA denies that Plaintiff is entitled to the relief requested or any relief whatsoever.

6 **GENERAL DENIAL**

7 Except as expressly admitted or otherwise stated herein, EPA denies each and every
8 allegation in Plaintiff's Complaint.

9
10 **DEFENSES**

11 1. Plaintiff has failed to state a claim upon which relief can be granted.

12 WHEREFORE, for these reasons, EPA requests that the Court deny Plaintiff's Complaint
13 with prejudice, that the United States be awarded its costs in this action, and that the Court grant
14 such other and further relief as may be appropriate.

15 Respectfully submitted this 18th day of January 2018.

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18 JEFFREY H. WOOD
19 ACTING ASST. ATTORNEY
20 GENERAL
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22 Environment & Natural Resources
23 Division

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CERTIFICATE OF SERVICE

I hereby state and certify that on January 18, 2018, I have filed the foregoing document using the ECF system, and that such document will be served electronically on all parties of record.

/s/ Norman L. Rave, Jr.
NORMAN L. RAVE, JR.