

Criminal No. 2023-03

In the
Supreme Court of the United Kingdom

GONERIL,
Petitioner,

v.

THE KINGDOM,
Respondent.

ON WRIT OF CERTIORARI
TO THE COURT OF THE KING
BEFORE THE KING HIMSELF

BRIEF FOR RESPONDENT

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QUESTIONS PRESENTED

King Lear bequeathed the land of his kingdom to two of his daughters, Goneril and Regan, and their husbands after considering each's expression of affection. Lear reserved the ability to arrive and depart from each property at his will. Upon receiving the most generous gift, Goneril stripped Lear of his knights and wrote a letter to Edmund, the illegitimate Duke of Gloucester, asking for a divorce in exchange for making Edmund king. Goneril and Edmund were thereafter arrested and Goneril was convicted of misprision of treason, insurrection, seditious conspiracy, and advocating the violent overthrow of the government.

The questions presented are:

- (1) Whether Lear's territorial grant had the legal effect of ending his reign, thus rendering Goneril and Regan sovereign over their assigned territories, so that their actions against Lear were not crimes, but steps taken to defend their proper government authority; and
- (2) If Lear's rule continued despite his territorial grant, whether Goneril's free speech rights under the First Amendment shield her from prosecution for her statements and activity in resisting his authority.

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STATEMENT OF THE CASE

*“Shot through the heart, and you’re to blame. You give
love a bad name.”*

Bon Jovi, *You Give Love a Bad Name* (Mercury 1986).

I. The Gift

Good ole’ King Lear, benevolent ruler of Britain and father to three beloved daughters, sought to enter retirement after many long years of service to his kingdom. R.9.¹ King Lear did not possess a single heir to award his gift, but three daughters whom he cherished equally. Looking forward to potential assisted living and the aid he would require in his old age, King Lear decided the best way to determine the recipients of his land and responsibilities was to measure the love each daughter felt for their dear old dad. R.9-11.

Goneril, the oldest, expressed her father to be “dearer than eyesight, space, and liberty,” and stereotypical middle child Regan noted that Goneril’s answer “comes too short” of Regan’s own love for the king. R.11. Seeing her sisters grovel in dishonesty, youngest Cordelia told her father of her true love “according to [her] bond, no more nor less.” R.13. Falling for the trickery of Goneril and Regan, Lear was upset with Cordelia’s response and chose to leave her nothing, banishing her from his kingdom—though Cordelia did earn herself a husband and the Kingdom of France that night. R.25. King Lear additionally banished his loyal aid Kent for coming to Cordelia’s defense, as Lear was blinded by the love he had received from his first two daughters. R.17.

¹ All citations to the record (R.[Page No.]) refer to William Shakespeare, *King Lear* (Folger Shakespeare Library ed. 1993) (1606).

King Lear granted Goneril and Regan, with their husbands, his kingdom in two halves, along with the responsibilities, wealth, and rule that comes with control of state. R.9-11. However, King Lear retained the name and addition of a king. R.15. He also reserved his place as a resident of both houses, where he may travel between his daughters, along with a small army of one hundred knights—a small inconvenience that should be a happy arrangement for such loving and devoted daughters. R.15.

II. The Betrayal

Soon Goneril and Regan each became tired of caring for their father, claiming “the old man and ‘s people cannot be well bestowed.” R.117. King Lear begins to realize that his daughters lied to him and did not actually possess the fondness they vowed; Lear pledges to make them feel “the terrors of the Earth.” R.117.

At this same time, Goneril has her eyes on the new illegitimate Duke of Gloucester, Edmund—given title after his father gave aid to the elderly king and thus had his own eyes plucked out by Regan’s husband, Cornwall. R.163. Goneril has grown tired of her own husband, Albany, and believes he carries sympathies for King Lear. As the oldest sister, Goneril secretly claims the shiny new Duke for herself, pledging herself with a kiss. R.179.

Faced with the puzzle of how to get rid of both her father and husband at the same time, Goneril writes to Edmund asking that he remember their “reciprocal vows,” and directing him to “cut [] off” Albany’s army so that she may then make Edmund her legitimate husband and the King of Britain. R.213-215. Goneril makes clear her support for Edmund’s plan to take the British government by force, and encourages the defeat of her husband, who would surely pardon King Lear of any actions taken against their house. R.227-229.

This conspiracy to overthrow the government may have succeeded, but Goneril's letter to Edmund is intercepted in transit and provided to Albany. R.231. Upon Albany's victory over France, he produces the letter and charges Edmund with capital treason, noting Goneril "subcontracted to this lord." R.241. Upon being confronted with her "own evil," Goneril forgets her place as a wife and smugly challenges Albany to arrest her, claiming "the laws are mine, not thine." R.247. Nevertheless, Goneril is arrested and charged with treason, misprision of treason, insurrection, seditious conspiracy, and advocating overthrow of government. 18 U.S.C. §§ 2381, 2382, 2383, 2384 and 2385

III. Procedural History

After their arrests, King Lear proclaimed that the laws in effect as of 2023 in the future English colonies in North America shall be the law over the proceedings. Edmund and Goneril were tried jointly before the King's Bench, Goneril's counsel making arguments that King Lear's mystical being, that which holds his sovereignty, was passed to Goneril upon the conveyance of his land and crown. Goneril also argued that her speech and actions during the course of the betrayal are constitutionally protected free speech.

The trial court relied on Edmund's admission upon arrest of "what you have charged me with, that have I done," and convicted him of treason. R.247. Edmund having already lost his appeal, was executed for his actions.

Goneril's case was also considered and the trial court acquitted her of treason, but moved forward with convictions of misprision of treason, insurrection, seditious conspiracy, and advocating overthrow of government. The court rejected the argument that the conveyance of land included the conveyance of the entirety of Lear's reign, and additionally found that the government had an interest in regulating the

non-speech elements of Goneril's acts such that she held no constitutional protections of free speech. Goneril was sentenced to twenty years of imprisonment and disqualification from future public office.

Goneril now appeals her convictions and begs mercy in much the same way that she first professed her daughterly love: with an eye to flattery and a singular goal of securing the crown and kingdom for herself.

ARGUMENT

Each of the convictions against Goneril should stand. King Lear's conveyance of land to his daughters did not strip him of his inherent sovereign power, both due to his divine right and choice to retain some power from the divestment. In addition, Goneril's statements constitute a true threat and inciting language, and are thus not protected by free speech provisions. This Court should affirm the ruling of the King's Bench.

I. You Know Nothing, Jon Snow.²

The King's Bench held that the transfer of property—even the whole of the kingdom—does not end the reign of the sovereign. This determination is accurate for three distinct reasons. First, the King holds a divine right and sovereignty is not merely conveyed with the land. Second, as sovereign and absolute authority, King Lear chose the conditions and limitations of his conveyance, demonstrating soon thereafter his retention of his power to banish, and thus his power over his subjects. Third, though King Lear had the intention to gift his land and crown to his daughters, his failure to make an absolute disposition of the gift invalidated the entire transfer, land and all. This Court should affirm the King's Bench's conviction of Goneril, the petitioner.

² "A Man Without Honor," *Game of Thrones*, Sn. 2, Ep. 7 (May 13, 2012).

A. Why Be a King, When You Can Be a God?³

Goneril’s argument that Lear’s territorial grant ended his reign fails as the King holds a divine right to his sovereignty that does not distinguish with the conveyance of mere property.⁴ Indeed, the King receives this divine right and “burden of government” directly from God. *See* James VI of Scotland, *Baskilikon Doron* (1599) (describing the duties and responsibilities of a monarch). Lear was born into succession and the eventual crown. *See* Kendrick Lamar, *DNA*. (Top Dawg 2017) (“I got, I got, I got, I got – loyalty, got royalty inside my DNA”).

Even in cases where the King has no male heirs, where female heirs have not yet been given equal establishment, the party in succession to the monarch is determined by the sovereign’s “express words, or testament, when it is declared by him in his lifetime.” *See* Thomas Hobbes, *Leviathan* 125-126 (Edwin Curley ed. 1994) (1651) (noting that the power of succession is left to the will of the present monarch). However, though the King may have named his successor(s) in his lifetime, this does not mean that such successor(s) may begin their reign prior to the King’s death, no matter how large the scope or long the length of time that the successor(s) have been left waiting. *See, e.g.*, Charles III of England, Edward VII of England.

In this case, though King Lear has named both Goneril and Regan, with their husbands, as heirs apparent, and has

³ Eminem, *Rap God* (Aftermath 2014).

⁴ King Lear has determined that the laws in effect as of 2023 in the future English colonies in North America shall be the law over the proceedings—however, the case law from such colonies fails to consider the question of monarchical transfer of power amidst their strange form of government. As such, we rely on additional sources of a more appropriate time period and system of hierarchy and government.

granted them “rule, interest of territory, and cares of state,” he does not grant them sovereignty. *See* R.9-11. Though the King may no longer partake in royal duties or collect revenues from his kingdom, and even if such land within the Kingdom and such duties have been bequeathed to the heir, the King remains the god anointed sovereign. *See* William Shakespeare, *Richard II*, act 3, sc. 2 (1595) (“Not all the water in the rough rude sea can wash the balm off from an anointed king; the breath of worldly men cannot depose the deputy elected by the Lord.”).

Though the King may grant his successors land, and additional royal duties, only God grants absolute power of the mystical sovereign, and as long as the King may live, he remains “every inch a king.” R.203.

B. Lear’s Kingdom. Lear’s Rules.

Though as King, Lear retains the mystical aspects of sovereignty until his death, he additionally retains those monarchical powers and responsibilities subject to his chosen limitations at the time of conveyance.

It is undisputed that King Lear was absolute monarch and sovereign prior to the conveyance of land and power to his issue of “younger strengths.” R.9-11. As the monarch and ruler of his kingdom, King Lear holds absolute power and authority, without checks and balances. As an absolute monarch, Lear is able to rule by royal prerogative, without need for any consent by the court or advisor. *See* James VI of Scotland, *Baskilikon Doron* (1599).

Indeed, each of his daughters realize his ability to grant land and power and each speaks of their love and affections for their elderly father—affections which were deceitful words of opportunity for Goneril and Regan. If they did not believe in King Lear’s absolute power at that time, it is clear

no such words as “I love you more than word can wield the matter” would have been uttered. R.11.

It is additionally undisputed that Lear made certain conveyances of power and land to Goneril, Regan, and their spouses, investing them jointly with his power. R.15. Yet, King Lear made certain choices regarding his divestment, including which powers and responsibilities he would retain. Lear states with the conveyance that he shall retain one hundred knights and shall remain in the Kingdom, sustained and housed by each of those now with property. R.15. He additionally notes he will retain the name and titles of the King. R.15. Clearly, Goneril and Regan each think the name of “King”, this sleeping arrangement, and escort of knights are the extent of Lear’s remaining portion of the crown, and any other actions as mere “unconstant starts” to the end of Lear’s rule. R.29. However, King Lear retained additional monarchical powers when he divested of his land and kingdom.

As the sovereign with absolute power, King Lear was able to choose specifically the limitations on his transfer of power. As Lear lists those items to which he will bestow his issue, they will have listened closely for what fortunes and authority they should expect to gain. As stated, the sovereign may use express terms to express those next in succession, but he also may show his desire for succession with “natural signs of the will.” See Thomas Hobbes, *Leviathan* 125-126 (1651) (stating that when a sovereign does not make the succession plans clear during life, one may look to an implied successor, or any other natural sign of the will that was demonstrated by the sovereign.) Though this concept traditionally relates to the evaluation of which person shall succeed the thrown, such wills, whims, and wishes by the King expressed in relation to his conveyance give notice of the specifics of his gift.

It is clear that King Lear chose to retain aspects of his monarchical power and sovereignty even after his conveyance to Goneril and Regan, as he banishes Kent from the Kingdom mere minutes after the yield of power is complete. R.17-19. If Lear did not choose to keep a certain amount of power for himself, including power over his kingdom and subjects, he would not have immediately wielded that which he chose to give up. In fact, as such an action was performed in front of Goneril and Regan, they were on notice of the power King Lear retained, and remarked on his use of power. R.29.

Even if Lear had not banished Kent in front of Goneril and Regan, and even if he had not stated he would retain the title of King or any other stipulation, Lear could still choose to retain sovereignty and reign at any time. A sovereign or head of state may choose to act on its powers simply by “thinking about it” with no need to give notice or record of such action. *See* Olivia Olander, “Trump: I could declassify documents by thinking about it,” *POLITICO*, Sept. 21, 2022 (“There doesn’t have to be a process, as I understand it...You’re the president of the United States, you can declassify just by saying it’s declassified, even by thinking about it.”). Because King Lear chose to wield his sovereign abilities by banishing Kent, it can be seen that he “thought about” retaining those powers amid the land conveyance.

Because Goneril witnessed King Lear’s wielding of his power and sovereignty over Kent, she knew or should have known that he retained the mystical aspects of his sovereignty, and thus any action in an attempt to further remove him from power would result in criminal charges. Though she held some of the powers of the crown, Goneril did not possess that final portion of sovereignty King Lear held back for himself. Upon Goneril’s choice to aide Edmund in his plot and take actions against both her husband, Albany, and her father, King Lear, she committed

crimes against the sovereignty rightfully resulting in her convictions for misprision of treason, insurrection, seditious conspiracy, and advocating overthrow of government. 18 U.S.C. §§ 2382, 2383, 2384 and 2385.

C. Fool me once, shame on...shame on you. Fool me—you can't get fooled again.⁵

Because King Lear's gift of land, property, and responsibility included requirements for housing the dear old king, his conveyance was not a valid gift. As such, Goneril not only did not have sovereign reign over the property, she did not have any legal claim to it at all.

In order to make an *inter vivos* gift, there must be delivery, intention to make the gift, and absolute disposition of the subject of the gift. *In re Est. of Walker*, 890 A.2d 216, 222 (D.C. 2006).⁶ Delivery of the gift must give the recipient as much control over the subject of the gift as possible in the circumstances. *See id.* at 225-226. If this absolute disposition does not occur, the would-be recipient is not entitled to judgment as a matter of law.

When King Lear made his oral conveyance of land, he included the provision that he was to live between the daughters, and keep a small army of one hundred knights on the property. R.15. Though King Lear had the intent to make a gift, he did not give absolute disposition over the gift, retaining some portion of control over the land himself. R.115. Because Goneril was never in full possession of the property, receiving the land and crown with Lear's

⁵ "Remarks by the President on Teaching American History and Civic Education," THE WHITE HOUSE (last updated January 20, 2009), <https://georgewbush-whitehouse.archives.gov/news/releases/2002/09/20020917-7.html>

⁶ As the law of property in the future colonies rest in the laws of each individual state, the presumption is made that the laws of the capital apply to those property matters of the central sovereign.

covenants of continued presence and title, King Lear’s gift was not valid and did not grant Goneril the reign she believed. As such, Goneril not only did not hold the mystical sovereignty that remained with Lear after his intended gift, Goneril did not control the land, wealth, or army which she commanded and asserts that she was protecting. Perhaps if Goneril had simply acted as a dutiful daughter caring for her poor elderly father, she would receive such land upon his eventual death—a result obviously off the table now. After all, the Lear is a wise king—some say the wisest ever—and cannot be taken for a fool. Petitioner would do well to remember the words of the 43rd President of the American Colonies, George W. Bush, no fool himself, who recalled the well-known phrase possibly from the colony state of Tennessee:

There’s an old saying in Tennessee—I know it’s in Texas, probably in Tennessee—that says, fool me once shame on—shame on you. Fool me—you can’t get fooled again.

See “Remarks by the President on Teaching American History and Civic Education,” THE WHITE HOUSE (last updated January 20, 2009).

II. You Should Have Gone for the Head⁷

A. Look At Her, She’s Wicked! Get Her!⁸

Goneril’s acts resisting authority and promises to make Edmund King of England in exchange for the murder of her husband, and equal in authority, Albany, are not shielded by any free speech rights. Therefore, this court should affirm all convictions against Goneril.

⁷ AVENGERS: INFINITY WAR (Russo, J., & Russo, A., Walt Disney Studios Motion Pictures, 2018).

⁸ Wicked (Original Broadway Cast), *Defying Gravity* (Decca Broadway 2003).

Under the 2023 laws of the future English North American colonies, as effective in ancient Britain during King Lear's reign, Goneril enjoys certain free speech protections under the First Amendment to the American Constitution. *See* U.S. Const. amend. I ("Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.").

However, the ability to utter whatever one may want is not absolute and is regulated at times by the government, with good reason. While hyperbolic language and stated disagreements with the sovereign or executive are a guaranteed right, "true threats" of physical violence or other barriers to safety may be banned. *See Watts v. United States*, 394 U.S. 705, 707-708 (1969) (stating the country has an "overwhelming interest in protecting the safety of its [sovereign]... without interference from threats of physical violence"). The speaker is not required to have actual intent to carry out the threat for it to be considered "true," and an act meant to intimidate is harmful enough to allow the state to ban its expression. *See Virginia v. Black*, 538 U.S. 343, 359-362 (2003). Such utterances, whether written or vocalized, are additionally not protected by free speech when "directed to inciting or producing imminent lawless action and [] likely to incite or produce such action." *Brandenburg v. Ohio*, 395 U.S. 444, 447 (1969).

In Goneril's case, her statements against her father regarding his reservation of knights and her opinion of his soundness of mind are likely protected speech as these are simply opinions and disagreements with the sovereign—even if such language is no way to speak to one's elderly father. This remains the case even though Lear's requests

appear completely reasonable; it was not as if he were running a makeshift strip club or throwing bachelor parties without permission from Goneril, whose childhood nickname is “Peaches.” *See District of Columbia v. Wesby*, 538 U.S. __ (2018).

However, Goneril’s letter to Edmund, asking for him to “cut off” Albany and going so far as to note that a “time and place will be fruitfully offered” is a true threat in the scope of the law.⁹ R.213. Goneril’s direction not only seeks to interfere with the functioning of the British monarchy, but also directs and incites imminent lawless action from Edmund. *See Brandenburg* at p. 447.

If Goneril were the true mystical sovereign, as bequeathed by King Lear, it is true that she would not face any criminal charges for her words, as the sovereign cannot injure its subjects and its subjects cannot choose to put a sovereign to death. *See* Thomas Hobbes, *Leviathan* 111-115 (1651) (describing the twelve principal rights of the sovereign). However, because King Lear’s bequeathing of land did not carry with it the sovereignty to his daughters, Goneril is mistaken when she states, “the laws are mine, not thine.” R.247. No, the laws are always the sovereign’s to

⁹ This brief does not explore how Goneril may have convinced Edmund to perform such lawless and violent acts. Though she believed herself sovereign, or at least though she could convince others of such, and was surely struck with an unusual amount of narcissistic confidence, it remains to be explored whether other more sinister forces were involved. The Kingdom is not fully convinced that Goneril is not a witch—a crime warranting the death penalty—as famously applied by the jurist Matthew Hale. *See* Nathan Dorn, “Sir Matthew Hale and Evidence of Witchcraft,” LIBRARY OF CONGRESS BLOGS (Oct. 30, 2021) <https://blogs.loc.gov/law/2021/10/sir-matthew-hale-and-evidence-of-witchcraft/>; *see also* Ken Armstrong, “Draft Overturning Roe v. Wade Quotes Infamous Witch Trial Judge With Long-Discredited Ideas on Rape,” ProPublica, May 6, 2022 (discussing seventeenth century jurist Matthew Hale and his thoughts on women).

make and un-make as he may choose. The near immortal words of the 37th President of the American Colonies apply here just as they did in 20th Century: “Well, when the President does it, that means it’s not illegal.” *See* Clive Irving, “Watergate Didn't Reveal Nixon's Demons—David Frost Did,” THE DAILY BEAST, <https://www.thedailybeast.com/nixon-wanted-to-hit-reporters-too>. It follows *a fortiori* that Goneril cannot be a true mystical sovereign for if she were then she would not have been tried and convicted.

B. The First Thing We Do—Let’s Kill All the Lawyers¹⁰

Additionally, Goneril’s constant assertions of executive privilege at the trial phase of this case in an attempt to block the testimony of Edmund and others must fail as only the current sovereign has such abilities. *See* Charlie Savage, “Trump’s Claim of Executive Privilege in the Jan. 6 Inquiry, Explained,” N.Y. TIMES, Oct. 19, 2021. Lear could to choose to assert executive privilege to control the testimony of Goneril, as heir apparent, as this ability ensures the ability for candid conversations between the sovereign and those close to him. Lear’s abilities are so expansive, so great, so powerful—some might say the most powerful—that he could block Goneril from testifying in her own defense. However, Goneril does not have the ability to project such powers from her own rank and any witnesses testifying with information to the detriment of Goneril may not be blocked.

Because King Lear did not transfer his sovereign power to Goneril, and because Goneril’s words contain true threats and directions to incite violence, her words are not protected by the free speech protections in the First Amendment and her convictions should be affirmed.

¹⁰ William Shakespeare, *Henry VI Part 2*, Act IV, Sc. 2 (1600).

CONCLUSION

This Court should affirm the decision of the King’s Bench to convict Goneril of her crimes—thus answering the question of “who can arraign [her] for ‘t?’” R.247.

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