

WHERE DID THAT FILING COME FROM?

Filing Office Error and Other Such Things And UCC Insurance

by
James D. Prendergast
Senior Vice President and General Counsel
and
Jennifer Klemp
Manager, Search and Filing Section
UCC Division
The First American Corporation

We want to commence this article by stating from the beginning that this article is not intended as a criticism of the competency, dedication, work ethic or legal knowledge and experience of the men and women who maintain the UCC filing offices around the country. Quite the contrary. The fact that we have found it necessary to write this article to prove the reality of “filing office error” is a tribute to the other fact that such error occurs very infrequently. However, the fact that error does occur in any human or machine based system also demonstrates the need for management of the risk of such occurrence. UCC insurance is at its core a risk management tool providing an alternative to the commercial lender self-insuring against risk involved in the security interest perfection and priority process.

Further, author Jim Prendergast has, on many occasions, written about the rogue judge and the errant judicial decision that throws a wrench into the perfection and priority process so carefully balanced through the revision of Article 9.¹ Throwing a bad decision

¹ See, e.g., “What Comes Around Goes Around for the IRS,” *The Secured Lender*; “Forget the Article 9 Folklore...The Exact Debtor Name May Not Be Enough,” *abfjournal*, “The Utility of UCC Insurance for Factors,” *The Commercial Factor*, “UCC Insurance: Cost-Effective Alternative to Borrower’s Counsel

on this finely tuned scale distorts the process and results in added risk to the filer and the subsequent searcher.² Jim admits, now that he is no longer in private commercial law practice but in house at First American, that he really loves new traps for the unwary and really bad law cases. UCC insurance does not contain an exclusion for bad law contrary to Article 9. Such cases support the conclusion that UCC insurance, whether sold by First American or any of the other major title insurance companies, provides a cost effective risk management alternative to self insurance. The premium cost for UCC insurance is sufficiently low that, notwithstanding the low probability of occurrence, the reality of these cases justifies the use of UCC insurance over the cost of self insurance.

But this article is not about bad case law, but errors in the filing system that result in missed priming liens. Revised Article 9 established a balance of risk between the filer of the financing statement and the subsequent searcher searching for possible priming liens. First, the initial burden is on the filer to file under the correct name of a debtor that is a registered organization.³ Second, when addressing the issue of what errors in the name of the debtor will render the filing ineffective as “seriously misleading,” only those errors that would **not** be overcome by the standard search logic of the filing office’s computer system are to be so considered.⁴ If the searcher enters the correct name of the debtor, found in the debtor’s organizational documents, and the debtor name with the

Legal Opinion,” *ACC Docket*, “The Utility of UCC Insurance,” *The Secured Lender*; “It Can Happen and It Does! The Cases for UCC Insurance,” Parts 1 and 2, *Commercial Law Newsletter*, and “Guide to the Eagle 9™ UCC Insurance Program,” *California Business Law Practitioner*.

² For an excellent discussion of the impact of the recent *Spearing* case on the integrity of the UCC filing system, see Lynn M. LoPucki, “The *Spearing Tool* Filing System Disaster,” 68 *Ohio State Law Journal* (forthcoming 2007).

³ UCC §9-503(a).

⁴ UCC §9-506(c).

error appears on the search using the state's standard search logic, then the filing with the "incorrect" debtor name is not seriously misleading and the filing therefore effective. Revised Article 9 then simplified the entire searching process by requiring only a single search, for the majority of Article 9 collateral types, at the jurisdiction of the organization of the debtor.⁵ The simplicity of the searching process is then balanced by the subsequent searcher being at risk for mis-indexed effective financing statements.⁶ The balance is continued by providing that a subsequent "Purchaser" is not subject to an otherwise effective financing statement, a filing communicated to the filing office with tender of the filing fee, that the filing office refuses to accept for reasons other than as set forth in §9-516(b).⁷ The filer is on notice of the rejection of a financing statement. However, the subsequent searcher is at risk for the effective filing that is not rejected but accepted by the filing office and then misplaced.⁸ The balance is for the filer to file under the exact name of the debtor, minor errors absorbed by the state's computer search logic excepted, and on the subsequent searcher to search under the exact name of the debtor.

"Filing office error" as used in this article is not intended as a pejorative, or intended to indicate a level of culpability on behalf of the filing office for human or machine error. The term is intended as a neutral statement to indicate that a problem has occurred at a filing office that has resulted in the search results not being complete or accurate. Filing office systems and procedures are not infallible, no matter how much we or they wish they were. Error does occur and that is a statement of fact and not a

⁵ UCC §9-301.

⁶ UCC §9-516(a).

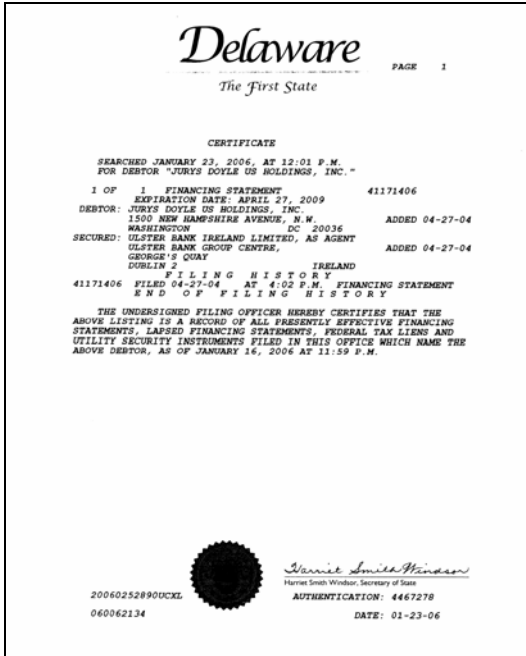
⁷ UCC §9-516(d).

⁸ UCC §9-517.

statement of blame. The “fact” that errors do occur in the filing and search process and that the occurrence of such errors cannot be totally avoided no matter what level of care is applied merely brings into play the risk management utility of UCC insurance and the comparison of third party insurance with self insurance. The cost of a filing office error cannot be recovered through an action against the state – sovereign immunity and such things. Third party insurance or self insurance are the only two available options.

To prove the point that filing office errors do occur, we have selected two examples from the Secretary of State of Delaware, an example from the Secretary of State of California, and an example from the Corporation Commission of the Commonwealth of Virginia. We could have selected numerous other examples, and from many other states and commonwealths, but this bicoastal approach seemed balanced and fair. However, the fact that your state or commonwealth was not selected doesn't mean you are home free or that another state's or commonwealth's system is perfect. Again, all human based systems have a degree of error. We admit that the percent of error is small, but so is the premium for UCC insurance.

DELAWARE ONE EXAMPLE



The Delaware example begins with the above search against the debtor “Jurys Doyle US Holdings, Inc.” Pay particular attention to the “US” imbedded in the corporate name. Under Section 503.3 of the Administrative Rules of the Delaware Secretary of State, Division of Corporations, Uniform Commercial Code, Revised Article 9, “Punctuation marks and accents are disregarded.” Given this standard search logic, “US” and “U.S.” should be treated the same for searching purposes and a search against either would, or should, bring up both.

The above search against “Jurys Doyle US Holdings, Inc.” was conducted on January 23, 2006. The only financing statement filed in Delaware against the debtor was by Ulster Bank Ireland Limited, as agent, filed on April 27, 2004. So far so good. But then we did another search in March.....

Delaware

The First State

PAGE 1

CERTIFICATE

SEARCHED MARCH 14, 2006, AT 7:01 P.M.
FOR DEBTOR "JURYS DOYLE US HOLDINGS, INC."

1 OF 7 FINANCING STATEMENT 22729725
EXPIRATION DATE: OCTOBER 18, 2007
DEBTOR: JURYS DOYLE U.S. HOLDINGS, INC.
1500 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON DC 20036 ADDED 10-18-02
SECURED: ALLIED IRISH BANKS, P.L.C.
CORPORATE BANKING, BANCENTRE,
BALLSBRIDGE DUBLIN 4, IRELAND ADDED 10-18-02
22729725 FILED 10-18-02 AT 1:08 P.M. FINANCING STATEMENT

2 OF 7 FINANCING STATEMENT 22729832
EXPIRATION DATE: OCTOBER 18, 2007
DEBTOR: JURYS DOYLE U.S. HOLDINGS, INC.
1500 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON DC 20036 ADDED 10-18-02
SECURED: ULSTER BANK IRELAND LIMITED, AS AGENT
ULSTER BANK GROUP CENTRE,
GEORGE'S QUAY DUBLIN 2 IRELAND ADDED 10-18-02
22729832 FILED 10-18-02 AT 11:53 A.M. FINANCING STATEMENT

3 OF 7 FINANCING STATEMENT 22730152
EXPIRATION DATE: OCTOBER 18, 2007
DEBTOR: JURYS DOYLE U.S. HOLDINGS, INC.
1500 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON DC 20036 ADDED 10-18-02
SECURED: IIB BANK LIMITED
91 MERRION SQUARE DUBLIN 2 IRELAND ADDED 10-18-02
22730152 FILED 10-18-02 AT 12:52 P.M. FINANCING STATEMENT

20060872457UCXL
060248209



Harriet Smith Windsor
Harriet Smith Windsor, Secretary of State
AUTHENTICATION: 4591407
DATE: 03-14-06

Delaware

The First State

PAGE 2

4 OF 7 FINANCING STATEMENT 22731192
EXPIRATION DATE: OCTOBER 18, 2007
DEBTOR: JURYS DOYLE U.S. HOLDINGS, INC.
1500 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON DC 20036 ADDED 10-18-02
SECURED: THE GOVERNOR AND COMPANY OF THE BANK OF IRELAND
LOWER BAGGOT STREET DUBLIN 2, IRELAND 0000 ADDED 10-18-02
22731192 FILED 10-18-02 AT 11:53 A.M. FINANCING STATEMENT

5 OF 7 FINANCING STATEMENT 22737793
EXPIRATION DATE: OCTOBER 18, 2007
DEBTOR: JURYS DOYLE U.S. HOLDINGS, INC.
1500 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON DC 20036 ADDED 10-18-02
SECURED: ULSTER BANK IRELAND LIMITED
ULSTER BANK GROUP CENTRE
GEORGE'S QUAY DUBLIN 2 IRELAND ADDED 10-18-02
22737793 FILED 10-18-02 AT 11:53 A.M. FINANCING STATEMENT

6 OF 7 FINANCING STATEMENT 22739328
EXPIRATION DATE: OCTOBER 18, 2007
DEBTOR: JURYS DOYLE U.S. HOLDINGS, INC.
1500 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON DC 20036 ADDED 10-18-02
SECURED: THE ROYAL BANK OF SCOTLAND PLC
100 WEST GEORGE STREET GLASGOW SCOTLAND G2 1FF ADDED 10-18-02
22739328 FILED 10-18-02 AT 11:53 A.M. FINANCING STATEMENT

7 OF 7 FINANCING STATEMENT 41171406
EXPIRATION DATE: APRIL 27, 2009
DEBTOR: JURYS DOYLE US HOLDINGS, INC.
1500 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON DC 20036 ADDED 04-27-04
SECURED: ULSTER BANK IRELAND LIMITED, AS AGENT

20060872457UCXL
060248209



Harriet Smith Windsor
Harriet Smith Windsor, Secretary of State
AUTHENTICATION: 4591407
DATE: 03-14-06

Delaware

The First State

PAGE 3

ULSTER BANK GROUP CENTRE, IRELAND ADDED 04-27-04
GEORGE'S QUAY DUBLIN 2 IRELAND
41171406 FILED 04-27-04 AT 4:02 P.M. FINANCING STATEMENT
RECORD OF FILING HISTORY

THE UNDERSIGNED FILING OFFICER HEREBY CERTIFIES THAT THE ABOVE LISTING IS A RECORD OF ALL PRESENTLY EFFECTIVE FINANCING STATEMENTS, LABORED FINANCING STATEMENTS, FEDERAL TAX LIENS AND UTILITY SECURITY INSTRUMENTS FILED IN THIS OFFICE WHICH NAME THE ABOVE DEBTOR, AS OF MARCH 3, 2006 AT 11:59 P.M.

20060872457UCXL
060248209



Harriet Smith Windsor
Harriet Smith Windsor, Secretary of State
AUTHENTICATION: 4591407
DATE: 03-14-06

On March 14, 2006, we conducted another search against “Jurys Doyle US Holdings, Inc.” to see if there were any additional filings subsequent to our initial search. There were no filings *subsequent* to the date of our initial, but, as you can see from the above three pages of the March 14, 2006 search, six *prior* filings popped up with a filing date of October 18, 2002, financing statements filed three plus years prior to our initial search. How did that happen?

Take a look at the name of the debtor in the six October 18, 2002 filings. The name of the debtor is “Jurys Doyle U.S. Holdings, Inc.” and not “Jurys Doyle US Holdings, Inc.” But, you may ask, what about Section 503.3 quoted above? The answer to this mystery was provided by the Delaware filing office as a computer anomaly that existed for about 48 hours. How they know this is beyond our understanding. The computer apparently adjusted the state’s standard search logic to treat “U.S.” differently than “US,” contrary to the standard search logic, for this 48 hour period, and then miraculously readjusted itself back. Bad computer! Now, what is the result of this glitch?

From the perspective of the filer of the six 2002 financing statements, arguably, during this 48 hour period, the filer was unperfected. A search under the correct name of the debtor would not have brought up the filer’s financing statements filed against “Jurys Doyle U.S. Holdings, Inc.” Fortunately, the debtor did not file bankruptcy during this 48 hour period. And what about the subsequent searcher? For this same 48 hour period, the 2004 filing was in first position and the filer could feel comfortable that there were no other filings. At the end of the 48 period, the six 2002 filings primed the 2004 filing and any subsequent filing. Whether you are the filer or the searcher, random computer

alteration in the search logic of a state is not a good thing. Happily, all's well that ends well, but the point is made – filing office error does happen.


DELAWARE TWO EXAMPLE

Delaware PAGE 1

The First State

CERTIFICATE
SEARCHED MAY 8, 2006, AT 5:05 P.M.
FOR DEBTOR "HDC MEZZ 2 PARTNERS, LP"

THE UNDERSIGNED FILING OFFICER HEREBY CERTIFIES THAT THERE
ARE NO PRESENTLY EFFECTIVE FINANCING STATEMENTS, FEDERAL TAX
LIENS OR UTILITY SECURITY INSTRUMENTS FILED IN THIS OFFICE WHICH
NAME THE ABOVE DEBTOR, AS OF APRIL 28, 2006 AT 11:59 P.M.


20061553486UCXN
060432623

Harriet Smith Windsor
Harriet Smith Windsor, Secretary of State
AUTHENTICATION: 4728666
DATE: 05-08-06

As you can tell from the above May 8, 2006 certified search from Delaware, as of April 28, 2006 there were no financing statements filed against the debtor – HDC Mezz 2 Partners, LP. Well, we then did another search the next day, May 9, 2006 against the same debtor. As shown on the following certified search dated as of May 1, 2006, a filing was made against the debtor by German American Capital Corporation on January 1, 2006, nearly four months **prior** to our initial search through date of April 28. No explanation, but clearly a mis-indexed January 11, 2006 filing that was discovered and then correctly indexed. The searcher that relied on the May 8th search would be in trouble after May 9th when the error was corrected.

Delaware PAGE 1


The First State

CERTIFICATE

SEARCHED MAY 9, 2006, AT 10:30 A.M.
FOR DEBTOR "HDC MEZZ 2 PARTNERS, LP"

1 OF 1 FINANCING STATEMENT 60106534
EXPIRATION DATE: JANUARY 11, 2011
DEBTOR: HDC MEZZ 2 PARTNERS, LP
77 WEST WACKER DRIVE, ADDED 01-11-06
SUITE 4600
CHICAGO IL 606012
SECURED: GERMAN AMERICAN CAPITAL CORPORATION, TOGETHER WITH ITS S
UCCESSORS AND ASSIGNS ADDED 01-11-06
60 WALL STREET, 10TH FLOOR
NEW YORK NY 10005
F I L I N G H I S T O R Y
60106534 FILED 01-11-06 AT 10:41 A.M. FINANCING STATEMENT
E N D O F F I L I N G H I S T O R Y

THE UNDERSIGNED FILING OFFICER HEREBY CERTIFIES THAT THE ABOVE LISTING IS A RECORD OF ALL PRESENTLY EFFECTIVE FINANCING STATEMENTS, FEDERAL TAX LIENS AND UTILITY SECURITY INSTRUMENTS FILED IN THIS OFFICE WHICH NAME THE ABOVE DEBTOR, AS OF MAY 1, 2006 AT 11:59 P.M.


20061560747UCKN
060434280

Harriet Smith Windsor
Harriet Smith Windsor, Secretary of State
AUTHENTICATION: 4930177
DATE: 05-09-06

THE CALIFORNIA EXAMPLE



**SECRETARY OF STATE
STATE OF CALIFORNIA
Search Certificate**

SEARCH REQUESTED ON:
Individual Debtor: **SPRAGUE ALBERT**
Address: **NOT SPECIFIED**
Date Range From: **NOT SPECIFIED**
Search: **ALL**

04/04/2006

The undersigned Filing Officer hereby certifies that there are no active financing statements, tax liens, attachment liens, or judgement liens on file in my office reflecting the above Debtor as of **03/29/2006 at 1700 hours.**

The search results herein reflect only the specific information requested. The results of this Debtor search will not reflect variances of this name. If the Debtor is known under other personal names, trade names, business entities, or addresses, separate searches of these names will have to be requested and conducted. The Secretary of State, his officers and agents disclaim any and all liability for claims resulting from other filings on which the name of the Debtor can be found in any other form than which was requested.

A handwritten signature in black ink, appearing to read "Bruce McPherson".

Bruce McPherson
Secretary of State

Document Number: 7508640003

The above search result certified by the California Secretary of State, with respect to our search request of April 4, 2006, states that as of March 29, 2006 there were “**no** active financing statements, tax liens, attachment liens, or judgement liens on file” against the debtor, Albert Sprague. Clear enough! However, when we search again on April 11, 2006, seven days after the initial search, up popped a filing against the debtor by Alliance Financial Capital, Inc. as secured party as shown on the following certified search report. However, the “new” filing was not a financing statement filed after the search though date of the previous search – March 29, 2006. On the contrary, the “newly” discovered financing statement was filed on June 27, 2001, a few months shy of five years **prior** to our initial search request. Perhaps the computer thought since the filing date was so close to the scheduled lapse date, assuming no continuation, why show it at all. However, what a surprise to the lender who funded based on the April 4, 2006 clear search. This example is of a mis-indexed filing that was found and reentered correctly. As we have discussed above, the subsequent searcher bears the risk of this type of filing office error. No one at the California Secretary of State’s Office knew how this happened – but it did!



SECRETARY OF STATE
STATE OF CALIFORNIA

Search Certificate

SEARCH REQUESTED ON:

4/11/2006

Individual Debtor: **SPRAGUE ALBERT**

Address: **NOT SPECIFIED**

Date Range From: **NOT SPECIFIED**

Search: **ALL**

- **Indicates Filings that have been accepted after the Certification Date.**

<u>Original Filing #</u>	<u>Filing Type</u>	<u>File Date</u>	<u>File Time</u>	<u>Lapse Date</u>	<u># of Pages</u>
01 -1 8460544	Financing Statement	06/27/2001	08:00	06/27/2006	2

Debtor:

Individual: SPRAGUE ALBERT
220 NORTH SIDE AVENUE, SONOMA CA USA, 95476

Organization: PROFESSIONAL NURSING SERVICES, INC.
1700 PUEBLO AVENUE, SUITE 207, NAPA CA USA, 94559

Secured Party: ALLIANCE FINANCIAL CAPITAL, INC
Organization: 700 AIRPORT BLVD STE 430, BURLINGAME CA USA, 94010

Amendment

<u>Filing #</u>	<u>Filing Type</u>	<u>File Date</u>	<u>File Time</u>	<u># of Pages</u>
*06-70656913	Filing Officer Statement	04/11/2006	8:57	2
*06-70656915	Filing Officer Statement	04/11/2006	9:00	1

The undersigned Filing Officer hereby certifies that the above listing is a record of all presently active financing statements, tax liens, attachment liens and judgement liens, including any change documents relating to them, which name the above debtor, subject to any above-stated search qualifiers and are on file in my office as of **04/05/2006** at **1700** hours.

The search results herein reflect only the specific information requested. The results of this Debtor search will not reflect variances of this name. If the Debtor is known under other personal names, trade names, business entities, or addresses, separate searches of these names will have to be requested and conducted. The Secretary of State, his officers and agents disclaim any and all liability for claims resulting from other filings on which the name of the Debtor can be found in any other form than which was requested.

Bruce McPherson
Secretary of State

Document Number: 7584890002

THE COMMONWEALTH OF VIRGINIA EXAMPLE

Just to give equal time to a commonwealth, the following is an example from Virginia. A financing statement was filed on January 31, 2006. The acknowledgement of filing from the Commonwealth of Virginia shows the effective date of the filing as January 31, 2000 notwithstanding the January 31, 2006 filing date.

02/15/2006 13:19 8045595920 UCC RETRIEVALS PAGE 03

MARK C. CHRISTIE
CHAIRMAN
THEODORE V. MORRISON, JR.
COMMISSIONER
JUDITH WILLIAMS JAGDMANN
COMMISSIONER

COMMONWEALTH OF VIRGINIA

JOEL H. PECK
CLERK OF THE COMMISSION
P.O. BOX 1197
RICHMOND, VIRGINIA 23218-1197

STATE CORPORATION COMMISSION
Office of the Clerk

February 7, 2006

UCC RETRIEVALS INC
HOLD FOR PICKUP
RICHMOND, VA 23219


RE: MICHAEL J. DARBY
DCN/FILE NO: 06-01-31-7163-0

Dear Customer:

This is your receipt for \$10.00 covering the fees for filing an original financing statement with this office.

The effective date of the filing is January 31, 2000 at 04:02 PM.

If you have any questions, please call (804) 371-9733 or toll-free in Virginia, 1-866-722-2551.

Sincerely,

Joe H. Peck
Clerk of the Commission



UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS (Pages and Items) CAREFULLY

A. NAME & PHONE OF CONTACT AT FILER (REQUIRED)

B. SEND ACKNOWLEDGEMENT TO: (Name and Address)

National Corporate Research Ltd,
523 West Sixth Street
Suite 544
Los Angeles, CA 90014

060131 7163

THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

FILED
FEB 16 2006
FBI - LOS ANGELES

1. DEBITOR'S EXACT FULL LEGAL NAME - including any suffix name (S, JR, etc.) as well as name of company or firm (REQUIRED)

04 DEBITOR'S LAST NAME DARBY	FIRST NAME MICHAEL	MOBILE PHONE J	OFFICE
06 COMPANY ADDRESS 7017 GREEN OAK DRIVE	CITY MCLEAN	STATE VA	POSTAL CODE 22101
08 TAXES - SEE INSTRUCTIONS	09 TYPE OF ORGANIZATION CORPORATION	10 JURISDICTION OF ORGANIZATION VA	11 INTERNATIONAL ENTRY <input type="checkbox"/>

2. ADDITIONAL DEBITORS EXACT FULL LEGAL NAME - including any suffix name (S, JR, etc.) as well as name of company or firm (REQUIRED)

04 DEBITOR'S LAST NAME	FIRST NAME	MOBILE PHONE	OFFICE
06 COMPANY ADDRESS	CITY	STATE	POSTAL CODE
08 TAXES - SEE INSTRUCTIONS	09 TYPE OF ORGANIZATION	10 JURISDICTION OF ORGANIZATION	11 INTERNATIONAL ENTRY <input type="checkbox"/>

3. SECURED PARTY'S NAME (NAME OF TOTAL ASSIGNOR IF ASSIGNOR NOT FILER) AND SECURED PARTY'S (S) (S)

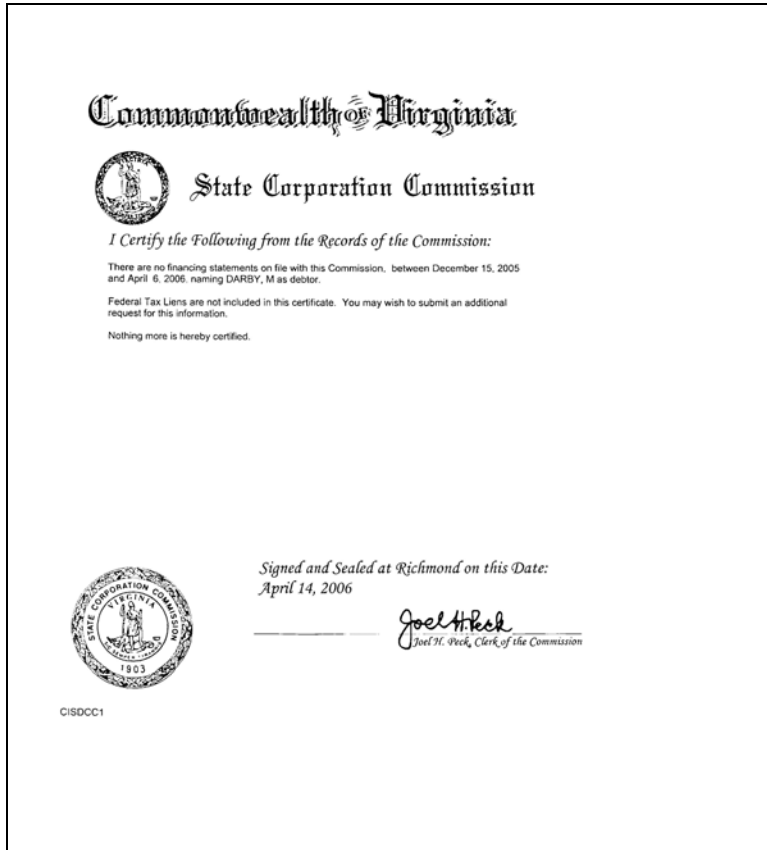
04 DEBITOR'S LAST NAME LEHMAN BROTHERS HOLDINGS INC.	FIRST NAME	MOBILE PHONE	OFFICE
06 COMPANY ADDRESS 399 PARK AVENUE, 5th FLOOR	CITY NEW YORK	STATE NY	POSTAL CODE 10022

4. THE FINANCING STATEMENT CANNOT BE FILED UNLESS:

PLEASE SEE THE ATTACHED EXHIBIT A.

5. ALTERNATE JURISDICTION (SEE INSTRUCTIONS)	6. FILING OFFICE	7. FILING DATE	8. FILING TIME	9. FILING METHOD	10. FILING FEE	11. FILING STATUS	12. FILING TYPE	13. FILING NUMBER	14. FILING OFFICE	15. FILING DATE	16. FILING TIME	17. FILING METHOD	18. FILING FEE	19. FILING STATUS	20. FILING TYPE	21. FILING NUMBER	22. FILING OFFICE	23. FILING DATE	24. FILING TIME	25. FILING METHOD	26. FILING FEE	27. FILING STATUS	28. FILING TYPE	29. FILING NUMBER	30. FILING OFFICE	31. FILING DATE	32. FILING TIME	33. FILING METHOD	34. FILING FEE	35. FILING STATUS	36. FILING TYPE	37. FILING NUMBER	38. FILING OFFICE	39. FILING DATE	40. FILING TIME	41. FILING METHOD	42. FILING FEE	43. FILING STATUS	44. FILING TYPE	45. FILING NUMBER	46. FILING OFFICE	47. FILING DATE	48. FILING TIME	49. FILING METHOD	50. FILING FEE	51. FILING STATUS	52. FILING TYPE	53. FILING NUMBER	54. FILING OFFICE	55. FILING DATE	56. FILING TIME	57. FILING METHOD	58. FILING FEE	59. FILING STATUS	60. FILING TYPE	61. FILING NUMBER	62. FILING OFFICE	63. FILING DATE	64. FILING TIME	65. FILING METHOD	66. FILING FEE	67. FILING STATUS	68. FILING TYPE	69. FILING NUMBER	70. FILING OFFICE	71. FILING DATE	72. FILING TIME	73. FILING METHOD	74. FILING FEE	75. FILING STATUS	76. FILING TYPE	77. FILING NUMBER	78. FILING OFFICE	79. FILING DATE	80. FILING TIME	81. FILING METHOD	82. FILING FEE	83. FILING STATUS	84. FILING TYPE	85. FILING NUMBER	86. FILING OFFICE	87. FILING DATE	88. FILING TIME	89. FILING METHOD	90. FILING FEE	91. FILING STATUS	92. FILING TYPE	93. FILING NUMBER	94. FILING OFFICE	95. FILING DATE	96. FILING TIME	97. FILING METHOD	98. FILING FEE	99. FILING STATUS	100. FILING TYPE	101. FILING NUMBER	102. FILING OFFICE	103. FILING DATE	104. FILING TIME	105. FILING METHOD	106. FILING FEE	107. FILING STATUS	108. FILING TYPE	109. FILING NUMBER	110. FILING OFFICE	111. FILING DATE	112. FILING TIME	113. FILING METHOD	114. FILING FEE	115. FILING STATUS	116. FILING TYPE	117. FILING NUMBER	118. FILING OFFICE	119. FILING DATE	120. FILING TIME	121. FILING METHOD	122. FILING FEE	123. FILING STATUS	124. FILING TYPE	125. FILING NUMBER	126. FILING OFFICE	127. FILING DATE	128. FILING TIME	129. FILING METHOD	130. FILING FEE	131. FILING STATUS	132. FILING TYPE	133. FILING NUMBER	134. FILING OFFICE	135. FILING DATE	136. FILING TIME	137. FILING METHOD	138. FILING FEE	139. FILING STATUS	140. FILING TYPE	141. FILING NUMBER	142. FILING OFFICE	143. FILING DATE	144. FILING TIME	145. FILING METHOD	146. FILING FEE	147. FILING STATUS	148. FILING TYPE	149. FILING NUMBER	150. FILING OFFICE	151. FILING DATE	152. FILING TIME	153. FILING METHOD	154. FILING FEE	155. FILING STATUS	156. FILING TYPE	157. FILING NUMBER	158. FILING OFFICE	159. FILING DATE	160. FILING TIME	161. FILING METHOD	162. FILING FEE	163. FILING STATUS	164. FILING TYPE	165. FILING NUMBER	166. FILING OFFICE	167. FILING DATE	168. FILING TIME	169. FILING METHOD	170. FILING FEE	171. FILING STATUS	172. FILING TYPE	173. FILING NUMBER	174. FILING OFFICE	175. FILING DATE	176. FILING TIME	177. FILING METHOD	178. FILING FEE	179. FILING STATUS	180. FILING TYPE	181. FILING NUMBER	182. FILING OFFICE	183. FILING DATE	184. FILING TIME	185. FILING METHOD	186. FILING FEE	187. FILING STATUS	188. FILING TYPE	189. FILING NUMBER	190. FILING OFFICE	191. FILING DATE	192. FILING TIME	193. FILING METHOD	194. FILING FEE	195. FILING STATUS	196. FILING TYPE	197. FILING NUMBER	198. FILING OFFICE	199. FILING DATE	200. FILING TIME	201. FILING METHOD	202. FILING FEE	203. FILING STATUS	204. FILING TYPE	205. FILING NUMBER	206. FILING OFFICE	207. FILING DATE	208. FILING TIME	209. FILING METHOD	210. FILING FEE	211. FILING STATUS	212. FILING TYPE	213. FILING NUMBER	214. FILING OFFICE	215. FILING DATE	216. FILING TIME	217. FILING METHOD	218. FILING FEE	219. FILING STATUS	220. FILING TYPE	221. FILING NUMBER	222. FILING OFFICE	223. FILING DATE	224. FILING TIME	225. FILING METHOD	226. FILING FEE	227. FILING STATUS	228. FILING TYPE	229. FILING NUMBER	230. FILING OFFICE	231. FILING DATE	232. FILING TIME	233. FILING METHOD	234. FILING FEE	235. FILING STATUS	236. FILING TYPE	237. FILING NUMBER	238. FILING OFFICE	239. FILING DATE	240. FILING TIME	241. FILING METHOD	242. FILING FEE	243. FILING STATUS	244. FILING TYPE	245. FILING NUMBER	246. FILING OFFICE	247. FILING DATE	248. FILING TIME	249. FILING METHOD	250. FILING FEE	251. FILING STATUS	252. FILING TYPE	253. FILING NUMBER	254. FILING OFFICE	255. FILING DATE	256. FILING TIME	257. FILING METHOD	258. FILING FEE	259. FILING STATUS	260. FILING TYPE	261. FILING NUMBER	262. FILING OFFICE	263. FILING DATE	264. FILING TIME	265. FILING METHOD	266. FILING FEE	267. FILING STATUS	268. FILING TYPE	269. FILING NUMBER	270. FILING OFFICE	271. FILING DATE	272. FILING TIME	273. FILING METHOD	274. FILING FEE	275. FILING STATUS	276. FILING TYPE	277. FILING NUMBER	278. FILING OFFICE	279. FILING DATE	280. FILING TIME	281. FILING METHOD	282. FILING FEE	283. FILING STATUS	284. FILING TYPE	285. FILING NUMBER	286. FILING OFFICE	287. FILING DATE	288. FILING TIME	289. FILING METHOD	290. FILING FEE	291. FILING STATUS	292. FILING TYPE	293. FILING NUMBER	294. FILING OFFICE	295. FILING DATE	296. FILING TIME	297. FILING METHOD	298. FILING FEE	299. FILING STATUS	300. FILING TYPE	301. FILING NUMBER	302. FILING OFFICE	303. FILING DATE	304. FILING TIME	305. FILING METHOD	306. FILING FEE	307. FILING STATUS	308. FILING TYPE	309. FILING NUMBER	310. FILING OFFICE	311. FILING DATE	312. FILING TIME	313. FILING METHOD	314. FILING FEE	315. FILING STATUS	316. FILING TYPE	317. FILING NUMBER	318. FILING OFFICE	319. FILING DATE	320. FILING TIME	321. FILING METHOD	322. FILING FEE	323. FILING STATUS	324. FILING TYPE	325. FILING NUMBER	326. FILING OFFICE	327. FILING DATE	328. FILING TIME	329. FILING METHOD	330. FILING FEE	331. FILING STATUS	332. FILING TYPE	333. FILING NUMBER	334. FILING OFFICE	335. FILING DATE	336. FILING TIME	337. FILING METHOD	338. FILING FEE	339. FILING STATUS	340. FILING TYPE	341. FILING NUMBER	342. FILING OFFICE	343. FILING DATE	344. FILING TIME	345. FILING METHOD	346. FILING FEE	347. FILING STATUS	348. FILING TYPE	349. FILING NUMBER	350. FILING OFFICE	351. FILING DATE	352. FILING TIME	353. FILING METHOD	354. FILING FEE	355. FILING STATUS	356. FILING TYPE	357. FILING NUMBER	358. FILING OFFICE	359. FILING DATE	360. FILING TIME	361. FILING METHOD	362. FILING FEE	363. FILING STATUS	364. FILING TYPE	365. FILING NUMBER	366. FILING OFFICE	367. FILING DATE	368. FILING TIME	369. FILING METHOD	370. FILING FEE	371. FILING STATUS	372. FILING TYPE	373. FILING NUMBER	374. FILING OFFICE	375. FILING DATE	376. FILING TIME	377. FILING METHOD	378. FILING FEE	379. FILING STATUS	380. FILING TYPE	381. FILING NUMBER	382. FILING OFFICE	383. FILING DATE	384. FILING TIME	385. FILING METHOD	386. FILING FEE	387. FILING STATUS	388. FILING TYPE	389. FILING NUMBER	390. FILING OFFICE	391. FILING DATE	392. FILING TIME	393. FILING METHOD	394. FILING FEE	395. FILING STATUS	396. FILING TYPE	397. FILING NUMBER	398. FILING OFFICE	399. FILING DATE	400. FILING TIME	401. FILING METHOD	402. FILING FEE	403. FILING STATUS	404. FILING TYPE	405. FILING NUMBER	406. FILING OFFICE	407. FILING DATE	408. FILING TIME	409. FILING METHOD	410. FILING FEE	411. FILING STATUS	412. FILING TYPE	413. FILING NUMBER	414. FILING OFFICE	415. FILING DATE	416. FILING TIME	417. FILING METHOD	418. FILING FEE	419. FILING STATUS	420. FILING TYPE	421. FILING NUMBER	422. FILING OFFICE	423. FILING DATE	424. FILING TIME	425. FILING METHOD	426. FILING FEE	427. FILING STATUS	428. FILING TYPE	429. FILING NUMBER	430. FILING OFFICE	431. FILING DATE	432. FILING TIME	433. FILING METHOD	434. FILING FEE	435. FILING STATUS	436. FILING TYPE	437. FILING NUMBER	438. FILING OFFICE	439. FILING DATE	440. FILING TIME	441. FILING METHOD	442. FILING FEE	443. FILING STATUS	444. FILING TYPE	445. FILING NUMBER	446. FILING OFFICE	447. FILING DATE	448. FILING TIME	449. FILING METHOD	450. FILING FEE	451. FILING STATUS	452. FILING TYPE	453. FILING NUMBER	454. FILING OFFICE	455. FILING DATE	456. FILING TIME	457. FILING METHOD	458. FILING FEE	459. FILING STATUS	460. FILING TYPE	461. FILING NUMBER	462. FILING OFFICE	463. FILING DATE	464. FILING TIME	465. FILING METHOD	466. FILING FEE	467. FILING STATUS	468. FILING TYPE	469. FILING NUMBER	470. FILING OFFICE	471. FILING DATE	472. FILING TIME	473. FILING METHOD	474. FILING FEE	475. FILING STATUS	476. FILING TYPE	477. FILING NUMBER	478. FILING OFFICE	479. FILING DATE	480. FILING TIME	481. FILING METHOD	482. FILING FEE	483. FILING STATUS	484. FILING TYPE	485. FILING NUMBER	486. FILING OFFICE	487. FILING DATE	488. FILING TIME	489. FILING METHOD	490. FILING FEE	491. FILING STATUS	492. FILING TYPE	493. FILING NUMBER	494. FILING OFFICE	495. FILING DATE	496. FILING TIME	497. FILING METHOD	498. FILING FEE	499. FILING STATUS	500. FILING TYPE	501. FILING NUMBER	502. FILING OFFICE	503. FILING DATE	504. FILING TIME	505. FILING METHOD	506. FILING FEE	507. FILING STATUS	508. FILING TYPE	509. FILING NUMBER	510. FILING OFFICE	511. FILING DATE	512. FILING TIME	513. FILING METHOD	514. FILING FEE	515. FILING STATUS	516. FILING TYPE	517. FILING NUMBER	518. FILING OFFICE	519. FILING DATE	520. FILING TIME	521. FILING METHOD	522. FILING FEE	523. FILING STATUS	524. FILING TYPE	525. FILING NUMBER	526. FILING OFFICE	527. FILING DATE	528. FILING TIME	529. FILING METHOD	530. FILING FEE	531. FILING STATUS	532. FILING TYPE	533. FILING NUMBER	534. FILING OFFICE	535. FILING DATE	536. FILING TIME	537. FILING METHOD	538. FILING FEE	539. FILING STATUS	540. FILING TYPE	541. FILING NUMBER	542. FILING OFFICE	543. FILING DATE	544. FILING TIME	545. FILING METHOD	546. FILING FEE	547. FILING STATUS	548. FILING TYPE	549. FILING NUMBER	550. FILING OFFICE	551. FILING DATE	552. FILING TIME	553. FILING METHOD	554. FILING FEE	555. FILING STATUS	556. FILING TYPE	557. FILING NUMBER	558. FILING OFFICE	559. FILING DATE	560. FILING TIME	561. FILING METHOD	562. FILING FEE	563. FILING STATUS	564. FILING TYPE	565. FILING NUMBER	566. FILING OFFICE	567. FILING DATE	568. FILING TIME	569. FILING METHOD	570. FILING FEE	571. FILING STATUS	572. FILING TYPE	573. FILING NUMBER	574. FILING OFFICE	575. FILING DATE	576. FILING TIME	577. FILING METHOD	578. FILING FEE	579. FILING STATUS	580. FILING TYPE	581. FILING NUMBER	582. FILING OFFICE	583. FILING DATE	584. FILING TIME	585. FILING METHOD	586. FILING FEE	587. FILING STATUS	588. FILING TYPE	589. FILING NUMBER	590. FILING OFFICE	591. FILING DATE	592. FILING TIME	593. FILING METHOD	594. FILING FEE	595. FILING STATUS	596. FILING TYPE	597. FILING NUMBER	598. FILING OFFICE	599. FILING DATE	600. FILING TIME	601. FILING METHOD	602. FILING FEE	603. FILING STATUS	604. FILING TYPE	605. FILING NUMBER	606. FILING OFFICE	607. FILING DATE	608. FILING TIME	609. FILING METHOD	610. FILING FEE	611. FILING STATUS	612. FILING TYPE	613. FILING NUMBER	614. FILING OFFICE	615. FILING DATE	616. FILING TIME	617. FILING METHOD	618. FILING FEE	619. FILING STATUS	620. FILING TYPE	621. FILING NUMBER	622. FILING OFFICE	623. FILING DATE	624. FILING TIME	625. FILING METHOD	626. FILING FEE	627. FILING STATUS	628. FILING TYPE	629. FILING NUMBER	630. FILING OFFICE	631. FILING DATE	632. FILING TIME	633. FILING METHOD	634. FILING FEE	635. FILING STATUS	636. FILING TYPE	637. FILING NUMBER	638. FILING OFFICE	639. FILING DATE	640. FILING TIME	641. FILING METHOD	642. FILING FEE	643. FILING STATUS	644. FILING TYPE	645. FILING NUMBER	646. FILING OFFICE	647. FILING DATE	648. FILING TIME	649. FILING METHOD	650. FILING FEE	651. FILING STATUS	652. FILING TYPE	653. FILING NUMBER	654. FILING OFFICE	655. FILING DATE	656. FILING TIME	657. FILING METHOD	658. FILING FEE	659. FILING STATUS	660. FILING TYPE	661. FILING NUMBER	662. FILING OFFICE	663. FILING DATE	664. FILING TIME	665. FILING METHOD	666. FILING FEE	667. FILING STATUS	668. FILING TYPE	669. FILING NUMBER	670. FILING OFFICE	671. FILING DATE	672. FILING TIME	673. FILING METHOD	674. FILING FEE	675. FILING STATUS	676. FILING TYPE	677. FILING NUMBER	678. FILING OFFICE	679. FILING DATE	680. FILING TIME	681. FILING METHOD	682. FILING FEE	683. FILING STATUS	684. FILING TYPE	685. FILING NUMBER	686. FILING OFFICE	687. FILING DATE	688. FILING TIME	689. FILING METHOD	690. FILING FEE	691. FILING STATUS	692. FILING TYPE	693. FILING NUMBER	694. FILING OFFICE	695. FILING DATE	696. FILING TIME	697. FILING METHOD	698. FILING FEE	699. FILING STATUS	700. FILING TYPE	701. FILING NUMBER	702. FILING OFFICE	703. FILING DATE	704. FILING TIME	705. FILING METHOD	706. FILING FEE	707. FILING STATUS	708. FILING TYPE	709. FILING NUMBER	710. FILING OFFICE	711. FILING DATE	712. FILING TIME	713. FILING METHOD	714. FILING FEE	715. FILING STATUS	716. FILING TYPE	717. FILING NUMBER	718. FILING OFFICE	719. FILING DATE	720. FILING TIME	721. FILING METHOD	722. FILING FEE	723. FILING STATUS	724. FILING TYPE	725. FILING NUMBER	726. FILING OFFICE	727. FILING DATE	728. FILING TIME	729. FILING METHOD	730. FILING FEE	731. FILING STATUS	732. FILING TYPE	733. FILING NUMBER	734. FILING OFFICE	735. FILING DATE	736. FILING TIME	737. FILING METHOD	738. FILING FEE	739. FILING STATUS	740. FILING TYPE	741. FILING NUMBER	742. FILING OFFICE	743. FILING DATE	744. FILING TIME	745. FILING METHOD	746. FILING FEE	747. FILING STATUS	748. FILING TYPE	749. FILING NUMBER	750. FILING OFFICE	751. FILING DATE	752. FILING TIME	753. FILING METHOD	754. FILING FEE	755. FILING STATUS	756. FILING TYPE	757. FILING NUMBER	758. FILING OFFICE	759. FILING DATE	760. FILING TIME	761. FILING METHOD	762. FILING FEE	763. FILING STATUS	764. FILING TYPE	765. FILING NUMBER	766. FILING OFFICE	767. FILING DATE	768. FILING TIME	769. FILING METHOD	770. FILING FEE	771. FILING STATUS	772. FILING TYPE	773. FILING NUMBER	774. FILING OFFICE	775. FILING DATE	776. FILING TIME	777. FILING METHOD	778. FILING FEE	779. FILING STATUS	780. FILING TYPE	781. FILING NUMBER	782. FILING OFFICE	783. FILING DATE	784. FILING TIME	785. FILING METHOD	786. FILING FEE	787. FILING STATUS	788. FILING TYPE	789. FILING NUMBER	790. FILING OFFICE	791. FILING DATE	792. FILING TIME	793. FILING METHOD	794. FILING FEE	795. FILING STATUS	796. FILING TYPE	797. FILING NUMBER	798. FILING OFFICE	799. FILING DATE	800. FILING TIME	801. FILING METHOD	802. FILING FEE	803. FILING STATUS	804. FILING TYPE	805. FILING NUMBER	806. FILING OFFICE	807. FILING DATE	808. FILING TIME	809. FILING METHOD	810. FILING FEE	811. FILING STATUS	812. FILING TYPE	813. FILING NUMBER	814. FILING OFFICE	815. FILING DATE	816. FILING TIME	817. FILING METHOD	818. FILING FEE	819. FILING STATUS	820. FILING TYPE	821. FILING NUMBER	822. FILING OFFICE	823. FILING DATE	824. FILING TIME	825. FILING METHOD	826. FILING FEE	827. FILING STATUS	828. FILING TYPE	829. FILING NUMBER	830. FILING OFFICE	831. FILING DATE	832. FILING TIME
--	------------------	----------------	----------------	------------------	----------------	-------------------	-----------------	-------------------	-------------------	-----------------	-----------------	-------------------	----------------	-------------------	-----------------	-------------------	-------------------	-----------------	-----------------	-------------------	----------------	-------------------	-----------------	-------------------	-------------------	-----------------	-----------------	-------------------	----------------	-------------------	-----------------	-------------------	-------------------	-----------------	-----------------	-------------------	----------------	-------------------	-----------------	-------------------	-------------------	-----------------	-----------------	-------------------	----------------	-------------------	-----------------	-------------------	-------------------	-----------------	-----------------	-------------------	----------------	-------------------	-----------------	-------------------	-------------------	-----------------	-----------------	-------------------	----------------	-------------------	-----------------	-------------------	-------------------	-----------------	-----------------	-------------------	----------------	-------------------	-----------------	-------------------	-------------------	-----------------	-----------------	-------------------	----------------	-------------------	-----------------	-------------------	-------------------	-----------------	-----------------	-------------------	----------------	-------------------	-----------------	-------------------	-------------------	-----------------	-----------------	-------------------	----------------	-------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------	--------------------	-----------------	--------------------	------------------	--------------------	--------------------	------------------	------------------

At first we assumed that the filing date indicated on the above cover letter was an innocent typo. Not so! We did a search and our filing of January 31, 2006 did not appear on a certified search dated April 14, 2006:



This caused us some concern and we brought the failure to index to the attention of the State Corporation Commission. In response, the indexing error was corrected and our January 31, 2006 filed financing statement appeared correctly on a subsequent certified search report dated May 9, 2006.

Commonwealth of Virginia



State Corporation Commission

I Certify the Following from the Records of the Commission:

The attached search report is a record of financing statements, and subsequent statements, if any, naming DARBY, MICHAEL, J. as debtor on file with the Commission between December 15, 2005 and April 27, 2006.

Federal Tax Liens are not included in this certificate. You may wish to submit an additional request for this information.

Nothing more is hereby certified.



Signed and Sealed at Richmond on this Date:
May 9, 2006

Joel H. Peck
Joel H. Peck, Clerk of the Commission

CS0310

UCCB4490 CLERK'S INFORMATION SYSTEM PAGE 1
 C15DCC1 UCC SEARCH REPORT 06/28/06 18:03:16

ORDER-NO: C005468777
 REQUESTOR: CAROLYN PETTIT HOLD ORDER REQUESTED NAME: DARBY, M
 ADDRESS: **00 NOT MAIL*** MIDLOTHIAN VA 23113 ADDRESS:
 ACCOUNT: A0002301 EXACT/PARTIAL: P
 STATEMENT TYPE: ALL
 FROM: 12/15/2005 THRU 06/19/2006
 STATUS TYPE: ALL

ORIG DCH/FILE NO	FILE DATE & TIME	SUBSEQUENT DCH/FILE NO	NO PAGES	TYPE	MICROFILM NUMBER	OLD FILE NO	SEL
06-01-31-7143-0	01/31/2006 04:02 PM		2	FSD	0602211482		X
DEBTOR	DARBY, MICHAEL, J., 7017 GREEN OAK DRIVE MCLEAN VA 22101				SP LEHMAN BROTHERS HOLDINGS INC. 399 PARK AVENUE, 8TH FLOOR NEW YORK NY 10022		
	06/24/2006 04:41 PM	06-06-24-7356-0	0	FSOS			X
COMMENTS: OUR UCC RECORDS HAVE BEEN CORRECTED TO REFLECT THE YEAR FILED FROM 2000 TO 2006							
DEBTOR	DARBY, MICHAEL, J., 7017 GREEN OAK DRIVE MCLEAN VA 22101				SP LEHMAN BROTHERS HOLDINGS INC. 399 PARK AVENUE, 8TH FLOOR NEW YORK NY 10022		

1 ORIGINALS 1 SUBSEQUENTS 2 PAGES
 1 SELECTED 1 SELECTED 2 SELECTED

FEE FOR COPIES 2.00
 FEE FOR CERTIFICATION... 0.00
 GOOD THROUGH DATE OF SEARCH..... 06/19/2006

A LIMITED SEARCH MAY NOT REVEAL ALL FILINGS AGAINST THE DEBTOR SEARCHED AND THE SEARCHER BEARS THE RISK OF RELYING ON SUCH A SEARCH.

CONCLUSION

As mentioned above, the purpose of this article is not to criticize state UCC filing offices or to denigrate the effectiveness and competence of the filing officers. They do an excellent job often under very difficult circumstances. Rather, the purpose of this article is merely to state the obvious, that errors occur within UCC filing offices. Notwithstanding the infrequency of occurrence, the fact that errors occur forces the lender to decide between self-insurance and third party insurance. UCC insurance is the risk management alternative to self-insurance.

UCC insurance can be cost justified from a number of different and cumulative vantage points. UCC insurance can replace the lack of an opinion of borrower's counsel as a better alternative than the lender relying solely on the representations and warranties of the debtor. The UCC Division of First American can replace the UCC compliance back office of a lender, often at less of a cost than the training of specialty personnel, given the inherent complexity of Article 9. UCC insurance is a cost effective risk management tool to offset the rare but disconcerting filing office error.