

1 Craig A. Marvinney, 0004951 (OH)
2 John M. Skeriotis, 0069263 (OH)
3 Jill A. Bautista, 0075560 (OH)
4 BROUSE MCDOWELL
5 388 S. Main Street, Suite 500
6 Akron, Ohio 44311-4407
7 Telephone: 330-535-5711
8 Facsimile: 330-253-8601
9 Email: cmarvinney@brouse.com,
10 jskeriotis@brouse.com,
11 jbautista@brouse.com

12 *Admitted pro hac vice*

13 Donald L. Myles, Jr., 007464 (AZ)
14 JONES, SKELTON & HOCHULI, P.L.C.
15 2901 N. Central Ave., Suite 800
16 Phoenix, Arizona 85012
17 Telephone: 602-263-1700
18 Facsimile: 602-263-1784
19 Email: dmyles@jshfirm.com

20 *Attorneys for Defendant/Counterclaimant*
21 *Midwest Industrial Supply, Inc.*

22 **UNITED STATES DISTRICT COURT**
23 **IN AND FOR THE DISTRICT OF ARIZONA**

24 SOILWORKS, LLC, an Arizona
25 corporation,

26 Plaintiff / Counterdefendant /
27 Counterclaimant,

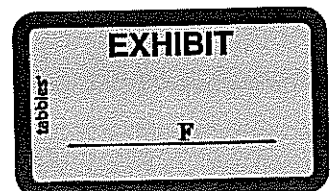
28 v.

MIDWEST INDUSTRIAL SUPPLY,
INC., an Ohio corporation authorized to do
business in Arizona,

Defendant / Counterclaimant /
Counterdefendant.

NO.: 2:06-CV-2141-DGC

**DECLARATION OF ROBERT
VITALE IN SUPPORT OF
MIDWEST INDUSTRIAL SUPPLY,
INC.'S OPPOSITION TO
SOILWORKS' MOTION FOR
SUMMARY JUDGMENT**



1 I, Robert Vitale having personal knowledge of the facts stated herein, and being of
2 legal age and sound mind and memory, do hereby declare as follows:

3
4 1. I am the Chief Executive Officer of Midwest Industrial Supply, Inc.
5 (“Midwest”). The declarations set forth herein are true to the best of my knowledge and
6 belief, and are based upon my personal knowledge and information known to me as the
7 representative of Midwest.

8
9 2. This declaration is being given in support of Midwest’s *Opposition to*
10 *Soilworks’ Motion for Partial Summary Judgment* in this action.

11 3. I have been in the soil stabilization and dust control industry for over thirty-
12 three (33) years, since Midwest became a part of the industry in 1975. Historically, used
13 oil and other waste materials were used by consumers (including governmental entities)
14 for dust suppression purposes. In the mid-1970s, consumers began moving away from
15 the use of these types of dust control materials due to environmental concerns and
16 regulatory mandates. This created a market a market opportunity for the development
17 and sale of manufactured products to control dust, including manufactured chemical dust
18 suppressants. Midwest was one of the first, if not the first, company to take advantage of
19 this market opportunity, and it began the developing, testing, using, and selling various
20 manufactured dust suppressant products in 1975. In 1978, Midwest’ Soil-Sement®
21 product was first introduced.

22
23
24
25 4. Over course of the last thirty-three (33) years in the dust control and soil
26 stabilization industry, I (along with Midwest) have participated in the development of
27 new products and technologies, and the improvement of existing products and
28

1 technologies. I am one of the inventors of Midwest's Patents. I have personally worked
2 with various state and federal agencies in order to develop testing protocols for both dust
3 control product performance and environmental soundness with regards to air, water,
4 vegetation, and human health and safety concerns. I have also guided numerous products
5 through the environmental and technical certification programs of Canada, the State of
6 California, and the United States Environmental Protection Agency ("U.S. EPA"). I have
7 also worked with engineering firms (including Midwest Research Institute and Desert
8 Research Institute) under contract with the U.S. EPA and other state and federal agencies
9 (including Midwest Research Institute and Desert Research Institute) in their
10 performance of comprehensive studies of dust control products.
11
12

13
14 5. During the past thirty (30) years, I have personally been involved been
15 involved in promoting, marketing, selling, and distributing Midwest's soil stabilization
16 and dust control products to various consumers worldwide. Since 1978, I have
17 personally been involved in preparing and submitted thousands of bids and quotes to
18 provide consumers with dust control and soil stabilization products to meet their
19 specifications and needs.
20

21 6. I previously gave a declaration in support of Midwest's *Motion for Partial*
22 *Summary Judgment* dated May 8, 2008, which is on file with the Court. In that
23 declaration, I explained that the attributes of a dust control product being "synthetic" and
24 "oil-sheen free" (*i.e.*, not a petroleum distillate) are often important to potential
25 consumers of dust control products. *See* Paragraph 20 of May 8, 2008 Vitale Dec. I also
26 explained that specifications for public projects often include express and/or implicit
27
28

1 requirements that dust control and soil stabilization products must be synthetic and/or oil-
2 sheen free. *See* Paragraph 21-23 of May 8, 2008 Vitale Dec. These specifications are
3 have been included in bid requests for public projects for which both Midwest and
4 Soilworks' distributors have submitted bids (or portions thereof) and have directly
5 competed with one another to supply the requested synthetic and/or oil-sheen free dust
6 control product for the project. *See* Paragraph 21-23 of May 8, 2008 Vitale Dec.
7

8
9 7. The dust control and soil stabilization industry is an industry in which there
10 are a very limited number of entities competing to provide their products to potential
11 consumers and distributors. Internet advertising and marketing/promotional materials are
12 heavily used and relied upon by both consumers and distributors for determinations of
13 products' claims regards environmental impact, product chemistry, and performance,
14 which claims are used in selecting the dust control and/or soil stabilization products for
15 their projects and making purchasing decisions.
16

17 8. In many cases, Midwest and Soilworks (or one of its distributor(s)) are the
18 only entities competing with one another to provide and sell their respective dust control
19 products to a potential consumer.
20

21 9. For example, the Army Corps of Engineers' Dust Control Field Handbook
22 identifies that a "synthetic organic fluid" be used as the dust control product for various
23 military applications. *See* United States Army Corps of Engineers' Dust Control Field
24 Handbook at p. 1, the pertinent excerpts of which are attached hereto as **Attachment 1**.
25 In this handbook, the Corp expressly recognizes that Midwest and Soilworks are the two
26 vendors that offer dust control products that are represented to be synthetic organic fluids.
27
28

1 *See id.* at p. 9, 10. The handbook states that the procedure for selecting an appropriate
2 product for military dust control applications is to identify the recommended product
3 category and then select a product and its vendor from the list provided for the
4 recommended product category. *See id.* at p. vi. Thus, when a military project calls for
5 the application of “synthetic organic fluid” for dust control purposes, the Corp directs the
6 military to select either Soilworks or Midwest to be the vendor of the dust control
7 product. *See id.* at vi, 1, 9, 10. If Soilworks did not represent that its Durasoil product
8 was a “synthetic organic fluid,” Midwest would be the only recommended vendor
9 identified in the handbook for these applications. *See id.*

12 10. Other examples of Midwest’s direct competition with Soilworks (or its
13 distributors) include the public projects for which the bid requests that were discussed in
14 my May 8, 2008 declaration were issued for dust palliative products. *See* Paragraphs of
15 21-23 of May 8, 2008 Vitale Dec. These bid requests included express specifications for
16 synthetic and/or non-petroleum distillate (*i.e.*, oil-sheen free) dust control products. In
17 response to these bid requests, Midwest and Soilworks’ distributor submitted bids (or
18 portions thereof) and competed with one another to supply the consumer with the dust
19 control product for the project. *See* Paragraphs of 21-23 of May 8, 2008 Vitale Dec.

22 11. For example, in 2006, Midwest competed with a Soilworks’ distributor
23 (Polar Supply Company) to supply Midwest’s and Soilworks’ respective dust control
24 products for an airport construction project for the Alaskan Department of Transportation
25 with dust palliative specifications that included express requirements that “the product
26 shall be a high viscosity *synthetic* iso-alkane,” have binder, and that the “material shall
27
28

1 *not* be a petroleum distillate” (the “Chevak airport project”). *See* Paragraph 21 of May 8,
2 2008 Vitale Dec. and Attachment 6 thereto. The dust palliative specification for the
3 Chevak airport project is attached hereto as **Attachment 2**.

4
5 12. As another example, in 2006, Midwest competed with a Soilworks’
6 distributor (Polar Supply Company) to supply Midwest’s and Soilworks’ respective dust
7 control products for another airport construction project for the Alaskan Department of
8 Transportation with dust palliative specifications that included express requirements that
9 “the product shall be a high viscosity *synthetic* iso-alkane,” have a binder, and that the
10 “material shall *not* be a petroleum distillate” (the “Kokhanok airport project”). *See*
11 Paragraph 22 of May 8, 2008 Vitale Dec. and Attachment 7 thereto. The dust palliative
12 specification for the Kokhanok airport project is attached hereto as **Attachment 3**.

13
14
15 13. In some of these instances, Soilworks’ distributors’ bids or quotes were
16 selected and the distributor obtained the contract to supply Soilworks’ dust control
17 product for the project based upon Soilworks’ representations that its Durasoil project
18 is synthetic, has a binder, and is not a petroleum distillate (oil-sheen free), thereby
19 causing Midwest to lose the contract for project and associated the sale of Midwest’s
20 dust control product. This situation occurred in the case of the Kokhanok airport
21 project. Midwest and Polar Supply both submitted quotes for their respective dust
22 palliative products to a general contractor that submitted a bid to ADOT for the
23 project. The general contractor selected Polar Supply Company’s quote for
24 Soilworks’ Durasoil product in its fulfillment of the ADOT bid dust palliative
25 requirement for the Kokhanok airport project and purchased Soilworks’ Durasoil
26
27
28

1 instead of Midwest's EK35® product for the project. Because Midwest and the
2 company were the only two entities competing to supply the needed dust control
3 palliative for this project, Midwest would have obtained the contract to supply its dust
4 control product for the project if it were not for Soilworks' representations that its
5 Durasoil product is a synthetic iso-alkane, has a binder, and not a petroleum distillate.
6
7
8

9 I declare under penalty of perjury that the foregoing is true and correct.

10
11 Executed this 11 day of June, 2008.



12
13
14 Robert Vitale,
15 Chief Executive Officer of Midwest Industrial
16 Supply, Inc.
17
18
19
20
21
22
23
24
25
26
27
28

Dust Control Field Handbook

Standard Practices for Mitigating Dust
on Helipads, Lines of Communication,
Airfields, and Base Camps



U.S. Army Corps
of Engineers®
Engineer Research and
Development Center

ATTACHMENT
1

ERDC/GSL SR06-7

October 2006

U.S. Army Engineer Research and Development Center

Dust Control Field Handbook

Standard Practices for Mitigating Dust
on Helipads, Lines of Communication,
Airfields, and Base Camps

John F. Rushing and Jeb S. Tingle

*Geotechnical and Structures Laboratory
U.S. Army Engineer Research and Development Center
3909 Halls Ferry Road
Vicksburg, MS 39180-6199*

Final report

Approved for public release; distribution is unlimited

Prepared for U.S. Marine Corps Systems Command
Quantico, VA 22134

ABSTRACT: The U.S. Army Engineer Research and Development Center has evaluated potential chemical dust palliatives for mitigating fugitive dust in military operations. The products were compared in laboratory testing and several field trials. The results of these efforts are compiled in this document to provide assistance for selecting and applying chemical dust palliatives for use on helipads, roads, airfields, and base camps. This document summarizes recommendations and conclusions derived from individual research projects. The information is intended to serve as a guide for acceptable dust mitigation. Variations of the procedures documented may be necessary to meet specific requirements.

DISCLAIMER: The contents of this report are not to be used for advertising, publication, or promotional purposes. Citation of trade names does not constitute an official endorsement or approval of the use of such commercial products. All product names and trademarks cited are the property of their respective owners. The findings of this report are not to be construed as an official Department of the Army position unless so designated by other authorized documents.

DESTROY THIS REPORT WHEN NO LONGER NEEDED. DO NOT RETURN IT TO THE ORIGINATOR.

CONTENTS

Preface.....	v
Procedure for Using Dust Control Field Handbook.....	vi
Recommended Applications	1
Recommended Product Applications – Table 1	1
Dust	2
Palliatives	2
Detailed Dust Palliative Descriptions.....	2
Chloride Salts.....	2
Lignosulfonates.....	3
Petroleum Products.....	4
Polyacrylamides.....	5
Polymer Emulsions.....	6
Polysaccharides.....	7
Powdered Polymer.....	8
Synthetic Fluids	9
Vendors	10
Product and Vendor Information – Table 2	10
Application Techniques	11
Soil Type.....	11
Intended Use	11
Application Rates.....	11
Dilution Ratios.....	12
Topical Method.....	12

	Admix Method.....	13
Equipment	Distribution Equipment and Vendor Information – Table 3	14
Helipads	Mitigating Dust on Helipads – CH-53 and CH-46.....	15
	Mitigating Dust on Helipads – UH-1 and AH-1	16
	Alternative Method for Helipads – CH-53 and CH-46	18
	Alternative Method for Helipads – UH-1 and AH-1	19
Roads	Mitigating Dust on Lines-of-Communication and Maneuver Supply Routes	21
	Alternative Method for Lines-of-Communication	24
Base Camps	Mitigating Dust in Base Camps and Non-Traffic Areas	26
Easy Lawn® Hydroseeder	Easy Lawn® Hydroseeder Operation.....	27
Finn® Hydroseeder	Finn® Hydroseeder Operation	37
Tips	Tips for Selecting Dust Palliatives	52
	Tips for Selecting Application Equipment.....	54
	Tips for Applying Dust Palliatives.....	55
References	Literature Citations.....	62
	Report Documentation Page	

PREFACE

This handbook was developed as part of a dust control program funded by the U.S. Marine Corps Systems Command, Quantico, VA. The information presented herein is for use in selecting, procuring, and applying dust palliatives for helipads, lines of communication, airfields, and base camps. Recommendations are based upon field testing conducted at Yuma, AZ, Douglas, AZ, and Fort Leonard Wood, MO, during the period 2003 to 2005.

The report was prepared by John F. Rushing and Jeb S. Tingle of the Airfields and Pavements Branch (APB) of the U.S. Army Engineer Research and Development Center (ERDC), Vicksburg, MS.

Work was conducted under the general supervision of Don R. Alexander, Chief, APB; Dr. Albert J. Bush III, Chief, Engineering Systems and Materials Division; Dr. William P. Grogan, Deputy Director, Geotechnical and Structures Laboratory (GSL); and Dr. David W. Pitman, Director, GSL.

COL Richard B. Jenkins was Commander and Executive Director of ERDC. Dr. James R. Houston was Director.

PROCEDURE FOR USING DUST CONTROL FIELD HANDBOOK

- (1) Use Table 1 (at tab *Recommended Applications*) to select recommended product category for military applications.
- (2) Review **Detailed Dust Palliative Descriptions** (tab *Dust Palliatives*).
- (3) Select product from recommended product category (Table 2, tab *Vendors*).
- (4) Review recommended product application equipment (Table 3 at tab *Equipment* and tabs *Easy Lawn® Hydroseeder* and *Finn® Hydroseeder*).
- (5) Review product application guidance (tabs *Application Techniques* and *Helipads, Roads, and Base Camps*).

Table 1 Recommended Product Applications									
Application	Primary Solution				Secondary Solution(s)				
	Product Category	Application Rate	Dilution Ratio	Application Type	Product Category	Application Rate	Dilution Ratio	Application Type	
Airfields	Synthetic fluid	0.4 gsy	n/a	Topical	Polymer emulsion	1.2 gsy	3:1	Admix [#]	
Lines of Communication	Polymer emulsion	0.8 gsy	3:1	Admix	Synthetic fluid	0.6 gsy	n/a	Topical	
					Chloride salt*	0.8 gsy	n/a	Topical	
Helipads	Synthetic fluid	0.4 gsy	n/a	Topical	Polymer emulsion	1.2 gsy	3:1	Topical	
					Powdered polymer	1.2 gsy	1.3 lb/gal	Topical	
Base Camps	Synthetic fluid	0.4 gsy	n/a	Topical	Polymer emulsion	0.6 gsy	3:1	Topical	
					Powdered polymer	0.6 gsy	1.3 lb/gal	Topical	
					Polysaccharide	0.6 gsy	3:1	Topical	

* Should not be used in excessively dry or excessively wet conditions.
[#] Depth of mixing should be minimum 4 in.

Recommended Applications

Synthetic Fluids

Synthetic organic fluids are applied to a soil "as received." These fluids are not miscible with water and therefore are unable to be diluted. They consist of isoalkanes that do not dry or cure with time. The reworkable binder is ready for immediate use upon application and maintains effectiveness over extended periods of time.

Synthetic Fluid				
Product Description	Vendor Information	Effective Uses	Limitations	Shipping
Blend of isoalkanes that forms a reworkable binder in soil. Will not mix with water. Effective for long-term use.	<p><i>Envirokleen</i> Midwest Industrial Supply Todd Hawkins 1-800-321-0699 todd@midwestind.com</p> <p><i>Durasoil</i> Soilworks, Inc. Chad Falkenberg 1-800-545-5420 chad@soilworks.com</p>	<p>Helipads</p> <p>Lines of communication</p> <p>Base camps</p> <p>Airfields</p>	More expensive than most products	275-gal containers (2,000 lb)

Table 2 Product and Vendor Information						
Product Category	Dust Palliative	Vendor	POC	Telephone	Email	
Chloride salt	Dust Fyghter	Midwest Industrial Supply	Todd Hawkins	1-800-321-0699	todd@midwestind.com	
	Road Oyl	Midwest Industrial Supply	Todd Hawkins	1-800-321-0699	todd@midwestind.com	
Lignosulfonate	Dustac	Dust Pro	Lou Snow	(602) 251-3878	nodust@dustpro.com	
	CSS Asphalt Emulsion	Western Emulsions	Sales Representative	(520) 662-7203	western@westernemulsions.com	
Petroleum product	PolyPlus	Polymers Plus	Jean Whitish	(608) 836-0805	jwhitish@polymersplusllc.com	
Polyacrylamide	Envirolac II	Environmental Products and Applications	John Vermillion	(760) 779-1814	dustcontrolman@aol.com	
	Soilac	Soilworks	Chad Falkenberg	1-800-545-5420	chad@soilworks.com	
	Soil-Sement	Midwest Industrial Supply	Todd Hawkins	1-800-321-0699	todd@midwestind.com	
	DC 100	Environmental and Fire Technology	Cal Blystra	(616) 784-0770	c.blystra@worldnet.att.net	
	Liquid Dust Control	Enviroseal Corporation	Andy Stevens	(772) 335-8225	andy@enviroseal.com	
Powdered polymer	Surtac	Soilworks	Chad Falkenberg	1-800-545-5420	chad@soilworks.com	
Synthetic fluid	Powdered Surtac	Soilworks	Chad Falkenberg	1-800-545-5420	chad@soilworks.com	
	Durasoil	Soilworks	Chad Falkenberg	1-800-545-5420	chad@soilworks.com	
	Envirokleen	Midwest Industrial Supply	Todd Hawkins	1-800-321-0699	todd@midwestind.com	
	EK-35	Midwest Industrial Supply	Todd Hawkins	1-800-321-0699	todd@midwestind.com	

11/14/2006 09:58 907-562-7003
JUN-12-2006(MON) 16:21 TAMSHER CONSTRUCTION

POLAR SUPPLY CO
(FAX) 1 907 373 3022

PAGE 05/06
P. 004/005

06/12/2006 15:43 9872822262

KOKHANOK AIRPORT

PAGE 03

JUN-12-06 MON 02:58 PM DOT AVIATION CONST.

FAX NO. 807 289 0871

P. 01

ITEM P-167 DUST PALLIATIVE

7/18/06
Attn: Chad
1/2
4/6

DESCRIPTION

167-1.1 The scope of this work shall consist of furnishing all materials, equipment, and labor necessary to apply the specified dust control agent in accordance with the manufacturer's recommendations to the Crushed Aggregate Surface Course (CASC) on the runway (including safety areas), taxiway and apron. The evulsion support area shall not be treated, which is defined as the full width of the Apron from Taxiway, ~~Station 2+10.00 to 2+89.57.~~

MATERIALS

167-2.1 GENERAL. Material shall be a modified synthetic organic fluid dust control and stabilization product. The material shall be a durable, reworkable binder that does not dry or cure but is a continuously active suppressant.

Material shall meet the following requirements:

Material shall be non-corrosive, reworkable, and non-toxic.

Material shall not be a petroleum distillate or petroleum resin.

The product shall be a high viscosity synthetic iso-alkane designed for the control of fugitive particulates on unconsolidated surfaces.

The product must not auto-ignite or be combustible.

No known substances may be physically or chemically affected by contact with the product.

The product must not be an oxidizer, a classified waste material, a regulated material or a reportable product.

The product must have a cumulative effect on the surface to which it is applied.

The product must be capable of withstanding tracked vehicle traffic.

The product must be suitable for applications with no preliminary surface preparation necessary (i.e. an already compacted surface does not have to be ripped, graded, or otherwise disturbed prior to treatment) or integrating into the surface course material by reclaimer or blade mixing and compaction to specified density for stabilization of the surface course.

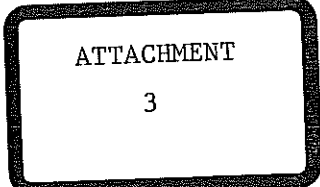
Product must conform to and have Boeing Specification B6-17487. Evaluation of Aircraft Maintenance Materials testing and acceptance. The product must be non-injurious to aircraft surfaces when used as a stabilizer / dust suppressant.

MINIMUM REQUIREMENTS

PROPERTY	TEST METHOD	REQUIREMENTS
Density @ 15°C	ASTM D1298	0.82 - 0.86 Kg/L
Flash Point, COC	ASTM D92	>140°C
Solubility in Water	---	Insoluble
Pour Point	ASTM D97	≤ 9°C

Chevak Airport
Alaska Rehabilitation Phase II
Project #5626 (AIP 3-02-0400-002-2005) P.167-1
Kokhanok Airport Resurfacing & Lighting
AIP 3-02-0400-002-2005 / 54849

Central Region Spec
(rev. 7/18/05)



Steve

5611850

ITEM P-167 DUST PALLIATIVE

DESCRIPTION

167-1.1 The scope of this work shall consist of furnishing all materials, equipment, and labor necessary to apply the specified dust control agent in accordance with the manufacturer's recommendations to the Crushed Aggregate Surface Course (CASC) on the runway (including safety areas), taxiway and apron. The aviation support area shall not be treated, which is defined as the full width of the Apron from Taxiway station 2+46.05 to 4+09.27.

MATERIALS

167-2.1 **GENERAL.** Material shall be a modified synthetic organic fluid dust control and stabilization product. The material shall be a durable, reworkable binder that does not dry or cure but is a continuously active suppressant.

Material shall meet the following requirements:

Material shall be non-corrosive, reworkable, and non-toxic.

Material shall not be a petroleum distillate or petroleum resin.

The product shall be a high viscosity synthetic iso-alkane designed for the control of fugitive particulates on unconsolidated surfaces.

The product must not auto-ignite or be combustible.

No known substances may be physically or chemically affected by contact with the product.

The product must not be an oxidizer, a classified waste material, a regulated material or a reportable product.

The product must have a cumulative effect on the surface to which it is applied.

The product must be capable of withstanding tracked vehicle traffic.

The product must be suitable for applications with no preliminary surface preparation necessary (i.e. on already compacted surface does not have to be ripped, graded, or otherwise disturbed prior to treatment) or integrating into the surface coarse material by roller or blade mixing and compaction to specified density for stabilization of the surface course.

Product must conform to and have Boeing Specification D6-17487, Evaluation of Aircraft Maintenance Materials testing and acceptance. The product must be non-injurious to aircraft surfaces when used as a stabilizer / dust suppressant.

FK35

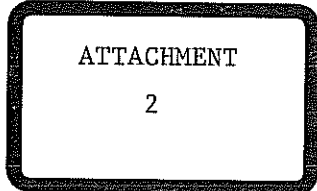
ve

MINIMUM REQUIREMENTS

<u>PROPERTY</u>	<u>TEST METHOD</u>	<u>REQUIREMENTS</u>
Density @ 15°C	ASTM D1298	0.02 - 0.08 Kg/L
Flash Point, COC	ASTM D92	>140°C
Solubility in Water	---	Insoluble
Pour Point	ASTM D97	< 9°C

Chevak Airport
Airport Relocation Phase II
Project 56620/AIP 3-02-0408-002-2005 P-167-1

Central Region Spec
(rev. 7/18/05)



1 CERTIFICATE OF SERVICE

2 The undersigned hereby certifies that a copy of the foregoing **DECLARATION**
3 **OF ROBERT VITALE IN SUPPORT OF MID WEST INDUSTRIAL SUPPLY,**
4 **INC.'S OPPOSITION TO SOILWORKS' MOTION FOR SUMMARY**
5 **JUDGMENT** has been electronically filed on this 11th of June, 2008. Notice of this
6 filing will be sent to all parties by operation of the Court's electronic filing system.
7 Parties may access this filing through the Court's system.
8
9

10 /s/ John Skeriotis

11 John Skeriotis
12
13

14 Doc. No. 717936.3
15
16
17
18
19
20
21
22
23
24
25
26
27
28