No. 12-1226

IN THE

Supreme Court of the United States

PEGGY YOUNG,

Petitioner,

v.

UNITED PARCEL SERVICE, INC.,

Respondent.

On Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

BRIEF OF *AMICUS CURIAE* BLACK WOMEN'S HEALTH IMPERATIVE, JOINED BY OTHER BLACK WOMEN'S HEALTH ORGANIZATIONS, IN SUPPORT OF PETITIONER

Jonathan M. Cohen
Counsel of Record
Kami E. Quinn
Jenna A. Hudson
Kristiné Hansen
James Liddell
GILBERT LLP
1100 New York Ave., N.W.
Suite 700
Washington, DC 20005
(202) 772-2259
cohenj@gotofirm.com

Counsel for Black Women's Health Imperative

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Page(s)

Cases

Statutes and Legislative Material

Other Authorities

STATEMENT OF INTEREST OF *AMICUS CURIAE*[1]

Amicus curiae, the Black Women's Health Imperative (the "Imperative"), and the parties that join it in filing this brief are public interest organizations that focus on the health of Black women and their families. Each of these organizations addresses issues important to the Black community involving pregnancy and pregnancy-related conditions, including through advocacy and other programs.

The Imperative is the only organization in the United States devoted solely to advancing the health of this country's approximately 20 million Black women through advocacy, community health and wellness education, and leadership development. Rather than just documenting the enormous health disparities that exist for Black women, the Imperative takes action to place Black women and their experiences at the forefront and expose the conditions and systems that impose undue health burdens on Black women. The Imperative's work underscores how inequalities and complexities in Black women's lives profoundly impact their reproductive choices and rights, as well as their

[1] In accordance with Supreme Court Rule 37.6, *amicus curiae* notes that the position it takes in this brief has not been approved or financed by Petitioner, Respondent, or their counsel. Neither Petitioner, Respondent, nor their counsel had any role in authoring, nor made any monetary contribution to fund the preparation or submission of, this brief. Pursuant to Supreme Court Rule 37.3, a*micus curiae* states that all parties have consented to the filing of this brief; blanket letters of consent have been filed with the Clerk of the Court.

healthcare decisions. Pregnancy, childbirth, and related medical issues are a major focus of the Imperative's mission, as is the related issue of economic security for Black families.

The Imperative is joined in this brief by two organizations with which it partners to improve the health of Black women nationwide: Black Women for Wellness ("BWW") and New Voices Pittsburgh: Women of Color for Reproductive Justice ("New Voices").

BWW seeks to empower the health and wellbeing of Black women and girls in Los Angeles and throughout California. BWW has worked for more than seventeen years to expand access to reproductive and sexual health and rights by supporting state and county policy implementation and regulations, providing sex education and outreach to youth, sharing information with consumers on reproductive and neurological toxins, implementing healthy eating and exercise programs to prevent obesity and infertility, conducting research with beauty professionals to determine the impacts of chemical exposure on health, organizing and mobilizing around local and statewide elections, and publishing voter education and information materials culturally relevant to the Black community.

New Voices is the premier reproductive justice and human rights organization in the Greater Pittsburgh Region. The mission of New Voices is to build a social change movement dedicated to the health and wellbeing of Black women and girls

through leadership development, human rights, and reproductive justice. Over the last decade, New Voices has served more than 10,000 women and girls of color. New Voices is expanding into both a statewide and national organization with the formation of New Voices Philadelphia and New Voices Cleveland.

As part of their advocacy for the health of Black women and their families, the Imperative and its partners seek to prevent Black women from being forced to choose between their jobs and the health of their pregnancies. As discussed below, Black women disproportionately hold jobs that require physical exertion that may be unsafe while pregnant. Many of these women's employers, however, do not accommodate their pregnancies or related conditions, even if they would accommodate employees who have similar physical limitations. Black women thus are disproportionately put to a Hobson's choice between the economic security that their current jobs provide and the health of themselves and their children.

The Imperative and its partners advocate on behalf of women who, in the absence of employer accommodation, would be put to this Hobson's choice. They therefore have a deep interest in the Pregnancy Discrimination Act's requirement that employers accommodate employees with pregnancy-related impediments as they do employees who are similar in their ability or inability to work but not impeded by pregnancy-related issues. Accordingly, the Imperative supports Petitioner's appeal and

respectfully requests that this Court reverse the decision below.

SUMMARY OF ARGUMENT

In this brief, *amicus curiae* shows the substantial extent to which failing to accommodate pregnancy and related conditions negatively impacts women, families, and communities – particularly Black women, families, and communities. Congress passed the Pregnancy Discrimination Act (the "Act") based on a substantial legislative record demonstrating these negative effects, and the legislative history shows that Congress intended the second clause of the Act to protect pregnant women by requiring broader accommodation than what otherwise may have been required under the Civil Rights Act. As this brief discusses, the negative effects that drove Congress to craft the broad requirement of the Act's second clause continue to affect women and their families to this day, and particularly Black women and their families. Because Congress enacted the broad protections contained in the Act's second clause to address these harmful effects, *amicus curiae* supports Petitioner in respectfully requesting that this Court reverse the court below.

ARGUMENT

I. CONGRESS INCLUDED THE SECOND CLAUSE OF THE ACT TO PREVENT FAILURES TO ACCOMMODATE.

Title VII of the Civil Rights Act seeks to provide equal employment opportunities by, in part,

requiring employers to treat equally employees who are similar to each other "in all respects" other than their membership in a protected class.[2] Congress included sex as a protected class in the Civil Rights Act, but originally it did not expressly state that sex includes pregnancy and related conditions. As a result, this Court held in *General Electric Co. v. Gilbert*, 429 U.S. 125 (1976), that Title VII did not require equal treatment of pregnancy and related conditions.

Following this Court's decision in *Gilbert*, Congress passed the Act. The Act clarifies that sex includes pregnancy and related conditions, thus requiring employers generally to accommodate pregnancy-related limitations in the same manner as the Civil Rights Act applies to sex-based issues more broadly. The Act, however, goes further. It includes a second statutory clause that expressly requires employers to accommodate pregnant women on the same basis as they accommodate other employees to whom they are similar only in their "ability or inability to work."[3] By its plain terms, this second clause of the Act expands the protections for pregnancy and related conditions beyond the Civil Rights Act's requirement that employers treat all employees the same as other employees who are similar to them "in all respects."[4]

---

[2] *See Mitchell v. Toledo Hosp.*, 964 F.2d 577, 583 (6th Cir. 1992).

[3] 42 U.S.C. § 2000e(k).

[4] *See Ensley-Gaines v. Runyon*, 100 F.3d 1220, 1226 (6th Cir. 1996) (quoting *Mitchell*, 964 F.2d at 583).

Congress expanded the scope of the Act beyond the protections of the Civil Rights Act purposefully. Congress's statutory language is the best evidence of this intent.[5] However, even if that language were ambiguous, the statute's legislative history evidences Congress's intent.

As the Act's legislative history shows, Congress recognized that failing to equally accommodate pregnant employees was a "significant barrier to the equal participation of women in the labor market" and "historically had a persistent and harmful effect upon [women's] careers."[6] Congress thus found that "[i]t would be difficult to overstate the importance of removing this barrier to equal employment opportunity for women affected by pregnancy."[7] For this reason, Congress used broader wording in the Act's second clause, which Congress recognized would require employers to "transfer[] workers to lighter assignments . . . or [apply] other practices, so long as the requirements and benefits are administered equally for all workers in terms [of] their actual ability to perform work."[8]

Congress was prescient in its stated concern that lack of accommodation could prove harmful to women and their families and communities. Indeed,

---

[5] *See* 42 U.S.C. § 2000e(k).

[6] *See* S. Rep. No. 95-331, 95th Cong., 1st Sess. at 9 (1977) (quoting statement of Ethel Bent Walsh, Vice Chairman, Equal Employment Opportunity Commission, before the Senate Labor Subcommittee, April 26, 1977, p. 1); H.R. Rep. No. 95-948, 95th Cong. 2d Sess. at 6 (1978).

[7] S. Rep. No. 95-331 at 9.

[8] *See* H.R. Rep. No. 95-948 at 5.

evidence of the pernicious effects of failing to accommodate pregnant women has continued to mount since Congress passed the Act. Congress considered, and the evidence continues to show that, when employers do not accommodate pregnant women on the same basis as they accommodate other employees, many women – and Black women in particular – must choose between their jobs and the health of their pregnancies. As a result, these women lose economic security, and suffer significant adverse consequences. In addition, Congress considered, and the evidence continues to show that, failing to accommodate women equally also disadvantages women's families and communities by creating a cycle of poverty – particularly for Black families and Black communities.

II. APPLYING THE SECOND CLAUSE OF THE ACT AS WRITTEN CONTRIBUTES TO EQUAL OPPORTUNITY FOR WOMEN (PARTICULARLY BLACK WOMEN).

In passing the Act, Congress found that the failure to accommodate equally pregnant employees was a "significant barrier to the equal participation of women in the labor market."[9] Congress also identified the failure to accommodate pregnancy equally as a root cause of women disproportionately being stuck in "low-paying, dead-end jobs."[10]

---

[9] S. Rep. No. 95-331 at 9 (quoting statement of Ethel Bent Walsh, Vice Chairman, Equal Employment Opportunity Commission, before the Senate Labor Subcommittee, April 26, 1977, p. 1).

[10] *Id.* at 6; *see also* H.R. Rep. No. 95-948 at 3.

Congress drew these conclusions when only 46 percent of women over the age of 16 were part of, or looking to join, the workforce.[11] With this number in mind, it found that "[i]t would be difficult to overstate the importance of removing this barrier to equal employment opportunity for women affected by pregnancy."[12]

Today, the impact of failing to accommodate women affected by pregnancy is even broader. Department of Labor statistics show that, as of 2010, 58.6 percent over the age of 16 were part of, or looking to join, the workforce.[13] This statistic is significant because 75 percent of women who enter the workforce today will become pregnant at least once during their careers, and many women will be pregnant while looking for employment.[14]

Most of these women will work while pregnant, many well into the ninth month of pregnancy.[15] According to the Census Bureau, 62 percent of women in the United States work during

---

[11] *See* S. Rep. No. 95-331 at 128.

[12] *See id.*

[13] U.S. Dep't. of Labor, *Women in the Labor Force in 2010*, http://www.dol.gov/wb/factsheets/Qf-laborforce-10.htm (last visited Sept. 10, 2014).

[14] *See* Michelle R. Hebl et al., *Hostile and Benevolent Reactions Toward Pregnant Women: Complementary Interpersonal Punishments and Rewards That Maintain Traditional Roles*, 92 Journal of Applied Psychology 1499, 1499-1511 (2007), *available at* http://mason.gmu.edu/~eking6/HeblKingJAP2007.pdf.

[15] *See* Tallesse D. Johnson, *Maternity Leave and Employment Patterns of First-Time Mothers*, U.S. Census Bureau (2008), *available at* http://www.census.gov/prod/2008pubs/p70-113.pdf.

the same year in which they give birth.[16] Further, "in every single state in 2012, the majority of women who gave birth in a one-year period were also in the labor force."[17] These statistics show that, just as Congress found when it passed the Act, a significant percentage of women face potential workplace discrimination based on pregnancy and pregnancy-related conditions.

Congress correctly found that pregnancy-related discrimination often takes the form of the failure to provide accommodations equal to what others with similar limitations enjoy.[18] When a woman is forced to leave her job as a result of an employer's failure to accommodate her pregnancy, even for a short period of time, she suffers economic injury that can reverberate long after her pregnancy has ended.

This continues to affect women, just as it did when Congress made its findings and enacted the Act. For example, once a woman loses her job due to lack of accommodation, it becomes materially more difficult for her to regain employment. A Federal Reserve Bank study found that 13 percent of men and women that lost full-time jobs were

---

[16] *See* U.S. Census Bureau, *Am. Cmty. Survey 1 Year Estimates, Geographies: All States within United States, Table B13012: Women 16 to 50 Years Who had a Birth in the Past 12 Months by Marital Status and Labor Force Statistics*, http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_12_1YR_B13012&prodType=table, (last visited Sept. 10, 2014).

[17] *Id.*

[18] *See* S. Rep. No. 95-331 at 128; H.R. Rep. No. 95-948 at 6.

subsequently only able to find part-time work, and approximately 35 percent are not able to secure new employment within a year of searching.[19] Additionally, the same Federal Reserve Bank study found that when men and women were able to find new full-time work after a short break in employment, they earned an average of 13-17 percent less at their new jobs.[20] Moreover, women are less likely than men to secure new employment, so their prospects for finding employment after losing a job due to an employer's failure to provide accommodations and/or earning an income commensurate with their previous positions likely are even bleaker.[21] In fact, the Department of Labor has found that women are nearly twice as likely as men to work part-time, and that one in five women working part-time does so because she is unable to find full-time work.[22]

Losing a job can mean losing more than just income; periods of unemployment can cause workers' job skills to atrophy, making them less attractive to potential employers and depressing their future wages.[23] According to one

---

[19] *See* Henry S. Farber, *What Do We Know About Job Loss In The United States? Evidence from the Displaced Workers Survey, 1984-2004*, Federal Reserve Bank of Chicago, 24 (2005), http://www.chicagofed.org/digital_assets/publications/economic_perspectives/2005/ep_2qtr2005_part2_farber.pdf.

[20] *See id.* at 25.

[21] *See id.* at 18.

[22] *See* U.S. Dep't. of Labor, *Women's Employment During the Recovery*, http://dol.gov/_sec/media/reports/femalelaborforce (last visited Sept. 10, 2014).

[23] *See* Sherif Khalifa, *Labor Mismatch, Skill Obsolescence, and Unemployment Persistence,* Cal. State Univ., Fullerton, 2, 4

study, workers lose five percentile points worth of job skills for every year of unemployment.[24] This again leads to a decrease in wages. Even once reemployed, research shows that "displaced workers face significant earnings losses [for] up to 20 years after being laid-off, with wages about 15 percent lower for laid-off workers after being reemployed compared to workers who were employed continuously."[25]

Moreover, some employers screen out applicants based on duration of unemployment.[26] Indeed, "[l]ong term unemployed workers with relevant work experience are less likely to be invited for an interview than recently unemployed job applicants with no relevant experience."[27] Thus,

---

(2013), http://www.business.fullerton.edu/economics/skhalifa/PDFPaper16.pdf.

[24] *See* Per-Anders Edin & Magnus Gustavsson, *Time Out Of Work And Skill Depreciation*, 61 Cornell Indus. & Lab. Rel. Rev. 163, 163 (2008), *available at* http://digitalcommons.ilr.cornell.edu/cgi/viewcontent.cgi?article=1318&context=ilrreview; *see also* Executive Office of the President, *Addressing the Negative Cycle of Long-Term Unemployment,* 5, 16-17 (Jan. 2014), http://www.whitehouse.gov/sites/default/files/docs/wh_report_addressing_the_negative_cycle_of_long-term_unemployment_1-31-14_-_final3.pdf [hereinafter *Addressing the Negative Cycle of Long-Term Unemployment*].

[25] *Addressing the Negative Cycle of Long-Term Unemployment*, *supra* note 24, at 4 (citing Justin Barnett & Amanda Michaud, *Wage Scars from Job Loss* (U. MN., Working Paper, 2012)).

[26] *See id.* at 14. (citing Rand Ghayad, *The Jobless Trap* (Northeastern University Dep't. of Economics, Working Paper, 2013), *available at* http://media.wix.com/ugd/576e9a_f6cf3b6661e44621ad26547112f66691.pdf).

[27] *Id.* (emphasis omitted).

failing to accommodate women can lead to permanent and substantial economic damage.

Black women are more likely than women of other racial backgrounds to require accommodations for pregnancy-related conditions. The reason is that, according to the Bureau of Labor Statistics, Black women are overrepresented in low-wage jobs, accounting for 15 percent of women making the minimum wage despite constituting less than 13 percent of the female workforce.[28] These jobs are more likely than higher-wage jobs to be physically demanding, making accommodations more important because physically demanding work carries a statistically-significant increased risk of preterm delivery and low birth weight.[29]

---

[28] *It Shouldn't Be A Heavy Lift: Fair Treatment For Pregnant Workers,* Nat'l Women's Law Ctr., 7 (2013), http://www.nwlc.org/sites/default/files/pdfs/pregnant_workers.pdf [hereinafter *It Shouldn't Be A Heavy Lift: Fair Treatment For Pregnant Workers*] (citing *Fair Pay for Women Requires Increasing the Minimum Wage and Tipped Minimum Wage*, Nat'l Women's Law Ctr. (Sept. 5, 2014), http://www.nwlc.org/sites/default/files/pdfs/fair_pay_for_women_requires_increasing_the_minimum_wage_and_tipped_minimum_wage_sept_2014.pdf [hereinafter *Fair Pay for Women Requires Increasing the Minimum Wage and Tipped Minimum Wage*]; U.S. Bureau of Labor Statistics, *Table 4. Employed Foreign-Born and Native-Born Persons 16 Years and Over by Occupation and Sex, 2013 Annual Averages*, (May 22, 2014), http://www.bls.gov/news.release/forbrn.t04.htm; U.S. Bureau of Labor Statistics *Current Population Survey, 2012 Annual Averages Table 39*, http://www.bls.gov/cps/cpsaat39.pdf (last visited Sept. 10, 2014)).

[29] *See* Letter from Wendy Chavkin, MD, MPH, to New York City Council Member James Vacca, (Nov. 29, 2012),

Low-wage jobs also are less likely to have flexible schedules or offer accommodations.

> Over 40 percent of full-time low-wage workers report that their employers do not permit them to decide when to take their breaks; between two-thirds and three-quarters of full-time low-wage workers report that they are unable to choose their start and quit times; and roughly half report having very little or no control over the scheduling of hours more generally.[30]

Accordingly, Black women are more likely to require accommodations and less likely to receive them.

In passing the Act, Congress looked at evidence of the effects that failing to accommodate pregnancy and related conditions have on women. Recognizing the importance of these negative effects prompted Congress to draft the broader second clause of Act to require that pregnant women be treated the same as other employees "similar in their ability or inability to work." Congress's conclusion that it was necessary to broaden the scope of

---

available at http://www.abetterbalance.org/web/images/stories/Chavkin_letter_FINAL.pdf.

[30] *See It Shouldn't Be A Heavy Lift: Fair Treatment For Pregnant Workers*, *supra* note 28, at 7 (citing Liz Watson & Jennifer Swanberg, *Flexible Workplace Solutions for Low-Wage Hourly Workers: A Framework for a National Conversation*, Georgetown Law & Univ. KY, 19 (May 2011), http://workplaceflexibility2010.org/images/uploads/whatsnew/Flexible%20Workplace%20Solutions%20for%20Low-Wage%20Hourly%20Workers.pdf).

protection through the second clause was well supported then, and the trends that Congress sought to remedy continue today (especially for Black women).

III. WITHOUT THE SECOND CLAUSE OF THE ACT, FAMILIES AND COMMUNITIES (AND PARTICULARLY BLACK FAMILIES AND COMMUNITIES) SUFFER LASTING HARM.

When it passed the Act, Congress also considered the impact that failing to accommodate pregnancy in the workforce would have on women's families and, by extension, their communities. When Congress passed the Act, it recognized that women contributed more than 40 percent of the total household income in 24 percent of American families.[31] It also recognized that 70 percent of all women working in America were either the sole wage earner in their households (either because their husbands did not work or because they were single, divorced, or widowed) or had a spouse who made less than $7,000 per year (approximately 231 percent of the poverty line for a man with a two person family with a female head of household in 1977).[32] Congress also found that 10 percent of children being born at the time would be raised by a mother who was the sole worker in her household.[33] Accordingly, when Congress passed the Act, it did so

---

[31] S. Rep. No. 95-331 at 9.

[32] *Id.*; U.S. Census Bureau, *Poverty Thresholds 1977*, https://www.census.gov/hhes/www/poverty/data/threshld/thresh77.html (last visited Sept. 10, 2014).

[33] S. Rep. No. 95-331 at 9.

recognizing that women played a major part in their families' economic security.

Since Congress passed the Act, women have come to contribute even more significantly to family income. In 2011, 40 percent of women in the workforce were the head of household.[34] Of these female heads of household, "37 [percent] are married mothers who have a higher income than their husbands," and "63 [percent] are single mothers."[35] In 2013, 69.9 percent of married mothers and 84.2 percent of single mothers were members of the workforce.[36]

Moreover, as women's financial contributions to their families increase, so too does the potential for economic harm to families and communities if pregnancy is not accommodated. As discussed above, when women lose their jobs, they often are unable to secure new jobs, and if they do, those jobs often pay less than their previous jobs, leading to increasing economic damage.[37] Research shows that the children of economically disadvantaged parents experience poverty at sharply higher rates than the

---

[34] Wendy Wang, Kim Parker & Paul Taylor, *Breadwinner Moms: Mothers Are the Sole or Primary Provider in Four-in-Ten Households with Children; Public Conflicted about the Growing Trend*, Pew Research Center (May 29, 2013), http://www.pewsocialtrends.org/files/2013/05/Breadwinner_moms_final.pdf.

[35] *Id*.

[36] U.S. Dep't. of Labor, *Latest Annual Data*, http://www.dol.gov/wb/stats/recentfacts.htm (last visited Sept. 10, 2014).

[37] *See* Farber, *supra* note 19, at 18.

general public. [38] Moreover, such workers often cannot afford to provide extracurricular support to educate and nurture their children.[39] Consequently, children in low-income families are more likely to drop out of school, experience health problems, and bear children at a young age – potentially perpetuating the cycle for yet another generation.[40]

These problems are particularly pronounced in the Black community because Black women are overrepresented in low-wage jobs, and are more likely than women of other racial backgrounds to have to support children on their own. "Among mothers with children under 18, Black mothers (75.6 percent) were more likely to be in the labor force than White (69.6 percent), Asian (64.2 percent), or Hispanic (61.2 percent) mothers."[41] Additionally, single working mothers who are the sole breadwinner are more likely to be young Black women or Hispanic women than women of any other race.[42]

---

[38] *See* John Irons, *Economic Scarring: The Long-Term Impacts of the Recession*, Economic Policy Institute, (Sept. 30, 2009), https://docs.google.com/viewer?url=http://www.epi.org/page/-/img/110209scarring.pdf&hl=en_US&embedded=true.

[39] *See* Lisa Dodson & Randy Albelda, *How Youth Are Put At Risk By Parents' Low-Wage Jobs*, UMASS Boston Ctr. For Social Policy (2012), http://cdn.umb.edu/images/centers_institutes/center_social_policy/Youth_at_RiskParents_Low_Wage_Jobs_Fall_121.pdf.

[40] *See id.* at 1, 12-14.

[41] U.S. Bureau of Labor Statistics, Rep. 1050, *Labor Force Characteristics by Race and Ethnicity, 2013,* 6 (May 2013), *available at* http://www.bls.gov/cps/cpsrace2013.pdf; *see also id.* at 37-39.

[42] *See* Wang, Parker & Taylor, *supra* note 34, at 1, 18-19.

Moreover, economic security and equality of opportunity are directly connected to the success of the next generation.[43] Thus, the inter-generational consequences of failing to accommodate pregnancy-related limitations fall most heavily on Black families and communities, creating a cycle of poverty and disadvantage.[44]

Research shows that "young people in single-parent families . . . and families of color face exaggerated challenges and responsibilities . . . that may demand more of their parent's time and attention to assist family needs than other youth."[45] These same children "face safety issues that might be mitigated by parents' higher income and by greater flexibility in work schedules that would enable parents to be available more to protect and monitor their adolescents."[46]

The consequences of forcing women, and particularly Black women, to choose between their jobs and the health of their pregnancies can be long lasting and widespread. Congress knew this, and drafted the second clause of the Act to try to prevent it. Accordingly, the Court should interpret that clause to provide the protection to women, and especially Black women, that Congress intended.

---

[43] *See* Irons, *supra* note 38, at 2; *see also* Dodson & Albelda, *supra* note 39, at 9-12.

[44] *See Fair Pay for Women Requires Increasing the Minimum Wage and Tipped Minimum Wage*, *supra* note 28; Barbara Ehrenreich, *It Is Expensive To Be Poor*, The Atlantic (Jan. 13, 2014), http://www.theatlantic.com/business/archive/2014/01/it-is-expensive-to-be-poor/282979.

[45] Dodson & Albelda, *supra* note 39, at 17.

[46] *See id.*

IV. CONCLUSION

For the reasons set forth above, the Imperative supports Petitioner and respectfully requests that this Court reverse the decision below.

September 11, 2014

Respectfully submitted,

Jonathan M. Cohen
Counsel of Record
Kami E. Quinn
Jenna A. Hudson
Kristiné Hansen
James Liddell
GILBERT LLP
1100 New York Ave., N.W.,
Suite 700
Washington, DC 20005
(202) 772-2259
cohenj@gotofirm.com