

Court File No. CV-16-544546

ONTARIO
SUPERIOR COURT OF JUSTICE

BETWEEN:

DIANE ZETTEL, CAMERON GRANT and CHAD HAGEL
Applicants

- and -

UNIVERSITY OF TORONTO MISSISSAUGA STUDENTS' UNION
Respondent

CROSS-EXAMINATION OF DIANE ZETTEL
on her Affidavit sworn January 9, 2016
held at the offices of ASAP Reporting Services Inc.,
333 Bay Street, Suite 900, Toronto, Ontario,
on Tuesday, March 15, 2016, at 4:19 p.m.

CONDENSED TRANSCRIPT WITH INDEX

APPEARANCES:

Marty Moore on behalf of the Applicants
Alan Honner

Alexi Wood on behalf of the Respondent
Jennifer Saville

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LIST OF UNDERTAKINGS

Undertakings (U/T) found at pages:
18, 26, 27, and 31

LIST OF EXHIBITS

NO .	DESCRIPTION	PAGE
1	Newspaper article from the UTM newspaper	25

1 Toronto, Ontario
2 --- Upon commencing Tuesday, March 15, 2016, at
3 4:19 p.m.
4 SWORN: DIANE ZETTEL
5 CROSS-EXAMINATION BY MS. WOOD:
6 1 Q. Good afternoon, Ms.
7 Zettel. Am I am pronouncing your name correctly?
8 A. Yes.
9 2 Q. You here on behalf of the
10 University of Toronto Mississauga Students for
11 Life. Is that correct?
12 A. Yes.
13 3 Q. Your answers today will
14 bind -- I am just going to refer to it as SFL.
15 Your answers today will bind SFL?
16 A. Yes.
17 4 Q. Just a moment ago, you
18 took an oath on the Bible?
19 A. Yes.
20 5 Q. That oath is binding on
21 your conscience?
22 A. Yes.
23 6 Q. You understand you are to
24 tell the truth today?
25 A. Yes.

1 of the files on the USB drive appears to be an
2 audio file of some sort.
3 We have tried on a couple of
4 computers, and we are not able to own it. If we
5 could get a copy of that that is actually
6 openable, that would be great. Have you been able
7 to open it?
8 A. I don't know. Not
9 from -- like, I don't know. It is -- another club
10 member put that together. I can maybe ask him if
11 he could -- I don't know.
12 9 Q. Who provided you with the
13 audio recording?
14 A. Cameron Grant.
15 10 Q. Cameron Grant?
16 A. Yes.
17 11 Q. What is that recording?
18 A. It was from the, I
19 believe, November 6th meeting that we had with the
20 Clubs Committee.
21 12 Q. It is an audio recording
22 taken of the meeting with the Clubs Committee?
23 A. Yes.
24 13 Q. Did you tell the Clubs
25 Committee that you were recording the conversation

1 7 Q. Before we get going, I
2 just wanted to ask your counsel a couple of
3 questions quickly on the record. First, Mr.
4 Moore, you provided me with an affidavit of
5 Michael Kennedy that was sworn on March 14, 2016.
6 I got a PDF of it in my office on Friday; correct?
7 MR. MOORE: Yes.
8 MS. WOOD: We still don't have
9 a copy with exhibits.
10 MR. MOORE: I don't have a
11 copy with exhibits either. I apologize for that.
12 MS. WOOD: No problem.
13 MR. MOORE: I will get you
14 that copy as soon as possible. I apologize for
15 the delay.
16 MS. WOOD: Not a problem. I
17 wanted to clarify about that. I don't expect that
18 I need to cross-examine Mr. Kennedy on this. I
19 wanted to clarify that we still needed the ones
20 with the exhibits. Thank you.
21 8 Q. The second comment --
22 sort of housekeeping issue, Ms. Zettel, throughout
23 the course of the day, we have had some
24 conversations with Mr. Moore with regards to a USB
25 drive that was provided to us earlier today. One

1 that you were having with them?
2 A. I believe so. I don't
3 know.
4 14 Q. Is it a complete
5 recording of the entire meeting?
6 A. I am unsure. I have not
7 actually listened to it.
8 15 Q. I may have some questions
9 obviously arising from this recording. I don't
10 know how it was made, the circumstances under
11 which it was made, if it was made surreptitiously.
12 That will be a problem. These are some question
13 that I obviously will have remaining open after
14 the end of today.
15 MR. MOORE: All right.
16 MS. WOOD:
17 16 Q. Ms. Zettel, can you spell
18 your name for the record, please?
19 A. Just my last name?
20 17 Q. Both first and last name,
21 please?
22 A. D-I-A-N-E Z-E-T-T-E-L.
23 18 Q. You are currently the
24 president of Students for Life at UTM?
25 A. Yes.

1 19 Q. You are a fourth year
2 student?
3 A. Yes.
4 20 Q. You are a full-time
5 student?
6 A. Yes.
7 21 Q. For how long have you
8 have been the president of SFL?
9 A. Since September of this
10 year, so 2015.
11 22 Q. September 2015?
12 A. Yes.
13 23 Q. Did you hold any
14 positions with SFL before that time?
15 A. I was an executive member
16 in the year, school year, 2014-2015.
17 24 Q. What do you mean by "an
18 executive member"?
19 A. I was -- I held the
20 position of -- I believe it was secretary during
21 that year.
22 25 Q. Did SFL exist in any --
23 my understanding is that SFL was first approved as
24 a UTMSU recognized student group in the school
25 year 2014-2015; correct?

1 33 Q. How did you know Lisa?
2 A. We were friends. We met
3 through -- I think we met through the Catholic
4 Club.
5 34 Q. Did Lisa approach you to
6 become a member of the executive of SFL?
7 A. Yes.
8 35 Q. What did she say to you
9 when she approached you to become a member of SFL?
10 A. I am not exactly sure. I
11 think just that she was planning on starting up
12 this club and was wondering if I would become an
13 executive member.
14 36 Q. What did she say the club
15 would be?
16 A. A pro-life club.
17 37 Q. What did that mean to
18 you?
19 A. To me, it meant a club on
20 campus that defended the rights of humans at all
21 stages of life.
22 38 Q. Do you know who else Lisa
23 approached?
24 A. To become executive?
25 39 Q. To become involved in

1 A. Yes.
2 26 Q. Did SFL exist in any form
3 prior to the school year 2014-2015?
4 A. No.
5 27 Q. You didn't exist as an
6 unrecognized club on campus prior to the 2014-2015
7 school year?
8 A. No.
9 28 Q. It is fair to say then
10 that SFL was founded in 2014-2015?
11 A. Yes.
12 29 Q. Who founded SFL?
13 A. A former student Lisa
14 Caballero.
15 30 Q. She was the only one?
16 A. Yes. She was the main
17 one who -- I would say "yes." She was the main
18 founder, yes.
19 31 Q. Is she the one who
20 submitted the application to UTMSU in 2014?
21 A. Yes.
22 32 Q. Your name was also on
23 that list as one of the proposed initial
24 executives; correct?
25 A. Yes.

1 SFL, to help start the club.
2 A. I am not exactly sure.
3 Like, I believe she approached Cameron, as well.
4 I'm not exactly -- I can't speak for him.
5 40 Q. He was one of the initial
6 executives, as well, correct?
7 A. Yes.
8 41 Q. At some point, you must
9 have had a conversation that involved both Lisa
10 and Cameron about putting your names on the
11 executive; correct?
12 A. Yes.
13 42 Q. At that point, what --
14 again, it was Lisa who was putting together the
15 application to UTMSU?
16 A. Yes.
17 43 Q. Do you know when Lisa
18 started to think about founding SFL?
19 A. I believe she started to
20 think about it the year prior to that, so the year
21 2013-2014.
22 44 Q. Do you know what prompted
23 her to want to start the club?
24 A. I am not exactly sure. I
25 guess just the lack of a pro-life club on the

1 campus.
2 45 Q. Do you know if she spoke
3 to any other groups -- I will start smaller. Do
4 you know if she spoke to any other pro-life
5 organizations on any other campuses?
6 A. I honestly don't know.
7 46 Q. Did you ever speak to any
8 other pro-life organizations on other campuses?
9 A. No.
10 MR. MOORE: Clarification of
11 the timeframe of this?
12 MS. WOOD:
13 47 Q. Before they submitted the
14 application, so when they were building up to
15 launching the club.
16 A. I personally didn't speak
17 to any other pro-life clubs.
18 48 Q. Do you know, prior to
19 submitting the application in summer of 2014, did
20 Lisa speak to any other groups to help her launch
21 the club?
22 A. I know she spoke with
23 NCLN to help.
24 49 Q. What is NCLN?
25 A. Sorry. National Campus

1 Life Network.
2 50 Q. What conversation did
3 Lisa have with NCLN?
4 A. I am not exactly sure,
5 but I believe she just said that she wanted to
6 start a pro-life club on our campus and was
7 wondering if they would be able to provide some
8 support.
9 51 Q. Did they?
10 A. Yes.
11 52 Q. What support did they
12 provide?
13 A. They helped provide us
14 with, I guess, resources for how to start a club,
15 different ideas for club events.
16 53 Q. What else?
17 A. I guess they -- like,
18 their campus coordinator came to our campus and
19 helped to train some of our members.
20 54 Q. What else?
21 A. I am not exactly sure.
22 55 Q. Did they provide you with
23 a website?
24 A. They provided -- not at
25 that time.

1 56 Q. Not at that time?
2 A. No.
3 57 Q. Prior to submitting the
4 application in present 2014, we have talked about
5 a couple of things. I want to take them step by
6 step. You said they provided you with resources
7 to start a club. With what resources did they
8 provide you?
9 A. I don't know. I guess
10 just -- I am not exactly sure, but just, I guess,
11 ideas for how to, you know, create events, how to
12 reach out to people, how to -- I don't know. Just
13 how to organize the club itself and, you know, how
14 to hold meetings and everything.
15 58 Q. What were some of the
16 suggestions for events?
17 A. They suggested inviting
18 speakers, having movie nights, doing outreach on
19 campus, speaking with students on campus.
20 59 Q. Did they offer to help
21 coordinate bringing in speakers and holding movie
22 nights?
23 A. Yes. I don't know if
24 they, like, directly offered specifically but,
25 yes.

1 60 Q. Your understanding was
2 they would help assist and facilitate that if you
3 wanted them to?
4 A. Yes.
5 61 Q. You also said their
6 campus coordinator came to train members. When
7 did that happen approximately?
8 A. Like, I guess that would
9 have been later, once the club was already in
10 existence, so during that year of its first year
11 of existence.
12 62 Q. In the 2014-2015 school
13 year?
14 A. Yes.
15 63 Q. Who was the campus
16 coordinator who came? What was their name?
17 A. Clarissa Canaria.
18 64 Q. Where did she come from?
19 Where is she headquartered?
20 A. Toronto.
21 65 Q. What is her job? Do you
22 know?
23 A. She is a clubs campus
24 coordinator.
25 66 Q. What does that mean?

1 A. So basically, she just
2 a -- for all the southwestern Ontario
3 universities, she is kind of able to help any
4 pro-life clubs with creating a club, with running
5 their club, with suggestion for events and how to
6 keep the clubs going.
7 67 Q. You said she came to
8 train your members. On what was she training your
9 members?
10 A. Just pro-life
11 apologetics.
12 68 Q. What does that mean?
13 A. I guess just how to
14 defend the pro-life position.
15 69 Q. Did she provide you with
16 any materials, printed pamphlets or posters or
17 display materials?
18 A. Yes. She provided us
19 with pamphlets.
20 70 Q. Do you still have those
21 pamphlets?
22 A. No. Not the ones she
23 provided us with.
24 71 Q. Do you have other
25 pamphlets now?

1 campus.
2 MR. MOORE: I don't know if
3 the fact that they have pamphlets right now
4 indicates what those pamphlets are being used for.
5 MS. WOOD: I am happy to
6 discuss that with her.
7 75 Q. You originally had one
8 set of pamphlets through NCLN and currently have
9 different pamphlets. Have you distributed those
10 pamphlets on campus?
11 A. Yes.
12 76 Q. You distributed the first
13 set of pamphlets on campus from 2014 to 2015, and
14 you are now distributing another set of pamphlets
15 on campus?
16 A. Yes.
17 MS. WOOD: May I have an
18 undertaking to provide that pamphlet?
19 U/T MR. MOORE: Yes.
20 MS. WOOD:
21 77 Q. What other training
22 materials -- you said she brought training
23 materials. What were those materials?
24 A. I guess no other real
25 materials, just -- she just had a presentation and

1 A. Yes. We have different
2 ones this year.
3 72 Q. Are they still through
4 NCLN?
5 A. Yes.
6 73 Q. Can I get a copy of one
7 of those pamphlets, please?
8 A. Yes.
9 74 Q. Did she provide you with
10 any other --
11 MR. MOORE: Can I just -- I
12 don't know if that was a request for an
13 undertaking, but I don't see how that pamphlet is
14 relevant to the discussion.
15 MS. WOOD: It goes to their
16 current activities on campus that they are
17 currently undertaking.
18 MR. MOORE: How is that
19 relevant right now?
20 MS. WOOD: They currently have
21 an active -- they currently have a presence on
22 campus. She has alleged in her claim they are
23 prevented from having a presence on campus. If
24 she has pamphlets that are provided through NCLN,
25 that goes to their ability to have a presence on

1 provided us with -- yes, information.
2 78 Q. She had a presentation?
3 A. Yes.
4 79 Q. What was the
5 presentation?
6 A. It was, like I said, just
7 a PowerPoint presentation for how to defend the
8 pro-life perspective.
9 80 Q. Who attended that
10 training session?
11 A. A number of members of
12 the club or people who had signed up on the club's
13 list. At this point, I honestly can't remember
14 everybody who was there.
15 81 Q. Approximately how many
16 people came to that?
17 A. I am guessing around like
18 5 to 10 people.
19 82 Q. What is SFL's current
20 relationship with NCLN?
21 A. They are still providing
22 us with, you know, resources and help to keep our
23 club going and help us remain active.
24 83 Q. What resources?
25 A. They provide us with --

1 like I said, they provide us with templates or
2 outlines for how to engage students in discussion
3 about abortion. They provide us with the
4 post-cards that we hand out when we do that kind
5 of outreach. They provide us with ideas for
6 monthly activities that we can organize on campus.
7 84 Q. Are you currently using
8 those templates for your activities on campus?
9 A. Yes.
10 85 Q. You are currently -- are
11 you currently having monthly activities on campus?
12 A. Yes. We are trying.
13 86 Q. What are the activities
14 that you are currently having?
15 A. I guess one of them was,
16 like, just during February, we handed out candies
17 with little facts on them. During March, we
18 handed out different flyers with information on
19 them. We are hoping to have a guest speaker come
20 in next month.
21 87 Q. What were the flyers you
22 were handing out in March?
23 A. They were flyers showing
24 the -- I may have the age wrong, but it is the
25 actual size of, I think, an eight-week-old's feet.

1 you would want to change from the interview?
2 A. Not that I can think of
3 now.
4 94 Q. How is it that you came
5 to be interviewed by Mr. Levant?
6 A. Shortly after the
7 affidavit was made public, he contacted me or a
8 member of his team contacted me and asked if I
9 would want to be interviewed.
10 95 Q. Do you know how he found
11 out about the litigation?
12 A. I don't know.
13 96 Q. During the interview with
14 Mr. Levant, you both discuss John Carpay and the
15 Justice Centre for Constitutional Freedoms?
16 A. Yes.
17 97 Q. Who is John Carpay?
18 A. He is a lawyer at the
19 Justice Centre for Constitutional Freedoms.
20 98 Q. Do you know him?
21 A. Not personally, no.
22 99 Q. You have ever spoken to
23 him?
24 A. Over the phone, yes, but
25 not in person.

1 It is basically just showing the size of their
2 feet.
3 88 Q. Any other flyers that
4 were handing out in March?
5 A. I guess when we do our
6 outreach, we have postcards we hand out to people
7 if they are interested. We have the ones that I
8 already mentioned that were provided by NCLN.
9 Then we also have some that were just created by
10 our club.
11 89 Q. Your club has created its
12 own set of materials that it is distributing, as
13 well?
14 A. Yes.
15 90 Q. Shortly on SFL filed this
16 application, you were interviewed by Ezra Levant?
17 A. Yes.
18 91 Q. Have you watched this
19 video? It is available on YouTube. Have you
20 watched the video?
21 A. Yes.
22 92 Q. Are your words accurately
23 documented in the interview?
24 A. I believe so.
25 93 Q. Is there anything that

1 100 Q. How did you come to meet
2 him?
3 A. In September, when we
4 first started, you know, dealing with the UTMSU
5 and with the denial of our club status, we went
6 to, I guess, NCLN and asked what we should do in
7 response to the decision made by UTMSU. They
8 directed us to the, I guess, legal counsel of
9 JCCF.
10 101 Q. In the interview, Mr.
11 Levant says, "That obviously Mr. Carpay is 'not
12 charging you' for his legal fees." Is that
13 accurate?
14 A. Yes.
15 102 Q. Mr. Levant also states in
16 the interview that he has offered to fundraise for
17 the SFL case; correct?
18 A. Yes.
19 103 Q. Has Mr. Levant made any
20 donations to the SFL?
21 A. No. No donations would
22 go directly to us. They would go to the JCCF.
23 104 Q. Do you know if Mr. Levant
24 has made donations to the JCCF on behalf of SFL?
25 A. I am not sure.

1 105 Q. In the interview, Mr.
2 Levant suggests his viewers can go to a website
3 called therealbigots.com and donate to fund the
4 SFL litigation. Have you seen this website?
5 A. No.
6 106 Q. Do you know if the JCCF
7 has received funding through therealbigots.com to
8 fund the SFL litigation?
9 A. I am not sure.
10 107 Q. Does SFL fundraise?
11 A. No.
12 108 Q. What is the SFL's
13 operating budget? How do you have money for
14 operations if you don't fundraise?
15 A. We receive donations. We
16 received a donation this year from the Mississauga
17 Right to Life. That has been the money that we
18 have been using to operate.
19 109 Q. Have you received any
20 donations from any other sources?
21 A. No.
22 110 Q. NCLN doesn't provide any
23 funding? It just provides printed materials and
24 resources?
25 A. Yes.

1 111 Q. Yesterday, a newspaper
2 article appeared in The Medium, which I understand
3 to be the UTM newspaper. Have you seen this
4 article?
5 A. Yes.
6 112 Q. Is this the article?
7 A. Yes.
8 MS. WOOD: I would like to
9 have this marked as Exhibit 1, please.
10 EXHIBIT NO. 1: Newspaper
11 article from the UTM
12 newspaper.
13 MS. WOOD:
14 113 Q. I take it then that you
15 were interviewed by Ms. Danesi, the reporter who
16 wrote this article?
17 A. Yes, through e-mail.
18 114 Q. These quotes are accurate
19 in the article?
20 A. Yes.
21 115 Q. Did you contact the
22 reporter first, or did she contact you first?
23 A. She contacted me first.
24 116 Q. Do you know what her
25 interest was in writing this article?

1 A. She had written an
2 article previously when the -- I guess, this first
3 began, when the court action was first filed. She
4 had wanted to do a follow-up story.
5 117 Q. How many e-mails did you
6 send to her?
7 A. I am not exactly sure. I
8 could go back and check, but I believe maybe two
9 or three.
10 118 Q. I would like you to go
11 back and check, please. I would like to see
12 copies of those e-mails, please.
13 U/T A. All right.
14 119 Q. Thank you. Who is
15 Marigrace Noronha?
16 A. She is a member of the
17 UTM SFL.
18 120 Q. How do you know her?
19 A. Just through the Students
20 for Life club.
21 121 Q. At its 23 November 2015
22 meeting, the SFL attempted to elect her as the
23 fourth executive; correct?
24 A. Yes.
25 122 Q. Did you ask Ms. Noronha

1 to become the fourth member of the executive?
2 A. I don't think I asked her
3 personally. We made an appeal to all of our club
4 members looking for an executive.
5 123 Q. She volunteered?
6 A. Yes.
7 124 Q. Whether did you make that
8 appeal to the members of SFL for the fourth
9 executive?
10 A. I am not exactly sure.
11 125 Q. Could you find out and
12 let me know, please?
13 U/T A. Yes.
14 126 Q. How did you make that
15 appeal to the members of SFL? Was it an e-mail?
16 A. Yes, I believe it was an
17 e-mail.
18 127 Q. I would like to go to the
19 23 November 2015 meeting where SFL meet to elect
20 the fourth member of its executive. You
21 understood going into that meeting that the UTMSU
22 requirements for UTMSU student groups were that
23 they had to have four executives; correct?
24 A. Yes.
25 128 Q. The fact that there were

1 only three executives had been noted by the UTMSU
2 as a constitutional discrepancy for SFL; correct?
3 A. Yes.
4 129 Q. And that SFL had agreed
5 to attempt to fix those discrepancies; correct?
6 A. Yes.
7 130 Q. SFL selected the date for
8 the November 23rd meeting; correct?
9 A. Yes.
10 131 Q. If I could have you turn,
11 please, to page 361 of our responding application
12 record, this is a chain of e-mails that starts on
13 page 361 and continues to page 363. It is a chain
14 of e-mails between Students for Life at UTM and
15 Russ Adade who is the VP Campus Life at UTMSU;
16 correct?
17 A. Yes.
18 132 Q. Do you recognize these
19 e-mails?
20 A. Yes.
21 133 Q. If I could -- just in
22 sort of summary, the initial e-mails say they are
23 trying to set up a date for the meeting. SFL --
24 it is actually Cameron -- wants to clarify that
25 the meeting is going to be on November 16th.

1 boardroom booking, did it?
2 A. No.
3 136 Q. If I could turn you to
4 paragraph 25 of your affidavit, please, the second
5 line of that paragraph you state, "We had notified
6 all the SFL members of the meeting." (As read.)
7 That is reference to the 23 November meeting that
8 we have just been discussing?
9 A. Yes.
10 137 Q. How did you notify all of
11 the SFL members of the meeting?
12 A. Through an e-mail.
13 138 Q. What did you say to them
14 in that e-mail?
15 A. I guess that we were
16 holding a general meeting for our club to -- I
17 guess, to elect a fourth executive member and make
18 the needed amendments to our constitution so that
19 we could be moved forward to being recognized as a
20 club with UTMSU.
21 139 Q. Do you know when you sent
22 that e-mail?
23 A. I don't know.
24 140 Q. Could you get me the date
25 of that e-mail, please?

1 It ends up that,
2 unfortunately, the meeting can't be on the 16th
3 because Marigrace, the person that you wanted to
4 elect as the executive, wasn't able to join, so
5 the meeting was rescheduled at that point.
6 There is some back and forth
7 about when the next meeting can be. At the end of
8 the chain, finally, it is set that -- again, there
9 is an e-mail on November 18th from Cameron:
10 "How about Monday the
11 23rd from 2 to 3? If you
12 can book the boardroom
13 for us again, that would
14 be awesome, but if not,
15 we can get a study room."
16 (As read.)
17 Russ replies on November 19th,
18 "I have booked the boardroom in the student centre
19 for next Monday at 2 to 3." (As read.) Is that
20 correct?
21 A. Yes. That looks right.
22 134 Q. The meeting was held on
23 the 23rd of November; correct?
24 A. Yes.
25 135 Q. SFL didn't pay for that

1 U/T A. All right. I will try.
2 MR. MOORE: Can I just jump in
3 on that one?
4 MS. WOOD: Yes.
5 MR. MOORE: I am not sure if
6 that e-mail was sent from an account that they no
7 longer have access to, just to put that on the
8 record I am not sure whether that is the case or
9 not.
10 MS. WOOD: If it was
11 presumably sent to other members, such as Cameron
12 Grant or Mr. Hagel who is here, presumably, they
13 would have a copy of that e-mail that was sent to
14 them.
15 141 Q. Did you copy Mr. Adade on
16 that e-mail?
17 A. No. I wasn't the one who
18 sent it, but I don't think he was.
19 142 Q. Presumably, you would be
20 able to confirm that. If you received it or Mr.
21 Grant or Mr. Hagel had received it, somebody can
22 confirm whether or not Mr. Adade was copied on it?
23 A. Yes. I believe that he
24 wasn't.
25 143 Q. Thank you. I am just

1 going to take a quick break. We can go off the
2 record.
3 --- Recess taken at 4:54 p.m.
4 --- Upon resuming at 5:00 p.m.
5 MS. WOOD: Mr. Moore, we have
6 spoken with both of my clients today, as well,
7 that we are going to leave the examinations open
8 pending the RSU decision. Also, of course, I
9 understand there is a recording that may be
10 coming, and I may have further questions related
11 to additional productions that I haven't had a
12 chance to review yet. Subject to that, those are
13 my questions for today. Thank you.
14 --- Whereupon the proceeding adjourned at
15 5:01 p.m. sine die
16
17
18
19
20
21
22
23
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