

HOW TO USE JURY INSTRUCTIONS PRETRIAL AND ESTABLISH THEMES

"There are two kinds of people in the world, those who believe there are two kinds of people in the world and those who don't." Robert Benchley,

"Behind every argument is someone's ignorance." Robert Benchley

"Anything can happen, but it usually doesn't." Robert Benchley

INTRODUCTION

This presentation concerns how to use jury instructions to frame the case, to draft the complaint, to organize your evidence, and help to establish case themes. It follows three previous presentations given at the Wyoming Trial Lawyers Association conference in 2005 and 2006. Part of those presentation will be occasionally repeated, as the strategy remains the same throughout the case.

STARTING WITH THE JURY INSTRUCTIONS

Most skill building is hierarchical. If you do the foundational things better, you will be able to do the more sophisticated things better. Start with the elements; use the jury instructions and annotations or commentaries to frame your pleadings; compare the answer to the complaint. Think of what evidence you will need to prove your case, and how you will use that evidence. Then, frame your requests for admissions around what has been denied in the answer. Again, from the beginning think, of what evidence will meet each element of your cause of action, or establish damage or injury with admissible evidence, or show that there is no evidence of a particular affirmative defense. The requests will narrow the issues, and the focus on who and what to prove will be easier. As you develop your evidence, your specific theme will become

apparent. Until a better case specific theme arises, an example of a good working theme is what David Ball calls the “teaser” – “Let me tell you the story of the speeding driver who killed a young child in Cheyenne last year.” Any humanizing theme for damages comes later, such as, “A loss too great to walk away from.” Other secondary themes focus on disproving juror negative attitudes such as those David Ball lists, and particularly to establish the defendant’s conscious bad choices, lack of personal responsibility including failing to take those reasonable steps that would have prevented your client’s injuries, and failure to take responsibility for the bad consequences of those acts or failures to act, such as failing to pay for your client’s medical bills, denying things that he, she, or it should have admitted, and forcing your client to go to trial over things any responsible person would have owned up to. Another of your guidelines should be from the Roman lawyer, Quintilian who said that the essentials of every lawsuit are: unity of approach, credibility, and emotions appropriate to the case. Part of this presentation is to suggest how those principles can work for you.

GENERAL PLEADING STRATEGY

I have to admit that I never understood pleadings as anything more than an annoyance until an older attorney told me to start with the jury instructions in drafting petitions and complaints. I had practiced for five years; I was still clueless. The only slightly good news is that the older lawyer also told me that he, himself, had only recently started doing what he had suggested to me. By using the jury instructions to outline the elements as the starting point, the chances of having a Rule 12(b)(6) motion sustained become nil. If one focuses on the elements of proof prior to filing suit, one knows what has to be proven, sets about on how to prove it, and the chances of losing

on a motion for summary judgment or directed verdict also approach zero. This approach makes drafting the statement of the case instruction much easier. Some state jury instructions, such as for Colorado and Nebraska, are online in Westlaw for easy searching and downloading. Unfortunately, Wyoming was not yet online on either Westlaw or at the Wyoming State Bar site when I checked on February 6, 2007. I have the hard copy with a CD. While you cannot search the CD, you can copy and paste text from the .pdf files. Click on the "Text Select Tool" in Adobe Reader, then copy the desired text to paste in your brief or requested jury instruction. With the online databases, such as the one on Westlaw, you can search within the annotated jury instructions for the relevant law as well as for the instructions themselves.

TWO WAYS TO APPROACH THE CHANGES IN WYOMING TORT LAW

The jury instructions, commentaries, or annotations generally should be the starting point for all research prior to filing the petition or complaint, and they help to analyze the elements and to counter the defenses. The Defense Research Institute publishes a book called, Products Liability Defenses: A State-by-State Compendium. Kim D. Cannon and Anthony Wendtland with Clint A. Langer wrote the clear, thoughtful, Wyoming chapter. I usually go to that publication first, as it will give an overview of the elements of the plaintiff's case as well as what defenses to look out for. The authors recommend not to engage in any product liability litigation in Wyoming without consulting **W.S. § 1-1-109**. The text notes the following:

Some recent appellate decisions indicate that questions remain about how strict product liability theories and ideas developed under the Second Restatement will be applied to cases tried under W.S. §1-1-109. See, *e.g. Borns v. Voss*, 70 P.3d 262

(Wyo. 2003) (affirming application of common law strict liability in dog bite cases after 1994 and noting that there are three existing theories of recovery in dog bite cases); *Call v. State Industries*, 2000 U.S. App. (10th Cir.) (affirming jury verdict in favor of plaintiff after trial court refused to offer comparative fault instruction).

In a 2003 decision, the Tenth Circuit may have hinted that W.S. §1-1-109 merely limits damage apportionment in a products liability case, but does not limit the scope of an actor's duty. *Thom v. Bristol-Myers Squibb Co.*, 353 F.3d 848 (10th Cir. 2003) (noting the Wyoming comparative fault scheme allows a party to present evidence of another party's negligence "in order to reduce damages; [it] in no way defines or affects the scope of a defendant's initial duty."); see also, *Valance v. VI-Doug, Inc.* 50 P.3d 697, 702 (Wyo. 2002).

It is possible that the Wyoming Supreme Court will fine-tune the interaction between the strict products liability theories of recovery and W.S. §1-1-109 in a way that may still somehow impose a heightened duty of care on a products liability defendant in a case tried as a comparative fault case under this statute. See, e.g., *Borns*, 70 P.3d at 274.

Their second recommendation is to review Professor Burman's excellent academic review, "Wyoming's New Comparative Fault Statute," 31 Land & Water L. Rev. 509 (1996). I would recommend both of the above to everyone.

Professor Burman suggests two problems initially, "Allowing certain types of non-negligent conduct by a plaintiff and/or third parties to be a defense to a claim for negligence seems patently unfair, and including non-parties with no procedural safeguards for plaintiffs is potentially unconstitutional." (*Supra* at 510).. Second,

Burman notes that tying the definition of “fault” to proximate cause raises difficult conceptual and practical problems. Wyo. Stat. Ann. § 1-1-109(a) provides the following definitions, “(i) “Actor” means a person or other entity, including the claimant, whose fault is determined to be a proximate cause of the death, injury or damage, whether or not the actor is a party to the litigation... (iv) “Fault” includes acts of omissions, determined to be a proximate cause of death or injury to person or property, that are in any measure negligent, or that subject an actor to strict tort or products liability, and includes breach of warranty, assumption of risk and misuse or alteration of a product.” Burman asserts that the inclusion of “proximate cause” in the definition of “actor” is unfortunate for two reasons: first, because of its traditional use in relation to torts and negligence in particular; second, even in the context of tort law its meaning is murky at best. (*Supra* at 513). Determination of fault is a two step process. First, to find whether the actor’s “acts or omissions... (were) a proximate cause of death or injury to person or property.” If yes, then whether those acts would subject an actor to strict tort or strict liability. As set out above “fault” includes breach of warranty, assumption of risk and misuse or alteration of a product.

The threshold question is whether the act or omission was a proximate cause of claimant’s injury? (*supra* at 514). Burman analyzes,

The Wyoming Supreme Court has expressed causation this way: “Legal cause” must be more than conduct that “created only a condition or occasion for the harm to occur . . . (It must) be a substantial factor in bringing about the harm.”

[1. JFN261](#) While that definition may appear to draw a meaningful distinction between actions or inactions that should lead to liability and those that do not, it does not. Consider, for example, the owner of a retail store that fails to clean up spilled liquid. A customer slips and falls on the liquid. The store owner could argue that the failure to clean up the liquid “created only a condition or occasion for the harm,” and the store is, therefore, not liable because there was no proximate cause under the standard of *Natural Gas Processing Co. v. Hull*. The owner

would be wrong.

The slip and fall example is based on the facts of *Rhoades v. K-Mart Corporation*. [FN27] In that case, the Wyoming Supreme Court reversed a directed verdict in favor of K-Mart. The court focussed on the foreseeability that liquid could have been spilled, and, without discussing proximate cause, said that there could be liability if the circumstances “were such as created a reasonable probability that the dangerous condition would occur.” [FN28] There was no allegation or evidence that K-Mart employees were responsible for spilling the liquid on the floor, only an assertion that they had a duty to discover and clean up the spill. The court found that the store's failure to remedy the dangerous condition presented a sufficient question to go to a jury.

The court's inconsistent treatment of proximate cause suggests another rule. Proximate cause exists if legal cause exists. That, in fact, is the rule adopted by the Restatement of Torts. “Legal cause” (the Restatement has abandoned “proximate cause”) exists “if a) (the actor's) conduct is a substantial factor in bringing about the harm, and b) there is no rule of law relieving the actor from liability because of the manner in which his negligence has resulted in the harm.” [FN29] The gist is clear. A defendant is liable if the defendant's conduct was a substantial factor in causing the plaintiff's harm and the law says there is liability. Or, to paraphrase Justice Potter Stewart, [FN30] courts know proximate cause when they see it.

Whatever the definition, “proximate cause,” or “legal cause,” is both a link between a defendant's tortious conduct and liability, and an important limitation on the defendant's liability for harm that the defendant's actions or omissions helped to cause.

A significant problem with the new statute is that the cart has been placed before the horse. Normally, a jury is asked to decide if a defendant owes a duty to the plaintiff that was breached before deciding whether that breach was a proximate cause of the plaintiff's injury. Under the new statute, however, before determining whether a claimant was negligent or is otherwise at fault, the fact finder must first determine whether the claimant's acts were a “proximate cause” of the claimant's injuries. [FN31] Asking a jury to decide whether an act or omission is a proximate cause before deciding whether the actor has breached a duty to act or not act in a certain way, or whether the actor should be held to a strict liability standard, is to ask the jury to make a conclusion about proximate cause without having the necessary foundation, for example, did the actor in question have a duty to act in a certain way and did he or she do so?

Because “proximate cause” has historically served as the necessary link between a defendant's conduct and liability, and a limitation on a defendant's liability, perhaps the best interpretation of “proximate cause” in Wyoming's comparative fault statute is that the phrase is intended to be a limitation. That is, there is some conduct by a claimant and/or other actors which, although causally linked to the claimant's injury, was not a proximate cause of the claimant's injury. This means that the fact finder may determine that although the claimant (or any other actor) was a cause in fact of the claimant's injury, the actor was not a proximate cause

of that injury. Accordingly, the fact finder should not allocate any percent age of fault to the claimant or that actor.

Construing “proximate cause” as a limitation on comparative fault is consistent with the Wyoming Supreme Court’s interpretation of Wyoming’s original comparative negligence statute. That statute provided for the reduction of a plaintiff’s damages in proportion to “the amount of *518 negligence attributed to the person recovering.” [\[FN32\]](#) In construing that statute, the court cautioned that “particular care should be taken . . . so that only the negligence that proximately causes any particular injury is considered by the jury when apportioning fault.” [\[FN33\]](#)

Since the new statute empowers the jury to find that an actor that was a cause in fact of the claimant’s injury was not a proximate cause, the instructions to the jury will need to make the distinction clear, or, come up with a different method of describing causation. Drawing the line between cause in fact and proximate cause is difficult for lawyers. It will be a more difficult task for juries. Of all the attempts to describe the causation that will lead to liability, the Restatement’s is probably the clearest. Proximate or legal cause exists “if a) (the actor’s) conduct is a substantial factor in bringing about the harm, and b) there is no rule of law relieving the actor from liability because of the manner in which his negligence has resulted in the harm.” [\[FN34\]](#)

Under this standard, a court would not, presumably, let the question of proximate cause go to the jury if there were a rule of law relieving the actor from liability, even if the actor’s acts or omissions were a substantial factor in causing the harm. Assuming no such rule exists, the jury will be left with the manageable task of deciding whether the actor’s conduct was a substantial factor in causing the claimant’s harm. Instructing the jury to focus on whether the actor’s conduct was a “substantial factor” avoids the problem presented by trying to make a distinction between conduct that merely created a condition, and other types of conduct. [\[FN35\]](#) The question for the jury will become whether the defendant’s actions in creating or allowing a dangerous condition were a substantial factor in causing the harm.

The Committee in its notes to W.C.P.J.I. 11.00 suggest that the definition of “fault” raises questions about products liability and traditional defenses such as misuse and assumption of risk and to what extent these are complete defenses or comparative fault issues

Despite the above, to draft the complaint, if one follows the format of W.C.P.J.I. notes under 3.01 is a pretty simple approach, it should pass Rule 12 muster, and I imagine it is a standard approach for most practitioners. Recall the above cited cases

where Wyo. Stat. Ann. § 1-1-109 effects damages and not initial duty. Thus, the defendant was negligent; the negligence of the defendant was a cause of injury and damage to the plaintiff; the nature and extent of those injuries and the elements of the plaintiff's damage and the amount thereof. First, identify the plaintiff, and the defendant. Next, allege that the defendant was negligent in the following particulars, and list them. Allege that this negligence was the cause of the following injury and damage to the plaintiff, and list the applicable elements from W.C.P.J.I. 4.01 and 4.06.

Ask the defendant in Requests to Admit that the plaintiff is without fault. In a separate Request ask the defendant to admit that there are no unnamed others who have any fault. In Interrogatories, ask the defendant to describe the evidence of any such fault of the plaintiff or others, and to produce any evidence of any such claimed fault. The thought is to take away surprise and perhaps open the way for a partial summary judgment. I would also ask the defendant to admit that there is no other act or failure to act by anyone that was a substantial factor in bringing about the injury or damage following W.C.P.J.I. 3.04, although this instruction may have some different language than W.S.A. § 1-1-109 by its use of the word "substantial".

CASE ANALYSIS

When you focus from the start on, "What do I need to win this case?" And "How can I win this case?" your goals become clearer. Professor James W. McElhaney, in suggests a broader perspective focusing on the "big idea." McElhaney defines the big idea as the "moral imperative," "the wrong that cries out to be set right or that has to be prevented." The big idea, McElhaney says, that "should drive everything you do." McElhaney says that inherent in every successful trial is a four step process:

- 1) I am honest;
- 2) you should believe in me;
- 3) I believe in the justice of my client's cause;
- 4) therefore, (let me structure the facts so that) you should decide the case (for yourself and) for my client. (In parenthesis added).

One difference now is that Greg Cusimano and David Wenger have taught us to add to structure the facts so that the jurors draw their own conclusions.

One of the oldest trial practice books I have is by a Roman lawyer named Quintilian who taught oratory. As mentioned, Quintilian said that the three most important things for lawyers were **unity of approach, credibility, and emotions appropriate to the case**. With those, one will win far more cases than one loses; without them, the opposite is true. Part of the art of being a lawyer is to achieve that unity between the external data with a convincing internalized approach which gets everyone emotionally involved in a good way (hopefully) with your presentation. Listening (particularly inter-active listening) enhances rapport and opens up the speaker to then listen. Credibility is enhanced by grace and humanity under pressure, and authoritative knowledge of the case. How does one unwrap and present the right emotions? The actor, director, and writer, Stanislavski sought to have his actors discover the inner truth of their roles. For example, he says:

“In our art you must live the part, every moment that you are playing it, and every time...never allow yourself to portray anything that you have not inwardly experienced and which is not even interesting to you... Truth on the stage is whatever we can believe in with sincerity, whether in ourselves or in

our colleagues...Always and forever, when you are on the stage, you must portray yourself. But it will be in an infinite variety or combinations of objectives, and given circumstances which you have prepared for your part, and which have been smelted in the furnace of your emotion memory...Consequently it is best for you to make a practice of: (1) finding your real object on the stage and getting into active communication with it, and (2) recognizing false objects, false relationships and combating them. Above all give special attention to the quality of the spiritual material on which you base your communication with others,

If someone asks you if it is cold outside, revisit it in your imagination -- how you walked or drove, how the people dressed, with hats, collars turned up, whether the snow crunched under your feet. He wanted actors to see how easily falsehoods -- those aspects of behavior that an audience can detect even without being aware -- are assumed by an untrained or inexperienced actor in performance. Stanislavski wished to analyze as far as possible the qualities of a given phenomenon to give an awareness to the actor of the complexities of human behavior. Dyer Bilgrave describes Stanislavski's directions to his actors to extract and articulate the goals of their characters from the scripts to produce realistic behavior on stage, to justify these goals to make them deeper, more necessary, more embedded in inner life. The appearance of reality is enhanced by asking the "Magic If." "If I were in Macbeth's position, what would I do?" Meaningful objectives stimulate desire. The actor must ask, "What do I do? Why do I do it? How do I do it?" Consider the matrix of time and space, economic background, work history, medical history, social history, and the plaintiff's, and

sometimes the defendant's, key formative experiences. The play in simplest form has objectives, efforts, changed circumstances, and adjustment to those changed circumstances until the objective is achieved or relinquished. The plaintiff's life becomes the trial.

ARISTOTLE'S CLASSICAL APPROACH

Aristotle in his Rhetoric, described the three elements of persuasive speech as **ethos, pathos, and logos**, and in that order. Sidney Kanazawa suggests, "If the speaker does not establish himself or herself as someone worth listening to, nothing he or she says will have any persuasive impact." Aristotle said that for a speaker to appear credible, the speaker must display practical intelligence, virtuous character, and good will.

The second element is pathos – put the black hat on the defendant even before you try to establish that emotional hook that will make the jury like, want to root for, and to help our client. I believe that this may be true for judges and juries. It is an over simplification, but some of our judges are former prosecutors who may still see the world of those with black hats and white hats. David Ball says that for jurors, if you start with your client's actions, the jurors will try to connect any information about your client into the cause of the for example, the wreck. He suggests, "**Don't talk about your client until the jurors know all about what the other side did.**" **The emotional hook is baited in voir dire in two ways. First, is what David Ball calls the "teaser" – "Let me tell you the story of the speeding driver who killed a young child in Cheyenne last year."** The next step is to establish the favorable opinion of your client.

Joshua Karton teaches attorneys to create a ten word telegram of your case. For

example, “Derelict doctor prescribes wrong drug. Kills child. Make him pay!” Who can forget, “If the glove don’t fit, you must acquit!” A secondary theme is that “This is a loss too great to walk away from.” The plaintiff is a striver and a survivor who has worked very hard at rehabilitation to get back everything he or could get, the rest is the debt that must be repaid. One way to show this is with the physical or occupational therapist who has worked so hard with the plaintiff to reach a recovery as good as it gets. The recovery efforts are verified by records of weight lifting increases and a functional capacity test. A physician testifies to the nature of the injury and the resulting impairment. Anecdotes from friends and family show how the activities of daily living provide a constant reminder of the injury or impairment that will never go away.

The third element is logos. Some generally think of it as study. For others it means “logic”. Pbs.org provides the following definition: “The Greek word logos (traditionally meaning word, thought, principle, or speech) has been used among both philosophers and theologians. In most of its usages, logos is marked by two main distinctions - the first dealing with human reason (the rationality in the human mind which seeks to attain universal understanding and harmony), the second with universal intelligence (the universal ruling force governing and revealing through the cosmos to humankind, i.e., the Divine).” For Aristotle, it may well have meant an argument or a pondering of the reasons for or against a course of action. I think the above ties well into our story telling function to move the jury to act for good reasons.

A SUMMARY OF AN ATLA APPROACH TO CASE THEMES

Charles L. Becton, in **ATLA’s Litigating Tort Cases**, says that in outline form themes demonstrate why you should win by—

- Simplifying facts and issues;
- Resolving differences in the evidence;
- Requiring that no credible person be disbelieved;
- Globalizing the claim or defense;
- Illustrating the logic of your argument;
- Undermining the opposition's case without ridicule or rancor;
- Evoking noble human qualities of fairness;
- Embracing the law. (12-12).

Becton suggest that the right theme includes motive to satisfy the jurors need to know "Why?" Thus, your theme or sub-theme must answer that question. Stanislavski thought that the triumvirate of feelings, mind and motivation impelled our psychic life. Emotions or mind drive physical actions. Richard Hornby suggests that motivation looks backwards into psychology and the past, while objectives move forward and toward a goal. Motivation may show subtext or hidden meanings. Becton advises using the following litmus test:

- (1) Does the theme summarize the story?
- (2) Does the theme have factual as well as emotional appeal?
- (3) Does the theme paint a visual image for the jury?
- (4) Does the theme blend with the life experiences, values, and perceptions of the jurors?
- (5) Does the theme apply classical rhetorical principles of ethos, pathos, and logos?
- (6) Does the theme guide the jurors decision making process?

- (7) Does the theme treat jurors like thinking adults?
- (8) Is the theme consistent with the applicable legal instructions?
- (9) Does the theme point out the injustice of the case and allow jurors to view a victory for the client as somehow advancing community interests?
- (10) Does the theme have universal application?

David Ball lists the following criteria: visceral considerations, clarity and simplicity, familiarity, and common values and concerns.

APPLYING THE THEME TO THE SPECIFIC WITNESS

The same principles enrich the testimony of any witness. Use a multi-sensory approach. Prepare your witnesses to describe or critique his or her own analysis of the situation, his or her efforts, emotions, senses, feelings, and plans. Let the defense witnesses identify whether there are any deficiencies in his or her own conduct. Would they do the same thing over again? Why not? What course would they take if they only knew...? What facts that they know now would have changed their behavior? Similarly, if you want to impeach a witness with a document, ask the witness to identify the document, then ask one or two innocuous questions before seeking the devastating admissions contained in the document.

Carl R. Rogers asserts that the most socially useful learning in the modern world is to learn the process of learning; that is, to maintain a continuing openness to experience and to incorporate oneself of the process of continuous openness and change. Just as a facilitator in the Rogerian world, if the lawyer is similarly open to change to a perpetual learning mode, it can set a similar mood or climate in your preparation of your case, your preparation of, or the examination of a witness. More

can be accomplished often if the tone is less adversarial. If the lawyer is open to the views of the witness, often the converse will be true, and once the witness feels he or she has had a fair hearing, the witness will listen to you. The same is often true for open ended questions in *voir dire*. Both depositions and *voir dire* become places to continually work on your inter-active listening and learning skills, with pacing, anchoring, and a thoughtful whole brain approach.

WHAT DO YOU BRING TO THE PICTURE?

The photographer, Ansel Adams, began as a classical pianist. He and Fred Archer developed the zone system in photography which is analogous to taking a musical scale and putting black on one end and white on the other. Zone I is black with no detail. Zone III is black or shadows with detail. Zone V is neutral grey. Zone VII is highlights or whites with detail. Adams said that taking a picture is like writing a musical score. Printing the picture is performing the score. The point is that whatever your background is, whoever you are, bring that to the your preparation, and to the trial, and show it to the witnesses. The more you are yourself and show that, the more your personal credibility will increase. Avoid acting or talking like a lawyer. Your rapport with the jury and the witnesses will increase the more you listen.

RECREATE THE SCENE OF THE ACCIDENT WITH YOUR SENSES

Now, think of how you can recreate the scene of the accident with your senses in your own imagination, and use that to recreate the emotional memory in others. Ask the defendant, "Did you hear Jennifer scream?" "You saw that she was trapped in the car?" "You heard her cries for help?" "Could you smell the smoke?" "You saw the fire department squirt away the spilled gas?" "What were your fears?" "Were you afraid

that the car would explode?” “What did you do?” Some of your secondary themes may come from this approach.

FRAMING, DE-FRAMING OR REFRAMING

Framing provides the structure to your case analysis to give it your meaning, where no such meaning or structure existed before. Deframing is the process of challenging or casting doubt on the current meaning or term definition. Think of how many times you have had an expert witness try to deframe you. Reframing is the process of providing a new or alternative meaning, and getting agreement with that meaning. You can still lead or pace the witness, or use your own personal approach if need be. One of my lawyer pals has said for years that whoever frames the case wins. If you start with the key factual assumption, put those into the “right” language, and move the witness down the path, the case is properly framed. If the witness balks at the yes/no format, let him or her be heard, and find out where the fuss is. Sometimes the issue is one of deframing the witness’s definition. As Abraham Lincoln asked, “If you call a tail a leg, how many legs does a dog have?” The answer, “Four. Calling a tail a leg, doesn’t make it a leg.” Sometimes, it can be as simple as having the witness write in his or her own qualifiers. Some examples of actual charts I have used are attached.

CONCLUSION

Start with the elements of the case from the jury instructions. Think how and with what evidence you will prove each element. Recall Quintilian: unity of approach, credibility, and emotions appropriate to the case. To achieve that unity, weave in your imagination the threads of the relevant facts with the relevant legal theories with

emotional memory. After drafting your complaint with the jury instructions, compare these to the Answer. Secure Admissions. Use requests to admit to get focused on having as many issues as possible resolved in one's favor, or at the opponent's costs when the admissions are wrongfully denied. This may also simplify the issues for trial, or let you know where the real battle is. Continue to use your themes to develop your case. Remember the advise Paracelsus gave doctors, "Listen to the patient he is giving you the diagnosis!" Listen to your client, he or she may be giving you the theme.

Michael J. Javoronok, NSBA #12027
CO Sup Ct. # 18186
MICHAEL J. JAVORONOK LAW FIRM
2425 Circle Drive, Suite 100
Scottsbluff, NE 69361
Phone: (308) 630-0808
(800) 828-8146
Fax: (308) 630-0771
E-mail: mjlaw@aol.com