

IN THE SUPREME COURT OF MISSOURI

No. SC98454

STATE EX REL. VVP SERVICES, LLC,

Relator,

v.

THE HONORABLE JOHN M. TORRENCE,

Respondent.

Original Proceeding in Prohibition

REPLY BRIEF OF RELATOR VVP SERVICES, LLC

Respectfully submitted,

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INTRODUCTION

Miller and Shriver's Response Brief underscores why this Court must make permanent its Writ of Prohibition requiring Respondent to dismiss their claims against Relator for lack of personal jurisdiction:

- Miller and Shriver concede that they offered no evidence to refute Relator's evidence contesting personal jurisdiction, and they continue to rest solely on their conclusory allegations, in violation of this Court's directives;
- Miller and Shriver concede that they rely on a conspiracy theory, or an unpled vicarious liability theory based on alleged acts of *other defendants*, which is inconsistent with Missouri law;
- Miller and Shriver concede they live and work in Kansas, and they were not involved in the PHC Litigation. They simply could not have been targeted in Missouri, nor did they suffer the brunt of alleged harm in Missouri; and
- Miller and Shriver have not established a substantial connection between their alleged harm and Relator's contacts with Missouri as required by Missouri's long-arm statute and due process.

Under Miller and Shriver's theory of personal jurisdiction, a nonresident plaintiff can haul a nonresident defendant into court in Missouri for injuries the plaintiff did not suffer here, so long as the plaintiff baldly alleges the nonresident defendant participated in a conspiracy with another who allegedly targeted Missouri residents. That theory contradicts Missouri law and should be flatly rejected by this Court.

ARGUMENT AND AUTHORITY

I. MILLER AND SHRIVER CONCEDE THEY FAILED TO PRESENT ANY EVIDENCE IN RESPONSE TO RELATOR’S EVIDENCE, AND THEY CONTINUE TO RELY ON THEIR BARE ALLEGATIONS

Relator came forward with competent, admissible evidence demonstrating that it lacks any contacts with Missouri, let alone contacts with Miller and Shriver here, that would justify Respondent’s exercise of personal jurisdiction over Relator. (A29-31). Relator also presented sworn testimony that Relator did not authorize anyone (necessarily including its employees) to create or post the blogs, and did not hire or pay anyone to create or post the blogs. (*Id.*) This Court required Miller and Shriver to respond with their own evidence refuting Relator’s evidence. *State ex rel. Cedar Crest Apartments, LLC v. Grate*, 577 S.W.3d 490, 496 n.5 (Mo. banc 2019) (“*Cedar Crest*”). ***Miller and Shriver admit that they did not do so.*** (Response Brief, p. 6). Nor do Miller and Shriver cite any authority for their propositions that they either were not required to submit contrary evidence (which ignores this Court’s prior rulings), or that they could merely respond to Relator’s evidence with pure legal argument, albeit in a single footnote in the opposition brief. (A59, fn. 1). Miller and Shriver simply ignored the evidence and improperly fell back on the conclusory allegations of the Complaint. They continue to do so here.

This Court should also reject Miller and Shriver’s suggestion that Respondent considered Relator’s evidence, weighed credibility of any witnesses, or evaluated any facts outside of the Complaint. (Response Brief, pp. 6-7). Respondent’s Order is devoid of any factual analysis, let alone any determination about Relator’s evidence. (A79). To the

contrary, Respondent’s Order makes clear that he denied Relator’s Motion to Dismiss based solely on the allegations in the Complaint. (*Id.*)

Finally, Miller and Shriver’s reliance on the affidavit of Haley Hey is similarly misplaced, and that affidavit does not support the exercise of personal jurisdiction over Relator here. First, Hey’s affidavit was never presented to or considered by Respondent in ruling on Relator’s Motion to Dismiss. Second, Hey’s testimony that she typed two of the blogs is the very type of “merits” evidence that Plaintiffs claim this Court should not and cannot consider. (Response Brief, p. 14). Third, Hey does not testify that she engaged in any conduct on behalf of or at the direction of Relator, or that she was acting in the course and scope of her employment by Relator—rather, she claims to have typed two blogs at the direction of Amit Raizada. (Response App., p. 26, ¶13). Finally, and most importantly, Hey expressly denies targeting Missouri, Plaintiffs, or anyone else in Missouri by and through the blogs. (*Id.*, ¶15). Thus, this belated evidence does not establish any contacts that Relator had with Miller or Shriver, or with Missouri.

II. MILLER AND SHRIVER CONCEDE THEY BASE PERSONAL JURISDICTION OVER RELATOR ON A CONSPIRACY THEORY OR A VICARIOUS LIABILITY THEORY PREMISED ON ALLEGED CONDUCT OF OTHERS

It is clear from Miller and Shriver’s Response Brief that they seek to establish personal jurisdiction over Relator based on alleged contacts that others may have had with Missouri. Miller and Shriver’s own “high level” summary of their arguments seals this point, as they argue: (1) ***Raizada*** directed ***Hey*** to draft two blogs; (2) ***Raizada*** paid SEO

Profile Defender \$20,000; (3) **Ruddie** modified the blogs using search engine optimization techniques to boost internet presence; and (4) **Raizada** caused the blogs to be posted to the internet. (Response Brief, p. 2). These allegations are tellingly silent as to Relator.

The Complaint is similarly devoid of any facts as to any alleged conduct of Relator itself. In their Complaint, Miller and Shriver allege five “facts” that are even arguably specific to Relator: (1) Relator employed Raizada, Hey, and Dave Diamond in California (A10, ¶48, A16, ¶88); (2) on “information and belief” Relator owned the computers used by Raizada and Hey in California (A10-11, ¶48); (3) Relator engaged SEO Profile Defender to perform work on Relator’s behalf (A14, ¶71); (4) On July 28, 2017, a call occurred between Ruddie and someone in Relator’s California offices (A15, ¶73); and (5) on “information and belief” Relator processed a payment for Michael Wolf’s purchase of a Scribd.com account in July 2017. (A14, ¶72). None of these “facts” show that Relator had any contacts with Missouri or engaged in any conduct that targeted Plaintiffs in Missouri.

Because Relator has no connection with Missouri whatsoever, Miller and Shriver repeatedly argue that Respondent can exercise personal jurisdiction over Relator based on alleged acts of Relator’s former employees, Amit Raizada and Hey, in supposedly targeting the PHC Litigation with the blogs. Alternatively, Miller and Shriver argue that personal jurisdiction exists over Relator in Missouri because Relator alleged entered into some conspiracy with the other defendants to target the PHC Litigation. This Court should reject these arguments.

First, Miller and Shriver have not even alleged some agency or vicarious liability theory based upon Relator's employment of Raizada or Hey from which any of their contacts could even possibly be imputed to Relator. Notably, Miller and Shriver do not allege Raizada or Hey acted in the course and of the scope of their employment, nor do Miller and Shriver seek to hold Relator vicariously liable for the alleged conduct of its employees. (A2-A27). Mere employment, standing alone, does not equate to any conduct by Relator, nor does it establish that any of the alleged acts of its employees were done for, at the direction, or on behalf of Relator. To the contrary, Relator's evidence, which Miller and Shriver did not refute, shows Relator did not authorize anyone (including employees) to create or post the blogs. (A28, ¶¶13-14). Similarly, as discussed above, Hey's affidavit also wholly refutes such a claim.

Second, Miller and Shriver did not allege sufficient facts from which Respondent could conclude that Relator participated in some conspiracy to harm Miller and Shriver in Missouri. Plaintiffs simply lumped Relator in with all of the other Defendants in conclusory allegations claiming that all "Defendants" coordinated with Raizada or otherwise participated in his alleged acts in posting the blogs. (*See, e.g.*, A3-A25, ¶¶ 25, 26, 30, 36, 49, 98, 103, 104, 106, 127, 128, 134, 135, 137, 138). This Court has flatly condemned such generic pleading as insufficient to establish minimum contacts for personal jurisdiction, *Cedar Crest*, 577 S.W.3d at 497, n.5 (rejecting allegations that simply refer to "defendants" as a whole), and Miller and Shriver have failed to meaningfully distinguish their defective pleading from the same type of allegations this Court has condemned.

Finally, even if facts supporting these agency theories had been alleged, both this Court and the United States Supreme Court have unequivocally confirmed that personal jurisdiction cannot be based on the alleged conduct or contacts of others—the minimum contacts required must be those of the nonresident defendant itself. *See State ex rel. LG Chem, Ltd. v. McLaughlin*, ___S.W.3d ___, 2020 WL 2845764 at *2 (Mo. banc June 2, 2020) (“LG Chem”) (holding “a plaintiff may not use the actions of a third party to satisfy the due process requirement of the specific personal jurisdiction analysis.”); *Bristol-Myers Squibb Co. v. Super. Ct. of Cal., S.F. Cty.*, ___ U.S. ___, 137 S. Ct. 1773, 1779-80, 198 L.Ed.2d 395 (2018) (“BMS”) (holding each plaintiff must establish sufficient minimum contacts with the forum for her claims as against each defendant); *see also Mongler v. Knight*, No. 2:17 CV 6 CDP, 2017 WL 2931369, at *5 (W.D. Mo. July 10, 2017) (rejecting conspiracy theory of jurisdiction because due process requires each individual defendant, on its own, have sufficient minimum contacts with the forum state); *Viasystems, Inc. v. EBM–Papst St. Georgen GmbH & Co., KG*, 646 F.3d 589, 596 (8th Cir. 2011) (rejecting jurisdiction based on an agency relationship).

Miller and Shriver’s reliance on opinions from the Seventh Circuit, the Tenth Circuit, and an outdated 1981 Missouri appellate case applying Mississippi law is sorely misplaced and ignores recent binding precedent. Miller and Shriver simply cannot bootstrap personal jurisdiction over Relator using the alleged contacts of others.

III. MILLER AND SHRIVER DO NOT ALLEGE FACTS SUFFICIENT TO SHOW RELATOR TARGETED THEM IN MISSOURI TO MAKE A PRIMA FACIE SHOWING OF PERSONAL JURISDICTION

Miller and Shriver have not presented any facts demonstrating that Relator deliberately directed any acts *at Plaintiffs in Missouri* with the intent to cause them harm here, as required to bring Relator's conduct within the long-arm statute. *Capitol Idem. Corp. v. Citizens Nat'l Bank*, 8 S.W.3d 893, 903 (Mo. App. W.D. 2000) (holding to show out-of-state acts within the long-arm statute, "[t]he defendant must have set in motion some course of action which was deliberately designed to move into Missouri and injure the plaintiff.") Miller and Shriver cannot make such showing because they live and work in Kansas, and they necessarily felt the brunt of any alleged harm from defamation in Kansas. *Elmore v. Owens-Illinois, Inc.*, 673 S.W.2d 434, 437 (Mo. banc 1984); *see also Turntine v. Peterson*, No. 4:19-CV-107 RLW, 2019 WL 2076047 *3 (E.D. Mo. May 10, 2019) (citing *Elmore* and concluding based on Missouri law "[t]he effects of Defendants' purportedly defamatory statements would primarily be felt in Missouri, where Plaintiffs reside and conduct substantial portions of their business"), *reversed on other grounds*, 959 F.3d 873 (8th Cir. 2020). The mere fact that Plaintiffs frequently traveled to Missouri or that they might have felt some consequences in the state is not sufficient to find Relator committed a tortious act against Plaintiffs in Missouri with the intent to cause them harm here. *PPG*, 560 S.W.3d at 892. As this Court recently confirmed, "'foreseeability' alone has never been a sufficient benchmark for personal jurisdiction" *LG Chem*, 2020 WL 2845764, at *3 (internal citations omitted).

Contrary to Miller and Shriver's assertions, Relator does not argue that only Missouri residents can bring a defamation action in Missouri. Rather, Relator argues these Kansas plaintiffs have not shown the required connection between any damages they allegedly suffered and any contacts that Relator itself had with them in Missouri.

Miller and Shriver's reliance on *Keeton v. Hustler Magazine, Inc.*, 465 U.S. 770, 780 (1984), is misplaced, as both the facts and the Court's analysis are distinguishable here. First, the Court in *Keeton* expressly noted that a plaintiff's residence may play an important role in determining whether a defendant has sufficient minimum contacts with the forum. *Id.* Second, the Court in *Keeton* found personal jurisdiction existed over claims asserted by a nonresident plaintiff because Hustler was carrying on a "part of its general business" in New Hampshire, *id.*, and "continuously and deliberately exploited the New Hampshire market" so as to reasonably anticipate being haled into court there for claims arising out of that conduct. *Id.* at 781. Those facts do not exist here, as there are no allegations, no evidence, and no argument that Relator is doing business in Missouri or has continuous and systematic contacts with Missouri.

Finally, the United States Supreme Court has subsequently distinguished *Keeton* to hold that where, as here, there is no substantial connection between a nonresident plaintiff's claims and the nonresident defendant's contacts with the forum, personal jurisdiction will not lie. *See BMS*, 137 S.Ct. at 1781-83 (finding no personal jurisdiction existed over nonresident defendant for claims asserted by nonresident plaintiffs who did not suffer injury in the forum state, even though joined with claims asserted by resident plaintiffs). This Court is in accord. *See State ex rel. Bayer Corp. v. Moriarty*, 536 S.W.3d 227, 230

(Mo. banc 2017) (holding nonresident plaintiffs failed to plead facts showing their claims arose out of or related to nonresident defendant’s Missouri activities or that their injuries occurred there); *State ex rel. Norfolk S. Ry. Co. v. Dolan*, 512 S.W.3d 41, 45 (Mo. banc 2017) (finding no personal jurisdiction over claims asserted by out-of-state employee against out-of-state railroad for injuries employee sustained in another state).

Respondent cannot exercise personal jurisdiction over Relator here because Miller and Shriver have not set forth any facts showing Relator has any contacts with Missouri whatsoever. They certainly have not established a substantial connection between their alleged defamation damages and any contact Relator has had with them in Missouri.

IV. THE CALDER EFFECTS TEST DOES NOT APPLY HERE

Miller and Shriver misstate and misapply the *Calder* “effects” test set forth in *Calder v. Jones*, 465 U.S. 783, 790 (1984), and incorrectly claim that this Court has “embraced” that test. (Response Brief, p. 17). *Baldwin v. Fischer-Smith*, 315 S.W.3d 389 (Mo. App. S.D. 2010), was **not** a decision of this Court—it was a decision of the Missouri Court of Appeal for the Southern District. This Court has not yet specifically considered or applied the *Calder* effects test under similar facts and circumstances.

In order to find some targeting theory, Miller and Shriver desperately try to connect the posting of the blogs on nationwide forums by unknown persons other than Relator to the PHC Litigation pending in Missouri. Miller and Shriver concede they had no involvement in the PHC Litigation, nor are their claims in way connected to the PHC Litigation. There simply is no basis for Miller and Shriver to claim that Relator (or anyone else for that matter) targeted them in Missouri with the blogs. The Missouri Court of

Appeals has expressly rejected the notion that one can simply target the forum state (an unrelated Missouri lawsuit) to establish personal jurisdiction. Rather, Missouri looks to whether the defendant's conduct was aimed *at a Missouri resident and intended to cause injury in Missouri*. *Baldwin*, 315 S.W.3d at 397. Unlike *Baldwin*, Miller and Shriver are not Missouri residents and did not suffer the brunt of any alleged harm from defamation here. Unlike *Baldwin*, Miller and Shriver have alleged no facts demonstrating that Relator engaged in any tortious conduct aimed at them in Missouri and intended to cause them injury here.

Calder actually supports Relator's arguments. Unlike the plaintiff in *Calder*, Miller and Shriver do not live in Missouri; their primary place of business is not in Missouri; they were not involved in the PHC Litigation in Missouri; and they did not suffer their claimed harm from the blogs in Missouri. Bare allegations of "traveling" to Missouri cannot form a basis for the exercise of personal jurisdiction. And, unlike the defendants in *Calder*, who made frequent trips to the forum for business, made direct phone calls to forum residents in furtherance of the tort, and engaged in other business in California, there are absolutely no contacts between Missouri and Relator relating to these claims from which Respondent could conclude Relator had sufficient minimum contacts to satisfy due process. Accordingly, the *Calder* "effects" test does not afford a basis for personal jurisdiction over Relator.

V. THE EXERCISE OF PERSONAL JURISDICTION OVER RELATOR IS UNREASONABLE.

Miller and Shriver have failed to address the five-factor test that this Court, and lower Missouri courts have often considered in analyzing the due process considerations for

exercising personal jurisdiction over a nonresident defendant. As set forth in Relator's Opening Brief, those factors weigh against exercising personal jurisdiction here. The alternative factors discussed by Miller and Shriver do not change that result.

First, Relator, which is a Florida entity with its principal place of business in California, will unquestionably be burdened by being forced to litigate these claims in Missouri. Second, Missouri has no substantial interest in adjudicating a dispute for claims asserted by Kansas residents against a Florida resident for alleged damages that were necessarily suffered in Kansas. Plaintiffs' reliance on some amorphous harm to the readers of the blogs in Missouri is misplaced and inconsistent with Missouri law, as Miller and Shriver have no standing to seek redress for any alleged harm to others. *Daniele v. Mo. Dept. of Conservation*, 282 S.W.3d 876, 880 (Mo. App. E.D. 2009) (holding the "real party in interest" is the party having a "justiciable interest susceptible of protection through litigation.") If a party lacks standing, the trial court has no jurisdiction to grant the requested relief. *Id.*

Finally, convenience to Miller and Shriver in forcing Relator to litigate their claims in Missouri is not a persuasive factor. Miller and Shriver are currently pursuing similar claims only against Raizada and Raizada Group. Shortly after receiving Hey's self-serving affidavit, Miller and Shriver dismissed Hey, and SEO Profile Defender and Ruddie have defaulted. Notably, although Miller and Shriver claim otherwise, Relator has not conceded that Respondent may exercise personal jurisdiction over Relator for any claims asserted by Asner, Gortenburg, or AG613, LLC, as all such claims have been stayed since Relator was

joined to the lawsuit. Due to that stay, Relator has been unable to seek dismissal of the other plaintiffs' claims, but intends to do so if and when the stay is lifted.

CONCLUSION

As set forth in Relator's Opening Brief and as confirmed by Plaintiffs' own Response Brief, there is no basis in fact or law for Respondent to exercise personal jurisdiction over Relator, a nonresident defendant with no Missouri contacts, in connection with defamation claims asserted by Kansas plaintiffs for injuries they necessarily suffered in Kansas. Accordingly, this Court should make its Preliminary Writ of Prohibition permanent, prohibiting Respondent from exercising jurisdiction over Relator and requiring Respondent to enter an order dismissing Miller and Shriver's claims against Relator for lack of personal jurisdiction.

Dated: July 31, 2020

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CERTIFICATE OF COMPLIANCE

I hereby certify pursuant to Rule 84.06(c) that this brief (1) contains the information required by Rule 55.03; (2) complies with the limitations of Rule 84.06(b); and (3) contains 3,441 words exclusive of the sections exempted by Rule 84.06(b) based on the word count that is part of Microsoft Word 2016.

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of July 2020, I electronically filed the foregoing with the Clerk of the Court for the Supreme Court of Missouri by using the Missouri eFiling System. Participants in the case who are registered users will be served by the Missouri eFiling System. I also certify that on the 31st day of July 2020, I served the foregoing via electronic mail on the following:

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