APPLICATION OF (name) James M. Dowd
TO THE APPELLATE JUDICIAL COMMISSION FOR THE
JUDGE CRANE VACANCY
MISSOURI COURT OF APPEALS, EASTERN DISTRICT

RESPONSES TO THESE QUESTIONS WILL BE MADE PUBLIC IF THE APPLICANT IS NOMINATED FOR THIS VACANCY

1. Present principal occupation or title:

   Attorney at law.

2. Are you at least 30 years of age? **Yes (X)** **No ( )**

3. (a) How many years have you been a citizen of the United States? **49**

   (b) How many consecutive years immediately preceding your application have you been a qualified voter of Missouri? **31**

4. State the date you were admitted to The Missouri Bar and whether your license is in good standing. If not, explain in detail.

   September 1990; Yes.

5. List any other states, courts, or agencies in which you are licensed as an attorney.

   Kansas (non-active).

6. (a) State the name and address of all colleges and universities attended, other than law school, together with the dates and degrees received.

   - **St. Mary's University, San Antonio, Texas;**
     - **August 1982 – December 1983.**
     - **No degree.**

   - **St. Louis University, Madrid, Spain;**
     - **January 1984 – May 1985.**

- **No degree.**

- **St. Louis University in St. Louis, Missouri;**
    - **August 1985 – December 1985:**
    - **Bachelor of Arts in History, December 1985.**

(b) List/describe any college or university activities, scholastic achievements and other awards or honors you think are relevant to the commission's decision.

- **Became fluent in the Spanish language and culture while studying for three semesters in Madrid and living with Spanish host families.**

- **Captain of varsity soccer team as a sophomore at St. Mary's University.**

- **1983 N.A.I.A. Soccer All-America (Honorable Mention) as a sophomore.**

7. (a) State the name and address of all law schools attended together with the dates and degrees received.

- **St. Mary's University in San Antonio, Texas;**
    - **August 1987 – May 1988.**
    - **No degree received.**

- **University of Missouri – Kansas City;**
    - **August 1988 – May 1990.**
    - **Juris Doctor.**

(b) List/describe any law school activities, scholastic achievements and other awards or honors you think are relevant to the commission's decision.

- **To gain law firm experience, to support my wife and I, and to earn money for tuition, I worked 20 to 30 hours per week as a law clerk at two Kansas City law firms during my second and third years.**

8. State, in chronological order (starting with the earliest employment) (a) significant non-law-related employment prior to law school and (b) all employment from the beginning of law school to the present. To the extent reasonably available to you, include the name and address of each employer and the dates of employment, and,

for legal employment, describe the positions you have held, e.g., associate, partner, law clerk, general counsel.

A. <u>Non-Law-Related Employment</u>.

- **Metropolitan St. Louis Sewer District.**
  2350 Market Street
  St. Louis, Missouri 63103
    - **Summers 1981, 1982, 1983, and 1985.**
    - **Construction worker; full-time.**

- **Muny Opera.**
  1 Theatre Drive, Forest Park
  St. Louis, Missouri 63112
    - **Summers 1981, 1982, and 1983.**
    - **Usher; 15 hours per week.**

- **La Casona Intensive English Live-in Camp.**
  Calle Embajadores 10
  La Granja, Spain 40100
    - **Summers 1984 and 1986.**
    - **English teacher, camp counselor; full-time.**

- **Firestone España S.A.**
  Isla Graciosa, 31
  Madrid, Spain 28703
    - **March 1986 - May 1987.**
    - **English teacher for the company's top executives.**

B. <u>Law-Related Employment</u>.

- **Stites, Holliger, & Knepper**
  1125 Grand Blvd.
  Kansas City, Missouri 64106
    - **September 1988 – May 1989.**
    - **Law Clerk; 20 to 30 hours per week while a full-time law student.**

- **Hubbell Sawyer Peak & O'Neal**
  30 W. Pershing Rd., Suite 350
  Kansas City, Missouri 64108-2463
    - **June 1989 – August 1990.**

- **Law Clerk; 20 to 30 hours per week while a full-time law student.**

- **Missouri Court of Appeals – Western District**
  1300 Oak Street
  Kansas City, Missouri 64106
    - **September 1990 – May 1992.**
    - **Appellate Judicial Clerk to Judge William E. Turnage.**

- **Baker University**
  8001 College Blvd.
  Overland Park, Kansas 66210
    - **1991 - 1994.**
    - **Business Law Teacher in B.S. and M.B.A. degree programs.**

- **Watson & Dameron**
  2500 Holmes Street
  Kansas City, Missouri 64108
    - **1992 – 1994.**
    - **Attorney at law; Associate.**

- **Dowd & Dowd, P.C.**
  100 North Broadway
  St. Louis, Missouri 63102
    - **1995 – 2009.**
    - **Attorney at law; Partner.**

- **Kell Lampin LLC**
  5770 Mexico Road
  St. Peters, Missouri 63376
    - **2010 – Present.**
    - **Attorney at law; Partner.**

- **The James M. Dowd Law Firm, P.C.**
  15 North Gore Avenue
  St. Louis, Missouri 63119
    - **2009 – Present.**
    - **Attorney at law; Principle.**

9. If you were a student at any school from which you were suspended, placed on probation, or expelled by school authorities, for any reason, describe the circumstances.

No.

10. Describe the nature of your experience in trial and appellate courts and explain how they demonstrate the quality of your legal work. *(You either may take as much space as you need here or attach your response on separate sheets).* Include in your response:

a) **Appellate Experience:** Please include a representative list of cases you have briefed and/or argued (if you are a judge, include representative cases from your practice prior to your judicial appointment) including, to the extent reasonably available to you, the style, date, and court and, if published, the citation; identify the client(s) you represented and opposing counsel; give a one-paragraph description of the case and your role.

b) **Trial-Level Experience:** Please include a representative list of cases and/or administrative hearings you have handled (if you are a judge, include representative cases from your practice prior to your judicial appointment) including, to the extent reasonably available to you, the style, date, and court; identify who you represented and opposing counsel; state whether the case was disposed of following a jury trial, bench trial or at what other stage; give a one-paragraph description of the case and your role.

c) **Judicial Experience:** If you are a judge, commissioner, or are serving or have served in other judicial capacity, please describe the nature and extent of your judicial responsibilities, including the dates you have served as a judge at each level, the types of dockets you have handled, and any special expertise you have developed that you believe is relevant to your qualifications for the position for which you are applying.

1. <u>Introduction</u>.

My legal career began as an Appellate Judicial Clerk for the Honorable William E. Turnage of the Missouri Court of Appeals – Western District. There I came to understand well the role of the appellate court and the job of an appellate judge. I could not have asked for a better teacher and mentor than Judge Turnage, a smart, collegial, and diligent jurist and one of the most concise and compelling legal writers of his generation.

This two-year clerkship was highly valuable because I was exposed to the appellate process which in reality embodies the entire life of a lawsuit. I reviewed trial transcripts, appellate briefs, attended oral arguments, and assisted Judge Turnage with writing his opinions for publication in over 75 cases. These cases covered virtually every aspect of Missouri law including criminal, domestic,

administrative, workers compensation, and civil matters. I believe this clerkship served me well as a foundation for the next phase of my career in private practice handling trial court litigation and appeals.

After my two-year clerkship ended, I went into private practice where I have been for the past 20 years handling hundreds of civil matters many of which have been complex, multi-party cases. I have tried products liability cases, business lost profits cases, and general personal injury cases. In short, I have extensive experience handling all aspects of a civil lawsuit from the time the client walks in the office until the highest court decides the case is over.

2. Appellate Experience.

In addition to my appellate clerkship, in private practice I have always handled the appeals in my cases. I have briefed and argued cases in the Missouri Court of Appeals, the Missouri Supreme Court, and in the United States Court of Appeals for the 8th Circuit. Representative cases I have handled on appeal include the following:

- Abengoa Bioenergy U.S. Holding, Inc. v. Chicago Title Insurance Co., 379 S.W.3d 864 (Mo.App. 2012)(Transfer to Supreme Court denied October 30, 2012).

  - Courts: Missouri Court of Appeals; Missouri Supreme Court.
  - Client: Abengoa Bioenergy.
  - Opposing Appellate Counsel: Mark Arnold, Husch Blackwell.
  - Case Summary:

I represented Abengoa, a multi-national ethanol producer based in St. Louis, in its case against Chicago Title for lost profits caused by Chicago Title's negligence. The facts are as follows: Abengoa decided to build a $200 million ethanol processing plant in central Kansas on a 120-acre tract of farmland. To build the plant, the tract needed to be re-zoned "heavy industrial." Abengoa filed an application to change the zoning with the local municipality. As part of the application, Abengoa was required to submit a list obtained from a title company of the neighboring property owners so that they could be sent the statutorily required due process notice of the hearing on Abengoa's zoning change application. Abengoa hired Chicago Title to do this work. However, the list provided by Chicago Title failed to include seven of the neighboring property owners. As a result, those seven property owners were not notified of the hearing. After Abengoa was granted its zoning change and began moving forward with the project, those seven property owners filed suit and Abengoa was forced to start the process over and ultimately was unable to build the Kansas plant. Instead, it built a plant in Granite City,

Illinois, which was less profitable than the Kansas plant would have been, cost more to build than the Kansas plant would have, and opened fifteen months after the Kansas plant would have. After the jury found in Abengoa's favor and awarded damages for lost profits, Chicago Title appealed. The issues on appeal included standing and preservation of error. The verdict was affirmed by the Missouri Court of Appeals and the Missouri Supreme Court. I was co-lead counsel on the appeal providing approximately one-half of the work product including the research for and writing of the brief that was ultimately successful.

- Ring v. Metropolitan St. Louis Sewer District (MSD), 41 S.W.3d 487 (Mo.App. 2000).

  - Courts: Missouri Court of Appeals; Missouri Supreme Court.
  - Client: MSD.
  - Opposing Counsel: Robert C. Johnson; Jeff Kalinowski.
  - Case Summary:

My firm and I were hired to defend MSD on the appeal of a class action settlement. MSD had been originally sued based on allegations that it had overcharged customers under an ordinance that was later ruled unconstitutional. MSD and the class representatives reached the settlement after nearly 10 years of litigation. Certain class members appealed the settlement alleging that they had not been adequately represented by the class representatives and that the settlement was not fair, reasonable, and adequate. The issues on appeal included intervention, standing, and the standards applicable to class action settlements. I wrote the brief in the Court of Appeals that was ultimately successful as the settlement was affirmed by the Court.

- State ex rel. Castillo v. Clark, 881 S.W.2d 627 (Mo.banc 1994).

  - Courts: Missouri Court of Appeals; Missouri Supreme Court.
  - Client: Plaintiff Rafael Castillo.
  - Opposing Counsel: James Stubbs, Kansas City, Missouri.
  - Case Summary:

I represented Mr. Castillo who was injured in a red light, green light intersection collision. On the morning of the first day of trial, the trial court ruled that my expert would not be allowed to testify because he had not provided an expert report to opposing counsel pursuant to Missouri Supreme Court Rule 60. Because I disagreed with the trial court's interpretation of Rule 60 and would have been unable to make a submissible case to the jury without my expert's testimony, I asked for and was granted a two-hour recess to apply for relief in the form of a writ of prohibition from the Court of Appeals. As the two-hour recess was expiring and

the trial court was getting ready to call down the jury and start the trial, the Court of Appeals issued its preliminary writ suspending the trial and taking jurisdiction over the case. A preliminary writ was granted and ultimately the matter came before the Missouri Supreme Court. The Supreme Court overruled the writ, sustained the trial court's original ruling, and issued its opinion clarifying the requirements of Rule 60. In fact, the Court amended Rule 60 as a result of this case. I handled all of the briefing and oral argument before the Court of Appeals and the Supreme Court.

- Martin v. Wal-Mart Stores, Inc., 183 F.3d 770 (8th Cir. 1999).

  - Court: United States Court of Appeals for the 8th Circuit.
  - Client: Harold Martin.
  - Opposing Counsel: Stefan J. Glynias, Lisa A. Green, Adrian P. Sulser.
  - Case Summary:

Harold Martin suffered a spinal injury when he fell at the Wal-Mart store in St. Robert, Missouri on shotgun pellets that had spilled onto the floor. At trial, the verdict directing instruction allowed the jury to find that Wal-Mart had constructive notice of dangers created by customers due to its self-service-store business model which allowed customers to handle merchandise. The case was tried to a jury before the Honorable Terry Adleman of the United States District Court for the Eastern District of Missouri. The jury reached a unanimous verdict in Mr. Martin's favor and awarded him compensatory damages. The main issue on appeal was whether the verdict director accurately stated Missouri law regarding self-service stores' constructive notice of dangers created by customers. I handled all aspects of the pre-trial litigation of the case, I second-chaired my partner at trial, I wrote the instruction that was at issue, and I wrote the appellate brief.

3. Trial Experience.

As far as trial experience, my first jury trial was in the early 1990s and my most recent jury trial was in March of this year. Representative cases include:

- Abengoa Bioenergy U.S. Holding, Inc. v. Chicago Title Insurance Co., 08SL-CC3193.

  - Court: St. Louis County Circuit Court.
  - Client: Abengoa Bioenergy.
  - Opposing Trial Counsel: Gordon L. Ankney, Paul P. Sonderegger, and Booker T. Shaw of Thompson Coburn.
  - Case Summary:

The basic facts of this business litigation case were discussed above in the section regarding my appellate experience. As far as the trial was concerned, this case was extraordinarily complex in two critical respects: causation and damages. Regarding causation, we had to prove that Abengoa did not build the Kansas plant because of Chicago Title's negligence. This was difficult because of the inherent complexities involved in the business decisions of a large multi-national corporation. Nevertheless, we were able to prove, despite the many moving parts involved in a $200 million investment decision, that when the issue was distilled to its core, the evidence showed that but for Chicago Title's negligence, Abengoa would have built the Kansas plant. The jury agreed. The damages question was even more complex and far more cumbersome. The issue concerned the nature of lost profit damages and the evidence needed to prove those damages in Missouri. Because Abengoa had not yet built the Kansas plant and therefore there were no on-going business operations from which to calculate the lost profits, we had to construct a damages model to show the profits the Kansas plant would have had. This involved an exhaustive forensic analysis of the financial data of three of Abengoa's other ethanol plants in the United States coupled with an analysis of the grain and ethanol markets. I worked for over two years with our economist expert and the client to coordinate this massive effort. In the end, our expert issued his opinion of the amount of Abengoa's substantial economic losses. The jury agreed and awarded Abengoa the precise amount in damages testified to by our expert after deliberating for less than one hour. As far as my role, I was hired at the outset by Abengoa. I developed the theory of causation, liability, and damages. I wrote and filed the petition and managed the case throughout the pleading and discovery stages. I served, together with Grant L. Davis, as co-lead trial counsel.

- Kleffner v. Hastings Fiberglass Co., 22012-01540-01.

  - Court: St. Louis City Circuit Court.
  - Clients: Vicki, Sarah, and Teddy Kleffner.
  - Opposing Counsel: Daniel T. Rabbitt, Rabbitt, Pitzer, & Snodgrass.
  - Case Summary:

I represented the widow and young children of an experienced electrician who was severally burned and later died as a result of an electrical explosion while working on a project at Barnes Hospital. I proved that the display screen of the Hastings voltage meter that Mr. Kleffner was using was unclear and confusing. As a result, Mr. Kleffner was led to believe that the electrical equipment he was working on had been powered off. In reality, it was highly-charged and as a result the explosion occurred resulting in his death. The case was filed in 2001, and litigated for three years. I handled all aspects of the case including pleadings, pre-trial litigation, written discovery, depositions, and trial. The case settled on January

27, 2004, the second day of trial before the Honorable Steven R. Ohmer, as a result of a settlement offer made by Hastings.

- Blaylock v. Sigma Aldrich Corporation et al., 22052-10421.

    - Court: St. Louis City Circuit Court.
    - Clients: Jerry Blaylock and Deborah Blaylock.
    - Opposing Counsel: Alan Gerson, Bradley Winters, Terese Drew, Daniel McGrath, Jeffrey Brinker.
    - Case Summary:

I represented Jerry Blaylock and his wife Debbie along with my co-counsel Kenneth B. McClain. Jerry contracted "popcorn lung" disease, a debilitating lung disease that left him dependant on an oxygen tank, as a result of inhaling artificial butter flavoring fumes while working at a St. Louis flavoring plant. The basis of this claim was that the suppliers failed to warn of the dangers of the chemical's fumes. The case was in litigation with extensive discovery, depositions, and pre-trial motion practice for three years. We picked a jury and started trial on October 27, 2008, before the Honorable Lisa Van Amburg. After a week's worth of evidence, the case settled. I was hired by the Blaylocks. I handled most of the pre-trial phase and I was co-lead trial counsel.

- Coffer/Worsham v. Citrus and Allied Essences et al., 0922-CC02281.

    - Court: St. Louis City Circuit Court.
    - Client: Michael Coffer and Gary S. Worsham.
    - Opposing Counsel: Andrew Rothschild, Brian Plegge, Kurt Schmid, James Foland, Kurtis Reeg, Jeffrey Brinker, Paul Lore.
    - Case Summary:

This was another "popcorn lung" case. Mr. Coffer and Mr. Worsham both contracted "popcorn lung" disease while working at a flavoring plant in St. Louis. The litigation of this case lasted nearly four years due to the complexities of the case and the fact that there were nine defendants. I was hired at the outset by Mr. Coffer and Mr. Worsham. I handled most of the pre-trial litigation in terms of appearances before the Honorable John F. Garvey in connection with the extensive pre-trail motion practice that occurred. We started the trial on March 18, 2013, and during the fourth day of trial the case settled.

In addition to my civil litigation experience, I have also handled many workers compensation matters including hearings and appeals to the Labor and Industrial Relations Commission.

3. <u>Judicial Experience</u>.

Not Applicable.

11. Describe any additional legal experience that you believe may be relevant to the decision of the commission (e.g., work as a law professor, in government, as corporate or other legal counsel).

- **Business Law teacher at Baker University; 1991-1994.**
    - **I taught over 20 courses of Business Law in Baker University's undergraduate and M.B.A. programs. In 1992, I was awarded the "Outstanding Faculty Service Award in Business and Management" which recognized the top teacher based on the evaluations by students and peers. I have found this teaching experience, as well as my English teaching experience while living in Spain, to be very helpful in my legal career. It has helped me to hone my public speaking and presentation skills and I became better at describing complex legal issues in a more understandable, straightforward way. These skills have helped me with juries and judges.**
- **Designated Legal Counsel; Consulate of Mexico.**
    - **As a bi-lingual attorney, I served for eight years (2002-2010) as one of the Consul's designated attorneys to assist Mexican nationals with a myriad of legal issues in the State of Missouri.**

12. List all bar associations and other professional societies of which you are a member, with any offices held and dates.

- **The Missouri Bar.**
- **Bar Association of Metropolitan St. Louis.**
- **St. Louis County Bar Association.**
- **Missouri Association of Trial Attorneys, Board of Governors (2005 – present).**

13. Describe your efforts (e.g. work on bar committees, pro bono efforts, CLEs presented, etc.) to contribute to the improvement of the law, the legal system and the administration of justice.

- **Pro Bono: Over the years and on a regular basis I provide pro bono legal advice to various persons and entities. These may originate from calls I receive from someone with a problem that I assist them with without any expectation of compensation. The help may be in the form of a letter or a phone call or just simply listening and providing advice.**

14. List your community activities, including any organizations not listed elsewhere with which you are affiliated.

- **Backstoppers, St. Louis, Missouri.**
  - **Backstoppers is an organization dedicated to providing moral and financial support to families of police officers and firemen who lost their lives in the line of duty.**
  - **I serve as a family liason for four surviving families. I regularly check in with the families to determine how they are getting along and whether there is anything by way of financial support that Backstoppers can provide. At Christmas, I deliver Christmas gifts to the families.**
- **Food for the Poor, Coconut Creek, Florida.**
  - **This organization is one of the largest charities in the world dedicated to providing food, shelter, and economic development to third-world countries particularly in Sub-Saharan Africa.**
  - **My wife and I have been benefactors of this organization for many years providing funds for food, the construction of single family homes, and a drinking well.**
- **St. Patrick's Center, St. Louis, Missouri.**
  - **My wife and I and our boys on an annual basis have organized and delivered sack lunches to this organization's homeless shelters in St. Louis.**

15. Describe your activities (e.g. speeches, presentations, educational activities, etc.) undertaken to further public understanding of and respect for courts and the judicial system and to promote access to justice for all.

- **St. Louis U. High School - Mock Trial Coach.**
    - **I serve as the lawyer-coach of the mock trial team at St. Louis University High School which competes in the Missouri High School Mock Trial Competition sponsored by the Bar Association of Metropolitan St. Louis. I have thoroughly enjoyed the experience of training these young men to know their way around the courtroom, the rules of evidence, and thinking on their feet. Through this activity, the students and their families gain insight into how our system works and the roles of the lawyer, judge, and jury.**

16. List any professional articles or books authored by you that have been published or any special recognition or award of a professional nature you have received.

    - **"AV Preeminent" rating by Martindale-Hubbell – 2010.**
    - **Missouri Lawyers Weekly "Top Plaintiff Wins" Award – 2012.**
    - **Missouri Super Lawyer recognition – 2005.**

17. Do you now hold or have you ever held an elective or an appointive public office or position? If yes, provide details.

    No.

18. Provide the branches and dates of (a) military service or (b) other public service not otherwise disclosed in this application. If discharged from the military, state whether the discharge was other than honorable.

    Not applicable.

19. State whether you are able, with or without a reasonable accommodation, to perform the essential functions of being an appellate judge, including participating in oral argument; performing legal research; communicating clearly and effectively, both orally and in writing; supervising the lower courts, serving on court committees and performing other administrative functions; and expeditiously deciding issues coming before the court.

    Yes.

20. Were you ever refused admission to the bar of Missouri or the bar of another state or the federal courts? If yes, provide details.

No.

21. Have you ever been disciplined, admonished or cited for breach of ethics or professional conduct by the Supreme Court of Missouri or by any court or bar association or committee thereof? If yes, provide details.

No.

22. If you are or were a member of the judiciary of the State of Missouri, please state:

    a) Whether an order of discipline ever has been entered against you by the Supreme Court of Missouri for breach of the Code of Judicial Conduct or the Canons of Judicial Conduct. If yes, provide details.

    b) Whether a reprimand or admonition ever has been entered against you by the Commission on Retirement, Removal and Discipline for any of the causes specified in Supreme Court Rule 12.07. If yes, provide details.

Not applicable.

23. Have you have ever been held in contempt of court? If yes, provide details.

No.

24. Have you ever been sued by a client or been a party to any other litigation, other than as guardian ad litem, plaintiff ad litem, or defendant ad litem?

    If your answer is yes, state the style of the case, where it was filed, and explain in detail. If you are a judge and you have been sued in your judicial capacity, list only those cases where you are or were other than a nominal party.

No.

25. Have you ever been convicted or received a suspended imposition of sentence for a felony or misdemeanor in state, federal or military court? *(Note that this question does not require that traffic offenses or other infractions be listed.)*

If your answer is yes, state the style of the case, where it was filed, and explain in detail.

No.

26. Are you delinquent in the payment of any federal, state, county or city taxes? If yes, provide details.

No.

27. You must attach to this application at least one, but not more than three, writing samples that comply with the requirements set out in the instructions for applicants.

See attached.

28. List/describe any additional honors or awards you have received, activities you have performed, or any other information not set out above that demonstrates the quality of your work as an attorney or that you otherwise believe is relevant to the commission's decision.

Please list the names of ***five*** persons whom you will ask to provide letters of reference for you with respect to your judicial qualifications. Do **not** list as a reference a judge of the court involved. As to each of the (5) references, **please provide name, title, mailing address, telephone and e-mail address.** ***Please note that it is your responsibility to contact your references,*** although if you intend to use as a reference a federal judge or other individual who only can provide a reference upon a specific request by the interviewing authority, please advise the commission and it will send that reference such a request. As to all references, it is your responsibility to see that they send the requested letters in a timely manner.

Provide your references with the attached Guidelines for References. The commission must receive your letters of reference, **via e-mail**, to EDjudgevacancy@courts.mo.gov, by the date indicated in the Instructions to Applicants.

Rev. Robert J. Reiker, Pastor
Mary Queen of Peace Catholic Church
676 W. Lockwood Avenue
Webster Groves, MO 63119
314.962.2311
frbobreiker@mqpwg.org

Ms. Anne Marie Lodholz
Teacher, Mock Trial Team Coach
St. Louis University High School
4970 Oakland Avenue
St. Louis, MO 63110
314.531.0330
amlodholz@sluh.org

Lt. Col. Timothy E. Reagan (Ret.)
St. Louis Metropolitan Police Department
6149 Marwinette Avenue
St. Louis, MO 63116
314.703.9853
TReagan@ameren.com

Robert D. Blitz, Esq.
Blitz, Bardgett, & Deutsch LC
120 South Central Avenue, Suite 1650
Clayton, MO 63105
314.863.1500
rblitz@bbdlc.com

Hon. Richard C. Bresnahan, Circuit Judge
St. Louis County, Division 18
7900 Carondelet
Clayton, MO 63105
314.615.1518
Richard.bresnahan@courts.mo.gov