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 9

10 **UNITED STATES DISTRICT COURT**
 11 **CENTRAL DISTRICT OF CALIFORNIA**
 12 **WESTERN DIVISION**

13 JADE BERREAU, as administrator of
 the Estate of Dashiell Snow,

14 Plaintiff,

15 v.

16 MCDONALD'S CORPORATION, and
 17 DOES 1-10, inclusive,

18 Defendants.

Case No. 2:16-CV-07394 FMO (ASx)

**DEFENDANT'S MEMORANDUM
 OF POINTS AND AUTHORITIES IN
 SUPPORT OF ITS MOTION TO
 DISMISS FOR LACK OF
 PERSONAL JURISDICTION AND
 IMPROPER VENUE PURSUANT
 TO FEDERAL RULES OF CIVIL
 PROCEDURE 12(B)(2) AND 12(B)(3)**

Date: December 1, 2016
 Time: 2:00 p.m.
 Judge: Hon. Fernando M. Olguin

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1 **INTRODUCTION**

2 Plaintiff Jade Berreau is a New York resident. She filed this lawsuit asserting
3 copyright, Lanham Act, unfair competition, and negligence claims against McDonald’s
4 Corporation (“McDonald’s”), a Delaware corporation headquartered in Illinois.
5 According to Ms. Berreau, McDonald’s has wrongfully appropriated the graffiti art of
6 her deceased partner, Dashiell Snow, and used that art in the décor of a small percentage
7 of McDonald’s restaurants.

8 Ms. Berreau’s allegations are meritless. But that is not a matter for litigation *in*
9 *this court* because nothing relevant to this lawsuit has any connection whatsoever to
10 California. The graffiti art is located in New York City. The McDonald’s restaurants at
11 issue are located overseas. And the complaint does not identify a single relevant act or
12 omission of McDonald’s that took place in California. Nor could it.

13 As such, this action must be dismissed for lack of personal jurisdiction pursuant
14 to Fed. R. Civ. P. 12(b)(2), or for improper venue pursuant to Fed. R. Civ. P. 12(b)(3).

15 **BACKGROUND**

16 McDonald’s is a Delaware Corporation headquartered in Oak Brook, Illinois.
17 *See* Declaration of David Vilkama (“Vilkama Decl.”), Ex. A at 1 (McDonald’s 2015
18 Form 10-K). Plaintiff correctly alleges that McDonald’s is a multi-national corporation
19 authorized to do business in Los Angeles County. ECF No. 1 (“Compl.”), ¶ 12. Plaintiff
20 alleges without elaboration that McDonald’s is “doing business” in this county, and
21 incorrectly alleges that McDonald’s maintains a regional office in Long Beach,
22 California. *Id.* In actuality, McDonald’s Corporation has no office in Long Beach. The
23 office Plaintiff identifies is a location of a different corporate entity, McDonald’s USA,
24 LLC.¹ Vilkama Decl. ¶¶ 6-7.

25
26
27 ¹ McDonald’s USA, LLC is a Delaware limited liability company which, like its
28 corporate parent, McDonald’s Corporation, is headquartered in Oak Brook, Illinois.
Vilkama Decl. Ex. B (Secretary’s Certificate). McDonald’s USA, LLC maintains a
regional office in Long Beach. Vilkama Decl. ¶ 6.

1 Plaintiff is a New York resident, Jade Berreau, filing suit as administrator of the
2 estate of Dashiell Snow, a former New York resident who is now deceased. Compl.
3 ¶ 11. The estate allegedly remains in probate before “the Surrogate’s Court of the
4 County of New York.” *Id.* ¶ 11. Mr. Snow, the complaint alleges, was a prolific artist
5 whose graffiti art “[l]ike other graffiti artists . . . consisted of stylized versions of his
6 signature and logo ‘SACE.’” *Id.* ¶ 15.

7 Plaintiff alleges that McDonald’s Corporation, “on information and belief from
8 its U.S. offices,” unlawfully copied artwork consisting of Mr. Snow’s name and
9 signature, which “Mr. Snow painted . . . on a wall in New York City.” *Id.* ¶¶ 19, 33.
10 According to the complaint, McDonald’s uses the allegedly copied work as décor
11 “[i]nside hundreds of its restaurant locations around the world” *Id.* ¶¶ 2, 18.

12 Tellingly, Plaintiff does not allege that any restaurants use the disputed décor in
13 California. Rather, the complaint identifies only a single *European* location in which
14 the décor is in use: a McDonald’s restaurant in London. *Id.* ¶ 2. That is because the
15 décor in question is *not* used in the United States. Plaintiff has not alleged, and cannot
16 truthfully allege, otherwise. *Vilkama Decl.* ¶ 4 (affirming that the disputed décor is used
17 only in McDonald’s restaurants located outside the United States).

18 ARGUMENT

19 This case was filed in what is obviously the wrong court. McDonald’s is not “at
20 home” in California, and the claims alleged have no connection to this State. As a result,
21 Plaintiff cannot meet her burden to show that McDonald’s is subject to personal
22 jurisdiction (or that venue is proper) in this Court. Under either Rule 12(b)(2) or
23 12(b)(3) of the Federal Rules of Civil Procedure, this case should be dismissed.

1 **I. This Action Should Be Dismissed Pursuant To FRCP 12(b)(2) For Lack Of**
 2 **Personal Jurisdiction.**

3 Personal jurisdiction may be either “general” or “specific.”² Corporate
 4 defendants are subject to general jurisdiction (meaning they can be sued on claims
 5 unrelated to their forum contacts) only where they are “at home.” *Goodyear Dunlop*
 6 *Tires Operations, S.A. v. Brown*, 131 S. Ct. 2846, 2851 (2011) (“*Goodyear*”). Specific
 7 jurisdiction, in contrast, subjects defendants to suit away from home, but is permissible
 8 only when a plaintiff’s cause of action arises out of the defendant’s purposeful contacts
 9 with the forum. *Id.*; *Walden v. Fiore*, 134 S. Ct. 1115, 1121-23 (2014); *see also*
 10 *Helicopteros Nacionales De Columbia, S.A. v. Hall*, 466 U.S. 408, 414 n.8 (1984). In
 11 this case, this Court cannot appropriately exercise general or specific jurisdiction over
 12 McDonald’s.

13 Notably, in responding to this motion, “the [P]laintiff bears the burden of
 14 establishing that jurisdiction is proper.” *Ranza v. Nike, Inc.*, 793 F.3d 1059, 1068 (9th
 15 Cir. 2015) (citation omitted). Where personal jurisdiction is challenged based on the
 16 facts alleged in the complaint, whether or not supported by affidavits or other materials,
 17 the plaintiff must make a prima facie showing of jurisdictional facts. *Schwarzenegger*
 18 *v. Fred Martin Motor Co.*, 374 F.3d 797, 800 (9th Cir. 2004) (“[P]laintiff cannot
 19 ‘simply rest on the bare allegations of its complaint’”) (quoting *Amba Marketing*
 20 *Systems, Inc. v. Jobar Int’l, Inc.*, 551 F.2d 784, 787 (9th Cir. 1977)); *Data Disc Inc. v.*
 21 *Systems Tech. Assoc’s, Inc.*, 557 F.2d 1280, 1285 (9th Cir. 1997). And even with
 22 respect to personal jurisdiction, a complaint must not require more inferences than those
 23 permissible under the pleading standard clarified in *Ashcroft v. Iqbal*, 556 U.S. 662

24 _____
 25 ² “Where, as here, no federal statute authorizes personal jurisdiction, the district
 26 court applies the law of the state in which the court sits. California’s long-arm statute,
 27 Cal.Civ.Proc.Code § 410.10, is coextensive with federal due process requirements
 28” *Mavrix Photo, Inc. v. Brand Techs., Inc.*, 647 F.3d 1218, 1223 (9th Cir. 2011)
 (citations omitted). This analysis applies equally to the state law claims. *See, e.g.,*
Schwarzenegger v. Fred Martin Motor Co., 374 F.3d 797, 800-01 (9th Cir. 2004)
 (noting that “the jurisdictional analyses under state law and federal due process are the
 same”).

1 (2009). *Fiore v. Walden*, 688 F.3d 558, 574-75 (9th Cir. 2012) (noting that “mere ‘bare
2 bones’ assertions of minimum contacts with the forum or legal conclusions
3 unsupported by specific factual allegations will not support a plaintiff’s pleading
4 burden”) (citation omitted), *rev’d on other grounds by Walden v. Fiore*, 134 S. Ct. 1115
5 (2014).

6 In her complaint, Plaintiff includes boilerplate language claiming that this Court
7 may exercise jurisdiction over McDonald’s. *See* Compl. ¶ 9 (“Defendants are subject
8 to the personal jurisdiction of the Court because they do transact business in, have
9 agents in, or are otherwise found in and have purposely availed themselves of the
10 privilege of doing business in California and in this District.”). Plaintiff’s assertion of
11 jurisdiction, however, does not come close to meeting her “burden of establishing that
12 jurisdiction is proper.” *Ranza*, 793 F.3d at 1068.

13 Nor can Plaintiff make the necessary showing. As explained below: McDonald’s
14 is not subject to general jurisdiction in California, *see infra* pp. 4-5; and Plaintiff’s
15 complaint fails to allege *any* suit-related contacts of McDonald’s with California that
16 could possibly give rise to specific jurisdiction in this case, *see infra* pp. 5-8.
17 Consequently, this action should be dismissed pursuant to Rule 12(b)(2).

18 **1. McDonald’s Is Not Subject To General Jurisdiction In California.**

19 When a defendant is subject to the general jurisdiction of a forum state, a court
20 in that forum may adjudicate *any* cause of action, even one unrelated to a defendant’s
21 activities in the state. *Helicopteros*, 466 U.S. at 414 n.9. In 2011, the United States
22 Supreme Court decided *Goodyear*, which clarified the law and narrowed the
23 circumstances under which the exercise of general jurisdiction over a corporation is
24 appropriate. 131 S. Ct. at 2851. Specifically, *Goodyear* held that to have general
25 jurisdiction over a corporate defendant, its “affiliations with the State must be so
26 ‘continuous and systematic’ as to render [the defendant] essentially at home in the
27 forum State.” *Id.*

1 Then in 2014, the Supreme Court decided *Daimler AG v. Bauman*, 134 S. Ct.
 2 746 (“*Daimler*”), which specified and further limited the circumstances in which a
 3 corporate defendant may be considered “at home” and therefore properly subject to
 4 general jurisdiction. *Lightfoot v. Cendant Mortg. Corp.*, 769 F.3d 681, 689 (9th Cir.
 5 2014) (quoting *Goodyear*, 131 S. Ct. at 2851, and citing *Daimler*, 134 S. Ct. at 755-
 6 58). As the Ninth Circuit has explained, under *Daimler*, “[t]he two places where a
 7 corporation is ‘essentially at home’ and therefore subject to general jurisdiction are its
 8 place of incorporation and its principal place of business.” *Lightfoot*, 769 F.3d at 658
 9 (citing *Daimler*, 134 S. Ct. at 760).³

10 McDonald’s is incorporated in Delaware, not California, and its “nerve center,”
 11 *Hertz Corp. v. Friend*, 559 U.S. 77, 93 (2010), is Illinois, where its headquarters are
 12 located. Vilka Decl. Ex. A. That ends the inquiry under *Daimler*: Because
 13 McDonald’s is not “at home” in California, it is not subject to general jurisdiction here.
 14 McDonald’s is subject to general jurisdiction only in Delaware or Illinois.

15 **2. Plaintiff Has Not Alleged Any Suit-related Contacts That Could**
 16 **Possibly Give Rise To Specific Jurisdiction.**

17 None of the alleged acts on which Plaintiff’s claims are based occurred in
 18 California or are in any way related to the business McDonald’s conducts in California.
 19 This is dispositive, because when specific jurisdiction is at issue, the only claims a court
 20 may adjudicate must arise out of the defendant’s suit-related contacts with the forum.
 21 *Goodyear*, 131 S. Ct. at 2851. Here, there are no suit-related California contacts, and
 22 thus no specific jurisdiction.

23 _____
 24 ³ The *Daimler* court acknowledged that in an “exceptional case,” a corporation
 25 might be at home in a state other than its place of incorporation or its principal place of
 26 business. That would entail, for example, a corporation’s *de facto* principal place of
 27 business being temporarily in a different location from its formal headquarters, such
 28 that jurisdiction could lie in the principal but temporary home. *Daimler*, 134 S. Ct. at
 755-57, 756 n.8, 761 n.19 (discussing *Perkins v. Benguet Consol. Mining Co.*, 342 U.S.
 437 (1952)); see also *Keeton v. Hustler Magazine, Inc.*, 465 U.S. 770, 779 n.11 (1984)
 (describing the facts of *Perkins*, in which a Philippine corporation temporarily relocated
 to and was subject to jurisdiction in Ohio during Japanese occupation of the Philippines
 during World War II). Nothing like that is true here.

1 A court has specific jurisdiction over a defendant if (1) there is a connection
2 between the forum and the episode-in-suit, and (2) once the requisite connection has
3 been shown, the exercise of jurisdiction is reasonable. *Asahi Metal Indus. Co. v.*
4 *Superior Court*, 480 U.S. 102, 113-14 (1987). In the Ninth Circuit, courts analyze
5 specific jurisdiction involving alleged torts using a three-part test: (1) the non-resident
6 defendant must purposefully direct its activities toward the forum; (2) the claim must
7 arise out of those forum-related activities; and (3) exercising jurisdiction must comport
8 with fair play and substantial justice. *See Schwarzenegger v. Fred Martin Motor Co.*,
9 374 F.3d 797, 802 (9th Cir. 2004); *see also Mavrix Photo, Inc. v. Brand Tech., Inc.*,
10 647 F.3d 1218, 1228 (9th Cir. 2011) (“Because Mavrix has alleged copyright
11 infringement, a tort-like cause of action, purposeful direction ‘is the proper analytical
12 framework.’”) (citations omitted); *Rio Properties, Inc. v. Rio Int’l Interlink*, 284 F.3d
13 1007, 1021 (9th Cir. 2002) (applying purposeful direction analysis to trademark
14 claims).

15 Plaintiff’s complaint fails this test, because no alleged tortious activity occurred
16 in (or was directed at) California. Read charitably, the complaint alleges only two acts
17 that could even conceivably suffice: (1) copying in the first place Mr. Snow’s graffiti
18 art from a wall in New York City, Compl. ¶¶ 19, 33; and (2) displaying unauthorized
19 copies of it as part of the décor at a relatively small number (“[h]undreds” out of tens
20 of thousands) of McDonald’s restaurants, including one located in London, Compl. ¶ 2.
21 And even apart from the complaint’s fatal failure to allege facts showing that
22 McDonald’s Corporation was actually the entity that purportedly did either of those
23 things, there is another fundamental problem: neither the allegedly wrongful copying
24 nor displaying had anything to do with California. Plaintiff does not allege otherwise.

25 To be clear: Plaintiff does not (and cannot) allege that McDonald’s copied any
26 of the allegedly infringing artwork in California; Plaintiff does not (and cannot) allege
27 that McDonald’s has displayed any of the allegedly infringing artwork in California;
28 indeed, Plaintiff does not even allege California copying or display on information and

1 belief. Nor could she. Vilkama Decl. ¶¶ 4, 5 (stating that McDonald’s Corporation and
2 McDonald’s USA, LLC did not have any role in creating or approving the disputed
3 décor for use in McDonald’s restaurants located outside of the United States). These
4 simple facts should end the inquiry. *See, e.g., Barantsevich v. VTB Bank*, 954 F. Supp.
5 2d 972, 998 (C.D. Cal. 2013).

6 With respect to copying, the best Plaintiff can allege is: “McDonald’s (on
7 information and belief from its U.S. offices) undertook to unlawfully copy, and did
8 unlawfully copy, Mr. Snow’s name, signature, and artwork for the purpose of
9 displaying it, and allowing its franchisees to display it, in restaurants around the
10 world” Compl. ¶ 19. But the complaint also makes clear that Mr. Snow painted
11 the allegedly copied work “on a wall in New York City.” Compl. ¶ 33. The complaint
12 makes no effort to explain how McDonald’s employees in California were somehow
13 involved in or connected to copying graffiti in New York City for an obvious reason:
14 there is no connection.

15 With respect to display, the only *Iqbal-Twombly* sufficient allegation in the
16 complaint concerns a restaurant located in London: “Defendants are using Mr. Snow’s
17 artwork as décor in hundreds of McDonald’s restaurants . . . Below right is an image of
18 a wall in a McDonald’s restaurant in London, which clearly includes a brazen copy of
19 Mr. Snow’s work. Hundreds of McDonald’s around the world use near-identical
20 interior design.” Compl. ¶ 2. If McDonald’s had used the décor in California, Plaintiff
21 could easily have alleged that. But she made no such allegation. And no such claim
22 could truthfully be made, because the work is *not* on display here (or anywhere else in
23 the United States). Vilkama Decl. ¶ 4.

24 While the complaint makes passing references to California contacts, those do
25 not suffice. To meet her burden, Plaintiff must plausibly allege that McDonald’s has a
26 sufficient number of contacts with California *that are related* to this lawsuit. *See*
27 *Walden v. Fiore*, 134 S. Ct. 1115, 1121 (2014) (reaffirming that, for specific jurisdiction
28 to exist, “the defendant’s suit-related conduct must create a substantial connection with

1 the forum State.”); *id.* at 1121 n.6 (confirming that contacts having nothing to do with
2 the “underlying controversy” in the litigation are irrelevant to specific jurisdiction)
3 (citation omitted). Plaintiff does not (and cannot) allege that McDonald’s engaged in
4 any other California activities that are relevant to this lawsuit.

5 The alleged regional office in Long Beach, *see* Compl. ¶ 12, does not support the
6 exercise of specific jurisdiction. This is not a location of McDonald’s Corporation, but
7 even if it were, *nothing* has ever even allegedly happened there that relates in any way
8 to the issues raised in the complaint. Nor could Plaintiff ever make any truthful suit-
9 related allegation as to this office. Vilkama Decl. ¶ 6 (affirming that the Long Beach
10 regional office of McDonald’s USA, LLC is not involved in creating or approving
11 décor for any McDonald’s restaurants).⁴ Plaintiff’s allegation about a regional office
12 (of McDonald’s Corporation’s subsidiary) is akin to the bare assertion that McDonald’s
13 does business in California and this District, and that is not enough. *See, e.g., Unicolors*
14 *Inc. v. Myth Clothing Co.*, Case No. 2:15-cv-9419-CAS (JCx), 2016 WL 738289, at *6
15 (C.D. Cal. Feb. 22, 2016) (explaining that conclusory allegation that defendant is
16 “doing business in California” is insufficient under Ninth Circuit and Supreme Court
17 precedent) (citations omitted).

18 In short, the complaint fails to allege *any* suit-related contacts of McDonald’s
19 Corporation with California.⁵ As in *Walden*, “none of [defendant’s] challenged conduct
20 had anything to do with [California] itself.” 134 S. Ct. at 1125. As a result, McDonald’s
21 is not subject to personal jurisdiction in this District.

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24 ⁴ For this reason, the result would be no different if Plaintiff were to seek to amend
25 her complaint to name McDonald’s USA, LLC as a defendant. The governing Supreme
26 Court and Ninth Circuit precedent precludes exercising personal jurisdiction over
McDonald’s USA, LLC for all of the same reasons.

27 ⁵ Of course, the fact that Plaintiff’s lawyers are based in California and happen to
28 prefer this forum is also insufficient to invoke the power of this Court. *See, e.g., Roth*
v. Garcia Marquez, 942 F.2d 617, 620-21 (9th Cir. 1991) (personal jurisdiction turns
on the *defendant’s* contacts).

1 **II. This Action Should Be Dismissed Pursuant To FRCP 12(b)(3) Because**
2 **Venue Is Improper In This Court.**

3 When a defendant challenges venue based on Rule 12(b)(3), the plaintiff bears
4 the burden of showing that venue is proper. *Rio Properties, Inc. v. Rio Int’l Interlink*,
5 284 F.3d 1007, 1019 (9th Cir. 2002); *Piedmont Label Co. v. Sun Garden Packaging*
6 *Co.*, 598 F.2d 491, 496 (9th Cir. 1979); *Whiteman v. Grand Wailea Resort*, No. 3:98-
7 cv-04442-MMC, 1999 WL 163044, at *1 (N.D. Cal. Mar. 17, 1999). She cannot meet
8 her burden.

9 Plaintiff alleges that venue is appropriate in this district under the general venue
10 statute, which provides that a civil action may be brought in a judicial district that
11 satisfies one of three criteria:

- 12 1) one in which any defendant resides, if all defendants reside in-state;⁶
- 13 2) one in which a substantial part of the events or omissions giving rise to the
14 claim occurred, or a substantial part of property that is the subject of the
15 action is situated; or
- 16 3) if there is no other appropriate district, one in which any defendant is
17 subject to personal jurisdiction with respect to the action.

18 *See* 28 U.S.C. § 1391(b).

19 The venue provision of the Copyright Act governs venue over the asserted
20 copyright claims. *See* 28 U.S.C. § 1400(a). It provides that “[c]ivil actions, suits, or
21 proceedings arising under any Act of Congress relating to copyrights . . . may be
22 instituted in the district in which the defendant or his agent resides or may be found.”
23 *Id.* Despite being ostensibly more restrictive than § 1391(b),⁷ the Ninth Circuit

24 _____
25 ⁶ For purposes of § 1391(b)(1), a corporation resides in any judicial district in which
it is subject to personal jurisdiction with respect to the action. 28 U.S.C. § 1391(c)(2).

26 ⁷ *Cf. In re TC Heartland LLC*, 821 F.3d 1338 (Fed. Cir. 2016) (en banc) (rejecting
27 argument for more restrictive reading of patent venue statute, 28 U.S.C. § 1400(b),
which also authorizes suit “in the judicial district where the defendant resides”) (emphasis added), *petition for cert. filed, TC Heartland LLC v. Kraft Food Brands*
28 *Group LLC* (U.S. Sept. 12, 2016) (No. 16-341).

1 interprets § 1400(a) to allow venue in any judicial district in which the defendant would
2 be subject to personal jurisdiction if the district were “treated as a separate state.”
3 *Brayton Purcell LLP v. Recordon & Recordon*, 606 F.3d 1124, 1126 (9th Cir. 2010);
4 *Columbia Pictures Television v. Krypton BC*, 106 F.3d at 284 (9th Cir. 1997) (“Venue
5 under 28 U.S.C. § 1400(a) is proper in any judicial district in which the defendant
6 would be amenable to personal jurisdiction if the district were a separate state.”)

7 None of these venue requirements are met in this case. No events or omissions
8 giving rise to Plaintiff’s claim have allegedly occurred in this District. No property that
9 is the subject of the action is situated here. Venue therefore is not proper under
10 § 1391(b)(2). The remaining inquiries under § 1391(b)(1), § 1391(b)(3), and § 1400(a)
11 are coterminous with the personal jurisdiction analysis. For the reasons set forth above,
12 *see supra* pp. 3-8, McDonald’s would not be amenable to personal jurisdiction in the
13 Central District of California if the district were a separate state. As such, venue is
14 improper here.

15 **CONCLUSION**

16 McDonald’s respectfully requests that the Court grant its motion to dismiss.

17
18 Dated: October 28, 2016

STRIS & MAHER LLP

19 /s/ Elizabeth Brannen
20 Elizabeth Brannen

21 *Attorneys for Defendant*
22 McDonald’s Corporation
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