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Jeff,

This is an Answer Brief I wrote for the U.S. Court of Appeals for the Eleventh Circuit on behalf of General Electric in defense of a judgment won at trial against Auto-Owners Insurance Co. The judgment arose from coverage Auto-Owners provided to a contractor who used defective concrete to repair the balconies of an oceanfront condominium developed by one of GE's subsidiaries. This is a good example of protecting a federal court judgment.

I hope these papers are helpful to you in deciding whether my abilities would compliment those of the other fine lawyers already on your team. The cases filed against you raise novel and interesting legal issues and I would welcome the challenge of helping to create and articulate the arguments that would present your defense in its most favorable light while preserving the issues for appeal.

If you decide to retain me, I would like to discuss this matter further with Bob and to prepare a recommendation for your review on what I would propose to do to get up to speed.

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