No. 17-8023

IN THE

United States Court of Appeals for the Eighth Circuit

JACLYN WATERS,

Plaintiff–Respondent,

v.

FERRARA CANDY CO.,

Defendant–Petitioner.

On Petition for Permission to Appeal from the
United States District Court for the
Eastern District of Missouri
The Hon. Noelle C. Collins, U.S. Magistrate Judge
Case No. 17-cv-00197-NCC

DEFENDANT'S PETITION FOR PERMISSION TO APPEAL AN ORDER REMANDING A CLASS ACTION UNDER 28 U.S.C. § 1453(c)

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Dated: June 26, 2017

RULE 26.1 CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure, Defendant Ferrara Candy Co. states that it is a wholly owned subsidiary of F&S Holdings 1, Inc., which is in turn a wholly owned subsidiary of Candy Intermediate Holdings, Inc., which is in turn a subsidiary of Ferrara Candy Company Holdings, Inc. No publicly held company owns 10% or more of Ferrara Candy Co.'s stock.

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INTRODUCTION

This case squarely presents an important question of first impression: Whether a court may consider a defendant's costs of complying with injunctive relief when determining the amount in controversy for purposes of establishing federal subject-matter jurisdiction under the Class Action Fairness Act of 2005 ("CAFA"). That question has divided this Circuit's district courts since CAFA was enacted, raising a serious risk that the scope of federal-court jurisdiction will depend on where a lawsuit happens to be filed. That alone warrants this Court's immediate review.

To make matters worse, the decision below fundamentally misreads the statute. The District Court applied pre-CAFA precedents, interpreting different provisions, to hold that an injunction must be valued from the plaintiff's viewpoint. That was wrong. CAFA's text, history, and purpose all point in the opposite direction. And the District Court's alternate holding, which suggests that a removing defendant is prohibited from relying on a plausible assessment of its costs if the court believes a cheaper alternative may be possible, cannot be squared with the case law.

This Court should allow the appeal, resolve the longstanding intra-circuit split, and reverse the District Court's erroneous decision.

FACTS NECESSARY TO UNDERSTAND THE QUESTION PRESENTED

A. Statutory Background

CAFA vests district courts with jurisdiction over class actions in which "the matter in controversy exceeds the sum or value of $5,000,000," the proposed class consists of more than 100 members, and "any member of [the] class of plaintiffs is a citizen of a State different from any defendant." 28 U.S.C. § 1332(d).

Congress enacted CAFA to "expand substantially federal court jurisdiction over class actions." S. Rep. 109-14 at 43 (2005). To achieve that objective, CAFA breaks from the traditional requirements of diversity jurisdiction in two important ways. First, the statute jettisons the requirement of complete diversity. *See Exxon Mobil Corp. v. Allapattah Servs., Inc.*, 545 U.S. 546, 556 (2005). Only minimal diversity is necessary to establish CAFA jurisdiction. 28 U.S.C. § 1332(d)(2). Second, the statute eliminates the rule against aggregating the value of plaintiffs' claims. *See Allapattah Servs.*, 545 U.S. at 571. Instead, CAFA expressly provides that, "[i]n any class action, the claims of the individual class members *shall be aggregated* to determine whether the matter in controversy exceeds the sum or value of $5,000,000, exclusive of interest and costs." *Id.* at § 1332(d)(6) (emphasis added).

B. Proceedings Below

Plaintiff Jaclyn Waters filed this putative class action against Illinois-based Ferrara Candy Co. ("Ferrara") in the Circuit Court of the City of St. Louis,

Missouri. Dkt. No. 1-1 at ¶ 6. Ferrara is the maker of some of America's best-known brands of candy. Waters complained that boxes of Ferrara's "Red Hots" candy contained "non-functional" empty space, or "slack-fill." *Id.* ¶¶ 3, 5. Relying principally on Federal regulations that prohibit such slack-fill in product packaging, Waters asserted that the Red Hots packaging was misleading and deceptive in violation of Missouri's Merchandising Practices Act (MMPA). *Id.* ¶¶ 13-17. Among other things, Waters "request[ed] injunctive relief, and such other equitable relief as the Court deems just and proper" under the MMPA. *Id.* ¶ 44 (citing Mo. Rev. Stat. § 407.025.2).[1]

Ferrara removed the case to the Eastern District of Missouri, invoking the court's subject-matter jurisdiction under CAFA. Dkt. No. 1. Waters moved for remand. Dkt. No. 12. As relevant here, Waters argued that her suit did not satisfy CAFA's $5 million amount in controversy requirement. *Id*. Ferrara opposed. Dkt. No. 14.

Ferrara's opposition attached a declaration from the company's Chief Operating Officer, Michael Murray. Dkt. No. 16. Murray testified that "[t]he

[1] Waters' state-court petition made other references to injunctive relief, as well. *See* Dkt. No. 1-1, at ¶ 4 ("Plaintiff brings this action on behalf of herself and all others similarly situated to recover damages and injunctive relief . . . ."); *id.* ¶ 31 ("Included within the common questions of law or fact are . . . Whether, and to what extent, injunctive relief should be granted to prevent such conduct in the future . . . .").

packaging line machinery and packaging process involved in producing Red Hots candy are determinative factors in the level of fill of candy" in the Red Hots packaging. *Id.* ¶ 4. Accordingly, Murray explained that "[m]aterially and consistently increasing the level of fill . . . would require substantial changes to Ferrara's packaging processes, including upgrading Ferrara's packaging capital equipment." *Id.* Based on his "knowledge of [Ferrara's] packaging processes and [his] investigation into the costs of making [the] necessary upgrades," Murray determined that the costs of modifying the company's machinery to comply with "an injunction requiring a material increase in the percentage fill of Red Hots candy . . . would exceed $6,000,000." *Id.* ¶ 5; *see id.* ¶ 6 (breaking out the costs for each type of packaging).

On June 16, 2017, the District Court granted Waters' motion to remand on the ground that Ferrara had not met its burden to establish the amount in controversy. Dkt. No. 32 at 12. The District Court held that the value of Waters' requested injunction could only be assessed from the plaintiff's viewpoint. *Id.* at 11. Because Ferrara had not offered evidence of the marginal value to each class member of receiving additional pieces of candy in each package, the court found that it could not count the injunction towards CAFA's $5 million threshold. *Id.*

The District Court believed that it was bound to assess the value of the injunction from the plaintiff's viewpoint by this Court's decisions interpreting the

traditional diversity jurisdiction statute, 28 U.S.C. § 1332(a). Dkt. No. 32 at 8-9. Because CAFA does not "specify whose viewpoint is to be used when determining whether the $5 million threshold [is] met," the court concluded that pre-CAFA rules applied. *Id.* at 10.

Alternatively, the District Court held that Ferrara had not met its burden to establish the amount in controversy by a preponderance of the evidence, because Murray's declaration did not "specify" whether the hypothetical injunction he described would require "shrinking the package size" or increasing the fill, or whether it would entail changes to "every Red Hots candy production line." *Id.* at 12.

QUESTION PRESENTED

Whether this Court should grant the petition to appeal where the decision below deepens a longstanding split among the Eighth Circuit's district courts on an important question of first impression, and where the District Court's decision runs contrary to established precedent and congressional intent.

RELIEF SOUGHT

Ferrara seeks review and reversal of the District Court's order remanding this case. This request for permission to appeal is authorized by 28 U.S.C. § 1453(c) and is timely because the District Court's order was entered on June 16, 2017.

REASONS WHY THE APPEAL SHOULD BE ALLOWED

The Class Action Fairness Act permits immediate appeals from orders remanding class actions. *See* 28 U.S.C. § 1453(c). Such appeals should be allowed where they present the opportunity to resolve "important and consequential" questions and to "alleviate uncertainty in the district courts." *Froud v. Anadarko E & P Co. P'ship*, 607 F.3d 520, 523 (8th Cir. 2010) (per curiam) (quoting *Estate of Pew v. Cardarelli*, 527 F.3d 25, 29 (2d Cir. 2008) (in parenthetical)); *see Hargett v. RevClaims, LLC*, 854 F.3d 962, 965 (8th Cir. 2017) (granting 1453(c) petition "to address a novel and important CAFA issue"). This is just such an appeal. The question whether an injunction's cost to the defendant ought to count toward the amount in controversy under CAFA goes to the heart of the statute's purpose of expanding federal jurisdiction over class actions. Unless this Court grants review, that question will continue to divide the Circuit's district courts. That is all the more troubling because the plaintiff's-viewpoint rule adopted by the court below and several others runs directly counter to the statute's text, history, and purpose. Review is also warranted to correct the District Court's alternate holding, which was manifestly contrary to this Court's longstanding precedent. This Court should allow the appeal.

I. THE DECISION BELOW DEEPENS AN UNTENABLE INTRA-CIRCUIT SPLIT OVER CAFA'S AMOUNT-IN-CONTROVERSY REQUIREMENT.

The question whether a defendant may rely on its own costs of complying with injunctive or declaratory relief to meet CAFA's amount-in-controversy threshold has divided this Circuit's district courts since the statute's passage in 2005. The decision below only adds to that confusion. This Court should intervene and "alleviate uncertainty in the district courts" on this "important and consequential" question of first impression. *Froud*, 607 F.3d at 523 (internal quotation marks omitted).

Without guidance from this Court, the district courts have split over the proper application of CAFA's amount-in-controversy provisions, 28 U.S.C. § 1332(d)(2) and (6). Some courts, including the District Court below, have read the statute to incorporate interpretations of the traditional diversity jurisdiction statute, 28 U.S.C. § 1332(a). In keeping with this Court's pre-CAFA precedents, those courts have held that the amount in controversy in suits seeking equitable relief "is the value to the plaintiff of the right that is in issue." *Usery v. Anadarko Petroleum Corp.*, 606 F.3d 1017, 1018 (8th Cir. 2010) (applying 28 U.S.C. §1332(a)). Accordingly, those courts have hewed to a strict plaintiff's-viewpoint rule in valuing injunctive or declaratory relief sought by a class. *See, e.g.*, Dkt. No. 32 at 8-9; *Basham v. Am. Nat. Cty. Mut. Ins. Co.*, 979 F. Supp. 2d 883, 890-891

(W.D. Ark. 2013) (citing pre-CAFA precedent); *Nelson v. Am. Family Mut. Ins. Co.*, No. 13-CV-607, 2013 WL 5745384, at *10 (D. Minn. Oct. 23, 2013) (citing *Anadarko Petroleum*, 606 F.3d at 1018-19); *O'Brien v. United Healthcare Servs., Inc.*, No. 12-0114-CV, 2012 WL 1232312, at *1 (W.D. Mo. Apr. 12, 2012) (same).

At least two other district courts, however, have recognized that CAFA changed the landscape of diversity jurisdiction for class actions. They have noted that the purpose of the plaintiff's-viewpoint rule is to enforce the prohibition against aggregating plaintiffs' claims to meet the jurisdictional amount under 28 U.S.C. § 1332(a). *See Adams v. Am. Family Mut. Ins. Co.*, 981 F. Supp. 2d 837, 848 n.13 (S.D. Iowa 2013) (citing *Toller v. Sagamore Ins. Co.*, 558 F. Supp. 2d 924, 930-931 (E.D. Ark. 2008)). Because CAFA affirmatively *requires* aggregation, *see* 28 U.S.C. § 1332(d)(6), these courts have reasoned that there is no bar to looking to the costs to a defendant of complying with equitable relief. *See Toller*, 558 F. Supp. 2d at 930-931 (considering the incremental value of premiums the defendant insurer would have charged if its policies had been sold with the coverage sought by plaintiff's injunction); *Adams*, 981 F. Supp. 2d at 850 (concluding that the defendant had established CAFA's threshold by plausibly alleging it was "likely to face pecuniary costs that logically flow from" the plaintiffs' requested declaration and injunction "in amounts exceeding $5 million").

The upshot of these disparate interpretations is that whether a defendant can avail itself of CAFA's protections will depend on which district court is responsible for the State or county in which the suit is filed. *See* 28 U.S.C. § 1441(a). The split among judicial districts within States is particularly pernicious. Until this Court steps in, a defendant sued in Arkansas state court in Little Rock, who files a notice of removal in the Eastern District of Arkansas, may have access to a federal forum while the *same defendant*, facing the *same claims* in Texarkana would have its case remanded from the Western District. *Compare Toller*, 558 F. Supp. 2d at 930-31, *with Basham*, 979 F. Supp. 2d at 891. This Court should grant the appeal to resolve this untenable division.[2]

II. THE DISTRICT COURT'S DECISION MISUNDERSTANDS THE STATUTE AND UNDERMINES ITS PURPOSE.

This Court's review is also warranted because the District Court's decision contravenes CAFA's text and history and runs directly counter to its purpose. The District Court believed that it was bound by this Court's non-CAFA precedents, because "the language of diversity jurisdiction ultimately remained unchanged

[2] The question has also led to a split among the federal courts of appeals. *Compare Keeling v. Esurance Ins. Co.*, 660 F.3d 273, 274 (7th Cir. 2011) (Easterbrook, J.) (holding that "[t]he cost of prospective relief cannot be ignored in the calculation of the amount in controversy"), *with Smith v. Nationwide Prop. & Cas. Ins. Co.*, 505 F.3d 401, 407 (6th Cir. 2007) (applying the plaintiff's-viewpoint rule); *S. Florida Wellness, Inc. v. Allstate Ins. Co.*, 745 F.3d 1312, 1316 (11th Cir. 2014) (same).

when Congress passed CAFA." Dkt. No. 32, at 9. The court reasoned that, if "Congress chose to pass CAFA and incorporate previous diversity jurisdiction sections without providing a particular viewpoint test," then "the plain language of the statute implies that the plaintiff's viewpoint test is still proper in the class action context." *Id.* at 10.

The District Court was wrong. CAFA does not incorporate any pre-existing "diversity jurisdiction sections" relevant to the amount-in-controversy standard. To the contrary, Congress passed two entirely new provisions to govern the amount-in-controversy threshold for class actions. *Compare* 28 U.S.C. §1332(d)(2), (6), *with id.* §1332(a). CAFA's text, history, and purpose show that these changes were intended to exempt class actions from the plaintiff's-viewpoint rule.

To understand why, start with the origins of this Court's plaintiff's-viewpoint rule. In *Snyder v. Harris*, 394 U.S. 332 (1969), the Supreme Court held that the federal diversity jurisdiction statute—codified today at 28 U.S.C. § 1332(a)—barred the aggregation of class action plaintiffs' claims to meet the jurisdictional amount. *Id.* at 336. Although the Court acknowledged that it was "linguistically possible" to read the statute to allow aggregation, it feared that doing so would "seriously undercut" Congress's efforts to "check . . . the rising caseload of the federal courts, especially with regard to the federal courts' diversity

of citizenship jurisdiction" by periodically raising the amount-in-controversy threshold. *Id.* at 338-340.

"In light of" *Snyder*, this Court held that "the 'plaintiff's viewpoint' rule is the only valid rule." *Massachusetts State Pharm. Ass'n v. Fed. Prescription Serv., Inc.*, 431 F.2d 130, 132 n.1 (8th Cir. 1970). Valuing "the amount in controversy from the defendant's viewpoint," the court reasoned, "would in effect permit aggregation of claims contrary to the teaching in *Snyder*." *Id.* This Court has consistently applied that reasoning in non-CAFA cases ever since. *See, e.g.*, *Advance Am. Servicing of Arkansas, Inc. v. McGinnis*, 526 F.3d 1170, 1173 (8th Cir. 2008), *abrogation on other grounds recognized by CMH Homes, Inc. v. Goodner*, 729 F.3d 832, 836 (8th Cir. 2013); *Smith v. Am. States Preferred Ins. Co.*, 249 F.3d 812, 813 (8th Cir. 2001).

The District Court's failure to acknowledge the rationale behind the plaintiff's-viewpoint rule led it to overlook the best evidence of Congress's intent: the statute's text. In contrast to the traditional rule, CAFA provides that "[i]n any class action, the claims of the individual class members *shall be aggregated* to determine whether the matter in controversy exceeds" the jurisdictional amount. 28 U.S.C. § 1332(d)(6) (emphasis added). In other words, Congress signaled it was *not* adopting the interpretation courts had given Section 1332(a). *Contra* Dkt. No. 32 at 10 (citing *Lorillard v. Pons*, 434 U.S. 575, 581 (1978)).

CAFA's rejection of the pre-existing rules was meant to serve the statute's broader purpose. Contrary to *Snyder*'s fears of rising federal caseloads, CAFA's drafters fully "intended to expand substantially federal court jurisdiction over class actions." S. Rep. 109-14 at 43 (2005). They were "aware that some courts," such as the Eighth Circuit, had "reasoned that assessing the amount in controversy from the defendant's perspective was tantamount to aggregating damages." *Id.* But Congress wanted Federal courts to exercise their jurisdiction "if the value of the matter in litigation exceeds $5,000,000 either from the viewpoint of the plaintiff *or the viewpoint of the defendant*, and regardless of the type of relief sought (e.g., damages, injunctive relief, or declaratory relief)." *Id.* at 42 (emphasis added). That is why CAFA rendered the concerns behind the plaintiff's-viewpoint rule "[ir]relevant" by mandating aggregation. *Id.* at 43.[3]

The District Court's misguided application of the plaintiff's-viewpoint rule thus contravenes the statute's text and history and undermines the statute's stated purpose of "ensuring 'Federal court consideration of interstate cases of national

[3] The District Court sought additional support for its decision to ignore the legislative history by noting that some courts had criticized a passage in the Senate Report regarding the burden to establish the propriety of removal. Dkt. No. 32 at 10-11. Even if those criticisms survive the Supreme Court's decision in *Dart Cherokee Basin Operating Co., LLC v. Owens*, 135 S. Ct. 547 (2014), the point is irrelevant because the Senate Report here merely confirms what CAFA's text expressly states. *See id* at 554 (citing the Senate Report in support of the holding that "no antiremoval presumption attends cases invoking CAFA.").

importance.' " *Standard Fire Ins. Co. v. Knowles*, 133 S. Ct. 1345, 1350 (2013) (quoting CAFA § 2(b)(2), 119 Stat. 5). Congress understood that "a class action seeking an injunction that would require a defendant to restructure its business in some fundamental way might 'cost' a defendant well in excess of" the jurisdictional amount, "but might have substantially less 'value' to a class of plaintiffs." S. Rep. 109-14 at 43. By ignoring these potentially enormous costs, the plaintiff's-viewpoint rule fails to assure Federal adjudication of "cases of national importance."

III. THE DISTRICT COURT'S ALTERNATE HOLDING IS MANIFESTLY CONTRARY TO THIS COURT'S PRECEDENT.

Finally, review is warranted because the District Court's alternate holding, that Ferrara failed to meet its burden to establish the amount in controversy—which this Court would review *de novo*—was seriously flawed. *See Raskas v. Johnson & Johnson*, 719 F.3d 884, 887 (8th Cir. 2013).

The rule in this Circuit is plain: "The removing party's 'burden of describing how the controversy exceeds $5 million' constitutes 'a pleading requirement, not a demand for proof.' " *Id.* at 888 (quoting *Hartis v. Chicago Title Ins. Co.*, 694 F.3d 935, 944-945 (8th Cir. 2012)). "Once the proponent of federal jurisdiction has explained *plausibly* how the stakes exceed $5 million . . . the case belongs in federal court unless it is legally impossible for the plaintiff to recover that much." *Id.* (quoting *Spivey v. Vertrue, Inc.*, 528 F.3d 982, 986 (7th Cir. 2008))

(emphasis added). Indeed, federal jurisdiction remains proper "[e]ven if it is highly improbable that the Plaintiffs will recover the amounts Defendants have put into controversy." *Id.*

The District Court thought Ferrara's description of the amount in controversy was deficient because it "fail[ed] to specify" whether the hypothetical injunction addressed in Mr. Murray's declaration "would require additional filling of the existing package sizes or shrinking the package size to more closely fit the current weight of actual candy" and whether it would require retooling "every Red Hots candy production line." Dkt No. 32 at 12.

In fact, the declaration expressly addressed an injunction requiring "upgrades to the equipment for packaging Ferrara's candy into cardboard boxes" in order to "material[ly] increase . . . the percentage fill of Red Hots candy in Theater and Changemaker boxes." Dkt No. 16, ¶ 5. What is more, it listed the various kinds of weighing and dispensing equipment such upgrades would require and broke out the cost of these upgrades for each of the two relevant production lines. *Id.* ¶ 6. But even if the face of Murray's declaration did not conclusively rebut the District Court's misreading, this Court has held that overinclusivity is not a basis to reject a plausible description of the amount in controversy. *Raskas*, 719 F.3d at 887. Nor are defendants "required to provide a formula or methodology for

calculating the potential damages." *Id.* at 888 (internal quotation marks omitted). The District Court was wrong to require more.

The District Court also criticized Ferrara's estimate as "speculative" in contrast to another case in which the defendant showed that it "was virtually certain to incur substantial pecuniary costs." Dkt No. 32 at 12 (internal quotation marks omitted). Once again, this Court forecloses application of such a standard. The defendant's burden is "a pleading requirement, not a demand for proof." *Raskas*, 71 F.3d at 888 (internal quotation marks omitted). A "plausible" allegation will suffice "[e]ven if it is *highly improbable*." *Id.* (emphasis added). In any event, the declaration was based on Murray's "knowledge of [Ferrara's] packaging processes and [his] investigation into the costs of making necessary upgrades." Dkt. No. 16 ¶ 5. That is the opposite of speculation.

Finally, the District Court faulted Ferrara for advancing a theory that "Plaintiff cannot reasonably have enough information to rebut." Dkt. No. 32 at 12. But that is true of virtually every amount-in-controversy allegation, including sales figures like the ones the District Court accepted without question in this very case. *Id.* at 4. This Court has never suggested such a limitation on the kinds of evidence defendants may offer to establish jurisdiction. *See Raskas*, 719 F.3d at 888 (rejecting objections to defendant's "inadmissible hearsay evidence" of the amount in controversy).

At bottom, the District Court fundamentally misunderstood the amount-in-controversy inquiry. The court thought it was "unjust to allow a defendant to invoke federal jurisdiction using a worst-case hypothetical that involves reworking their core business practices to solve the most minimal problem." Dkt. No. 32 at 11. That concern was doubly misguided. First, the District Court was not in a position at this stage in the proceedings to determine whether complying with an injunction would be "the most minimal problem" for Ferrara. Ferrara plausibly described an injunction that would force it to expend over $6 million. That is all CAFA requires. *Raskas*, 719 F.3d at 888. Second, defendants have no obligation to imagine the least costly way they might comply with a hypothetical injunction at the outset of proceedings. CAFA demands no more than a "plausible" description of the stakes. *Id.* And the statute embodies "a strong preference that interstate class actions should be heard in a federal court if properly removed by any defendant." *Dart Cherokee*, 135 S. Ct. at 554 (quoting S. Rep. 109-14 at 43 (2005)). The District Court should not have second-guessed Ferrara's detailed and obviously plausible explanation of the amount in controversy.

CONCLUSION

For all of the foregoing reasons, permission to appeal should be granted and the order remanding this case should be reversed.

Respectfully submitted,

/s/ Eugene A. Sokoloff

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Dated: June 26, 2017

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of June, 2017, a copy of the foregoing Petition of Defendant Ferrara Candy Co. for Permission to Appeal An Order Remanding A Class Action Under 28 U.S.C. § 1453(c) was served upon the following counsel by electronic and first-class mail:

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RE: 17-8023 Ferrara Candy Co. v. Jaclyn Waters

Dear Counsel:

A petition for permission to appeal has been filed under the caption and miscellaneous case number shown above.

Counsel for the respondent is directed to file a response to this application within 10 days from service of the petition.

Upon receipt of the response, the matter will be submitted to the court for a ruling. All counsel will be advised of the court's decision. No briefing schedule will be established unless the court grants the petition.

The Clerk of the United States District Court is being notified of the filing of the petition. If the petition is granted, petitioner must pay the district court all required fees. Please refer to Federal Rule of Appellate Procedure 5 and the applicable statutory sections for further guidance and information.

On June 1, 2007, the Eighth Circuit implemented the appellate version of CM/ECF. Electronic filing is **now mandatory for attorneys** and voluntary for pro se litigants proceeding without an attorney. Information about electronic filing can be found at the court's web site www.ca8.uscourts.gov. In order to become an authorized Eighth Circuit filer, you must register with the PACER Service Center at https://www.pacer.gov/psco/cgi-bin/cmecf/ea-regform.pl. Questions about CM/ECF may be addressed to the Clerk's office.

Michael E. Gans
Clerk of Court

DMW

Enclosure(s)

cc: Mr. Matthew Hall Armstrong
Mr. Troy Bozarth
Honorable Noelle C. Collins
Mr. Robert B. Hawk
Mr. Charles Noah Insler
Mr. Gregory J. Linhares
Mr. David J. Robbins
Ms. Naomi B. Spector

District Court/Agency Case Number(s): 4:17-cv-00197-NCC

Caption For Case Number: 17-8023

Jaclyn Waters

Respondent

v.

Ferrara Candy Co.

Petitioner

Addresses For Case Participants: 17-8023

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