MEALEY'S® LITIGATION REPORT
Class Actions

Will The Supreme Court Finally Resolve The Circuit Split Over Rule 23(C)(4) Issue Class Actions?

by
James P. Muehlberger,
Timothy E. Congrove
and
Daniel E. Cummings

Shook, Hardy & Bacon
Kansas City, Missouri

A commentary article reprinted from the June 4, 2021 issue of Mealey's Litigation Report: Class Actions

LexisNexis®

Commentary

Will The Supreme Court Finally Resolve The Circuit Split Over Rule 23(C)(4) Issue Class Actions?

By
James P. Muehlberger,
Timothy E. Congrove
and
Daniel E. Cummings

[Editor's Note: James Muehlberger and Timothy Congrove are partners and Daniel Cummings is an associate at Shook, Hardy & Bacon, where their practices include class actions and complex litigation. Any commentary or opinions do not reflect the opinions of Shook, Hardy & Bacon or LexisNexis®, Mealey Publications™. *Responses are welcome.]*

Federal courts have disagreed for two-and-a-half decades over the meaning of Federal Rule of Civil Procedure 23(c)(4) — "When appropriate, an action may be brought or maintained as a class action with respect to particular issues" — and how that simple provision fits within the broader scheme of Rule 23. This provision is found in subsection (c), which contains various "housekeeping" rules, whereas the core framework for class actions are housed in subsections (a) and (b). Rule 23(a) requires all putative class actions to satisfy the baseline requirements of numerosity, commonality, typicality, and adequacy of representation. Rule 23(b) enumerates the three permissible types of class actions. Most common is (b)(3), which requires "that the questions of law or fact common to class members predominate over any questions affecting only individual members."

Several circuits have adopted an expansive interpretation of Rule 23(c)(4), effectively permitting plaintiffs to do an end-run around the predominance requirement of subsection (b)(3) by certifying a class with respect to a specific issue under subsection (c)(4), even when common issues do not predominate over the case *as a whole*. The Fifth Circuit, by contrast, requires that common issues predominate over the case as a whole *before* certifying a common issue for class treatment under subsection (c)(4). In practice, requests for certification under subsection (c)(4) are often made by plaintiffs as a "Hail Mary" or backup argument when certification under (b)(2) or (b)(3) seems likely to fail.

Thus far, the Supreme Court has dodged the opportunity to resolve this split. But with three new members in the past four years and a stronger commitment to the textualist method of interpretation than ever before, the time may be ripe for the Court to take up the issue of issue classes. This article explores the circuit split as well as the strong arguments from the rule's text, structure, and history for the limited interpretation of Rule 23(c)(4).

The Issue Class Circuit Split

Rule 23, which governs class actions, was included in the original Federal Rules of Civil Procedure adopted in 1938. Decades later in 1966, Rule 23 was completely overhauled, birthing the modern class action rule we know today, including the basic class requirements in subsection (a) and the three categories of classes in subsection (b). The 1966 revision was also the genesis of the issue class rule now contained in Rule 23(c)(4).

Until the 1980s, courts generally took a "very narrow view" of Rule 23(c)(4) to the extent they cited it at all.

Throughout the 1980s and 1990s the use of class actions began to expand, although few courts explicitly addressed the interplay between subsections (b)(3) and (c)(4). One of the few exceptions was a district court in *In re Tetracycline Cases* which adopted the expansive view, forthrightly admitting that the "effect of this [interpretation] is to lessen . . . the importance of the predominance requirement."

Then, in 1996, the first federal circuit court weighed in. The Fifth Circuit adopted the limited interpretation of Rule 23(c)(4) in *Castano v. American Tobacco Co.*, explaining:

> A district court cannot manufacture predominance through the nimble use of subdivision (c)(4). ***The proper interpretation of the interaction between subdivisions (b)(3) and (c)(4) is that a cause of action, as a whole, must satisfy the predominance requirement of (b)(3) and that (c)(4) is a housekeeping rule that allows courts to sever the common issues for a class trial.*** Reading rule 23(c)(4) as allowing a court to sever issues until the remaining common issue predominates over the remaining individual issues would eviscerate the predominance requirement of rule 23(b)(3); the result would be automatic certification in every case where there is a common issue, a result that could not have been intended.

Later that year, the Ninth Circuit broke open a circuit split, holding that "[e]ven if the common questions do not predominate over the individual questions so that class certification of the entire action is warranted, Rule 23 authorizes the district court in appropriate cases to isolate the common issues under Rule 23(c)(4)[] and proceed with class treatment of these particular issues." In the following years, a few more circuits adopted the expansive interpretation, while other circuits noted the split and avoided taking a side.

Textualism and the Supreme Court

Textualism — the interpretive theory that legal rules should be interpreted based on their texts (understood in context) rather than on the presumed policies, purposes, or intentions behind them — has grown increasingly influential in the federal courts over the past several decades. In particular, the U.S. Supreme Court's current adherence to textualist legal interpretation sits in stark contrast to its predominant legal interpretation practices of several decades ago, which were marked by appeals to underlying "purpose" or "intent" or non-legal policy arguments. Any resolution of the circuit split over the interpretation of Rule 23(c)(4) will likely hinge on the text of that provision and the broader structure of Rule 23. The text, structure, and history of Rule 23 confirm that the Fifth Circuit's limited interpretation is the correct one.

An Overview of Rule 23

The Supreme Court has explained that "[t]he class action is 'an exception to the usual rule that litigation is conducted by and on behalf of the individual named parties only.'" Federal Rule of Civil Procedure 23 provides the framework for the class action procedural device in federal courts.

Subsection (a) provides three basic requirements that all class actions must satisfy: (a) "the class is so numerous that joinder of all members is impracticable"; (b) "there are questions of law or fact common to the class"; (c) "the claims or defenses of the representative parties are typical of the claims or defenses of the class"; and (d) "the representative parties will fairly and adequately protect the interests of the class."

Subsection (b) enumerates three different categories of class actions. A "proposed class must satisfy at least one of the three requirements listed in Rule 23(b)." Subsection (b)(1) covers a limited category of cases where "individual adjudications would be impossible or unworkable," such as a dispute over a limited fund. Subsection (b)(2) applies where plaintiffs seek indivisible class-wide injunctive relief. And the most commonly used category is subsection (b)(3), which allows for class actions where "the questions of law or fact common to class members predominate over any questions affecting only individual members, and [where] a class action is superior to other available methods for fairly and efficiently adjudicating the controversy."

Together, subsections (a) and (b) of Rule 23 provide the basic legal requirements for certifying a class ac-

tion. The remainder of Rule 23 provides various rules for implementing class actions. Subsection (c) covers a variety of housekeeping rules, such as requirements for certification orders, class judgments, and providing notice to the class, subclasses, and — relevant here — issue classes. Subsection (d) provides rules for "conducting the action." Subsection (e) governs settlements. Subsection (f) addresses appeals. Subsection (g) covers class counsel. And subsection (h) covers costs and attorney fees.

A Textual Analysis of Rule 23(c)(4)

A close textualist analysis supports the limited interpretation of issue classes under Rule 23(c)(4). The text of Rule 23(c)(4) itself — stating that "[w]hen appropriate, an action may be brought or maintained as a class action with respect to particular issues" — provides little guidance on its interaction with subsection (b). But the structure of the rule and the context of subsection (c)(4) support the limited interpretation of that provision, that an issue class action must satisfy the requirements of one of the categories in subsection (b), viewed in light of the entire action, not just the proposed issues.

Two key textual clues support the limited interpretation of (c)(4). First is the structure of Rule 23. If Rule 23 actually authorized issue classes to be a standalone category of class actions, one would expect them to be enumerated in subsection (b). Subsection (b) lists the only three permissible categories of class actions. The Supreme Court has said that a "proposed class must satisfy at least one of the three requirements listed in Rule 23(b)."

However, the expansive view of (c)(4) effectively eviscerates the need to satisfy subsection (b). If Rule 23(b)(3)'s predominance inquiry asks whether common issues predominate over individual issues *within the proposed issues*, rather than within the case as a whole, predominance will be found virtually by default. No competent class counsel would include issues of individualized inquiry within a proposed issue class. Thus, under the expansive interpretation, common issues of law and fact will always predominate over individual issues and subsection (b)(3) will always be satisfied for issue classes, rendering it a nullity.

The expansive interpretation effectively renders issue classes an independent category of class actions. If the expansive interpretation were correct, issue classes would be included in subsection (b), not buried in the miscellaneous housekeeping provisions of subsection (c). As Justice Scalia reminded us in the statutory interpretation context: "Congress . . . does not alter the fundamental details of a regulatory scheme in vague terms or ancillary provisions — it does not, one might say, hide elephants in mouseholes." Here, too, the drafters of Rule 23 did not hide an issue class elephant in the mouse hole of subsection (c)(4).

The second textual clue that supports the limited interpretation of (c)(4) is the text of subsections (c)(4) and (b)(3). These provisions suggests that the proper focus of the predominance inquiry for issue classes is the entire case, not just the selected issues proposed for certification. Subsection (c)(4) states: ". . . ***an action*** may be brought or maintained as a class action . . . ." Subsection (b) (in a prior, substantively identical version) stated: "***An action*** may be maintained as a class action if . . . ." Subsection (b)(3) states: ". . . that a class action is superior to other available methods for fairly and efficiently adjudicating ***the controversy***." The consistent references to the "action" and the "controversy" suggest that the proper lens through which courts should determine whether "questions of law or fact common to class members predominate over any questions affecting only individual members" is the entire "controversy," the "action." By contrast, asking whether common issues predominate over individual questions with regard to "particular issues" is not a natural or common-sense reading of the rule.

Textual Arguments for the Expansive Interpretation of Rule 23(c)(4)

The most common textual argument proffered in favor of the expansive interpretation of Rule 23(c)(4) is that the limited interpretation would render (c)(4) superfluous. But an obvious counter-argument is that the expansive interpretation would itself render subsection (b) superfluous, as discussed above, because the satisfaction of (b)(3)'s predominance requirement would be virtually automatic.

But more to the point, as Professor Laura Hines — the preeminent expert on Rule 23(c)(4) issue classes — has explained, the argument that the limited interpretation would render (c)(4) superfluous is simply false. Rule 23(c)(4) serves an important role by making clear that "a class action could include

both common issues (which could be litigated on a classwide basis) and individual issues (which could not, of course, be litigated on a class basis), does not make it superfluous." In other words, "Rule 23(c)(4) . . . makes explicit what is implicit in arguably several of the Rule 23(b) class action provisions, but especially in (b)(3): class claims need not be adjudicated in their entirety on a classwide basis." A claim is not disqualified for class treatment (so long as it satisfies Rule 23's requirements) merely because it requires *some* individualized inquiry, such as damages.

Another common argument by proponents of the expansive interpretation is based in a prior version of Rule 23. Prior to the "stylistic" 2007 amendments, the provisions for issue classes and sub-classes were combined in Rule 23(c)(4), which read: "(4) When appropriate (A) an action may be brought or maintained as a class action with respect to particular issues, or (B) a class may be divided into subclasses and each subclass treated as a class, and the provisions of this rule shall ***then*** be construed and applied accordingly." The word "then," the argument goes, suggests that the predominance analysis should be performed in light of the particular issue, not the case as a whole. But a better reading is that issue classes must still satisfy subsections (a) and (b), just as subclasses must. At most, proponents of the expansive interpretation of Rule 23(c)(4) can point to a single, ambiguous word that can be plausibly read as supporting either reading. This is not a particularly compelling argument in light of the strong argument from the structure of the rule supporting the limited interpretation.

Legal Context: The Drafters of Rule 23 Did Not Hide an Elephant in a Mouse Hole

The background legal context and the drafters' intent confirms what the textual analysis shows: that the limited interpretation of Rule 23(c)(4) is the correct reading of that provision.

At the time Rule 23(c)(4) was added in 1966, Rule 23 underwent a significant rewriting at the hands of the Advisory Committee. Rule 23 was not a novel creation of the rule's drafters, but reflected existing precedent on class actions at the time. Specifically, case law supported the practice of "adjudicating individual aspects of class members' claims (typically damages) following a favorable resolution of liability issues on behalf of the class." The Advisory Committee notes confirm this view, stating by way of example for Rule 23(c)(4) that "in a fraud or similar case the action may retain its 'class' character only through the adjudication of liability to the class; the members of the class may thereafter be required to come in individually and prove the amounts of their respective claims." The modest purpose of Rule 23(c)(4) was to clarify that, consistent with this pre-existing case law, a class action can involve some element of individual adjudication — not to create a new free-standing category of class action independent of the categories in Rule 23(b). A class may include some individualized inquiry, but common issues must predominate over the entire case.

The rule's drafters similarly viewed Rule 23(c)(4) as playing a limited role within the structure of Rule 23. Professor Ben Kaplan characterized the provision that was to become 23(c)(4) as "a sort of detail." In later correspondence, Professor Charles Allen Wright referred to the same provision as a "picky detail which does not require statement in the rule." It is therefore clear that the drafters of Rule 23(c)(4) intended it to be a small "mouse hole," and not a mighty provision that overwhelms the rest of the rule.

The background legal context and statements by the rule's drafters support the textual case for the limited interpretation of Rule 23(c)(4). This provision was added to Rule 23 simply to clarify that class actions are not an all-or-nothing proposition. Class actions can contain some individualized inquiry, so long as the requirements of subsection (b) are met. For a (b)(3) class action, this means that common issues must predominate over individualized issues with regard to the entire case.

Conclusion

As Yogi Berra once reportedly quipped, "It's tough to make predictions, especially about the future." Similarly difficult is predicting what the U.S. Supreme Court will do. But it's fair to say that the Supreme Court is much more likely to grant review where the circuit courts have split on a legal issue — even when only one circuit sits on one side of the split. Time will tell whether the Court finally resolves the circuit split over Rule 23(c)(4) issue classes. If it does, the Court would do well to look to the text, structure, and history of Rule 23 and adopt the correct, limited interpretation of Rule 23(c)(4).

Endnotes

1. *See generally*, Timothy E. Congrove, Gregory K. Wu, & Christopher Warren, *Uncertain Principles? Evaluating the Tension between Rule 23(b)(3) And (c)(4) post-Dukes, and the ALI's Effort to Integrate the Provisions*, Bloomberg Law (July 9, 2012), reprinted in 13:13 BNA Insights 741 (2012).

2. *See, e.g., Behr Dayton Thermal Prod. LLC v. Martin*, 139 S. Ct. 1319, 203 L. Ed. 2d 564 (2019) (denying petition for writ of certiorari); *Merrill Lynch, Pierce, Fenner & Smith, Inc. v. McReynolds*, 568 U.S. 887, 133 S. Ct. 338, 184 L. Ed. 2d 157 (2012) (denying petition for writ of certiorari); P*ella Corp. v. Saltzman*, 562 U.S. 1178, 131 S. Ct. 998, 178 L. Ed. 2d 826 (2011) (denying petition for writ of certiorari); *Healthplan Servs., Inc. v. Gunnells*, 542 U.S. 915, 124 S. Ct. 2837, 159 L. Ed. 2d 287 (2004) (denying petition for writ of certiorari).

3. The provision on issue classes was then located in subsection (c)(4)(A), sharing (c)(4) with the provision on sub-classes, which was in (c)(4)(B). In the "stylistic" revisions of 2007, the provisions on issue classes and sub-classes were placed in subsections (c)(4) and (c)(5), respectively. *See* Fed. R. Civ. P. 23, Advis. Comm. Notes, 2007 amends.

4. Laura J. Hines, *Challenging the Issue Class Action End-Run*, 52 Emory L.J. 709, 725 28 (2003).

5. *Id*. at 729 41.

6. 107 F.R.D. 719, 727 (W.D. Mo. 1985).

7. Some commentators have falsely claimed that there is no longer a circuit split on Rule 23(c)(4) or that the split is "weak" because, in essence, the Fifth Circuit has retreated from or secretly overruled the *Castano* case. *See, e.g.*, Patricia Bronte et. al., *"Carving at the Joint": The Precise Function of Rule 23(c)(4),* 62 DePaul L. Rev. 745, 745–46 (2013). Often, the case *In re Deepwater Horizon,* 739 F.3d 790 (5th Cir. 2014), is identified as conflicting with *Castano. See* Joseph A. Seiner, *The Issue Class*, 56 B.C. L. Rev. 121, 134 (2015). But nothing in *Deepwater Horizon* actually conflicts with or overrules *Castano*. Commentary to the contrary simply misreads or reads too much into *Deepwater Horizon*. And such a *sub silencio* overruling would violate Fifth Circuit precedent, namely the prior panel rule. S*ee Pruitt v. Levi Strauss & Co.*, 932 F.2d 458, 465 (5th Cir. 1991) ("In this circuit one 'panel may not overrule the decision, right or wrong, of a prior panel, in the absence of *en banc* reconsideration or superseding decision of the Supreme Court.'"). And district courts within the Fifth Circuit have continued to rely on and follow *Castano*'s limited interpretation of Rule 23(c)(4), even after *Deepwater Horizon. See, e.g.*, *Brawley v. Bath & Body Works, LLC*, No. 3:18-CV-02098-S, 2019 U.S. Dist. LEXIS 227538, 2019 WL 7945655, at *5 (N.D. Tex. Sept. 25, 2019); *Galitski v. Samsung Telecommunications Am., LLC*, No. 3:12-CV-4782-D, 2015 U.S. Dist. LEXIS 121698, 2015 WL 5319802, at *14 (N.D. Tex. Sept. 11, 2015); *Paternostro v. Choice Hotel Int'l Servs. Corp.*, 309 F.R.D. 397, 405 (E.D. La. 2015).

8. 84 F.3d 734, 745 n.21 (emphasis added).

9. *Valentino v. Carter-Wallace, Inc.*, 97 F.3d 1227, 1234 (9th Cir. 1996).

10. *See In re Nassau Cty. Strip Search* Cases, 461 F.3d 219, 226 (2d Cir. 2006) ("We agree with the Ninth Circuit's view of the matter."); *McReynolds v. Merrill Lynch, Pierce, Fenner & Smith, Inc.*, 672 F.3d 482 (7th Cir. 2012) (appearing to adopt the broad interpretation of Rule 23(c)(4)), *recognized as abrogated on other grounds by Phillips v. Sheriff of Cook Cty.*, 828 F.3d 541, 559 (7th Cir. 2016); *Martin v. Behr Dayton Thermal Prod. LLC*, 896 F.3d 405, 411 13 (6th Cir. 2018) ("The broad approach [to Rule 23(c)(4)] is the proper reading of Rule 23, in light of the goals of that rule."); s*ee also Gunnells v. Healthplan Servs., Inc.*, 348 F.3d 417, 444 (4th Cir. 2003) ("[T]here is a circuit conflict as to whether predominance must be shown with respect to an entire cause of action, or merely with respect to a specific issue, in order to invoke (c)(4). . . . But we have no need to enter that fray."); *In re St. Jude Med., Inc.*, 522 F.3d 836, 841 (8th Cir. 2008) ("[T]here is a conflict in authority on whether such a class may properly be certified under Rule 23."); *Hohider v. United Parcel Serv., Inc.*, 574 F.3d 169, 200 (3d Cir. 2009) ("The interaction between the requirements for class certification under Rule 23(a) and (b) and the authorization of issues classes under Rule 23(c)(4) is a difficult matter that has generated divergent interpretations among the courts. . . .

We have not yet engaged this specific question, nor need we do so here."); *Borrero v. United Healthcare of New York, Inc.*, 610 F.3d 1296, 1310 n.5 (11th Cir. 2010) (noting that the Eleventh Circuit had not "address[ed] the propriety of such partial certification" under Rule 23(c)(4)).

11. *See, e.g.*, Tara Leigh Grove, Comment, *Which Textualism?*, 134 Harv. L. Rev. 265 (2020) ("[T]extualism has in recent decades gained considerable prominence within the federal judiciary."); Anton Metlitsky, *The Roberts Court and the New Textualism*, 38 Cardozo L. Rev. 671 (2016); John F. Manning, The New Purposivism, 2011 Sup. Ct. Rev. 113 (2011); William N. Eskridge, Jr., *The New Textualism*, 37 UCLA L. Rev. 621 (1990); *see also* Hines, T*he Unruly Class Action, supra*, at 729 (discussing textualism in the context of Rule 23(c)(4)).

12. *See generally* Elena Kagan, *The Scalia Lecture: A Dialogue with Justice Kagan on the Reading of Statutes*, Harv. L. Today (Nov. 17, 2015), http://today.law.harvard.edu/in-scalia-lecture-kagan-discusses-statutory-interpretation (discussing the impact of Justice Scalia and textualism on the Supreme Court and federal court's jurisprudence).

13. *Wal-Mart Stores, Inc. v. Dukes*, 564 U.S. 338, 348 (2011) (quoting *Califano v. Yamasaki*, 442 U.S. 682, 700–701 (1979)).

14. *Id.* at 345.

15. *Id.* at 361.

16. *See id.* at 360 61.

17. *See* Laura J. Hines, *The Unruly Class Action*, 82 Geo. Wash. L. Rev. 718, 733 (2014) ("Given this view of Rule 23's structural design, the certification criteria set forth in (a) and (b) should be understood as rendering those requirements conditions precedent to the directives found in 23(c) and later subsections.").

18. *See* Hines, *The Unruly Class Action, supra*, at 729.

19. *Dukes*, 564 U.S. at 345.

20. *See Castano*, 84 F.3d at 745 n.21 ("Reading rule 23(c)(4) as allowing a court to sever issues until the remaining common issue predominates over the remaining individual issues would . . . [result in] automatic certification in every case where there is a common issue, a result that could not have been intended."); *Gunnells v. Healthplan Servs., Inc.*, 348 F.3d 417, 451 (4th Cir. 2003) (Niemeyer, J., concurring in part and dissenting in part) ("[I]f Rule 23(c)(4)(A) allows a court to omit from its predominance analysis any claims or issues affecting only individual members, it would seem that the predominance of the selected issue is a foregone conclusion since the common question of law or fact would always predominate over the individual issues that are not a factor."); *Butler v. Sears, Roebuck & Co.*, 702 F.3d 359, 361 (7th Cir. 2012) (Posner, J.) ("If there are . . . only common questions, the issue of predominance is automatically resolved."), judgment vacated on other grounds, 569 U.S. 1015, 133 S. Ct. 2768, 186 L. Ed. 2d 215 (2013), and judgment reinstated, 727 F.3d 796 (7th Cir. 2013); Hines, *The Unruly Class Action, supra*, at 718 ("Because all the 'particular issues' will be common to the class, under this theory (c)(4)[] class actions satisfy the (b)(3) predominance requirement by definition.").

21. *Whitman v. Am. Trucking Associations*, 531 U.S. 457, 468 (2001).

22. The current version reads: "A class action may be maintained if . . . ." This amendment was not intended to make any substantive change to the rule. See Fed. R. Civ. P. 23, Advis. Comm. Notes, 2007 amends. ("The [2007] changes are intended to be stylistic only.").

23. *E.g., Martin*, 896 F.3d at 413; *In re Nassau Cty. Strip Search Cases*, 461 F.3d 219, 226–27 (2d Cir. 2006).

24. Hines, *The Unruly Class Action, supra*, at 738 61.

25. *Id.* at 738

26. *Id.* at 739.

27. *Id.* at 742 743.

28. *Martin*, 896 F.3d at 413; In re Nassau, 461 F.3d at 226; *Gunnells v. Healthplan Servs., Inc.*, 348 F.3d 417, 439 (4th Cir. 2003).

29. Hines, *Challenging the Issue Class Action End-Run*, *supra* at 717–18.

30. Fed. R. Civ. P. 23, Advis. Comm. Notes 1966 Amends.; Hines, *Challenging the Issue Class Action End-Run, supra* at 715.

31. Hines, *The Unruly Class Action, supra*, at 741 44.

32. Hines, *The Unruly Class Action, supra*, at 743.

33. Fed. R. Civ. P. 23, Advis. Comm. Notes 1966 Amends.

34. Hines, *The Unruly Class Action, supra*, at 752.

35. Tr. of Civil Rules Committee Meeting, Oct. 31, Nov. 1-2, 1963, at 3.

36. Letter from Charles A. Wright to Benjamin Kaplan dated Mar. 30, 1963.

37. *See City of San Antonio, Texas v. Hotels.com*, L.P., et al., 2020 WL 5536086 (Sept. 2020 U.S.) (petition for writ of certiorari where the Fifth Circuit stood alone in a circuit split); *id.*, 141 S. Ct. 973, 208 L. Ed. 2d 509 (Jan. 8, 2021) (granting petition for writ of certiorari). ■

MEALEY'S LITIGATION REPORT: CLASS ACTIONS
edited by Bajeerah LaCava
The Report is produced twice monthly by

11600 John F. Kennedy Blvd., Suite 1655, Philadelphia, PA 19103, USA
Telephone: (215)564-1788 1-800-MEALEYS (1-800-632-5397)
Email: mealeyinfo@lexisnexis.com
Web site: http://www.lexisnexis.com/mealeys
ISSN 8755-9005