LexisNexis®

MARCH 2023

LITIGATION INSIGHTS

MOORE'S FEDERAL PRACTICE—TOP THREE HIGHLIGHTS

The following three summaries are this month's Editor's Top Picks from the dozens of decisions added to Moore's Federal Practice and Procedure.

ARBITRATION

Functus Officio Doctrine

Smarter Tools Inc. v. Chongqing SENCI Import & Export Trade Co.

57 F.4th 372, 2023 U.S. App. LEXIS 986 (2d Cir. Jan. 17, 2023)

Jump to full summary

The Second Circuit holds that the functus officio doctrine does not prevent a court from remanding an arbitration award for the arbitrator to issue a reasoned award contemplated by the parties' agreement.

CLASS ACTIONS

Class Action Fairness Act

LeFlar v. Target Corp.

57 F.4th 600, 2023 U.S. App. LEXIS 383 (8th Cir. Jan. 9, 2023)

Jump to full summary

The Eighth Circuit has held that a district court erred by applying, in a case removed under the Class Action Fairness Act, a presumption that all doubts about federal jurisdiction must be resolved in favor of remand to state court.

INTERSYSTEM PRECLUSION

***Rooker-Feldman* Doctrine**

Bruce v. City & Cnty. of Denver

57 F.4th 738, 2023 U.S. App. LEXIS 593 (10th Cir. Jan. 10, 2023)

Jump to full summary

The Tenth Circuit has held that a claimant in state-court receivership proceedings who was not a named party to those proceedings, but who had the right to appeal the state court's rulings, qualified as a state-court loser for purposes of the *Rooker-Feldman* doctrine.

Continue on next page

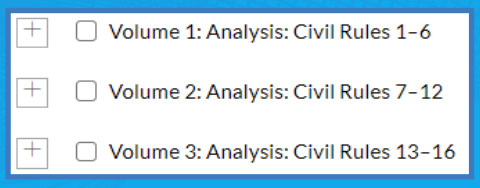
LexisNexis®

Moore's Federal Practice: THE BACKBONE OF ANY FEDERAL LITIGATOR'S LIBRARY

By Chet Lexvold, LexisNexis
Solutions Consultant for the Federal Government

In my 13 years of legal research experience, my top takeaway is that treatises and practice guides are under-utilized by the legal community. Researchers can save time and feel more confident in their research by incorporating secondary sources into their workflow. And for any federal litigator, Moore's Federal Practice is a must-have.

Moore's Federal Practice – Criminal and Moore's Federal Practice – Civil are must-have sources because of their authority: these sources are written by the judges, lawyers, and professors who write and amend the federal rules of criminal and civil procedure. The Tables of Contents for each source mirror the rules of criminal and civil procedure, making them very easy-to-use.



Ease-of-use saves time: the authors not only provide their own analysis, but also extensive citing authority, leading to substantive footnotes with cases from numerous federal circuits:

6 **Immaterial whether plaintiff will ultimately prevail.** Scheuer v. Rhodes, 416 U.S. 232, 236, 94 S. Ct. 1683, 40 L. Ed. 2d 90 (1974) (issue is not whether plaintiff will prevail but whether claimant is entitled to offer evidence to support claims, quoted in *Bernheim v. Litt*, 79 F.3d 318, 321 (2d Cir. 1996)); *accord* Skinner v. Switzer, 562 U.S. 521, 131 S. Ct. 1289, 179 L. Ed. 2d 233, 241–242 (2011) (question is not whether party will ultimately prevail, but whether the "complaint was sufficient to cross the federal court's threshold"); Swierkiewicz v. Sorema N.A., 534 U.S. 506, 515, 122 S. Ct. 992, 152 L. Ed. 2d 1 (2002) ("Rule 8(a) establishes a pleading standard without regard to whether a claim will succeed on the merits"); *see* Hoover v. Ronwin, 466 U.S. 558, 588, 104 S. Ct. 1989, 80 L. Ed. 2d 590 (1984) (Stevens, J., dissenting) ("the probability that [plaintiff] will not prevail at trial is no justification for dismissing the complaint").

2d Circuit *See* Bernheim v. Litt, 79 F.3d 318, 321 (2d Cir. 1996) (quoting *Scheuer*); Villager Pond, Inc. v. Town of Darien, 56 F.3d 375, 378 (2d Cir. 1995) (whether plaintiff will prevail not at issue); Branham v. Meachum, 77 F.3d 626 (2d Cir. 1996) (issue not based on plaintiff's likelihood of success).

5th Circuit Johnson v. Dallas Indep. Sch. Dist., 38 F.3d 198, 205 (5th Cir. 1994) (quoting *Scheuer*).

7th Circuit Pickrel v. City of Springfield, 45 F.3d 1115, 1118 (7th Cir. 1995) (quoting *Scheuer*).

9th Circuit Cervantes v. City of San Diego, 5 F.3d 1273, 1274–1275 (9th Cir. 1993) (quoting *Scheuer*).

11th Circuit Brandt v. Bassett, 69 F.3d 1539, 1550 (11th Cir. 1995) (quoting *Scheuer*); *see also* Harris v. Procter &

Instead of trying to construct the perfect keyword search and then devoting copious amounts of time combing through cases, determining whether (1) they are relevant to the issue, (2) they are authoritative on the issue, and (3) Shepardizing to ensure they have not been overruled, questioned, or distinguished on the issue, researchers can simply go to Moore's and rely on the expertise of the authors to both provide authoritative analysis AND relevant case law.

Continue on next page

ARBITRATION

Functus Officio Doctrine

Smarter Tools Inc. v. Chongqing SENCI Import & Export Trade Co.

57 F.4th 372, 2023 U.S. App. LEXIS 986 (2d Cir. Jan. 17, 2023)

The Second Circuit holds that the functus officio doctrine does not prevent a court from remanding an arbitration award for the arbitrator to issue a reasoned award contemplated by the parties' agreement.

Background. The plaintiff in this case, who had been the losing party in an arbitration, petitioned the district court to vacate the arbitral award. The defendants, who had won in arbitration, cross-petitioned to confirm the award. The district court agreed with the plaintiff that the arbitrator had exceeded his authority by failing to provide a reasoned award as requested by the parties. But instead of vacating the award, the court remanded the matter to allow the arbitrator to issue a reasoned award.

On remand, the arbitrator issued a final amended award that set forth the arbitrator's reasoning. The district court then confirmed the award.

The plaintiff appealed, contending that the district court had erred in remanding to the arbitrator. The plaintiff's main argument was that under the doctrine of functus officio and the Federal Arbitration Act, once the district court found that the arbitrator had exceeded his authority by failing to issue a reasoned award, the only remedy available was vacatur of the award. A panel of the Second Circuit disagreed with the plaintiff's view and affirmed the district court's judgment.

Functus Officio Doctrine. The Second Circuit began by explaining that the common-law doctrine of functus officio (Latin for "having performed the office") dictates that, once arbitrators have fully exercised their authority to adjudicate the issues submitted to them, their authority over those questions ends, and the arbitrators have no further authority, absent agreement by the parties, to redetermine those issues [*see* T.Co Metals, LLC v. Dempsey Pipe & Supply, Inc., 592 F.3d 329, 339 (2d Cir. 2010)]. The traditional rationale underlying the doctrine is that it is necessary to prevent re-examination of an issue by a nonjudicial officer who is potentially subject to outside communication and unilateral influence.

The Second Circuit recognizes several exceptions to the doctrine. For example, when an arbitration award is ambiguous, the district court may remand to the arbitrator for clarification [see New York Bus Tours, Inc. v. Kheel, 864 F.2d 9, 12 (2d Cir. 1988)]. Another exception applies when an arbitral award fails to address a contingency that later arises, or when the award is susceptible of more than one interpretation [*see* Gen. Re Life Corp. v. Lincoln Nat'l Life Ins. Co., 909 F.3d 544, 548 (2d Cir. 2018)]. Other circuits have recognized similar exceptions [see, e.g., Colonial Penn Ins. Co. v. Omaha Indem. Co., 943 F.2d 327, 332 (3d Cir. 1991) (arbitrator can correct mistake that is apparent on face of award, can resolve unadjudicated issue that had been submitted by parties, and can clarify ambiguity in award)].

Court's Power to Remand for Arbitrator to Issue Reasoned Award. The Second Circuit acknowledged that it was an open question within the circuit whether a court may remand for an arbitrator to produce a reasoned award. But several cases contained dicta indicating that remand is appropriate to allow the arbitrator to clarify the meaning or effect of an award [*see*, e.g., Hardy v. Walsh Manning Sec., L.L.C., 341 F.3d 126, 134 (2d Cir. 2003) (district court may remand to seek clarification of whether arbitration panel's intent in making award evidences manifest disregard of law); Siegel v. Titan Industrial Corp., 779 F.2d 891, 894 (2d Cir. 1985) (district court may remand for arbitrator to clarify basis for mathematical calculation underlying award, so as to permit effective judicial review)].

Continue on next page

In the present case, the Second Circuit squarely held that when a district court determines that an arbitrator failed to produce an award in the form agreed to by the parties, remand for a properly conformed order is a permissible choice. The court of appeals said that it makes no sense to redo an entire arbitration proceeding over an error in the form of the award issued after a hearing. Nor does a remand in such circumstances undermine the functus officio doctrine's purpose, which is to prevent arbitrators from changing their rulings after issuance due to outside influence by an interested party.

The appellate panel explained that the rationale for a remand to allow the arbitrator to produce an award conforming to the parties' agreement is consistent with the Second Circuit's exception to the functus officio doctrine for clarification of an award that is susceptible of multiple interpretations. Under that exception, an arbitrator may issue a clarification of an ambiguous award if (1) the final award is ambiguous; (2) the clarification merely clarifies the award, rather than substantively modifying it; and (3) the clarification comports with the parties' intent as set forth in the agreement that gave rise to the arbitration [*see* Gen. Re Life Corp. v. Lincoln Nat'l Life Ins. Co., 909 F.3d 544, 549 (2d Cir. 2018)]. And the court of appeals found that those circumstances aligned with what occurred in this case: the original award was found not to provide the reasoned award the parties bargained for, the amended award clarified the original award by including a rationale for it, and the clarification was consistent with the parties' intent that the arbitrator issue a reasoned award.

- **Vacatur Was Not District Court's Only Option.** The Second Circuit panel rejected an argument that vacatur of the original award was the only option available to the district court under the Federal Arbitration Act (FAA). Section 10(a)(4) of the FAA provides that an arbitration award may be vacated "where the arbitrators exceeded their powers, or so imperfectly executed them that a mutual, final, and definite award upon the subject matter submitted was not made" [9 U.S.C. § 10(a)(4)]. Because the FAA establishes a strong presumption in favor of enforcing an arbitration award, and an award is presumed valid unless proved otherwise, the court's inquiry under section 10(a)(4) focuses on whether the arbitrators had the power, based on the parties' submissions or the arbitration agreement, to reach a certain issue, not whether the arbitrators correctly decided that issue [see Westerbeke Corp. v. Daihatsu Motor Co., 304 F.3d 200, 220 (2d Cir. 2002)].

  Applying the strong presumption in favor of enforcing an arbitration award, the court of appeals found that the arbitrator's failure to render a reasoned award did not require vacatur of the original award. The question before the district court had been whether the arbitrator's original award was reasoned, but there was no question that the arbitrator had the power to reach the issues addressed.

  The court of appeals found that, rather than falling within the scope of section 10(a)(4), the failure to provide a reasoned award in this case fit better under section 11 of the FAA, which allows a court to "make an order modifying or correcting the award . . . [w]here the award is imperfect in matter of form not affecting the merits of the controversy" [9 U.S.C. § 11(c)]. The court reasoned that when, as in this case, the parties agree that the arbitrator will produce a reasoned award, the failure to provide one is an imperfection in a matter of form that does not affect the merits of the controversy. Thus, remand for the arbitrator to produce an award in a form consistent with the parties' agreement both effects the intent of the parties and promotes justice between them, consistent with section 11 [see 9 U.S.C. § 11]. The court of appeals concluded, therefore, that the district court had not erred in remanding for the production of a reasoned award, rather than vacating the original award and forcing the parties to begin anew.

- **Arbitrator Had Not Manifestly Disregarded Law.** The Second Circuit went on to reject an argument that the district court should have vacated the award on the ground of manifest disregard of the law. The appellate panel explained that "awards are vacated on grounds of manifest disregard only in those exceedingly rare instances where some egregious impropriety on the part of the arbitrator is apparent." An arbitration award manifestly disregards the law only if (1) the arbitrator knew of a governing legal principle yet refused to apply it or ignored it altogether; and (2) the law ignored by the arbitrator was well-defined, explicit, and clearly applicable to the case [*see* Porzig v. Dresdner, Kleinwort, Benson, N. Am. LLC, 497 F.3d 133, 139 (2d Cir. 2007)].

Continue on next page

Thus, an award should be enforced, despite a court's disagreement with it on the merits, so long as there is at least a barely colorable justification for the outcome reached [*see* T.Co Metals, LLC v. Dempsey Pipe & Supply, Inc., 592 F.3d 329, 339 (2d Cir. 2010)]. A "barely colorable justification" exists so long as the arbitrator had reasoning on which the award could have justifiably rested [*see* Willemijn Houdstermaatschappij, BV v. Standard Microsystems Corp., 103 F.3d 9, 13–14 (2d Cir. 1997)].

The court of appeals agreed with the district court that, based on the record in this case, the arbitrator was free to determine that the plaintiff (the losing party in arbitration) had not presented credible or sufficient evidence to support its position on the merits of the dispute. Accordingly, the appellate court concluded that "[t]he amended award more than satisfies the 'barely colorable justification' standard."

Continue on next page

CLASS ACTIONS

Class Action Fairness Act

LeFlar v. Target Corp.

57 F.4th 600, 2023 U.S. App. LEXIS 383 (8th Cir. Jan. 9, 2023)

The Eighth Circuit has held that a district court erred by applying, in a case removed under the Class Action Fairness Act, a presumption that all doubts about federal jurisdiction must be resolved in favor of remand to state court.

Background. The plaintiff bought a laptop from Target and was unable to view the written warranty until after checkout. He brought suit, in state court, against Target as a class action on behalf of "[a]ll citizens of Arkansas who purchased one or more products from [Target] that cost over $15 and that were subject to a written warranty." He claimed that the defendant violated the Magnuson-Moss Warranty Act's Pre-Sale Availability Rule by refusing to make the written warranties reasonably available, either by posting them in close proximity to products or placing signs nearby informing customers that they could access them upon request. He sought only injunctive and declaratory relief.

The defendant filed a notice of removal basing federal jurisdiction on the Class Action Fairness Act (CAFA). The district court granted a motion to remand to state court, finding that the CAFA amount in controversy of $5 million was not met. The court of appeals granted a request for permission to appeal the remand order under 28 U.S.C. § 1453(c)(1), because of the important and recurring issues presented.

District Court Applied Improper Standard. Under CAFA's jurisdictional requirements, minimal diversity is sufficient; only one plaintiff and one defendant need to be citizens of different states. The amount-in-controversy requirement is $5 million, rather than $75,000. And the proposed class must have at least 100 members. CAFA was intended to, and did, open federal courts to more class actions.

Courts have become confused, the court of appeals said, about how to evaluate the amount in controversy at each step. At step one, the pleading stage, the test is whether the notice of removal plausibly alleges that the case might be worth more than $5 million. At step two, following a jurisdictional challenge, the district court must determine if a factfinder might legally conclude that the value of the case is more than $5 million, not whether the damages are greater than the requisite amount. In practice, this means that, if the notice of removal plausibly alleges, and the evidence shows, that the case might be worth more than $5 million (excluding interest and costs), then it belongs in federal court.

The district court, the court of appeals decided, had applied the wrong legal standard when it stated that it was required to resolve all doubts about federal jurisdiction in favor of remand. This may be true in ordinary diversity cases, but the law is clear that this rule does not apply to CAFA jurisdiction. (The court of appeals also noted that that there is some reason to believe that the anti-removal presumption no longer applies in ordinary diversity cases following passage of the Federal Courts Jurisdiction and Venue Clarification Act of 2011, but had no need to reach this issue.) At the pleading stage in CAFA cases, 28 U.S.C. § 1446(a) requires only a short and plain statement of the grounds for removal. That is, it requires a plausible allegation that the case meets the jurisdictional requirements. The text of the CAFA removal provisions does not mention an anti-removal presumption, much less a requirement to resolve all doubts about federal jurisdiction in favor of remand. Instead, a district court must accept the allegations in the notice if they are made in good faith.

The analysis is similar at the evidence-weighing stage, the court of appeals said, except the removing party bears the burden to establish by a preponderance of the evidence that the amount in controversy exceeds $5 million. No anti-removal presumption applies. Instead, as in any other case, a preponderance-of-the-evidence standard involves a straight-up weighing of the evidence to determine which side has the better of the argument.

Incorrect application of this nonexistent presumption may well have played a pivotal role in the decision to remand, the court of appeals noted. The district court had refused to acknowledge the possibility that Target's sales figures for laptops, televisions, and other accessories might have been enough to plausibly allege that the case was worth more than $5 million. Also, in weighing the evidence, the district court described Target's compliance-cost estimates as unsupported and insufficient. In other words, the district court had not made its decision on a level playing field.

Continue on next page

The district court had compounded its error by focusing exclusively on the two declarations that accompanied Target's notice of removal. One estimated that Target sold about $1.58 million in laptops to Arkansas consumers over the 5-year period covering its allegedly noncompliant conduct. The other said it sold over $5 million in televisions and accessories during the same timeframe. Neither convinced the court that the amount in controversy exceeded $5 million. Conspicuously absent was any mention of the post-removal declaration of Target's lead compliance consultant, who estimated that Target would have to spend over $7.5 million if it lost the suit. This declaration separated the costs of compliance into individual categories such as extra signage, additional training, and the introduction of in-store warranty-retrieval systems. The district court's failure to consider this declaration effectively denied the defendant the opportunity to establish its claim of federal jurisdiction.

The court of appeals accordingly vacated the remand order and returned the case to the district court for further consideration.

Continue on next page

INTERSYSTEM PRECLUSION

Rooker-Feldman Doctrine

Bruce v. City & Cnty. of Denver

57 F.4th 738, 2023 U.S. App. LEXIS 593 (10th Cir. Jan. 10, 2023)

The Tenth Circuit has held that a claimant in state-court receivership proceedings who was not a named party to those proceedings, but who had the right to appeal the state court's rulings, qualified as a state-court loser for purposes of the *Rooker-Feldman* doctrine.

- ***Rooker-Feldman* Doctrine.** The *Rooker-Feldman* doctrine prevents lower federal courts from exercising jurisdiction "over cases brought by state-court losers complaining of injuries caused by state-court judgments rendered before the district court proceedings commenced and inviting district court review and rejection of those judgments" [Exxon Mobil Corp. v. Saudi Basic Indus. Corp., 544 U.S. 280, 284, 125 S. Ct. 1517, 161 L. Ed. 2d 454 (2005); *see* District of Columbia Court of Appeals v. Feldman, 460 U.S. 462, 103 S. Ct. 1303, 75 L. Ed. 2d 206 (1983); Rooker v. Fidelity Trust Co., 263 U.S. 413, 44 S. Ct. 149, 68 L. Ed. 362 (1923)]. The Tenth Circuit panel in this case noted that although the *Rooker-Feldman* doctrine represents a firm jurisdictional bar, it is narrow in scope. For example, it does not bar a claim that does not seek to modify or set aside a state-court judgment [see Mayotte v. U.S. Bank Nat'l Ass'n, 880 F.3d 1169, 1174–1176 (10th Cir. 2018) (*Rooker-Feldman* does not bar a federal claim "just because it could result in a judgment inconsistent with a state-court judgment")].

- **Threshold Issue—Whether Plaintiff Was Party in State Court for *Rooker-Feldman* Purposes.** The plaintiff in this case had been a claimant in previous state-court receivership litigation. The federal suit alleged constitutional and state-law violations stemming from the receiver's and the state court's treatment of the plaintiff's claimed interests. The district court dismissed the suit for lack of jurisdiction under the *Rooker-Feldman* doctrine.

  The plaintiff appealed, contending that the *Rooker-Feldman* doctrine was inapplicable because he had not been a party to the state-court litigation. The Tenth Circuit rejected this contention and went on to conclude that the doctrine did bar the plaintiff's suit.

- **Plaintiff's Party Status in State Court Did Not Prevent Application of *Rooker-Feldman*.** The Tenth Circuit panel acknowledged that in general, the *Rooker-Feldman* doctrine does not bar a suit by a federal court plaintiff who was not a party to the state court judgment [*see* Lance v. Dennis, 546 U.S. 459, 466, 126 S. Ct. 1198, 163 L. Ed. 2d 1059 (2006) (per curiam) (*Rooker-Feldman* "does not bar actions by nonparties to an earlier state-court judgment simply because, for purposes of preclusion law, they could be considered in privity with a party to the judgment"); Exxon Mobil Corp. v. Saudi Basic Indus. Corp., 544 U.S. 280, 284, 125 S. Ct. 1517, 161 L. Ed. 2d 454 (2005) (*Rooker-Feldman* applies only to certain actions brought by "state-court losers")]. The court of appeals explained that the underlying rationale for this general rule is that a federal court cannot be said to be entertaining an appeal from a state-court judgment (which is what *Rooker-Feldman* forbids) if the person bringing the challenge is not one who could ordinarily appeal that judgment in the state-court system.

  The question, therefore, is not whether a federal plaintiff was formally listed as a party in the state-court litigation, but whether the federal plaintiff could have appealed the state court's decision in the state's judicial system [cf. Dorce v. City of New York, 2 F.4th 82, 102–103 & n.24 (2d Cir. 2021)]. The Tenth Circuit pointed out that the doctrine's general applicability to the claims of those who were parties in the prior state proceeding does not reflect a requirement; it reflects the reality that the doctrine usually affects such litigants because they are typically the ones bound by the state court judgment and would attempt to undo it.

  The Tenth Circuit explained that a claimant in a receivership proceeding, although not named as a plaintiff or defendant, is equally bound by a state-court judgment and, like a named party, would have a right to

Continue on next page

and interest in appealing the judgment. The federal plaintiff in this case had a right to submit his claim for adjudication by the state court, and he did so. The state court adjudicated his claim; it evaluated his arguments and addressed them in its decision. The federal plaintiff also had a right to appeal the state court's rulings to a higher state court. The plaintiff was thus materially indistinguishable from a named party to the state-court litigation for *Rooker-Feldman* purposes.

Accordingly, the Tenth Circuit panel concluded that the plaintiff's nonparty status in the state-court litigation did not prevent application of the *Rooker-Feldman* doctrine's jurisdictional bar.

***Rooker-Feldman* Barred Plaintiff's Federal Suit.** Having determined that the nature of the plaintiff's participation in state court did not prevent application of the *Rooker-Feldman* doctrine, the Tenth Circuit went on to conclude that the doctrine did bar the plaintiff's federal claims.

The court of appeals observed that simply recasting a state-court loss as a deprivation of constitutional rights does not overcome *Rooker-Feldman*'s jurisdictional bar [*see* Campbell v. City of Spencer, 682 F.3d 1278, 1284–1285 (10th Cir. 2012)]. For example, the doctrine forbids review of a state-court judgment based on the losing party's claim that the judgment violated the loser's federal rights [see Johnson v. De Grandy, 512 U.S. 997, 1006, 114 S. Ct. 2647, 129 L. Ed. 2d 775 (1994)], or based on a claim that the state court violated the Constitution by giving effect to an unconstitutional state statute [*see* Howlett v. Rose, 496 U.S. 356, 369–370 n.16, 110 S. Ct. 2430, 110 L. Ed. 2d 332 (1990)].

The court of appeals concluded that the plaintiff's claims were an impermissible attempt to obtain redress for injuries arising from the state-court judgment by seeking district-court review and rejection of the judgment. As such, the claims were barred by the *Rooker-Feldman* doctrine [*see* Exxon Mobil Corp. v. Saudi Basic Indus. Corp., 544 U.S. 280, 284, 125 S. Ct. 1517, 161 L. Ed. 2d 454 (2005)]. Specifically, the plaintiff alleged injuries that resulted from the state court's upholding of unconstitutional fines and liens, and he sought monetary relief that would have compensated him for losses caused by the state court's determination of lien priority and other decisions, which relief would have effectively undone those decisions. "This is precisely the relief the *Rooker-Feldman* doctrine says lower federal courts are powerless to provide." Similarly, the plaintiff's claim for breach of fiduciary duty by the receiver was an impermissible attempt to seek review and rejection of the state court's orders that the receiver carried out; without the state court's orders, there would have been no injury.

Because the plaintiff alleged no injury apart from those caused by the state-court judgment, and the remedy he sought would have amounted to reversal of that judgment, the Tenth Circuit concluded that the *Rooker-Feldman* doctrine deprived the district court of jurisdiction. Accordingly, the court of appeals affirmed the district court's judgment of dismissal.

YOUR LEXISNEXIS® ACCOUNT TEAM

SHARAE SCRUGGS, JD
Client Manager
Federal Government Business, LexisNexis
sharae.scruggs@lexisnexis.com

MARISA BEIRNE, ESQ.
Solutions Consultant
Federal Government Business, LexisNexis
marisa.beirne@lexisnexis.com

ALEXIS HARDIE BYERS, ESQ.
Solutions Consultant
Federal Government Business, LexisNexis
alexis.hardie@lexisnexis.com

LexisNexis®