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THE HONORABLE SAMUEL S. CHUNG
Hearing Date: May 1, 2026
ORAL ARGUMENT REQUESTED

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

DENNY BLAINE PARK FOR ALL,

Plaintiff,

v.

CITY OF SEATTLE,

Defendant,

and

FRIENDS OF DENNY BLAINE,

Intervenor.

No. 25-2-12422-3

INTERVENOR FRIENDS OF DENNY BLAINE'S MOTION FOR CLARIFICATION OF PRELIMINARY INJUNCTION & ABATEMENT PLAN REGARDING TOPLESSNESS

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I. INTRODUCTION

Friends of Denny Blaine ("FDB") requests clarification of the Court's July 14, 2025, preliminary injunction order and the Court's understanding of the abatement plan to avoid ongoing harassment of users of Denny Blaine Park (the "Park"). Dkt. 50 ("Order") ¶12. The abatement plan submitted by the City of Seattle, at the behest of this Court, established a "clothing required" area. Many parkgoers have interpreted this to require "bottoms," but not tops. Seattle Parks and Recreation ("SPR") Rangers and Seattle Police Department ("SPD") Officers have similarly stated that the new requirement does not mandate tops. Nonetheless, private security hired to patrol the Park continuously direct parkgoers to put on a top and report it as a violation to the police, asking for the parkgoer to be cited. The specific nuisance this Court identified, nakedness associated with public sex acts and masturbation, is not implicated by mere toplessness. Indeed, even Plaintiff acknowledges that the Park has long been used for topless sunbathing—behavior Plaintiff's members largely do not object to. As such, a requirement that parkgoers cover their torsos was never an issue raised before this Court nor part of the abatement plan's purpose.

That distinction matters here, and today, because private security guards employed by adjacent homeowner Stuart Sloan through Security Services Northwest, Inc. ("SSNW") have been invoking this Court's order to demand that some parkgoers cover their torsos—while leaving others with equally bare torsos undisturbed. The enforcement pattern is sex- and gender-discriminatory, with a particularly cruel impact for some transgender parkgoers. FDB seeks a targeted clarification: that this Court's Preliminary Injunction Order and understanding of the abatement plan does not bar toplessness in the "clothing required" section of the Park regardless of a person's sex, gender, or gender identity or expression. This

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is consistent not only with Washington State law but also the Court's prior statements, the City's own interpretation of its plan, and the understanding of all parties' witnesses of the Park's historic use for topless sunbathing.

II. PROCEDURAL BACKGROUND

On July 14, 2025, this Court entered the Order, finding a likelihood that "public nudity and other sexual acts complained of" constitute a public nuisance. Order ¶ 12. The Court denied Plaintiff's request to close the Park, ordering the City to submit an abatement plan within 14 days. *Id.* ¶ 14.

During the August 6, 2025, hearing on the City's Plan of Abatement, this Court directly addressed the scope of the Order, confirming that it was not "banning all nudity in all places" and that "[P]laintiff's complaint [itself] does not seek a complete ban." Dkt. 173 at 2-3 (quoting Hearing Transcript, Aug. 6, 2025, at 8-9).

On August 8, 2025, the Court entered its Order Regarding Defendant City of Seattle's Plan of Abatement, giving the City 60 days to engage in abatement efforts. Dkt. 72. The City's submitted abatement plan divided the Park into zones, designating the upper lawn and surrounding area as "clothing required" and the beach area as "clothing optional." Dkt. 58. This language was the City's choice—not prescribed or interpreted by this Court.

III. STATEMENT OF FACTS

A. The "Clothing Required" Designation Is a Targeted Remedy for Genital and Sexual Exposure—Not a Ban on Toplessness.

The nuisance identified by this Court—that formed the evidentiary basis for the Preliminary Injunction Order as it related to nudity—was public sex acts, masturbation, and indecent exposure (i.e., exposure with lascivious intent). Order ¶ 3; *see also In re Recall of*

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Lauser, 584 P.3d 379, 383 (Wash. Feb. 26, 2026) (explaining that "indecent exposure is not mere nudity" but "requires some underlying 'lascivious' or sexual motivation to make it obscene"). Neither the Complaint, nor any supporting declaration, nor the Court's own findings, identified toplessness as a component of the nuisance.

The court-ordered abatement plan designates the upper portion of the Park as "clothing required." Dkt. 58; Dkt. 59, Ex. 1 §§ 1-2; Dkt. 72 at 2. Consistent with the purpose of the Order, this designation limits full nudity (genitals and anus); it clearly does not require fully covering the body. Just as socks and scarves are not required to cover the feet and neck, shirts are not required to cover the torso: toplessness is acceptable regardless of a parkgoer's sex or gender.

B. The Parties' Witnesses Uniformly Distinguished Toplessness from the Alleged Nuisance Conduct.

The deposition record is consistent across all witnesses: toplessness at Denny Blaine Park has a long, distinct history, and every deponent who was asked about toplessness separated it from the sexual conduct forming the basis of this lawsuit. This is consistent with the historical record reflecting female toplessness from at least the 1970s. Declaration of Cassandra Carley in Support of FDB's Mot. for Clarification ("Carley Decl.") Ex. A at FDB00012398 (noting the Park's "dubious reputation as a nude bathing beach" in the 1970s and 1980s); Ex. B at FDB00012611 (reporting 1988 police crackdown on topless Park sunbathing).

Plaintiff's own lead witness, Stuart Sloan, testified: "[B]eing topless is not the same as full nudity." Carley Decl. Ex. C (Deposition of Stuart Sloan) at 85:21-22. Sloan acknowledged toplessness had been present at the Park since at least the early 1990s, he did

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not consider it a nuisance, and it did not impede his Park use. *Id.* at 36:2-21, 85:7-22, 131:18-25.

Plaintiff member Molly Nordstrom similarly testified that topless sunbathing by a respectful group "would not preclude [her] from going" to the Park. Carley Decl. Ex. D (Deposition of Molly Nordstrom) at 154:22-155:23. She characterized toplessness as "partially nude" at most—explicitly distinguishing it from the full nudity at issue. *Id.* at 155:21-23.

Multiple other Plaintiff witnesses confirmed the same distinction, uniformly separating toplessness from the full nudity complained of. Carley Decl. Ex. E (Deposition of Spafford Robbins) at 20:3-7; Carley Decl. Ex. F (Deposition of Frederick Moll) at 49:10-13, 51:3-9; Carley Decl. Ex. G (Deposition of Betsy Terry-Losh) at 136:24-137:17; Carley Decl. Ex. H (Deposition of David Rinn) at 14:3-16, 21:17-24. Defendant and FDB witnesses made the same distinction: SPR's Andy Sheffer and former SPR employee Kathleen Blanchard both recalled the Park's history of topless sunbathing as separate from the full nudity at issue. Carley Decl. Ex. I (Deposition of Andy Sheffer) at 14:3-15:17; Carley Decl. Ex. J (Deposition of Kathleen Blanchard) at 26:24-28:12.

This accords with statements and actions by Park Rangers and SPD, and Washington law. M. Thornton Decl. ¶ 10 & Ex. B (attaching the incident report of Senior Park Ranger Domico Curry stating that toplessness in the "clothing required" section is permitted); Declaration of Kaia Elms ("Elms Decl.") ¶ 5 (reporting that Park Rangers have never told her or any other topless individual to cover their torso in the "clothing required" section of the Park).

C. Yet, SSNW Guards for Plaintiff Have Patrolled the Park, Discriminatorily Targeting Topless Parkgoers.

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Notwithstanding this clear record, since the abatement plan took effect, SSNW guards have repeatedly confronted topless parkgoers in the upper portion of the Park—citing this Court's order as their authority. The available evidence suggests this enforcement has disproportionately targeted women and individuals whom SSNW guards perceive to be female, while parkgoers who guards perceive to be male appear to have faced less scrutiny. SSNW's own records reflect this pattern.

Since April 2025, SSNW has monitored the Park and neighboring property 24 hours a day, seven days a week, 365 days a year. Carley Decl. Ex. K, at 13-14 (Plaintiff's Response to Interrogatory No. 5). On August 14, 2025, the day after the City erected a visual barrier between the clothing-optional and clothing-required sections of the Park, Counsel for Plaintiff instructed SSNW: "Please make sure your people at the Park make a record of all damage done to the new fence and new signs, any graffiti, and all nudity outside of the new fenced area." Carley Decl. Ex. L at DBPFA0008498. On August 28, 2025, for example, SSNW Security Officer Bethany Knapp surveilled and stalked a person she thought might be topless before photographing her and calling SPD:

> At approximately 1621, a W/F, blonde, approx. 40 years old . . . arrived at the park via Lime bike. At 1625 I noticed her lay a blanket in the grass just east of the parking lot. She appeared to be topless but was obscured by cars. I got out of my car and walked towards the grass area and obtained photos of her sunbathing naked. Once getting back to my car, I . . . called non-emergency SPD. . . . While on the phone, a vehicle obstructing my view of her moved and I noticed she was wearing a small pink bikini bottom but was still topless.

Dkt. 83, Ex. A at 202 (SSNW Incident Report No. 218366). On September 19, 2025, SSNW Security Officer Steven Law similarly contacted SPD about a person who had come topless from the beach to retrieve an item from their car. Dkt. 83, Ex. A at 297 (SSNW

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Incident Report No. 226346). Most recently, on April 4, 2026, Grady Jones—who had been identifying himself to parkgoers as "Jay"—confronted FDB member Kaia Elms on the upper lawn as she walked topless to the restroom. Jones told her, "You can't be naked up here. Please don't do that." Elms Decl. ¶¶ 6-8. When Kaia returned an hour later, Jones again confronted her, saying "you know you need to be wearing clothes, right?" *Id.* ¶ 9. When she explained that being topless is legal in Seattle, Jones told her "there are rules that say you need to be fully clothed while walking on the upper level at Denny Blaine"—expressly invoking the abatement plan. *Id.* Kaia explained that she had encountered Park Rangers while topless before, and that Park Rangers had never asked her or others to cover up when topless on the upper lawn. *Id.* ¶¶ 9, 5. Senior Seattle Park Ranger Domico Curry later confirmed on the scene that toplessness is not prohibited—for parkgoers of any sex or gender identity. M. Thornton Decl. ¶¶ 9-10 & Ex. B (Curry's report).

Targeting topless parkgoers is part of a larger pattern of conduct by Plaintiff's private security to exert private control over the Park by harassing and intimidating parkgoers engaging in innocent, lawful conduct. Transgender parkgoers have expressed particular concern that this aggressive conduct has stifled their Park use, destroying the beloved welcoming space that they had come to rely on to promote body positivity.

IV. STATEMENT OF ISSUES

Whether under the Court's Order or its interpretation of the City's abatement plan, all parkgoers—regardless of sex, gender, gender identity, or expression—are allowed to be topless in the Park's upper portion.

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V. AUTHORITY AND ARGUMENT

A. The Abatement Plan Is a Remedial Measure Defined by the Alleged Nuisance It Was Designed to Remedy—Not a Discriminatory Toplessness Ban.

A measure implemented pursuant to a court-ordered abatement must be "precisely tailor[ed]" in light of the harm it was designed to address and may go no further than necessary to remedy that harm. *DeLong v. Parmelee*, 157 Wn. App. 119, 150-51, 236 P.3d 936 (2010); *Whatcom Cty. v. Kane*, 31 Wn. App. 250, 253, 640 P.2d 1075 (1981); *Kitsap Cty. v. Kev, Inc.*, 106 Wn.2d 135, 143, 720 P.2d 818 (1986). When the scope of an abatement order is disputed, the court should look to the purpose of the order and the circumstances of its entry. *Cf. In re Marriage of Sager*, 71 Wn. App. 855, 862, 863 P.2d 106, 110 (1993) (interpreting an ambiguous decree according to the intent of the court in entering it); *R/L Assocs. v. Seattle*, 113 Wn.2d 402, 410, 780 P.2d 838 (1989).

The alleged harm this Court found to constitute a public nuisance was unambiguous: "public nudity and other sexual acts"—specifically masturbation, public sex acts, and full-frontal genital exposure. Order ¶ 12. The abatement plan's "clothing required" designation, read in light of that finding, means that parkgoers in the Park's upper portion must wear garments covering the genitals and anus. This directly addresses the alleged nuisance. Requiring torso coverage is separate, was not part of the evidentiary record before the Court, and cannot be read into an order whose scope must be construed narrowly in favor of the persons burdened by it.

The Court confirmed this on August 6, 2025, when it clarified that the Order targeted nudity "as constituted at the park"—meaning the sexual conduct and full genital exposure before the Court, not toplessness. Hearing Transcript, Aug. 6, 2025, at 8-9. The City agreed

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the Order "did not necessarily require the City to prohibit all nudity in the Park." Dkt. 87 at 3. Plaintiff's own witnesses confirmed the distinction: Sloan testified that "being topless is not the same as full nudity," Sloan Dep. 85:15–17, and Nordstrom confirmed that topless sunbathing "would not preclude" her from using the Park, Nordstrom Dep. 155:4–8. If toplessness was never the nuisance that Plaintiff's Complaint objected to, the court-ordered abatement remedy cannot be read to address it.

B. Even if the Plan's Language Were Ambiguous, a Sex- or Gender-Differentiated Torso-Covering Requirement Would Be Unlawful.

Even if the abatement plan's language were ambiguous, the City could not lawfully enforce a torso-covering requirement in a sex-differentiated fashion, and SSNW—as a private actor invoking this Court's order as its authority—certainly cannot wield enforcement powers the City itself does not possess. Court clarification of this point is necessary to prevent needless tension between private security and parkgoers and reducing unwarranted calls to SPD.

Washington's Equal Rights Amendment has no federal counterpart. It "absolutely prohibits discrimination on the basis of sex" and, unlike federal constitutional protections, "is not subject to even the narrow exceptions permitted under traditional 'strict scrutiny.'" *Sw. Wash. Chapter v. Pierce Cty.*, 100 Wn.2d 109, 127, 667 P.2d 1092 (1983) (citing *Darrin v. Gould*, 85 Wn.2d 859, 872, 540 P.2d 882 (1975)). Rather, "the ERA mandates equality in the strongest of terms and absolutely prohibits the sacrifice of equality for *any* state interest, no matter how compelling," with only three "very limited" exceptions. *Id.*; *see Darrin,* 85 Wn.2d at 872 n.8. While an "actual difference in the sexes, to which the law reasonably relates" may qualify as an exception, laws imposing classifications that bear no substantial relationship to the state interest to be served are not permitted. *Seattle v. Buchanan*, 90 Wn.2d 584, 591-92,

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584 P.2d 918 (1978) (citing *Hanson v. Hutt*, 83 Wn.2d 195, 517 P.2d 599 (1973)). To uphold a sex-based classification, the burden is on the state to show that an exception applies. *See Darrin,* 85 Wn.2d at 875-78 (finding gender-based discrimination a violation of the Equal Rights Amendment when state actor's claimed rationale was "insufficient to validate sex discrimination," and "[n]o compelling state interest require[d] a holding to the contrary"). Even facially neutral laws may violate the ERA if they are enforced in a discriminatory manner or shown to have a disparate impact on people of one sex or gender. *See State v. Brayman*, 110 Wn.2d 183, 204, 751 P.2d 294 (1988); *see also, e.g.*, *Bolser v. Wash. State Liquor Control Bd.*, 90 Wn.2d 223, 231, 580 P.2d 629 (1978).

Here, while SSNW has chosen to enforce the rule in a discriminatory manner, the City has not manifested an intent to do so. And neither has made the necessary showing that doing so would reasonably relate to an "actual difference in the sexes." Without such a showing, the ERA categorically prohibits discriminatory enforcement on the basis of sex. Although some Washington courts have previously upheld ordinances prohibiting the exposure of female (but not male) breasts in some cases, they only did so only after the state carried its burden of showing that an actual difference between sexes justified its sex-based classification and furthered state interests. *See Buchanan*, 90 Wn.2d at 590-91. Moreover, *Buchanan* dealt with the very "lewd conduct" Seattle ordinance that was subsequently struck down as unconstitutionally overbroad. *See generally City of Seattle v. Johnson*, 58 Wn. App 64, 791 P.2d 266 (1990). No Washington statute or city ordinance prohibits toplessness today.

Buchanan considered the "right of a municipal legislative body to enact laws for the protection of the public peace, order and morals." 90 Wn.2d at 587. Rather than allow amorphous public attitudes to dictate conduct, the Washington Supreme Court left that role to the legislature. *Id.* at 590 (noting that "courts lack the constitutional authority to decide" the

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wisdom of legislative actions). Nearly 50 years ago, and before Seattle's lewd conduct ordinance was subsequently declared unconstitutional, the *Buchanan* court's 1978 opinion presciently suggested that if "exposure of the female breast [were] becoming increasingly less offensive," then "it [could] reasonably be expected that public demand [would] soon make it imperative that this portion of the ordinance be repealed," entrusting the matter to the democratic process. *Id.* at 590.

Public attitudes in Seattle are no longer in question: they have unequivocally changed, and the City has disclaimed any former interest in this sex-based classification. Consistent with changed public perceptions and legislative positions, Seattle no longer disallows exposure of female breasts. After *Johnson,* Seattle formally repealed its lewd conduct ordinance in 1994, and the state has since enacted a new law distinguishing simple nudity from criminal indecent exposure and specifically identifying breastfeeding as conduct not implicated by the statute. Seattle Ordinance No. 117158 (repealing SMC 12A.10.070, the lewd conduct ordinance that replaced the one at issue in *Buchanan* and was struck down in *Johnson*); RCW 9A.88.010 (disallowing only nudity with lascivious intent—indecent exposure).[1] The Seattle electorate's expressed preference is especially noteworthy when other municipalities continue to claim an interest in sex-based classifications. *See, e.g.*, Carnation Municipal Code 9.28.030 (regulating exposure of the female breast). The legislature may no longer consider female versus male breasts to be an "actual difference between the sexes," as it apparently did in 1978, particularly given the increase in the transgender population and the increasing desire of women with a double mastectomy to appear topless.[2] Regardless, it is

[1] The state-wide licensing requirement at issue in *Bolser* has also been repealed. *See* WSR 01-06-014 (replacing WAC 314-16-125 with WAC 314-11-050); WSR 24-13-096 (repealing WAC 314-11-050).

[2] The *Buchanan* court's "real difference between the sexes" rationale rested not on physiology but on "common knowledge" about sexual arousal—precisely the kind of gender

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certain that the requisite ERA showing has not been made here. *Buchanan*, 90 Wn.2d at 591 (requiring not only a physical difference but also "a reasonable relationship to the legitimate legislative purpose which it serves"). Discriminatory enforcement of facially neutral laws would also be unconstitutional absent government justification. *Cf. Bolser*, 90 Wn.2d at 231 (upholding a breast-covering requirement only after the enforcing agency ruled it would apply equally to both sexes).

The City has neither sought nor demonstrated the requisite justification under the ERA for sex- or gender-differentiated enforcement. Consequently, the abatement plan cannot authorize any party—including SSNW—to enforce a toplessness prohibition that would violate the ERA if imposed by the government itself.

C. Clarification Is Necessary to Prevent Ongoing Harm and to Protect the Integrity of This Court's Order.

Courts have inherent authority to clarify their own orders to prevent misapplication. *See* CR 60(a); *Presidential Estates v. Barrett*, 129 Wn.2d 320, 329, 917 P.2d 100 (1996). As set forth above, no Seattle ordinance prohibits toplessness, and SPD and Park Rangers consistently decline to cite topless parkgoers. Yet SSNW continues to confront parkgoers and call the police on them for what is completely legal activity.

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stereotype that Washington's ERA was designed to displace. *See* 90 Wn.2d at 590 ("common knowledge tells us . . . that there is a real difference between the sexes with respect to breasts"). Several courts have recognized that the "erogenous zone" rationale is itself a product of social conditioning rather than biological fact, and that using it to justify differential regulation is circular. *See Free the Nipple–Fort Collins v. City of Fort Collins*, 916 F.3d 792, 802 (10th Cir. 2019) (finding that an ordinance prohibiting only female toplessness "perpetuat[ed] a stereotype engrained in our society that female breasts are primarily objects of sexual desire whereas male breasts are not"). FDB does not ask this Court to overrule *Buchanan*—no ordinance is at issue here—but notes that its reasoning is in significant tension with Washington ERA doctrine's categorical rejection of sex stereotypes, and that Seattle's repeal of the prohibition on female toplessness reflects the legislature's own judgment that the "actual difference" *Buchanan* identified no longer warrants different treatment.

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The need here is concrete and immediate. SSNW guards have repeatedly cited the abatement plan's "clothing required" language as their authority to demand that topless parkgoers cover up and to engage SPD. When FDB member Kaia Elms correctly stated that toplessness is legal in Seattle, Jones told her the abatement plan overrode that right. But no law—and no provision of this Court's order—authorizes what Jones claimed. When Jones tells a topless parkgoer that "there are rules that say you need to be fully clothed," he is not enforcing this Court's order. He is misrepresenting it. This misrepresentation of the Court's order will continue unless this Court speaks clearly.

The stakes are particularly high for LGBTQ+ and transgender parkgoers. Denny Blaine was recognized in September 2025 by the Washington State Department of Archaeology and Historic Preservation as a Washington Heritage Registry site—the first such designation for a nude and LGBTQ site in the State of Washington. Dkt. 119, Ex. C. As one transgender woman noted in earlier proceedings, Denny Blaine is "the only beach that reliably accepts people like me." *See* Dkt. 87 at 2. For these parkgoers, SSNW's conduct is not a minor inconvenience—it is the erasure of a rare safe space.

The pattern of SSNW's enforcement raises serious concerns. Jones's own incident reports reflect attention to parkgoers' gender presentation, including descriptions of whether parkgoers' bodies and voices matched his expectations about gender. M. Thornton Decl. ¶¶ 4-5. To the extent SSNW's enforcement is keyed to guards' subjective perceptions of a parkgoer's sex or gender—rather than any actual legal standard—it creates obvious risks for transgender, nonbinary, and gender-nonconforming individuals. A trans man who is topless may be treated differently than a cisgender man who is topless, not because of any lawful rule, but because of a guard's assumptions about gender. This Court need not resolve whether SSNW's conduct constitutes unlawful discrimination; that is not the question presented. But

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the Court can and should clarify that its Order does not authorize any private party to police parkgoers' bodies based on perceived sex or gender. For transgender, nonbinary, and gender-nonconforming parkgoers—who are among the most vulnerable and historically significant users of the Park—such clarification is not merely procedural. It is essential to their continued safe use of the Park.

A narrow clarification from this Court—that the abatement plan does not prohibit toplessness, regardless of sex, gender identity, or gender expression—will stop the misuse of the rules implemented pursuant to this Court's order, protect the rights of law-abiding parkgoers, and ensure that the abatement measures operate as intended: to address the specific problem of public sexual conduct, not to transform a historically LGBTQ+-affirming public space into one where a private security guard can police parkgoers' bodies and gender presentation.

FDB requests that the Court authorize the City to update current signage—which reads "clothing required"—to more accurately reflect what the abatement plan actually requires. Signage clarifying that "bottoms covering genitals required west of fence" would eliminate the ambiguity that SSNW has exploited, provide clear notice to parkgoers of all gender identities, and make unmistakable that the requirement does not extend to torso covering, hats, socks, scarves, or any other garment unrelated to the identified likely nuisance. This will give users notice of Park expectations and will prevent needless conflict between private security and parkgoers.

VI. CONCLUSION AND PROPOSED ORDER

FDB respectfully requests that the Court issue an order clarifying that the Court's Preliminary Injunction Order does not prohibit toplessness in the clothing required area of the

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abatement plan. FDB further requests that the Court authorize the City, in its discretion, to change the Park signage consistent with this clarification.

Dated: April 20, 2026

I certify that this memorandum contains 4,023 words, in compliance with the Local Civil Rules.

s/ Susan E. Foster

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CERTIFICATE OF SERVICE

On April 20, 2026, I caused to be served upon the below named counsel of record, at the address stated below, via the method of service indicated, a true and correct copy of the foregoing document.

Patrick J. Schneider, WSBA #11957 Rylan Weythman, WSBA #45352 Anthony Godwin, WSBA # 61371 Lindsey Folcik, WSBA #62959 1111 Third Avenue, Suite 3000 Seattle, Washington 98101-3292 pat.schneider@foster.com rylan.weythman@foster.com anthony.godwin@foster.com lindsey.folcik@foster.com Telephone: (206) 447-4400 Facsimile: (206) 447-9700 **Attorneys for Plaintiff**	☐ ☐ ☐ ☑ ☑	Via hand delivery Via U.S. Mail, 1st Class, Postage Prepaid Via Overnight Delivery Via Email Via Eservice
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I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED At Seattle, Washington, on April 20, 2026.

June Starr

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