

IN THE SUPREME COURT OF THE STATE OF MISSISSIPPI

DEANIE LEE, ET. AL.

APPELLANTS

VERSUS

CAUSE NO: 2008-TS-00605

**MISSISSIPPI DEPARTMENT
OF TRANSPORTATION**

APPELLEE

BRIEF OF APPELLANT

ORAL ARGUMENT REQUESTED

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DEANIE LEE, ET. AL.**

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CERTIFICATE OF INTERESTED PARTIES

The undersigned counsel of record certifies that all listed persons have an interest in the outcome of this case. The representations are made in order that the Justices of this Court may evaluate possible disqualifications or recusal.

Deanie Lee

Summer Jackson

Teresa A. Brown

Erica Blankinchip

Guy Eric Blankinchip

J. C. Bell, Trustee

Ceselie Blankinchip

Estate of Beverly Blankinchip

Dorothy Sipp

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Lawrence Abernathy, Attorney for Plaintiffs

James H. Heidelberg, Attorney for Defendant

Honorable Kathy Jackson, Circuit Judge

RESPECTFULLY SUBMITTED this the 14th day of November, 2008.

DEANIE LEE, ET. AL., PLAINTIFFS

BY: 

A. M. MURPHY

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STATEMENT OF ISSUES

- (1) FAILURE OF MDOT TO CORRECT DANGEROUS HYDROPLANING
CONDITION ON STATE HIGHWAY DESPITE NUMEROUS
COMPLAINTS SPANNING AT LEAST 7 YEARS PRIOR TO ACCIDENT
CONSTITUTES A COMPLETE WAIVER OF IMMUNITY BY MDOT.**
- (2) FAILURE OF MDOT TO WARN OF DANGEROUS CONDITION AFTER
HAVING RECEIVED NOTICE OF SAID DANGEROUS
HYDROPLANING CONDITION FOR MORE THAN SEVEN YEARS
CONSTITUTES A COMPLETE WAIVER OF IMMUNITY BY MDOT.**
- (3) TRIAL COURT ERRED IN FINDING WEATHER SOLE CAUSE OF
ACCIDENT AFTER BEING PRESENTED WITH FOUR
EYE WITNESS AFFIDAVITS TO THE CONTRARY.**

STATEMENT OF THE CASE

On September 21, 2003, Dorothy Sipp was heading North on State Highway No. 63, and at the same time and place Beverly Blankinchip was heading South. The automobile of Dorothy Sipp hydroplaned across the center line and into the path of Beverly Blankinchip resulting in a devastating crash which took the life of Beverly Blankinchip and severely injured Summer Jackson, Erica Blankinchip and Ceselie Blankinchip who were occupants of the Blankinchip automobile. Mrs. Dorothy Sipp suffered serious injuries.

The Plaintiffs in this case, Dorothy Sipp, the Estate of Beverly Blankinchip, Summer Jackson, Erica Blankinchip and Ceselie Blankinchip, gave notice of the claim and thereafter filed suit in the Circuit Court of George County, Mississippi. Each Plaintiff caused a separate suit to be filed and all of the suits were consolidated for trial purposes. All of the suits alleged the necessary averments to sustain the cause and it was provided in the Sipp Complaint that the Mississippi Department of Transportation (MDOT) failed in its duties to (A) properly inspect and maintain Highway 63 where the accident took place, (B) failed to properly place signs to warn of the dangerous condition and (C) failed to properly construct and engineer the highway where the accident occurred.

The trial Court properly stated the law that MDOT is immune from suit when performing discretionary duties, and the Court went on to provide that under 11-46-9(1)(d) the immunity is not absolute and can be changed under certain circumstances. The trial Court even found that a governmental entity charged with maintaining and repairing roads, owes a duty to warn motorist or repair roads only if it is "given notice of a dangerous condition." Further, the Court provided that if the danger were open and obvious MDOT would enjoy immunity, and the same if the accident were caused solely by the effect of weather (11-46-9(1)(q)).

The Court was supplied with five affidavits of local residents over a seven year span prior to the accident in question, who stated that they had called MDOT to complain about the dangerous condition (Karen Capps...even had MDOT engineers visit the site two years prior to the accident) and one Mississippi Highway Patrolman who testified MDOT would send their people to her office to examine accident reports to determine accident cites. Greene County Supervisors passed a scolding resolution condemning MDOT for abandoning, failing and refusing to maintain and repair the highway; and, still, the Court granted summary judgment that MDOT had no knowledge of the dangerous condition. As to the weather conditions being the sole cause of the accident the Court was provided four affidavits, two eye witnesses and two residents who lived next to or just a short distance away, all affiants stating the it was not raining hard at time of the accident, the local residents stating the it was a misty type rain, and had not rained hard at any time that day.

The trial Court resolved Summary Judgment in favor of MDOT and found that MODT had no notice of the dangerous condition, that the dangerous condition was open and obvious and that weather conditions were the sole cause of the accident. The Court dismissed all complaints with prejudice.

STATEMENT OF THE FACTS

On September 21, 2003, Dorothy Sipp was heading North on State Highway No. 63, and at the same time and place Beverly Blankinchip was heading South. The automobile of Dorothy Sipp hydroplaned across the center line and into the path of Beverly Blankinchip resulting in a devastating crash which took the life of Beverly Blankinchip and severely injured Summer Jackson, Erica Blankinchip and Ceselie Blankinchip who were occupants of the Blankinchip automobile. Mrs. Dorothy Sipp suffered serious injuries.

Many years prior to the accident there had been numerous serious and deadly crashes at or near the place of this accident and some of the local residents had complained to MDOT about the deplorable state of repair of the highway. Mrs. Dorothy Clark (1996), Mrs. Beka Lister (1999), Mrs. Lorena Clark (2000), Mr. Tom Dickerson (2001) and Mrs. Karen Capps (2001) all gave affidavits that they had contacted MDOT about the bad condition the highway spanning a time of seven years prior to the accident in question. Subsequent to the accident the Supervisors of Greene County, Mississippi, passed a resolution condemning MDOT for failing and refusing to properly maintain and repair Highway 63 and Highway 57 (2005). MDOT alleges that it never had any notice of the bad condition of the highway.

There is no argument by MDOT that the highway at or near the accident is rutted out and in deplorable condition.

MDOT filed a motion for summary judgment and the trial Judge granted the motion. In granting the summary judgment the Court completely ignored the contested issues as to "notice" to MDOT of the serious dangerous condition of the highway, the contested issue that the condition of the road is not open and obvious and that MDOT did nothing to warn of the

condition. The court failed to realize that whether standing water on a highway is open and obvious is a fact driven issue peculiar to each case and because it is so in one case does not make it so in another.

It was error for the Court to completely ignore the contested issues of fact and grant summary judgment in favor of MDOT.

SUMMARY OF THE ARGUMENT

The first two issues to be presented, Failure to repair dangerous condition in road and failure to warn of dangerous condition will be presented as one argument. The arguments as to what the law is and all arguments as to what duty owed or not owed, all comes down to one contested set of facts...actually one fact...what notice, if any, did MDOT have regarding the condition of the road prior to the accident. So, the issue of notice will turn on how much notice is required to lift the veil of immunity afforded the Government to prevent summary judgment.

{§11-46-9(1)(d)}

The third argument is the issue regarding “weather being the sole cause of the accident” turns on the burden of proof and issues of fact {§11-46-9(1)(q)}. What amount of weather is required to evoke immunity under §11-46-9(1)(q)? The issues of what caused hydroplaning, ruts as opposed to rain...heavy rain or just any amount of rain, or not too much rain is really a fact driven issue.....which facts are contested!

The Court erred in granting summary judgment in the face of contested material issues of fact.

ARGUMENT

**(1) FAILURE OF MDOT TO CORRECT DANGEROUS HYDROPLANING
CONDITION ON STATE HIGHWAY DESPITE NUMEROUS
COMPLAINTS SPANNING AT LEAST 7 YEARS PRIOR TO ACCIDENT
CONSTITUTES A COMPLETE WAIVER OF IMMUNITY BY MDOT.**

**(2) FAILURE OF MDOT TO WARN OF DANGEROUS CONDITION AFTER
HAVING RECEIVED NOTICE OF SAID DANGEROUS
HYDROPLANING CONDITION FOR MORE THAN SEVEN YEARS
CONSTITUTES A COMPLETE WAIVER OF IMMUNITY BY MDOT.**

On September 21, 2003, Dorothy Sipp hydroplaned across and into the path of an oncoming car resulting in a terrible crash which took the life of Beverly Blankinchip and injured Mrs. Sipp, Summer Jackson, Erica Blankinchip and Ceselie Blankinchip. After having given the required notice under the Tort Claim Act, suit was filed and the Mississippi Department of Transportation (MDOT) answered and denied all liability. Eventually MDOT filed a Motion for Summary Judgment, MRCP 56, claiming immunity and the Court granted same. Feeling aggrieved at this Order of Dismissal the Plaintiff have appealed to this Court for relief.

In order to defeat the immunity of MDOT and recover in this case the Plaintiff's had to prove the following:

- (1) an injury was suffered;
- (2) the injury was caused by a dangerous condition on the property of MDOT caused by the negligent or other wrongful conduct of MDOT.
- (3) MDOT had either actual or constructive notice of the defect.
- (4) MDOT had an adequate opportunity to protect or warn of this defect; and
- (5) the condition was not open and obvious to one exercising due care

The above was set out in *Howard vs. City of Biloxi*, 943 so.2d 751 (Miss. 2006) while construing §11-46-9 (1)(v). The pertinent part of §11-46-9 (1)(v), provides:

“Arising out of an injury caused by a dangerous condition of the governmental entity that was not caused by the negligent or other wrongful conduct of an employee of the governmental entity or **of which the governmental entity did not have notice, either actual or constructive, and adequate opportunity to protect or warn against;** provided, however, that governmental entity shall not be liable for the failure to warn of a dangerous condition which is obvious to one exercising due care.” (EMPHASIS ADDED)

In *Frazier v. Mississippi Dept. of Transp.*, 970 So.2d 221, (Miss. 2006) this Court made it absolutely clear that if MDOT had notice of the dangerous condition there would be no immunity and provided as follows (page 2) to-wit:

“ ¶ This statute and “the corresponding case law make it clear that a governmental entity is immune from claims arising from a non-obvious dangerous condition on government property, or failure to warn of the dangerous condition, **absent actual or constructive notice of the dangerous condition**” *Jones v. Mississippi Trans. Comm’n* 920 So.2d 516, 518-19 (¶4). **Therefore, a governmental entity charged with maintaining and repairing roads, owes a duty to warn motorists or repair roads only if it is “given notice of a dangerous condition.”** Id. at 519 (¶4) As we have previously stated, B “[i]n the absence of notice, a governmental entity’s decision to maintain or repair roads, or to place traffic control devices or signs, is purely discretionary, and the entity will be immune from suit even upon proof of an abuse of discretion. “Id; Miss Code Ann § 11-46-9(1)(d) (Rev. 2001); See *Barrentine v. Mississippi Dep’t of Transp.*, 913 So.2d 391, 393 (¶ 8) (Miss. Ct. App. 2005). **Thus, the decisive question under the guidelines of the Mississippi Tort Claims Act is whether MDOT had notice of the alleged defective seal. If MDOT did not have notice of the alleged dangerous condition, it is immune from liability and whether or not to use road signs to warn is discretionary under the Mississippi tort claims act.**” (EMPHASIS ADDED)

The issue of notice of a dangerous intersection as it related to immunity for MDOT turned on the issue of sufficient notice was resolved in *Reeves vs. Mississippi Dept. of Transp.*, 941 So.2d 844 (Miss. 2006). The trial Court found that the Plaintiff failed to prove notice had been given to MDOT regarding the dangerous intersection and therefore MDOT was immune. However, the Court further found that since the Plaintiff ran an intersection the sole cause of the accident was Plaintiff’s fault. However, in a prior case, *Miss. Dept. of Trans. vs. Cargill*, 847 So.2d 258 (Miss. 2003), a case of similar import, fixed liability to the Department of Transportation because there had been many accidents at the same location where water had

accumulated and DOT knew or should have know of accidents.

Of all the reported cases cited in this brief regarding the amount of notice of a dangerous condition to MDOT not one case contained as much notice as was given in this case. Five affidavits spanning seven years prior to the Blankinchip accident and a subsequent County Resolution condemning MDOT for failing and refusing to properly maintain Highway No. 63. (A-136 - 644) MDOT knew that Highway 63 was dangerous and refused to repair and maintain said road bed.

The Affidavit of Beka Lister (A- 225) regarding her 1999 hydroplaning accident, provides:

“Later that week, I called State officials on the coast and complained about the condition of the road. I do not remember just who all I called, but they were State Official for the road in the telephone book and I was advised that it would be looked into. I know I talked to the office on the coast.”

The Amended Affidavit of Dorothy Clark (A - 142 - 142a) (1996) provides:

“During the latter part f the term of office of Ronnie shows, the Highway Commissioner for my district, I called him at his office in Hattiesburg, Ms., and later he came to my office at my business on Main Street in Lucedale, and we discussed the drainage condition of Highway 63 commencing about where the Catfish House is presently located South to the Carl Havard road. Mr. Shows had no misunderstanding that there was a sever drainage problem on the road when we finished our conversation.”

The Affidavit of Lorena G. Clark (A- 146) regarding her 2000 hydroplaning accident provides:

“I called the Highway Department about the road almost two years before the accident because I hydroplaned in about the same place as the Blankinchip accident. I called the Mississippi Department of Transportation, Jackson, Ms., and they took my name, number and told me they would get back with me.

The Affidavit of Karen Capps, (A- 144, 144a) who personally examined the highway in 2002, with MDOT

Engineers, provides:

“I am familiar with the accident where Mrs. Blankinchip was killed, and that accident is just North of my old store less than a ½ mile”. “About a year or two before Mrs. Blankinchip’s accident, I requested a Highway Patrolman, Jeff Ruffin, to contact the Department of

Transportation and the men came to my store and we walked out to the highway and inspected it and discussed the condition...they said they knew it was "rutted out" and did nothing about it. I told them then that they were getting people hurt and someone was going to get their killing."

The Affidavit of Thomas H. Dickerson, Sr., (A- 140) (2000 - 2001) provides:

On one occasion I called the Mississippi Highway Department in Jackson Mississippi, during the year 2000 or 2001, and reported the bad condition of the road. I was told it would be looked into and someone would contact me. I gave the lady my name and phone number. I never heard from anyone."

The trial Court never mentioned any of these affidavits in her Order Granting Motion for Summary Judgment...not one reference, as if they did not exist. Even though MDOT denies it ever received any notice of the dangerous condition of the Highway then certainly there must be a conflict as to whether the Affidavit are truthful or whether MDOT is truthful. MDOT says no notice from any source, and the Affiants say Notice. If the Court is to be fair with the Plaintiff's, who are the non moving party, then the court failed in her duty to deny the summary judgment.

In *Barr v. Hancock County*, 950 So.2d 254 (Miss. 2007), this court provided the following rules:

"¶ 7. In reviewing a trial court's decision on a motion for summary judgment, the Court follows the same standard set forth in Mississippi Rule of civil Procedure 56(c). *See McMillan vs. Rodriguez*, 823 So.3d 1173, 1176 (¶9) (Miss.2002)"

The Court employs a de novo standard of review of a lower court's grant or denial of a summary judgment and examines all the evidentiary matter before it -admission in pleadings, answers to interrogatories, depositions, affidavits, etc. The evidence must be viewed in the light most favorable to the party against whom the motion has been made. If in this view, there is no genuine issue of material fact, and the moving party is entitled to judgment as a matter of law, summary judgment should forthwith be entered in his favor. Otherwise, the motion should be denied. **Issues of fact sufficient to require denial of a motion for summary judgment obviously are present where one party swears to one version of the matter in issue and other says to the opposite. In addition, the burden of demonstrating that no genuine issue of fact exist is on the moving party. That is, the non movant should be given the benefit of the doubt.**

The Court found that if the dangerous condition was obvious to one exercising due care then the duty of MDOT to warn would be abated and cited *Willingham vs. Mississippi Trans.*

Comm's, 944 So.2d 949 (Miss. Ct. Ap. 2006). This case is dissimilar to *Willingham* in that the Court was presented with five affidavits that the standing water was not discernable as to being a danger. The affidavit of Dorothy Sipp, (A- 149) provides:

“ * * *” As I crossed the intersection of U.S. 98 and State Highway 63,. The rain had changed from heavy to a light rain.”

“I saw the water on the road from the rain and was driving about 50 - 55 miles per hour and believed the road was safe for that speed. I did not see any signs on the highway to warn me of any dangerous conditions and believed the road to be safe.”

The Affidavit of Roosevelt Love, (A - 136) an eye witness to the accident, provides:

“On September 21, 2003, my wife and I were on our way home from Leakesville, Mississippi. I was the third and last car in a line of slow moving traffic heading South on State Highway No. 63. The Blankinchip car was one car ahead of me. It had been raining heavy up until about 10 minutes before the accident, and at that time the rain was a light rain. The road was completely covered with standing water and we were all going very slow. I was barely making about 40/45 miles per hour, if that much. I travel State Highway 63 North all of the time to go to Leakesville, Mississippi, and I personally know that from U.S. Highway 98 North to the Greene County Line, that part of the Highway is real bad to hold water. The road is rutted out and the water can not drain. It is a very dangerous stretch of the road”

“* * *”

“Just about the time of the accident I pulled out to see if the way was clear as I thought since the rain had let up that I could safely pass and it was at that time I saw the white vehicle in the air. Unreal”

“* * *”

The Affidavit of Becky Lynn White (A - 232) a lady who had a hydroplane accident July 12, 2005,
near the accident cite, provides:

“* * *”

On Tuesday, July 12, 2005, we were heading North on State Highway 63, just North of U. S. 98 and South of Beaver Dam Road when we hydroplaned. It just started raining hard and we had slowed our speed from about 55/60 to about 45/50 when we hit standing water in the road and hydroplaned, spinning around at least three time and then went off the road on the West side and turned over two time and flipped end over end on time and stopped just short of a big tree. **You could not tell during the rain whether water was**

standing on the road or not, it was not obvious that the water was standing on the road.

"* * *"

"There is no question that water stands on the road, does not drain off and is very dangerous. You can not tell when you are driving on the highway whether or not the road is dangerous or not, and there are no signs to warn of this condition. In fact, all of that Highway 63 North to Leakesville is in the same bad condition.

"you could not tell during the rain whether water was standing on the road or not, it was not obvious that the weather was standing on the road."

The Affidavit of Joyce V. Stewart, (A- 229) a lady who had a hydroplane accident July 9, 2007, near the accident cite, provides:

"* * *"

"On Monday, July 9, 2007, I was heading North on State Highway 63, just North of U.S. 98 and about 300 feet South of Rock Creek Road when I hydroplaned. It just raining moderately and I had slowed my speed from about 55/60 to about 50/55 when I hit standing water in the road and hydroplaned, spinning around and went off the road on the West side going backward and struck a light pole and came to a stop just before I hit the storage buildings. You could not tell during the rain whether water was standing on the road or not, it was not obvious that the water was standing on the road. The truck seemed to just rise up and float on the surface and then began spinning, and left the road going backwards, that was nothing I could do to control the direction of travel or control the car."

"There is no question that water stands on the road, does not drain off and is very dangerous. You can not tell when you are driving on the highway whether or not the road is dangerous or not, and there are no signs to warn of this condition. In fact, all of State Highway 63 North to Leakesville is in the same bad condition. This road has been in terrible condition for more than 10 years, or longer."

"I know there has been much talk over the years about how bad the road is all the way to Leakesville and that the State will not do anything to correct it."

The Affidavit of Bekah Lister, (A - 225) a lady who had a hydroplane accident July, 1999, provides:

"* * *". "You can not tell during the rain whether water was standing on the road or not, it is not obvious that water is standing on the road.."

"* * *". "You can not tell when you are driving on the highway whether or not the road is dangerous or not, and there are no signs to warn of this Condition.

The Affidavit of Mrs. Stella Gray (A -644), a lady who witnessed her husband's accident July 31, 2004, just North of the County line an accident in which her husband killed in a hydroplane accident. Mrs. Gray describes the bad state of condition of Highway 63.

Appellants would submit that the Trial Judge abused her discretion in granting summary judgment in view of the overwhelming proof that MDOT was on notice of the dangerous condition of the road, refused to repair same and failed in its duty to warn of the dangerous condition that was not open and obvious.. The Plaintiff's met all of the five requirements set out in *Howard vs. City of Biloxi*, and the contested issues of Notice to MDOT and the Notice by MDOT of the dangerous condition that was not open and obvious precluded summary judgment.

(3)

**(3) TRIAL COURT ERRED IN FINDING WEATHER SOLE CAUSE OF
ACCIDENT AFTER BEING PRESENTED WITH FOUR
EYE WITNESS AFFIDAVITS TO THE CONTRARY.**

There can be little question that the Trial Court in its attempt to apply *Willingham vs. Mississippi Transp. Com'n*, 944 So.2d 949 (MS 2006) completely ignored all of the affidavit of Plaintiffs' regarding the issues in this case. The pertinent part of the Court finding regarding weather conditions, provides as follows:

"Finally, under the Tort Claims Act, there is immunity from suit if the actions arises "out of an injury caused solely by the effect of weather conditions on the sue of streets and highways." §11-46-9(1)(q) Miss. Code Ann. Here, it is undisputed that there had been a rainstorm shortly before or around the time of the accident. As set out above, hydroplaning on a highway is a risk when the roads are wet; the rutting may heighten the risk, but without the weather event of rain, he hydroplane risk does not appear. *Willingham at 953. IT IS THEREOFRE,*"

The trial court's failure to consider the affidavits offered by Plaintiff's as set out above would have precluded the erroneous reliance upon *Willingham* as that case has no real application to the fact issues presented in this case. In *Willingham* the Court conditioned its ruling on

weather being the sole cause of the accident by providing (§ 16) **"no evidence was offered by the Appellants to indicate that the rutting was so severe that it posed a hidden danger to travelers who were exercising due care."** The Court was also presented affidavits of two local residents, Hollis Welford and Steve Capello, who provided that it had not rained hard at all that day, just a light rain.

The Affidavit of Hollis Welford, (A - 231) who lives where the accident occurred provides:

"* * *"

"* * *. I had stayed home that day and was watching the weather out the window of my house. On the day of the accident it did not rain hard, just a drizzle, light type rain. * * *."

The Affidavit of Steve Capello, (A- 230) who lives near where the accident occurred provides:

"* * *"

"On September 21, 2003, there was a bad wreck west of my house on State Highway No. 63. I have a clear and unobstructed view of the scene of the wreck. I was working in my sop, the large door was open. At least four or five hours prior to the wreck the weather was a drizzle or light rain. It was not storming nor was there any heavy rain. I was doing wood working when I heard a loud crash and I turned toward the loud crash and saw the white car in the air spinning...." "* * *."

It must be remembered that MDOT offered no proof that weather was the sole cause of the accident, but, the Plaintiffs did. The Affidavits of Steve Capello, Hollis Welford, Roosevelt Love and Dorothy Sipp clearly disputed that there was ever a "rainstorm shortly before or around the time of the accident", at most a drizzle.. And, the Affidavits of Dorothy Sipp, Roosevelt Love, Bekah Lister, Joyce V. Stewart and Becky Lynn White all provide, among other things, that one could not tell during the rain whether water was standing on the road or not, it is not obvious that water is standing on the road. The facts surrounding the effects of weather upon a highway is always a fact driven scenario peculiar to that particular time, place and event. It was gross error for the Trial Judge to find facts that were disputed by proper affidavits, especially

against the Plaintiff, the non moving parties to the Motion for Summary Judgment.

CONCLUSION

It was error for the Trial Judge to grant summary Judgment in favor of MDOT by ignoring all of Plaintiff's Affidavits concerning notice to MDOT of the dangerous condition (7 years of notice) existing on Highway 63. Further it was error for the Court to ignore the Affidavits that MDOT breached its duty to warn of a dangerous condition after notice and it was error for the Court to find facts against Plaintiffs regarding the weather conditions existing at time of the accident. The Trial Judge abused her discretion, was manifestly wrong and clearly erroneous when there was no credible evidence to support her ruling. Plaintiff's were the non moving party and were entitled to have all evidence viewed in light most favorable to them and this was not done. Plaintiffs produce sufficient Affidavits to create serious disputed facts that would precluded the granting of summary judgment; however, the Affidavits were apparently not considered by the Court and this was gross error. This cause should be reversed and remanded by this Court for a trial upon its merits.

RESPECTFULLY SUBMITTED this the 14th day of November, 2008.

Deanie Lee, et. al., Appellants

BY


A. M. MURPHY FOR APPELLANTS

CERTIFICATE OF SERVICE

I the undersigned attorney for the Plaintiff/Appellant do hereby certify that I have this day served a copy of the Appellant's Brief by United States Mail with postage prepaid to the following persons at these addresses:

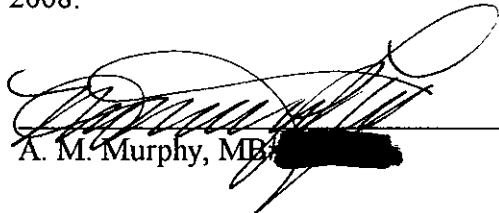

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