BRYCE DOWNEY & LENKOV LLC

General Liability Update
October 2014

Bryce Downey & Lenkov Case Results

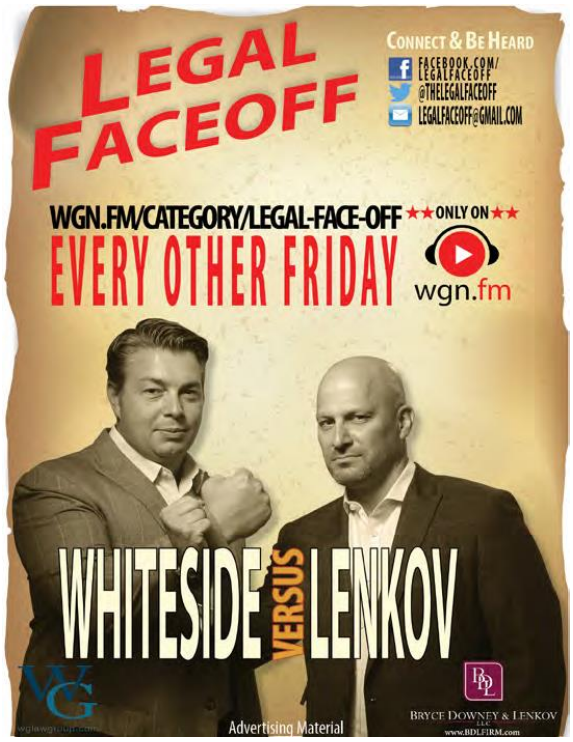
Frank Rowland recently succeeded in fully recovering our client's workers' compensation lien in excess of $1,000,000.00 in a civil action brought by a construction worker who was very seriously injured when a piece of heavy equipment allegedly failed due to claimed manufacturing defects. The employee sued the manufacturer of the machine, the lessor and several component part manufacturers. Each party, in turn, sued the employer, our client, for contribution.

In addition to defending the third party actions, there were indemnification agreements, a potential *Kotecki* waiver, and insurance issues that complicated both our position and overall litigation strategy. These were also resolved with no payment on the part of our client.

Terry Kiwala recently obtained the dismissal of our firm's client, a major drug store company, in a Madison County, Illinois asbestos case. Madison County has long been recognized as a haven for plaintiffs' attorneys filing asbestos and other toxic tort cases.

The Plaintiff was a pharmacist who contracted mesothelioma while working at various pharmacies for different defendants in multiple states. Our client had purchased many pharmacies, but had specifically excluded assumption of tort liability in the Asset Purchase Agreement. After reviewing Terry's motion for summary judgment based on that Agreement, Plaintiff's counsel voluntarily dismissed our client.

Legal Faceoff - WGN.FM



Legal Faceoff is a fast-paced, high-energy legal program dealing with the hottest issues of the day. Rich Lenkov and plaintiff's attorney Jason Whiteside provide a legal point/counterpoint perspective on issues ranging from celebrity scandals to sports controversies and everything in between. Listen to the podcast on WGN.FM every other Friday.

Untimely Claim Under Family Expense Act Stricken by Illinois Appellate Court

In *Pirello v. Maryville Academy, Inc.*, 2014 IL App (1st) 133964 (October 8, 2014), the Illinois Appellate Court held that a plaintiff was not allowed to recover medical expenses incurred before her 18th birthday when there had not been an effective assignment of the right to recover those expenses.

Plaintiff was injured in a fall from a building when she was 16 years old. She filed suit exactly 2 years after her 18th birthday, as allowed under the statute of limitations. Her Complaint alleged that she incurred medical expenses but it did not assert a claim for medical expenses under the Family Expense Act. Under the Act, medical expenses are only recoverable by the minor's parents. However, if the parents assign that right to the minor, the minor may seek recovery of those expenses as part of a personal injury suit.

Defendant moved for summary judgment seeking a determination that Plaintiff was not entitled to recover medical expenses incurred prior to her turning 18. Plaintiff then sought to file an amended complaint adding her father as a plaintiff and asserting his claim for medical expenses under the Act. The trial court ruled that any claim for medical expenses was time barred, and as such, summary judgment was granted and leave to file the amended complaint was denied.

On appeal, the appellate court explained that the right to recover Plaintiff's medical expenses incurred before she turned 18 belonged to her parents and their ability to sue for medical expenses was subject to the same statute of limitations (2 years after Plaintiff turned 18.) That statute of limitations ran on the day she filed her first complaint.

The appellate court also rejected Plaintiff's assertion that her father's claim should relate back to the date of her initial complaint. Under the Illinois Code of Civil Procedure, a claim will relate back if it grew out of the same transaction alleged in the original action. However, the court observed that Illinois case law does not allow claims to relate back if the amended complaint alleges arguably different injuries. Here, the financial loss associated with the medical expenses was a separate and distinct

injury belonging to her parents. It could not relate back.

Had Plaintiff's father assigned his right to recover the medical expenses to Plaintiff, she could have sued for them as part of her original action or amended the complaint to include them. There was no allegation of such an assignment. Accordingly, the claim for medical expenses could not be resurrected.

Thinking Point:

Cases involving minors often present the opportunity to minimize exposure by challenging the right of minors to recover medical expenses in their own names when there is no allegation of an assignment by parents.

Illinois Appellate Court Upholds Franchisor's Liability for Pizza Delivery Driver

In *Bruntjen v. Bethalto Pizza, LLC*, 2014 IL App (5th) 120245 (September 15, 2014), the Illinois Appellate Court held that, by implementing a mandatory driver safety program and retaining control over driver safety and hiring and firing of drivers, a franchisor could be liable under the theories of vicarious liability and direct negligence for the actions of its franchisee's driver.

In 2009, Kenneth Lyerla was working as a pizza delivery driver for Bethalto Pizza, a franchisee of Imo's. As he was driving his car to deliver a pizza, he crossed the centerline and struck and severely injured Plaintiff. In the resulting lawsuit, Plaintiff alleged that Imo's was vicariously liable for Lyerla's actions and was directly liable because Imo's undertook a duty to ensure driver safety by imposing a driver safety program and other driver qualification measures. Plaintiff also presented evidence that suggested that Imo's required drivers to put speed above safety in making deliveries. Imo's unsuccessfully pursued a motion to dismiss, motion for summary judgment, and motion for directed verdict. The jury entered a verdict for Plaintiff for $2,284,500.68.

On appeal, Imo's argued that it did not have a legal duty to protect the public from the acts of Bethalto and its employees because Bethalto retained control over the day-to-day operations of the franchise. Imo's relied on *Castro v. Brown's Chicken and Pasta, Inc.*, 314 Ill.App.3d 542 (1st Dist. 2000) and *Chelkova v. Southland Corp.*, 331 Ill.App.3d 716 (1st Dist. 2002), two cases in which franchisors who made suggestions and recommendations about security measures were held not to be liable to third persons injured in criminal attacks.

The appellate court in *Bruntjen*, however, noted that Imo's involvement in Bethalto's driver safety program went way beyond mere suggestions and recommendations. Imo's operating manual for its franchisees required that drivers have good driving records and that the records be checked every 6 months. Franchisees were required to keep the records of such checks. Most importantly, Imo's reserved the right to monitor adherence with its driver safety policy and to force compliance.

Relying on *Lawson v. Schmitt Boulder Hill, Inc.*, 398 Ill.App.3d 127 (2nd Dist. 2010), in which the court held that a crucial factor in determining whether a franchisor has voluntarily undertaken a duty of care to protect against criminal attacks is whether the franchisor maintained mandatory security procedures, the court in *Bruntjen* held that the imposition of mandatory and extensive driver safety measures created a duty to protect the public from injury.

The court also held that liability existed under the theory of *respondeat superior*. According to the court, the right to control is determinative of agency regardless of whether that control is actually exercised. Through its franchise agreement, operating manual and driver contract, Imo's exercised significant control over Bethalto's daily operations and could control the employment decisions, training, and safety of its drivers. This extensive control over the means and methods of Bethalto and its drivers created an agency relationship which exposed Imo's to liability as Bethalto's principle.

Thinking Point:

Franchisors who, by contract, operation manuals, programs and policies, subject franchisees to mandatory operational requirements run the risk of being both directly and vicariously liable for the actions of the franchisees and its employees. More control, whether exercised or not, means more liability.

Indiana Supreme Court Takes a Swing at the Baseball Rule

In our May 2013 General Liability Newsletter, we reported on the Indiana Court of Appeals decision in *South Shore Baseball, LLC v. DeJesus*, 982 N.E.2d 1076 (Ind.Ct.App. 2013), in which the court held that summary judgment should have been entered for a baseball stadium operator in a suit brought by a fan who was struck and injured by a foul ball. In that decision, the court held that the operator had no liability for negligence or under the theory of premises liability. The court also specifically adopted the "The Baseball Rule," under which ballpark operators have absolutely no liability to fans struck by baseballs if the operators provide protective screening for fans between first base and third base.

This past summer, the Indiana Supreme Court, in an opinion sprinkled with baseball references, also held that the trial court should have granted the operator's motion for summary judgment, but refused to adopt "The Baseball Rule" as the appellate court had done. *South Shore Baseball, LLC v. DeJesus*, 11 N.E.3d 903 (Ind. 2014).

First, in explaining the standard of review, the court noted that it stands "in the trial court's cleats." 11 N.E.3d at 906. Turning to the issue of whether "The Baseball Rule" should apply in Indiana, the court stated, "[a]lthough we appreciate a well-turned double play, we will take this particular pitch." 11 N.E.3d at 907. According to the court, sports do not merit their own special rule of liability. If "The Baseball Rule" is to be the law in Indiana, the court held that it was up to the General Assembly to enact it.

However, the court did agree with the appellate court and held that summary judgment was warranted on the premises liability and negligence claims. The undisputed facts established that Plaintiff's ticket bore the written warning that baseballs frequently left the field and entered the spectator area. A sign near her seat and announcements over the loudspeaker warned of the danger of foul balls. The operator would have no reason to believe that Plaintiff would not realize the risk of getting hit by a foul ball and protect herself against it. Further, the fact that the operator had elected to provide some protective netting did not create a duty to protect Plaintiff. There was no evidence of any increased harm to Plaintiff or reliance on her part based on the limited placement of netting.

Thinking Point:

It would appear from the *South Side Baseball* decision that the Indiana Supreme Court will

resist efforts to adopt rules limiting liability where there are sufficient grounds in the record to deny liability under existing law.

Illinois Appellate Court Affirms Summary Judgment on Issue of Proximate Cause in Case Involving Claim of Misadjusted Ski Bindings

In somewhat of a breath of fresh air, the Illinois Appellate Court recently affirmed summary judgment in favor of a defendant on the issue of proximate cause. In most cases, proximate cause is viewed a fact question left for the jury. In *Mack v. Viking Ski Shop, Inc*., 2014 IL App (1st) 130768 (September 24, 2014), the court revived the limited exception that in the face of uncontroverted facts, proximate cause can be a legal issue capable of being decided at the summary judgment stage.

In *Mack*, Plaintiff sustained serious knees injuries while skiing, allegedly because defendant Viking set the bindings of his skis too tightly. The proximate cause argument was framed in a scenario of conflicting expert opinions, late disclosures and standards of causation.

Plaintiff's case involved 2 experts: A highly qualified orthopedic surgeon who also had a biomechanical engineering degree and was the team doctor for the US Ski Team; and an experienced mechanical engineering expert. During the course of his discovery deposition, the physician initially testified that Plaintiff's injuries were consistent with overly tight bindings. However, at a later evidence deposition, the doctor could not testify whether plaintiff's injuries were or were not caused by the bindings, and further, he stated that he was not an expert on causation.

Similarly, Plaintiff's mechanical engineer originally testified that he had no intention of opining as to a causal relationship between the injury and bindings because he was not a biomedical engineer. Later, and beyond the deadline for expert disclosures, this engineer submitted an affidavit on causation, which Defendant promptly succeeded in getting barred on the grounds of late disclosure. Defendant, in turn, offered an expert who disputed causal connection and causation.

Due to the physician's equivocal testimony and the barring of the engineer's opinion, the trial court entered summary judgment for the Defendant, finding there to be an absence of any "affirmative and positive evidence" that would create a fact question on proximate cause.

The appellate court first disposed of the argument that the engineer's testimony should not have been barred for late disclosure, reaffirming that the trial judge has wide discretion in this area that was not abused in this case. Next, the court found that even if admitted, the testimony did not establish proximate cause. The physician's testimony was equivocal, and no other witness testified clearly that "*but for*" the overly tight bindings, the accident and injury would not have occurred. It further noted that Plaintiff bears the burden of proving that but for Defendant's negligence the injury would not have occurred. Finally, it restated that proximate cause must be established to a reasonable certainty and may not be based upon mere speculation, guess, surmise or conjecture.

Thinking Point:

Obviously, the case stands for the proposition that failure to comply with court disclosure rules and schedules can have very adverse consequences. Moreover, it demonstrates that

despite the difficulty of challenging proximate cause, it should be conceded only in the most obvious of cases. Last, it affirms the need to leave no gaps in a causation argument from either the plaintiff or defense side.

Illinois Court of Appeals Holds Tort Immunity Act Does Not Protect Municipality from Liability for Forcing Pedestrian to Walk in Roadway

Section 3-102 of the Illinois Tort Immunity Act imposes a duty to exercise reasonable care with regard to the condition of public property, but that duty is extended only to "intended and permitted users." Accordingly, Illinois courts have long held that a municipality does not have a duty to pedestrians who are not walking in areas designated for pedestrians, such as in roadways or parkways, because they are not "intended and permitted" users of those areas.

In *Pattullo-Banks v. City of Park Ridge*, 2014 IL App (1st) 132856 (September 4, 2014), the Illinois Court of Appeals held that the limitation of liability to "intended and permitted users" does not apply when the pedestrian is injured because the designated sidewalk or crosswalk has been obstructed by the municipality such that the pedestrian is forced to walk in an unmarked crosswalk or roadway.

In *Pattullo-Banks*, Plaintiff was struck by a car while walking across a street in an unmarked crosswalk. The City moved for summary judgment on the theory that Plaintiff was not in a designated crosswalk and therefore was not an intended and permitted user under §3-102. However, Plaintiff had alleged that the designated crosswalk was obstructed by an unnatural accumulation of snow and ice that was created when the City's snowplows cleared snow from the adjacent street and she had no choice but to walk in the street. The trial court agreed with the City and granted summary judgment on the basis that it had no duty under §3-102.

The appellate court reversed, noting that Plaintiff's theory of liability was not the City's duty as it pertained to the street, but rather the City's duty to maintain the sidewalk that it had covered with snow and ice. The City had a duty to keep its sidewalk in a reasonably safe condition and whether it breached that duty by creating an unnatural accumulation of snow and ice on it was a fact question that did not involve consideration of whether she was an intended and permitted user. Beyond that, the court observed that whether the failure of the City to properly maintain its sidewalk proximately caused Plaintiff to be struck by the car remained a question of fact for a jury to decide as well.

Thinking Point:

Immunities in Illinois are strictly construed. Municipal defendants need to squarely address the allegations of an artfully crafted Complaint that seeks to take a cause of action out from under an immunity. Plaintiff in *Pattullo-Banks* successfully avoided summary judgment on the issue of duty, but left herself with the task of establishing that the condition of the sidewalk was causally connected to her being hit by a car. Elsewhere in this newsletter, we discuss a recent decision in which summary judgment on the issue of proximate cause was affirmed.

Seventh Circuit Court of Appeals Reverses $180,000,000 Verdict Against One Defendant in Premises Liability Case

In *Jentz v. ConAgra Foods, Inc.*, ___ F.3d ___, 2014 WL 4414697 (7th Cir. September 9, 2014), the Seventh Circuit ruled that the contractor's rule adopted by the Illinois Supreme Court in *Community College District 508 v. Coopers & Lybrand*, 208 Ill.2d 259 (2003), barred Plaintiffs' recovery against ConAgra, and as such, the $180,000,000 verdict against the landowner who hired the contractor needed to be set aside.

In *Jentz*, ConAgra determined that one of its grain storage bins had become hot. "Hot bins" occur due to the decomposition of grain that is stored and compressed in the bin. Heat and carbon monoxide create the risk of the bin exploding. ConAgra hired West Side to remove as much grain as possible and cure the hot bin. West Side hired A&J Bin Cleaning to work on the project.

During the removal of the grain, oxygen fed the decomposing grain in the bottom of the bin and an explosion occurred. A&J Bin employees Jentz and Schmidt and West Side employee Becker were seriously injured as a result of the explosion. After a 17 day trial, a jury awarded nearly $180,000,000 in compensatory and punitive damages against ConAgra and West Side.

In its post-trial motion and again on appeal, ConAgra argued that under *Coopers & Lybrand*, one who hires an independent contractor to redress an unsafe condition cannot be liable when the feared event occurs. In *Cooper & Lybrand*, the plaintiff sued its accountants for malpractice. The accountants contended that the plaintiff was comparatively negligent because it created the financial condition that made it easier for the accountants to err.

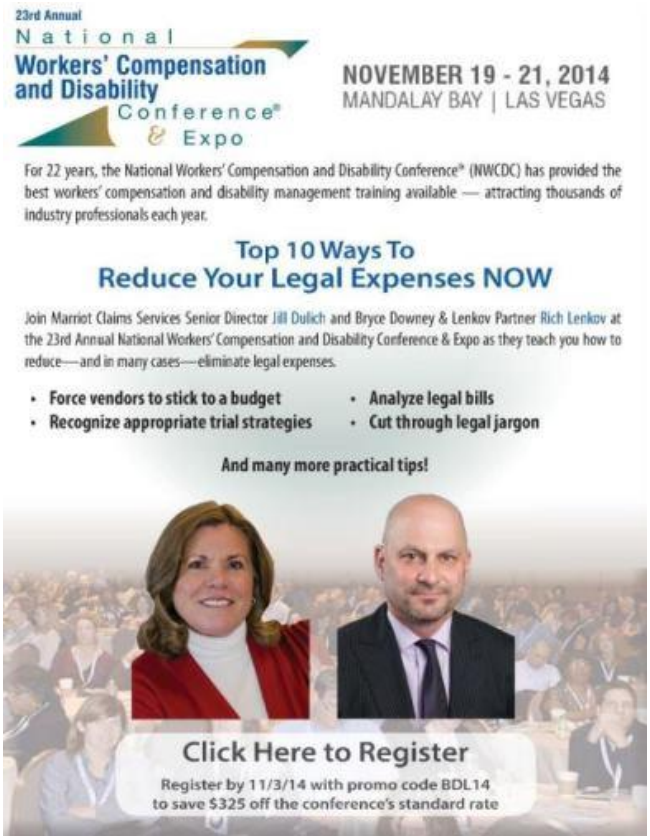
The Seventh Circuit agreed with ConAgra and pointed out that other Illinois cases also hold that there is no duty to guard against an unsafe condition that the independent contractor was hired to fix. In *Keating v. 68th & Paxton, LLC*, 401 Ill.App.3d 456 (2010), for example, the court held that a property owner could not be liable to a contractor who was hired to fix a dangerous porch.

Because ConAgra could not be liable for compensatory damages it also could not be liable for the $33,333,333.33 in punitive damages the jury awarded against it. With regard to West Side, because it did not appeal the award of compensatory damages, it remained liable for its share of the $79,890,000 compensatory award to the three Plaintiffs. However, because Illinois law only permits punitive damages for intentional or willful and wanton conduct, the $1,000,000 in punitive damages assessed against West Side was reversed. According to the court, there was no evidence to suggest that West Side wanted Plaintiffs to be harmed or that there was a gross deviation from the standard of care imposed on West Side.

Thinking Point:

It is not enough to just look at the relationship of the parties in determining potential liability. Sometimes a specific condition or type of conduct at issue may absolve a party of liability. In *Jentz*, a nine-figure verdict was upended by a very limited exception to landowner liability for injuries resulting from a hazard the subcontractor was hired to remedy.

Upcoming Seminars



- On **1/19/15**, Rich Lenkov will present **"Trial Preparations"** in Danville, IL. Stay tuned for more details

CLM
CLAIMS & LITIGATION MANAGEMENT ALLIANCE.
ADVANCING ETHICS, COOPERATION AND EDUCATION

- On **1/22/14**, the CLM Greater Chicago chapter will be hosting an educational and networking event. Stay tuned for more details

- On **2/5/15**, Rich Lenkov, Sherri Johnson (Senior Director of Corporate Claims, Interstate Hotels & Resorts) and Steve Truono (Vice President of Global Risk and Insurance, Starwood Hotels and Resorts) will present **"General Liability and Workers' Compensation Issues Unique to the Hotel Industry"** at the 2015 Retail, Restaurant & Hospitality Committee Conference in Orlando, FL. For more information and to register, Click Here

Recent Seminars

- On **8/14/14**, CLM Greater Chicago Chapter hosted a networking BBQ. Attendees mingled while enjoying tender brisket and spun the sponsor wheel to win prizes. One lucky winner took home a Hawks sweater! We would like to thank our sponsors for making this event possible.

- On **9/15/14**, Edward Jordan presented **"Closing Difficult/Complex Cases"** in Naperville, IL

FREE Webinars

Bryce Downey & Lenkov hosts monthly webinars on pressing issues and hot topics. Here's what some of our attendees have to say about past webinars:

"Very informative and reviewed actual cases that are applicable to what we see."

"Always an interesting webinar. I like the interaction/poll questions."

"It was very informative. Love going over the specific cases."

Upcoming

- **11/13/14, -** Rich Lenkov and Tony May will present **"Using Surveillance in your Workers' Compensation Claim."** Click here for more info and to register

- **11/18/14** - Jeff Kehl and Storrs Downey will present **"Spills, Thrills and Bills: The True**

Story Behind Illinois and Indiana Premises Liability Law." Click Here for more info and to register

- **11/21/14** - Jeff Kehl will present **"Exploiting the Internet for Pre-Suit Investigation."** Click Here for more info and to register

If you would like a copy of any of our prior webinars, please email Jason Klika at jklika@bdlfirm.com. Some recent webinars include:

- **AMA Guidelines: A Legal And Medical Perspective**
- **Understanding NTSB Accident Investigations**
- **Risky Business: Drugs, Sexual Orientation And Guns In The Illinois Workplace**
- **Subrogation Basics for Workers' Compensation Professionals**

Bryce Downey & Lenkov is Growing

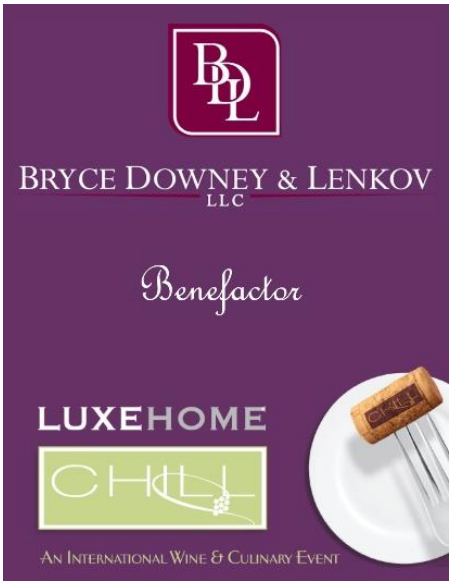
We are pleased to announce the addition of two new associate attorneys.

Jorge F. Rovelo represents our clients in all aspects of workers' compensation defense.

Kirsten L. Kaiser focuses her practice on workers' compensation and general litigation defense. She has successfully tried and argued many cases before Administrative Law Judges of the Indiana Worker's Compensation board and Social Security Disability Administration. Kirsten has also successfully tried personal injury and criminal cases before the Lake, Porter and Starke County trial courts. Kirsten is also experienced in mediation and subrogation matters, including ERISA, Medicare and Medicaid.

Giving Back

"CHILL" With Bryce Downey & Lenkov

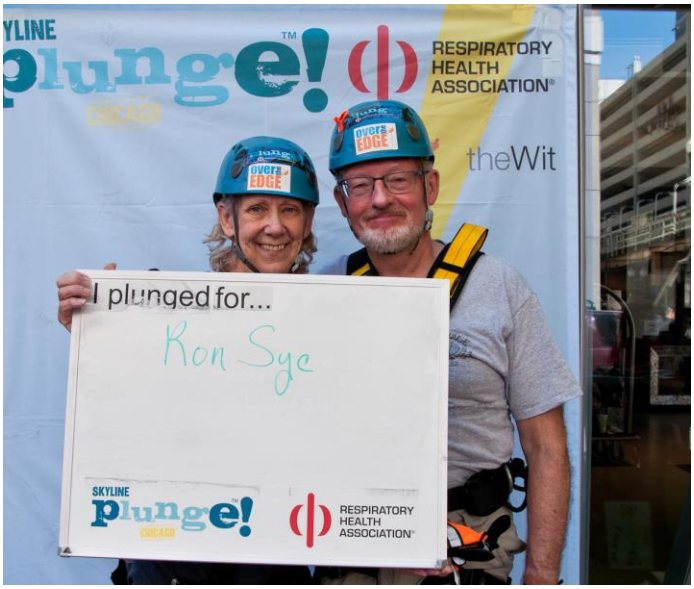


Bryce Downey & Lenkov is a longtime supporter of the Respiratory Health Association and is a benefactor at its upcoming event on 11/13/14. The CHILL event is a 2 ½ hour wine and food grazing event among the kitchen and bath showrooms on the first floor of the Merchandise Mart. Guests will mingle, and sample food and wine, and tour the Mart's first floor showrooms. All proceeds support RHA and their mission to protect clean air and ensure proper lung health care.

"Top 10 Mistake Law School Graduates Make"

On 9/16/14, Rich Lenkov and Michael Cklamovski of Fidelity National Law Group gave a webinar to NIU College of Law students. Rich and Mike shared their personal stories both in front of and behind the interviewing desk and left students with a powerful list of 10 mistakes not to make.

Geoff Bryce Rappelled 27 stories for Lung Health



On 9/7/14, Managing Partner, Geoff Bryce, and his wife, Sharon Syc rappelled 27 stories to help raise awareness and funds for lung disease research, education and advocacy. Geoff also received the "Making a Difference Awesome Event Supporter" award.

Every year, the Respiratory Health Association of Metropolitan Chicago offers the "Skyline Plunge" to those who are daring (or crazy) enough to rappel down a 27 story building. Geoff and Sharon were also featured in WGN's coverage of the event. Click here to watch the full interview.

Race Judicata 2014

Bryce Downey & Lenkov was proud to sponsor Chicago Volunteer Legal Services' (CVLS) Race Judicata 5K Race on 9/4/14. In addition to our sponsorship, this year, Bryce Downey & Lenkov sponsored the wine tent. Team BDL grows larger each year. This year we had 45 and were joined by our friends at Chicago Legal Prep, Chicago's first and only legal-themed charter high school, and NIU college of Law. Our fastest times were David Savin – 25:02, Jason Klika – 25:20 and Kassy Lopez – 26:31. Great job Team BDL!

Did you know? Bryce Downey & Lenkov regularly issues several practice area newsletters. If you would like a copy of any of the below articles from other BDL newsletters, please email our Marketing Coordinator, Jason, at jklika@bdlfirm.com.

IL Workers' Compensation

- **Top 5 Ways to Use an Employee's Actions to Defend their Workers' Compensation Claim**
- **Is a Petitioner Entitled to TTD When on FMLA?**

Labor & Employment Law

- **US Supreme Court Defines "Supervisor" for the Purposes of Employment Discrimination and Harassment Litigation**
- **Timing of Terminating Injured Worker Important in Retaliatory Discharge Cases**

Corporate & Construction

- **Trade Secrets: If it's not a "Trade Secret", How Do I protect it?**
- **Federal, State and Local Incentives Available for Businesses**

Contributors to the November 2014 General Liability Update

Bryce Downey and Lenkov attorneys who contributed to this update were Storrs Downey, Frank Rowland and Jeffrey Kehl.

Free Seminars!

Our attorneys regularly provide free seminars on a wide range of general liability topics. We speak to a few people or dozens, to companies of all sizes and large national organizations. Among the national conferences at which we've presented:

- Claims and Litigation Management Alliance Annual Conference
- National Workers' Compensation and Disability Conference® & Expo
- SEAK Annual National Workers' Compensation and Occupational Medicine Conference
- REBEX
- RIMS Annual Conference

Some of the topics we presented are:

- *Curbing Litigation Expenses*
- *Expert Retention and Usage*
- *Possible Termination of Injured Worker: Employer's Rights and Obligations*
- *The Mediation Process*
- *Top Twenty Myths & Realities on Illinois/Indiana Premises Liability Laws*
- *Comparison of Illinois and Indiana Products and Liability Laws*
- *Illinois Premises Liability*

If you would like us to come in for a free seminar, please email Storrs Downey at sdowney@bdlfirm.com or Jeffrey Kehl at jkehl@bdl.firm.com. We can teach you a lot in as little as 60 minutes.

Bryce Downey & Lenkov is a firm of experienced business counselors and accomplished trial lawyers who deliver service, success and satisfaction. We exceed clients' expectations while providing the highest caliber of service in a wide range of practice areas. With offices in Chicago, Crown Point, IN, Memphis and Atlanta and attorneys licensed in multiple states, Bryce Downey & Lenkov is able to serve its clients' needs with a regional concentration while maintaining a national practice. Our practice areas include:

Business Litigation
Business Transactions & Counseling
Corporate/LLC/Partnership
Organization and Governance
Construction
Employment and Labor Counseling & Litigation
Entertainment Law
Insurance Coverage
Insurance Litigation
Intellectual Property
Medical Malpractice
Professional Liability
Real Estate
Transportation
Workers' Compensation

The attorneys at Bryce Downey & Lenkov are committed to keeping you updated regarding the latest developments in workers' compensation law in Illinois and Indiana. If you would like more information on any of the topics discussed above, or have any questions regarding these issues, please contact Storrs Downey or Jeffrey Kehl at 312.377.1501 or any member of the general litigation team. *The content of this newsletter has been prepared by Bryce Downey & Lenkov LLC (the Firm) for informational purposes and does not constitute legal advice. This information is not intended to create, and receipt of it does not constitute, a lawyer-client relationship. You should not act upon this information without seeking advice from a lawyer licensed in your own state of country.*

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