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Erroneously sued as WAN YUEN BUDDHIST
CENTER and HONG SHIN BUDDHIST CENTER

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION

DOE 1 AND DOE 2,

Plaintiffs,

v.

SHIRLEY LAI, AKA ABBESS
CHAN MIN; JANE ROE AN
INDIVIDUAL, WAN YUEN
BUDDHIST CENTER; HONG SHIN
BUDDHIST CENTER,

Defendants.

Case No.: 5:25-cv-03485-JGB-DTB
(Honorable Jesus G. Bernal)

NOTICE OF MOTION AND
MOTION TO DISMISS; AND
MEMORANDUM OF POINTS
AND AUTHORITIES

Time: 9:00 a.m.
Date: February 9, 2026
Crt. Rm: 1

NOTICE OF MOTION

TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA, THE HONORABLE JESUS G. BERNAL, PLAINTIFFS AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on February 9, 2026 at 9:00 a.m. , or as soon thereafter as the matter may be heard, before the Honorable Jesus G. Bernal, United States District Judge, in Courtroom 1 of the United States District Court for the Central District of California, Eastern Division, located at 3470 Twelfth Street, Riverside, California 92501, Defendant Shirley Lai, a.k.a. Abbess Chan Min, erroneously sued as Wan Yuen Buddhist Center and Hong Shin Buddhist Center (“Defendant”), will and hereby does move for an order dismissing the Complaint in its entirety (all claims) pursuant to **Federal Rule of Civil Procedure 12(b)(6)**. Alternatively, because Plaintiffs allege all of their claims are actions taken as part of their monastic vows, the Court should abstain from the case under the ecclesiastical abstention pursuant to **Federal Rule of Civil Procedure 12(b)(1)**.

This Motion is made on the ground that the Complaint fails to state a claim upon which relief can be granted and must be dismissed as a matter of law.

Local Rule 7-3 Compliance. Defendant has complied with the meet-and-confer requirements of Local Rule 7-3. Defendant’s counsel conferred with Plaintiffs’ counsel by telephone on January 2, 2026, and further articulated the grounds for this Motion in written correspondence dated December 22, 2025. Plaintiffs declined to dismiss or amend the Complaint, necessitating this Motion.

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1 This Motion is based upon this Notice of Motion and Motion, the
2 accompanying Memorandum of Points and Authorities, and requests for
3 judicial notice filed herewith, the pleadings and records on file in this action, and
4 such other matters as may be presented to or considered by the Court.

5
6 Dated: January 12, 2026

CABANDAY LAW GROUP

7
8 By: //OFC//
9 **ORLANDO F. CABANDAY**
10 Attorneys for Defendant
11 **SHIRLEY LAI aka ABBESS CHAN**
12 **MIN Erroneously sued as WAN**
13 **YUEN BUDDHIST CENTER and**
14 **HONG SHIN BUDDHIST CENTER**
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1 **I. INTRODUCTION**

2 Plaintiffs assert ten causes of action: one claim under California Civil Code §
3 52.5 for human trafficking, four wage-and-hour claims under the California Labor
4 Code, and five claims under the Trafficking Victims Protection Act (“TVPA”). Each
5 claim fails as a matter of law because the Complaint itself pleads facts that negate
6 essential elements of every cause of action.

7 Plaintiffs do not plausibly allege an employment relationship, compensable
8 work, timely wage claims, coercion, involuntary labor, or individual employer
9 liability as to Defendant Abbess Chan Min. Instead, Plaintiffs’ own allegations
10 establish that all conduct underlying their claims arose from their voluntary
11 participation in Buddhist monastic life, not from any employer–employee
12 relationship.

13 Plaintiffs allege that they chose to become Mahāyāna Buddhist nuns, traveled
14 to the United States to learn and practice Buddhism, and resided at nonprofit
15 Buddhist temples as part of their religious training and monastic vocation. (Compl.
16 ¶¶ 9–11.) Consistent with those commitments, Plaintiffs allege that they took vows
17 of poverty, did not accept positions at Wan Yuen Buddhist Center or Hong Shin
18 Buddhist Center (collectively, the “Temples”) as employment, and did not work for
19 wages. (Compl. ¶¶ 19–25, 38–39.) Rather, Plaintiffs allege that they devoted their
20 time to religious study, communal monastic living, and temple service undertaken as
21 spiritual devotion. (Compl. ¶¶ 19–25, 31–36, 37–40.)

22 Notwithstanding these admissions, Plaintiffs attempt to recharacterize their
23 voluntary religious vocation as unlawful “employment” and “human trafficking,”
24 seeking civil damages for the very monastic life that formed the basis for their
25 residence at the Temples and their presence in the United States. The Complaint
26 does not allege that Abbess Chan Min paid wages, controlled compensation,
27 exercised employer authority, or obtained labor through coercion or involuntary

1 servitude. Nor does it allege facts supporting tolling of facially untimely wage
2 claims.

3 Finally, adjudicating Plaintiffs' claims would require the Court to determine
4 whether religious vows, monastic discipline, and devotional service—undertaken
5 voluntarily and central to Plaintiffs' faith—constitute compensable labor or coercive
6 conduct. The First Amendment forbids such inquiry into religious doctrine and
7 internal religious governance. *Serbian E. Orthodox Diocese v. Milivojevich*, 426
8 U.S. 696, 709–10 (1976); *Elvig v. Calvin Presbyterian Church*, 375 F.3d 951, 955
9 (9th Cir. 2004). Because the defects in the Complaint are legal and incurable,
10 dismissal under Rules 12(b)(1) and 12(b)(6) is warranted.

11 Accordingly, Defendant Abbess Chan Min respectfully requests that the Court
12 grant the Motion and dismiss the Complaint without leave to amend.

13 II. LEGAL STANDARD

14 A motion to dismiss under Fed. R. Civ. P. 12(b)(6) tests the legal sufficiency
15 of the complaint. *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007). To survive
16 dismissal, a plaintiff must plead sufficient factual matter to state a claim that is
17 plausible on its face. *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). Courts need not
18 accept legal conclusions or conclusory allegations that are contradicted by the
19 complaint's own factual allegations. *Id.* at 678–79. Where a plaintiff pleads facts
20 that affirmatively negate an essential element of a claim, dismissal under Rule
21 12(b)(6) is appropriate. *Spewell v. Golden State Warriors*, 266 F.3d 979, 988 (9th
22 Cir. 2001). Dismissal is likewise warranted where claims are time-barred on the face
23 of the complaint and no facts supporting tolling are pleaded. *Von Saher v. Norton*
24 *Simon Museum of Art*, 592 F.3d 954, 969 (9th Cir. 2010).

25 In resolving a Rule 12(b)(6) motion, the Court may consider the complaint
26 and matters properly subject to judicial notice without converting the motion into
27 one for summary judgment. *United States v. Ritchie*, 342 F.3d 903, 908–09 (9th Cir.

2003); Fed. R. Evid. 201. Judicially noticeable materials include public records, government documents, and administrative filings whose accuracy cannot reasonably be questioned. *Ritchie*, 342 F.3d at 908–09.

Accordingly, the Court may take judicial notice of immigration records and R-1 visa materials referenced in or integral to the Complaint, which reflect Plaintiffs’ representations that they entered and remained in the United States as religious workers engaged in monastic life, not as employees performing secular work for wages. (RJN Ex. 1.) The Court may also take judicial notice of Plaintiffs’ prior DLSE complaints and administrative filings, in which Plaintiffs identified only one Temple as their employer and did not name Abbess Chan Min. (RJN Ex. 2.) Admissions contained in such judicially noticed records may be considered in evaluating plausibility, and where they contradict conclusory allegations in the Complaint, the Court need not accept the latter as true. *Ritchie*, 342 F.3d at 908–09; *Sprewell*, 266 F.3d at 988.

Dismissal under Fed. R. Civ. P. 12(b)(1) is required where adjudication would necessitate inquiry into religious doctrine, religious vows, or internal religious governance. *Serbian E. Orthodox Diocese v. Milivojevich*, 426 U.S. 696, 709–10 (1976). Where claims arise from conduct undertaken as part of religious vocation or monastic life and cannot be resolved through neutral principles of law, the First Amendment requires abstention.

III. PLAINTIFFS’ CALIFORNIA WAGE AND HOUR CLAIMS FAIL

A. Plaintiffs’ Labor Claims Are Time Barred And Not Subject To Tolling¹

Plaintiffs’ wage-and-hour claims under the California Labor Code are time-barred. Claims for unpaid minimum wages and overtime under Labor Code sections 1194 and 1197 are governed by a three-year statute of limitations. Cal. Civ. Proc. Code § 338(a); *Murphy v. Kenneth Cole Prods., Inc.*, 40 Cal. 4th 1094, 1101 (2007).

¹ Plaintiffs have not alleged wage and hour claims under Federal Law, the Fair Labor Standards Act.

1 Claims for waiting-time penalties under Labor Code section 203 are likewise subject
2 to a three-year limitations period. *Id.* Claims for wage-statement penalties under
3 Labor Code section 226 are subject to a one-year statute of limitations. *Pineda v.*
4 *Bank of Am., N.A.*, 50 Cal. 4th 1389, 1394–95 (2010).

5 Plaintiffs allege that their association with the Temples ended no later than
6 2021. (Compl. ¶¶ 45, 94–97.) This action was filed in 2025—well outside every
7 applicable limitations period. The untimeliness of the Labor Code claims is therefore
8 apparent on the face of the Complaint.

9 Plaintiffs may attempt to rely on equitable tolling based on prior California
10 Labor Commissioner Division Labor Standards of Enforcement (“DLSE”) proceedings
11 referenced in the Complaint. (Compl. ¶¶ 104–107.) That attempt would
12 fail.

13 Equitable tolling must be affirmatively pleaded in the complaint; where it is
14 not alleged, the doctrine does not apply. *Supermail Cargo, Inc. v. United States*, 68
15 F.3d 1204, 1206–07 (9th Cir. 1995); *Von Saher v. Norton Simon Museum of Art*, 592
16 F.3d 954, 969 (9th Cir. 2010). Plaintiffs do not plead facts establishing the elements
17 of equitable tolling—timely notice, lack of prejudice, and reasonable and good-faith
18 conduct. *McDonald v. Antelope Valley Cmty. Coll. Dist.*, 45 Cal. 4th 88, 102 (2008).

19 Even if equitable tolling had been pleaded, it would apply only to the
20 defendant identified in the administrative proceeding. Tolling does not extend to
21 defendants who were not named in, or given notice of, the administrative claim.
22 *Johnson v. City of Loma Linda*, 24 Cal. 4th 61, 77 (2000). Plaintiffs’ DLSE filings
23 identify only Hong Shin as their employer and do not name Abbess Chan Min or
24 Wan Yuen. (Compl. ¶¶ 104–107; Request for Judicial Notice, Ex. 2.) Accordingly,
25 equitable tolling cannot apply to Abbess Chan Min or Wan Yuen Buddhist Center as
26 a matter of law.

27 Where, as here, the Complaint pleads facts establishing untimeliness and fails
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1 to allege a viable basis for tolling, dismissal under Rule 12(b)(6) is required. *Von*
2 *Saher*, 592 F.3d at 969.

3 **B. Plaintiffs Fail to Plead an Employer Relationship or Liability as to**
4 **Abbess Chan Min**

5 Plaintiffs' Labor Code claims fail because the Complaint does not plausibly
6 allege that any Defendant—let alone Abbess Chan Min—was Plaintiffs' employer.
7 To state a wage-and-hour claim, Plaintiffs must plead facts showing that each
8 defendant exercised control over wages, hours, or working conditions. Conclusory
9 allegations referring collectively to "Defendants," without defendant-specific factual
10 allegations establishing employer control, are insufficient under Fed. R. Civ. P. 8(a).

11 *Jones v. Royal Admin. Servs., Inc.*, 887 F.3d 443, 450–51 (9th Cir. 2018); *Perez v.*
12 *Wells Fargo & Co.*, 75 Cal. App. 5th 640, 653 (2022).

13 Here, the Complaint does not identify which Defendant employed Plaintiffs
14 for purposes of any Labor Code claim, nor does it allege which Defendant paid
15 wages, set compensation, or exercised control over wage practices. Where a
16 complaint fails to allege which defendant employed the plaintiff or controlled
17 compensation, dismissal under Rule 12(b)(6) is required. *Kurtz v. Kimberly-Clark*
18 *Corp.*, 321 F.R.D. 482, 541 (E.D. Cal. 2017).

19 Plaintiffs' own admissions further confirm that Abbess Chan Min was not
20 their employer. In prior DLSE proceedings, Plaintiffs expressly alleged that Hong
21 Shin Buddhist Center—and not Abbess Chan Min—was their employer. (Compl. ¶¶
22 104–107; Request for Judicial Notice, Ex. 2.) Plaintiffs did not name Abbess Chan
23 Min as an employer in those administrative filings. Plaintiffs are bound by those
24 representations and may not now advance an inconsistent position in this action.

25 *Hamilton v. State Farm Fire & Cas. Co.*, 270 F.3d 778, 782–83 (9th Cir. 2001);
26 *Cleveland v. Policy Mgmt. Sys. Corp.*, 526 U.S. 795, 806–07 (1999).

27 Even aside from those admissions, the Complaint independently fails to plead
28 individual employer liability. To impose Labor Code liability on an individual,

1 Plaintiffs must allege facts showing that the individual exercised control over wages,
2 hours, or payment of compensation. *Martinez v. Combs*, 49 Cal. 4th 35, 59 (2010).
3 The Complaint alleges only Abbess Chan Min's religious role and spiritual
4 authority. (Compl. ¶¶ 9–13.) It does not allege that she paid wages, maintained
5 payroll, set compensation, or controlled wage practices. Absent such allegations,
6 Plaintiffs fail to state a Labor Code claim against Abbess Chan Min as a matter of
7 law.

8 **C. Plaintiffs' Minimum Wage Claim Fails**

9 To state a California minimum wage claim in federal court, a plaintiff must
10 allege facts permitting a reasonable inference that, in at least one workweek, the
11 plaintiff worked a defined number of hours and was paid less than the applicable
12 minimum wage. *Landers v. Quality Commc'ns, Inc.*, 771 F.3d 638, 645–46 (9th Cir.
13 2014) (affirming dismissal under Rule 12(b)(6)). This pleading standard applies
14 equally to California wage-and-hour claims litigated in federal court. *McKeen-*
15 *Chaplin v. Provident Sav. Bank*, 862 F.3d 847, 853 (9th Cir. 2017); *Solis v. Zenith*
16 *Capital, LLC*, 2021 WL 1785032, at *4 (N.D. Cal. May 5, 2021).

17 The Complaint contains none of these required allegations. Plaintiffs do not
18 allege any specific workweek, hours worked, or minimum-wage shortfall. Instead,
19 they affirmatively allege that they took vows of poverty, did not work for wages, and
20 devoted their time to religious practice and communal service as part of their
21 voluntary monastic life. (Compl. ¶¶ 19–25, 31–36.) Because the Complaint pleads
22 neither compensable work nor a minimum-wage violation in any workweek,
23 Plaintiffs fail to state a California minimum-wage claim as a matter of law.

24 **D. The First Amendment Bars Plaintiffs' Labor Code Claims**

25 **(1) Ministerial Exception**

26 The ministerial exception bars employment-related claims brought by
27 individuals who perform religious functions for a religious organization. *Hosanna-*
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1 *Tabor Evangelical Lutheran Church & Sch. v. EEOC*, 565 U.S. 171, 188–89 (2012);
2 *Our Lady of Guadalupe Sch. v. Morrissey-Berru*, 591 U.S. 732, 747 (2020). The
3 exception applies based on the functions performed, not formal titles, and prohibits
4 courts from regulating the terms, conditions, or compensation of religious service.
5 Where plaintiffs perform core religious duties as part of a religious vocation, civil
6 courts may not adjudicate claims that would interfere with the religious institution’s
7 relationship with its ministers.

8 (2) Ecclesiastical Abstention

9 Separately, the First Amendment requires civil courts to abstain from
10 adjudicating claims that would require inquiry into religious doctrine, religious
11 vows, or the internal governance of a religious organization. *Serbian E. Orthodox*
12 *Diocese v. Milivojevich*, 426 U.S. 696, 709–10 (1976); *Elvig v. Calvin Presbyterian*
13 *Church*, 375 F.3d 951, 955 (9th Cir. 2004). Where resolution of a claim would
14 require evaluating the meaning, obligations, or consequences of religious
15 commitments or disciplinary practices, abstention is mandatory and dismissal under
16 Rule 12(b)(1) is required.

17 (3) Application to Plaintiffs’ Allegations

18 Plaintiffs’ own allegations trigger both doctrines. Plaintiffs allege that they are
19 Buddhist nuns who voluntarily undertook monastic vows, resided at nonprofit
20 Buddhist temples as part of their religious training, and devoted their daily lives to
21 religious practice, communal monastic living, and temple service undertaken as
22 spiritual devotion. (Compl. ¶¶ 9–11, 19–25, 31–36, 37–40.) They further allege that
23 their conduct was governed by monastic rules, religious discipline, and spiritual
24 obligations arising from those vows. (Id.) Plaintiffs’ Labor Code claims seek to
25 recharacterize those religious vows and devotional practices as compensable
26 employment and to subject the terms of monastic life to secular labor standards.
27 Adjudicating those claims would require the Court to assess the nature of Plaintiffs’
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1 religious duties, the meaning of their vows, and the internal governance of the
2 Temples—precisely the inquiries the First Amendment forbids. Abstention applies
3 here to Plaintiffs’ employment-based claims, which require inquiry into religious
4 vows and governance

5 Accordingly, Plaintiffs’ Labor Code claims are barred as a matter of law.

6 **IV. PLAINTIFFS’ TVPA AND CIVIL CODE § 52.5 CLAIMS FAIL**

7 To state a claim under the TVPA, 18 U.S.C. §§ 1589–1595, or California
8 Civil Code § 52.5, a plaintiff must allege facts showing that a defendant obtained
9 labor or services through force, threats, abuse of legal process, or other coercion
10 sufficient to deprive the plaintiff of a realistic ability to leave. *United States v. Dann*,
11 652 F.3d 1160, 1169 (9th Cir. 2011); *People v. Zayas*, 238 Cal. App. 4th 432, 444
12 (2015). Allegations of demanding conditions, long hours, religious pressure, or lack
13 of compensation—without allegations of coercion eliminating the ability to leave—
14 are insufficient as a matter of law. *Headley v. Church of Scientology Int’l*, 687 F.3d
15 1173, 1180–81 (9th Cir. 2012).

16 The Ninth Circuit’s decision in *Headley* establishes the governing pleading
17 standard. There, former members of a religious order alleged extreme working
18 conditions, including long hours, little or no pay, harsh discipline, austere living
19 conditions, inadequate food, and intense religious and social pressure to remain. *Id.*
20 at 1177–78. Despite those allegations—which were more severe than those pleaded
21 here—the Ninth Circuit held that the plaintiffs failed to state a TVPA claim because
22 they did not allege physical restraint, unlawful threats, or coercion depriving them of
23 the ability to leave. *Id.* at 1180–81. The court emphasized:

24 “The fact that the plaintiffs may have been motivated by religious beliefs or
25 subjected to disciplinary practices does not convert their service into
26 involuntary servitude.”

26 *Headley*, 687 F.3d at 1181.

27 Plaintiffs’ allegations fail under that standard. Plaintiffs allege that they
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1 voluntarily chose to become Buddhist monastics, took vows of poverty, and devoted
2 their time to meditation, chanting, study, ceremonies, and temple service as part of
3 their spiritual commitments and communal monastic life. (Compl. ¶¶ 19–25, 31–36,
4 37–40.) All of the conduct on which their claims are based is alleged to have
5 occurred as part of those religious practices. As in *Headley*, Plaintiffs allege
6 demanding conditions and minimal or no compensation, but they do not allege facts
7 showing coercion sufficient to state a TVPA claim.

8 Critically, Plaintiffs do not allege that any Defendant physically restrained
9 them, threatened unlawful harm, or compelled continued service through force or
10 threats. They do not allege that they attempted to leave and were prevented from
11 doing so, that their movement was restricted, or that Defendants used legal process
12 in response to an attempt to depart. At most, Plaintiffs allege dissatisfaction with
13 conditions they voluntarily accepted as part of monastic life—allegations the Ninth
14 Circuit has held insufficient as a matter of law. *Headley*, 687 F.3d at 1180–81.

15 Because Plaintiffs fail to plead the coercion required by the TVPA, their
16 California Civil Code § 52.5 claim necessarily fails as well. Section 52.5 is
17 coextensive with the TVPA and requires the same showing of coercion or
18 involuntary labor. *Zayas*, 238 Cal. App. 4th at 444; *Rosas v. Sarbanand Farms, LLC*,
19 329 F. Supp. 3d 1137, 1148–49 (E.D. Cal. 2018); *Doe v. Fitzgerald*, 90 F. Supp. 3d
20 1094, 1106 (D. Or. 2015).

21 **A. Immigration Reporting Does Not Constitute Abuse of Legal Process**

22 Plaintiffs allege that Defendants retained immigration-related documents
23 associated with Plaintiffs’ religious-worker status and later informed U.S.
24 immigration authorities that Plaintiffs were no longer residing at or affiliated with
25 the Temples. (Compl. ¶¶ 37–39, 41–47.) Even accepting those allegations as true,
26 lawful and truthful immigration reporting does not constitute abuse of legal process
27 under the TVPA. *Dann*, 652 F.3d at 1171–72.

1 The Complaint does not allege that Defendants made false statements,
2 initiated sham proceedings, or used immigration law to restrain Plaintiffs, prevent
3 them from leaving, or compel continued labor. Absent such allegations, Plaintiffs
4 fail to plead abuse of legal process as required to state a TVPA claim. *Id.*

5 **V. CONCLUSION**

6 For these reasons, Defendants respectfully request that the Court grant the
7 Motion to Dismiss and dismiss the Complaint in its entirety.

8 Dated: January 12, 2026

CABANDAY LAW GROUP

9
10 By: //OFC//
11 **ORLANDO F. CABANDAY**
12 Attorneys for Defendant
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Citation Verification Summary

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[ISSUE]	Footnote 2015 · p.11
[VERIFIED]	Citation p2-1 · p.2
[VERIFIED]	Citation p2-2 · p.2
[UNRESOLVED]	Citation p2-3 · p.2
[VERIFIED]	Citation p4-1 · p.4
[UNRESOLVED]	Citation p4-2 · p.4
[VERIFIED]	Citation p4-3 · p.4
[VERIFIED]	Citation p5-1 · p.5
[VERIFIED]	Citation p5-2 · p.5
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