

GREGORY TERRY BROOKS a/k/a
GREGORY T. BROOKS a/k/a
GREG BROOKS, JR.

DOCKET NUMBER: Section
19TH JUDICIAL DISTRICT

VS.

PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

LOUISIANA STATE UNIVERSITY AND
AGRICULTURAL AND MECHANICAL
COLLEGE a/k/a LOUISIANA STATE
UNIVERSITY, BOARD OF
SUPERVISORS OF LOUISIANA STATE
UNIVERSITY AGRICULTURAL AND
MECHANICAL COLLEGE, and OUR
LADY OF THE LAKE REGIONAL
MEDICAL CENTER

DEPUTY CLERK

Filed: _____

PETITION FOR DAMAGES

TO THE HONORABLE NINETEENTH JUDICIAL DISTRICT COURT FOR THE
PARISH OF EAST BATON ROUGE AND THE JUDGES THEREOF:

The original Petition for Damages of Gregory Terry Brooks a/k/a Gregory T. Brooks a/k/a
Greg Brooks, Jr., through undersigned counsel, respectfully represents as follows:

PARTIES

1.

Petitioner, Gregory Terry Brooks a/k/a Gregory T. Brooks a/k/a Greg Brooks, Jr.
[hereinafter referred to as "Greg Brooks, Jr." or "Greg"] is a person of the full age of majority and
is a resident of and domiciled in the Parish of Jefferson, State of Louisiana.

2.

Made Defendants herein:

- A. LOUISIANA STATE UNIVERSITY AND AGRICULTURAL AND MECHANICAL COLLEGE a/k/a LOUISIANA STATE UNIVERSITY [hereinafter, "LSU"] is located in Baton Rouge, Louisiana and is the premier flagship university for the State. LSU operates under the supervision and management of the Board of Supervisors of Louisiana State University Agricultural and Mechanical College, pursuant to La. Rev. Stat. § 17:3215.
- B. BOARD OF SUPERVISORS OF LOUISIANA STATE UNIVERSITY AND AGRICULTURAL AND MECHANICAL COLLEGE ["Board of Supervisors"] is the state agency to which the State of Louisiana has delegated the supervision and management of Louisiana State University pursuant to La. Rev. Stat. § 17:3215.
- C. OUR LADY OF THE LAKE REGIONAL MEDICAL CENTER is a Louisiana hospital which is authorized to do and is doing business within the jurisdiction of this Honorable Court.

For the sake of clarity, both Louisiana State University and Agricultural and Mechanical

College a/k/a Louisiana State University ["LSU"] and Board of Supervisors of Louisiana State University and Agricultural College ["Board of Supervisors"] shall be collectively referred to hereinafter as the "LSU Defendants."

VENUE

3.

Venue is proper in this Court pursuant to La. Rev. Stat. § 13:5104 and La. Rev. Stat. §17:3219, which provide that state agencies may be sued in the judicial district in which the State Capitol is located: East Baton Rouge.

FACTUAL BACKGROUND

4.

At all times relevant to the allegations contained herein, and more particularly between August 5, 2023 and September 15, 2023, The LSU Defendants governed, operated, controlled, organized, and managed both LSU and the LSU Division One NCAA football team. In furtherance of said operations, the LSU Defendants employed coaches, athletic trainers, and team doctors to put a competitive athletic team on the field and to ensure that a system was implemented to protect student athletes from foreseeable and preventable harm. By way of alternative pleading, the team doctors were not actual employees of LSU, but were actual and/or apparent agents of the university. Petitioner Greg Brooks, Jr. was a member of LSU's football team at all times relevant to the allegations of this Petition.

5.

At all times pertinent, as a member of Division One of the National Collegiate Athletic Association (the "NCAA"), The LSU Defendants undertook the duty to perform the following functions, among others:

- A. Employing Coaches and Staff (including athletic trainers and team doctors);
- B. Recruiting and maintaining student athletes;
- C. Coordinating and overseeing all aspects of team functions, including implementation of a system to protect student athletes from foreseeable and preventable harm;
- D. Ensuring that student athletes receive adequate care when needed on a timely basis; and
- E. Otherwise complying with statutory and common law duties imposed upon a university such as LSU.

6.

At all times relevant to the allegations contained herein, and more particularly on or about August 14, 2009, the LSU Defendants were in control of the LSU football team and had ample resources available to protect student athletes from foreseeable and preventable harm and to comply with statutory duties imposed upon a university such as LSU. Specifically, the LSU Defendants had a duty to make protecting student athletes a priority over winning football games, but instead, choose to establish and engage in a pattern of conduct in which winning football games was more important than protecting student athletes from harm. The LSU Defendants have allowed such a culture to develop within the LSU football program and have allowed the football program to embrace a “next man up” mentality, where student athletes are placed at a heightened risk of serious injury and where the interests of the football program are elevated above the individual student athletes.

7.

At all times relevant to the allegations contained herein, and more particularly in August and September of 2023, the head coach of the LSU football team was Brian Kelly. At all times relevant to this claim, the defensive coordinator of the LSU football team was Matt House, and the assistant coach over the safeties was Kerry Cooks. As Petitioner was a starting safety, Coaches Kelly, House and Cooks were the primary coaches that provided supervision and direction to him. At all times relevant to this claim, the LSU football coaching staff were all employees of LSU acting in the course and scope of such employment.

8.

At all times relevant to the allegations contained herein, and more particularly in August and September of 2023, the head athletic trainer for the LSU football team was Owen Stanley, and the team doctors involved in the care of Petitioner were Drs. Stephen Etheredge, Vincent Shaw, Jr., and upon information and belief, Tony Johnson, II. Etheredge, Shaw and Johnson are family practice doctors without specialized training in neurology. Under the system designed and implemented by the LSU Defendants through its employees acting in the course and scope of their employment, football players like Greg Brooks, Jr. were told to express any concerns they may have about their health or their physical condition to their coaches and athletic trainers, and then the coaches and/or athletic trainers were expected to guide the student athletes on how to proceed. Petitioner Greg Brooks, Jr. innocently and tragically relied on this system to his detriment. At all

times relevant to this action, Owen Stanley and the other athletic trainers and members of the athletic department who were involved in scheduling care for Greg Brooks were all employees of LSU, acting in the course and scope of their employment.

9.

Under the system designed and implemented by the LSU Defendants, the LSU coaches and athletic trainers controlled and continue to control all aspects of care and treatment for LSU football players and did so with regard to all care provided to Greg Brooks in August and September of 2023.

10.

On or about August 5, 2023, Greg Brooks passed out during a football practice and then began to vomit minutes later in front of his coaches and athletic trainers. Greg told his coaches and athletic trainers that he was dizzy, had a headache, and was nauseous—all of which are neurological symptoms. Upon information and belief, Athletic Trainer Stanley consulted with Team Doctor Etheredge without ever sending Greg to see Dr. Etheredge, and Greg was given Zofran for his nausea and cleared to return to practice without being referred to a specialist to rule out potentially serious neurological conditions, including brain tumors. By way of alternative pleading, Dr. Shaw or another family practice physician saw Greg briefly in the training room after practice on August 5, 2023 while seeing other LSU football players and failed to do any type of detailed examination of Greg during this brief encounter.

11.

Greg's complaints of nausea, dizziness, and headaches continued on a persistent basis from August 5, 2023, forward, as he repeatedly reported his concerning neurological symptoms to the LSU's coaching and athletic training staff.

12.

On August 7, 2023, Athletic Trainer Stanley noted that "[Greg] was re-evaluated due to an increase in symptoms upon return to practice. Ruled out concussion with full C3 Logix." Upon information and belief, "C3 Logix" is a software app that LSU athletic trainers had installed on their mobile devices in 2023 and were using to evaluate athletes with suspected head injuries, such as concussions. Rather than refer Greg Brooks, Jr. to a competent neurologist to evaluate him, Athletic Trainer Stanley instead evaluated Greg himself with an app on his iPad and again cleared him to practice despite clearly lacking the appropriate medical training and education to make such

a decision. Upon information and belief, LSU engaged in a pattern of allowing their athletic trainers to use the C-3 Logix app on their mobile devices to evaluate head injuries. Upon further information and belief, Team Doctor Shaw approved this course of action on August 7th without ever seeing Greg, and this was a practice that was regularly utilized at LSU in 2023—doctors signing off on decisions made by athletic trainers without performing their own independent evaluations.

13.

On August 11, 2023, Greg again experienced concerning neurological symptoms after performing a “rolling drill” during practice. Athletic Trainer Stanley noted “[d]izziness[sic] and weird auro[sic] then progressively got worse over the next 4 hours as well as headache. Presents like Vertigo. Given some meds and schedule for vestibular crystal evaluation/adjustment.” Upon information and belief, this course of action was approved by Team Doctor Etheredge without Dr. Etheredge ever seeing the patient and with Dr. Etheredge allowing an athletic trainer to make the diagnosis of “vertigo” for Greg. Upon information and belief, the LSU Defendants allowed Stanley and other athletic trainers to diagnose and treat student athletes without ever even consulting with a team physician. Athletic trainers, like Stanley, are not qualified to make medical diagnoses. Had Greg been referred to a neurologist in early August, Greg’s brain tumor would have been discovered weeks earlier, and Greg would have been spared the pain and suffering that he endured in the weeks leading up to his ultimate brain tumor diagnosis on September 14, 2023. He also would have been afforded the opportunity to research and explore treatment options, rather than get rushed to an emergent brain surgery.

14.

Greg continued to complain about dizziness, nausea, and headaches on a daily basis to his coaches and athletic trainers, but they continued to assure him it was not anything to worry about and continued to clear him to practice and even play in games—despite the fact that Greg Brooks, Jr. was experiencing concerning neurological symptoms. Although Greg was given the “option” of sitting out of practice and/or a game, he was simultaneously told by the coaching staff that if he chose to sit out, someone else would take his place, such that he may lose his starting position as a safety on the team. Greg did not want to lose his starting position as a safety, or his position as a Team Captain; and thus, he continued to believe the LSU Defendants’ assurances that he had

nothing to worry about and played through his pain, dizziness, and nausea.

15.

In fact, Greg Brooks, Jr. started the first two games of the 2023 LSU football season and played the majority of both games before Defendants finally made an appointment for him to see a neurologist, which did not occur September 13, 2023—over 39 days after Greg’s symptoms began. Pursuant to the applicable standard of care for a board-certified neurologist, an MRI was ordered to rule out a serious underlying cause of Greg’s symptoms. That MRI confirmed that Greg Brooks, Jr. had a brain tumor.

16.

The LSU Defendants, through their agents, should have referred or taken Greg to see a neurologist in early August to protect him from harm, and if they had done so, Greg’s tumor would have been discovered weeks earlier, and he would not have continued playing football with a brain tumor. The LSU Defendants should have had a system in place that instructed athletic trainers to send student athletes with symptoms like Greg’s symptoms to a neurologist for care or to a hospital where an MRI or other imaging studies could be done to protect these student athletes from harm, as opposed to allowing untrained and uneducated athletic trainers to clear the student athletes for practices and games.

17.

Upon information and belief, the LSU Defendants arranged all medical care provided to Greg Brooks, Jr. and paid for all medical care as well. Interestingly, the neurologist who ordered the MRI for Greg did not communicate the results of the MRI directly to Greg, but instead, called the LSU athletic department to report the results. Rather than contact Greg’s parents or ask Greg to contact his parents so that they could be present when the results of the MRI were shared with him, the LSU Defendants, through their agents, communicated the results directly to Greg before his parents could travel to Baton Rouge, which caused Greg great emotional distress.

18.

The LSU Defendants, through their agents, next made arrangements for Greg to be admitted to an LSU-affiliated hospital, Our Lady of the Lake Regional Medical Center, on the same day he was told that he had a brain tumor. The LSU Defendants then went one step further to make arrangements for their hand-picked neurosurgeon, Brandon Gaynor, M.D., to perform surgery to remove the tumor the following day. By way of alternative pleading, Defendant Our

Lady of the Lake Regional Medical Center picked Gaynor to do the subject surgery. Defendants never explained to Greg or his parents that they could explore other treatment options for Greg, and instead, led Greg and his parents to believe that moving forward emergently with the brain surgery at Our Lady of the Lake Regional Medical Center with the surgeon hand-selected by Defendants was Greg's only option.

19.

Greg trusted Defendants at the time and relied upon Defendants to do what was in his best interest. He suffered great harm because of his detrimental reliance on Defendants for, upon information and belief, the surgeon chosen to perform surgery for Greg was not qualified to do this particular surgery and moreover, was certainly not the best choice for this surgery even in the Baton Rouge area. Petitioner now knows that there is at least one other neurosurgeon in the Baton Rouge area with significantly more experience and training to do the surgery that was done on September 15th, but nobody told Greg about this individual before Defendants made arrangements for Brandon Gaynor, M.D. to operate.

20.

Upon information and belief, Brandon Gaynor, M.D. completed his neurosurgery residency in 2016 and thereafter, was negligently granted privileges by Our Lady of the Lake Regional Medical Center to perform the brain surgery that occurred on September 15, 2023.

21.

Upon information and belief, Brandon Gaynor, M.D. lacked the appropriate training, education, and/or experience to perform the procedure in question, such that the delicate procedure to remove this type of brain tumor, which requires craniotomy and excision, is routinely performed by fellowship-trained *pediatric* neurosurgeons. Dr. Gaynor's own website clearly indicates that his training, education, and experience lies in performing *spinal surgery on adults*.¹

22.

Petitioner further asserts that one of the most well-respected medical institutions in the country with ample experience in removing tumors like Greg's was ready, able, and willing to accept Greg as a patient, but Defendants never advised Greg of this option until after the surgery was done, and they realized he had suffered catastrophic neurological injuries. This institution, St. Jude Children's Research Hospital, later agreed to accept Greg as a patient, but by then, he had

¹ <http://www.theneuromedicalcenter.com/physicians/brandon-gaynor-med/>

already suffered irreparable brain injury.²

23.

During the surgery performed by Brandon Gaynor, M.D. and his team, Greg suffered multiple strokes due to their acts of malpractice, which are being addressed in a medical review panel proceeding. Greg sustained severe and permanent injuries during the surgery and was transferred to Memphis for care in early October of 2023. He has had no contact with any members of the coaching staff at LSU since leaving Baton Rouge.

24.

When Greg was transferred to Memphis for care, the coaching staff, athletic training staff, and administrators at LSU knew that Brandon Gaynor, M.D. had caused serious and permanent injuries during the surgery that they arranged on September 15, 2023, such that Defendants knew or should have known that Greg and his family were extremely upset with Dr. Gaynor before Greg was taken to Memphis. Notwithstanding this knowledge, Defendants allowed Dr. Gaynor to be honored with a “Geaux Tigers Hero” award during halftime of the LSU/Florida game for his “heroic” efforts in treating Greg. Giving this award to Dr. Gaynor was done so without Greg’s approval or the approval of his family and without even telling them. As Dr. Gaynor’s efforts were far from “heroic” in the view of Greg and his family, Defendants’ actions further exacerbated Greg’s considerable emotional distress.

25.

Petitioner further asserts that by giving this award to Dr. Gaynor and sharing confidential information about his medical condition in a very public setting, Defendants, through their agents, violated his privacy rights and further intentionally used his name, likeness, and image to make themselves appear favorable in the public’s eye.

26.

The LSU head football coach, Brian Kelly, and other administrators affiliated with LSU have repeatedly made public comments about Petitioner and his medical condition in violation of his privacy rights and in an effort to make themselves appear favorable in the public’s eye.

² Petitioner has submitted a Request for Medical Review Panel to the Louisiana Division of Administration to address his healthcare liability/malpractice allegations brought pursuant to Louisiana’ Medical Malpractice Act.

Moreover, they have disseminated false and misleading information about Greg's health status in making some of these public comments.

27.

The LSU Defendants, through the Tiger Athletic Foundation, have also set up the equivalent of a "Go Fund Me" page for Greg, but have refused to transfer ownership and management of this monetary fund to Greg and/or his parents, such that he cannot access the funds. The LSU Defendants instead have maintained control over this fund and have made it difficult for Petitioner to utilize funds that were raised for his sole benefit at a time when he desperately requires assistance.

28.

The LSU Defendants owed a duty to their student athletes, including Greg Brooks, to develop, plan, and execute an athletic program that was reasonably safe and that would ensure that student athletes received the care they needed when they experienced concerning symptoms that could indicate serious medical diagnoses. Moreover, the LSU Defendants owed a duty to their student athletes, including Greg Brooks, Jr., to hold them out of practices and games when they were experiencing symptoms that could be indicative of a serious medical diagnosis. Instead, the LSU Defendants encouraged their student athletes to play through their pain if they wanted to keep their starting positions or remain on the team. Defendants further owed a duty to Greg Brooks, Jr. not to use his name, likeness and image or their benefit without his permission and not to reveal confidential information about him to the public without his permission.

**COUNTS OF NEGLIGENCE BROUGHT PURSUANT TO CIVIL CODE ARTICLES
2315 AND/OR 2316**

29.

Petitioner, Greg Brooks, Jr., suffered injuries and damages that were caused, contributed to, and/or precipitated by the negligence of the LSU Defendants and/or Our Lady of the Lake Regional Medical Center, all of whom are jointly and/or solidarily liable to Petitioner for the following reasons:

30.

The LSU Defendants are liable unto Petitioner because Petitioner's injuries and damages were proximately and legally caused by the fault, including negligence of LSU and the Board of Supervisors, including their employees, officers, agents, employees, contractors, and any and all

other individuals for whom Defendants are financially and/or legally responsible, including the following negligent acts of omission and/or commission, all of which may be shown at trial:

- A. Allowing Greg Brooks, Jr. to participate in practices and play in games without first being seen by a specialist and without the proper imaging studies having been done to rule out a serious cause of his symptoms;
- B. Making Greg Brooks, Jr. feel like he would lose his starting position and/or his leadership position with the team if he missed a practice or a game because of an injury or illness;
- C. Creating a culture within the LSU football program that puts winning games over the health and safety of student athletes by making student athletes feel that they will lose their starting position or leadership position on the team if they miss a practice or game because of injury or illness;
- D. Encouraging and/or allowing athletic trainers to use apps on their mobile devices to evaluate student athletes for potential brain injuries, as opposed to sending student athletes to the appropriate specialists for appropriate medical work-up, clearly demonstrating that Defendants prioritize winning games over the best interests of the student athletes;
- E. Encouraging and/or allowing athletic trainers to diagnose and treat student athletes without referring them to a team physician for detailed examination and/or for allowing trainers to follow instructions of family practice doctors who have not seen a particular student athlete and/or by encouraging and allowing athletic trainers to send student athletes to team doctors that are family practice physicians, as opposed to sending them to the appropriate medical specialists, and utilizing team doctors who are part of the athletic program as opposed to independent doctors with no allegiance to the football program, furthering the culture of winning over protecting student athletes;
- F. Dictating care for student athletes without making it clear to them that they have the right to seek care from doctors and/or hospitals of their choosing, and specifically dictating care for Petitioner without making it clear to him that he had the right to seek care from doctors of his own choosing, or research his own options for medical treatment and/or for dictating or recommending care without first doing adequate research to make sure the recommended care is in the best interest of the student athlete;
- G. Using the name, likeness and/or image of Petitioner without his permission;
- H. Disclosing confidential medical information about Petitioner to the public without his permission;
- I. Giving or allowing a doctor to receive a “hero” award for treating Petitioner without asking Petitioner to approve the award and without even telling Petitioner that the award was being given to this negligent physician during a highly publicized event sanctioned by Defendants;
- J. Disseminating false and misleading information about Petitioner without even seeking his permission to talk about him;
- K. Failing to establish policies, rules or guidelines pertaining to the care of student athletes exhibiting concerning neurological symptoms, and failing to train athletic department employees and agents how to respond to student athletes with such symptoms; and
- L. Any and all other acts of negligence which may be shown at the trial of this matter.

31.

The LSU Defendants are vicariously liable for the negligent actions/inactions of LSU and

their agents, servants, employees, coaches, trainers, volunteers and/or officers as described herein, pursuant to the doctrine of *respondeat superior*.

32.

Defendant, Our Lady of the Lake Regional Medical Center, is liable unto Petitioner because Greg Brooks, Jr.'s injuries and damages were proximately and legally caused by the fault, including negligence, of Our Lady of the Lake Regional Medical Center, including its directors, officers, agents, and/or employees involved in the credentialing and/or privileging processes at the institution, for the following negligent acts of omission and/or commission, all of which may be shown at trial:

- A. Negligently granting initial privileges to Brandon Gaynor, M.D., through the hospital's Board of Directors, to perform the brain surgery on the hospital's campus that Greg Brooks, Jr. eventually underwent on September 15, 2023;
- B. Failing to develop and/or implement and/or enforce adequate policies and procedures to credential and/or grant privileges to physicians, including Brandon Gaynor, M.D.; and
- C. Failing to follow its own institutional policies and procedures in negligently granting privileges to Brandon Gaynor, M.D., through the hospital's Board of Directors, to perform the brain surgery on the hospital's campus that Greg Brooks, Jr. eventually underwent on September 15, 2023.

DAMAGES

33.

As a direct and/or proximate result of the negligent and careless acts and omissions of the Defendants, including their agents, servants, and/or employees, coaches, trainers, volunteers and officers, Greg Brooks, Jr. sustained severe and painful personal injuries, damages, harms, and losses that he otherwise would not have sustained, including, but not limited to, the following:

- A. Past and future physical pain and suffering;
- B. Past and future mental anguish and emotional distress;
- C. Past and future medical expenses;
- D. The need for ongoing medical monitoring;
- E. Permanent disability;
- F. Loss of earnings and/or lost earning capacity; and

G. Loss of the enjoyment of life.

34.

DEMAND FOR JURY TRIAL


Petitioner demands a trial by jury on all issues so triable in this case.


35.

PRAYER

WHEREFORE, Petitioner Greg Brooks, Jr. respectfully prays that Defendants, LSU, the Board of Supervisors, and Our Lady of the Lake Regional Medical Center, be served and cited with this Petition for Damages and that, after due proceedings, there be judgment herein in favor of Petitioner and against Defendants, for all damages as are reasonable in the premises, together with legal interest from the date of judicial demand until paid, or all costs of these proceedings, and for all general and equitable relief to which Petitioner is entitled as a matter of law.

Respectfully submitted,


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[SERVICE INSTRUCTIONS ON NEXT PAGE]

PLEASE SERVE:

**THE STATE OF LOUISIANA,
THROUGH THE BOARD OF SUPERVISORS OF
LOUISIANA STATE UNIVERSITY
AND AGRICULTURAL AND MECHANICAL COLLEGE**

Through its Chairman, Ms. Mary L. Werner
104B University Administration Building
3810 West Lakeshore Drive
Baton Rouge, Louisiana 70808

**THE STATE OF LOUISIANA,
THROUGH THE BOARD OF SUPERVISORS OF
LOUISIANA STATE UNIVERSITY
AND AGRICULTURAL AND MECHANICAL COLLEGE**

Through the Office of the Louisiana Attorney General,
Ms. Liz Murril
1885 North Third Street
Baton Rouge, Louisiana 70802

**THE STATE OF LOUISIANA,
THROUGH THE BOARD OF SUPERVISORS OF
LOUISIANA STATE UNIVERSITY
AND AGRICULTURAL AND MECHANICAL COLLEGE**

Through the Louisiana Office of Risk Management,
1201 North Third Street, Suite G-192
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OUR LADY OF THE LAKE HOSPITAL INC.,

through its Registered Agent,
Jennifer Decuir
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Baton Rouge, Louisiana 70809

GREGORY TERRY BROOKS a/k/a
GREGORY T. BROOKS a/k/a
GREG BROOKS, JR.

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UNIVERSITY AGRICULTURAL AND
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LADY OF THE LAKE REGIONAL
MEDICAL CENTER

DEPUTY CLERK

Filed: _____

REQUEST FOR TEN DAYS NOTICE OF SETTING AND OF JUDGMENT

NOW INTO COURT, through undersigned counsel, comes Petitioner, Gregory Terry Brooks a/k/a Gregory T. Brooks a/k/a Greg Brooks, Jr., who respectfully requests that he be given at least ten (10) days written notice in advance of any setting in the above captioned matter, whether same be for trial or hearing, etc., in accordance with Article 1572 of the Louisiana Code of Civil Procedure.

Respectfully submitted,

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