

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JANE DOE (K.B.),	§	
	§	
Plaintiff,	§	
	§	
v.	§	No. 4:22-cv-00226
	§	
BACKPAGE.COM, LLC and	§	
FACEBOOK, INC. n/k/a META	§	
PLATFORMS, INC.,	§	
	§	
Defendants.	§	

**NOTICE OF REMOVAL BY DEFENDANT FACEBOOK, INC., N/K/A META PLATFORMS, INC.**

Pursuant to Sections 1332, 1441, and 1446 of Title 28 of the United States Code, Defendant Facebook, Inc. n/k/a Meta Platforms, Inc. (“Facebook”), by its undersigned attorneys, submits this Notice of Removal from the 234th District Court of Harris County, Texas, in which the above-captioned action is now pending, to the United States District Court for the Southern District of Texas, and in support of said Notice, states as follows:<sup>1</sup>

**I. NATURE OF THE ACTION**

1. Plaintiff Jane Doe (K.B.) (“Plaintiff”) commenced this action by the filing of an original petition against Backpage.com, LLC (“Backpage”) in the 234th District Court of Harris County, Texas on January 14, 2022. The action was

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<sup>1</sup> By removing this action to federal court, Facebook does not concede that personal jurisdiction exists and reserves all rights to contest personal jurisdiction.

docketed in that court as Cause No. 2022-02660. Plaintiff then filed her First Amended Petition (“Petition”) later the same day, adding Facebook as a defendant.

## II. PARTIES

2. The Petition names Backpage and Facebook as defendants. Petition at 1, ¶¶ 11-12, 13-74.

3. Plaintiff is an individual who alleges that she resides in Florida. Petition ¶ 13. Accordingly, Plaintiff is a citizen of Florida.

4. As the Petition alleges, Facebook is a “foreign corporation,” Petition ¶ 10, incorporated in Delaware and having its principal place of business in California.

5. As for Backpage, “the citizenship of a[n] LLC is determined by the citizenship of all of its members.” *Harvey v. Grey Wolf Drilling Co.*, 542 F.3d 1077, 1080 (5th Cir. 2008). Likewise, for diversity purposes, the citizenship of a limited partnership is determined by the citizenship of its members. *Id.* Backpage is wholly owned by IC Holdings, LLC. *See generally* Notice of Removal at ¶¶ 47-60, *Doe v. Medalist Holdings, L.L.C.*, No. 5:17-cv-01264-MWF-FFM (C.D. Cal. June 23, 2017). IC Holdings, LLC is a Delaware limited liability company, wholly owned by Dartmoor Holdings, LLC. Dartmoor Holdings, LLC is a Delaware limited liability company, wholly owned by Atlantische Bedrijven C.V. Atlantische Bedrijven C.V. is a Dutch limited partnership. Atlantische Bedrijven C.V. is owned by Kickapoo River Investments, LLC and Lupine Investments LLC. Kickapoo River Investments, LLC and Lupine Investments LLC are Delaware limited liability companies, each of which is wholly owned by Amstel River Holdings, LLC. Amstel

River Holdings, LLC is a Delaware limited liability company, wholly owned by the Vicky Ferrer Family Trust.

6. The trustee of the Vicky Ferrer Family Trust is Carl Ferrer, a resident and citizen of Texas, so the Vicky Ferrer Family Trust is a citizen of Texas. *Mullins v. TestAmerica, Inc.*, 564 F.3d 386, 397 n.6 (5th Cir. 2009) (citizenship of a trust is that of its trustee).

7. Accordingly, Backpage is a citizen of Texas because it is ultimately owned or controlled by a citizen of Texas, the Vicky Ferrer Family Trust. *See Navarro Savings Association v. Lee*, 446 U.S. 458 (1980).

### III. PLAINTIFF'S CLAIMS

8. Plaintiff asserts entirely different theories and factually distinct claims against Backpage and Facebook. The Petition seeks to hold Backpage liable on the theory that Plaintiff was the subject of advertisements posted by third-party traffickers on the website backpage.com, operated by Backpage. Specifically, Plaintiff alleges that a third-party trafficker who exploited her “paid money to Backpage to post ads selling Jane Doe for sex,” that she was sold for unlawful sex acts in Houston between June 2017 and July 2018, and that her trafficking was “made possible and facilitated by Backpage, who directly profited from her trafficking.” Petition ¶¶ 85-87. Accordingly, Plaintiff allegedly was “caused by any means into prostitution and sex trafficking by the acts of Backpage.” *Id.* ¶ 88. Plaintiff also asserts that Backpage was seized by the U.S. Department of Justice in April 2018. *Id.* ¶ 84. She alleges violations of Texas Civil Practice & Remedies Code (“TCPRC”) Chapter 98 and Chapter 98A against Backpage. *Id.* ¶¶ 100-11.

9. By contrast, Plaintiff does not allege any connection between Facebook and her alleged trafficking. She does not allege that she had an account on any Facebook platform, that any person approached her or communicated with her at all on any Facebook platform, that ads showing her were posted on any Facebook platform, or that any Facebook platform was connected with her third-party trafficker or with her trafficking. Rather, the Petition alleges in broad strokes that human trafficking and sexual exploitation occurs on Facebook's platform. Petition ¶¶ 1-6. Nevertheless, Plaintiff asserts claims against Facebook for public nuisance and violations of TCPRC Chapter 98. *Id.* ¶¶ 90-99.

#### IV. BASES FOR REMOVAL

**A. Complete Diversity Exists, and the Forum-Defendant Rule Does Not Prohibit Removal Because Backpage Was Not a "Properly Joined" Party Within the Meaning of 28 U.S.C. § 1441(b)**

10. Plaintiff's action is removable based on the presence of federal diversity jurisdiction. Diversity of citizenship exists where the parties in interest are citizens of different States and the amount in controversy exceeds \$75,000. 28 U.S.C. § 1332(a). Where these requirements are met, the Court has subject matter jurisdiction under section 1332(a).

11. In addition, where there is complete diversity and the jurisdictional amount requirement is met, removal is appropriate unless "any of the parties in interest *properly joined* and served as defendants is a citizen of the State in which such action is brought." 28 U.S.C. § 1441(b)(2) (emphasis added). This rule, known as the forum-defendant rule, is procedural, not jurisdictional. *In re 1994 Exxon Chem. Fire*, 558 F.3d 378, 392 (5th Cir. 2009).

12. Diversity jurisdiction is present under 28 U.S.C. § 1332(a) because this action is between “citizens of different States” and the amount in controversy “exceeds the sum or value of \$75,000, exclusive of interest and costs.”

13. There is complete diversity between the parties. Plaintiff is an individual residing in Florida and is therefore a citizen of Florida. Petition ¶¶ 10. Defendant Facebook is a Delaware corporation with its principal place of business at 1 Hacker Way, Menlo Park, California 94025, and thus is a citizen of Delaware and California pursuant to 28 U.S.C. § 1332(c)(1). And, as explained above, defendant Backpage is a citizen of Texas.

14. The amount in controversy exceeds \$75,000, as Plaintiff seeks over \$1,000,000 in damages, as well as exemplary damages. Petition ¶¶ 9, 116.

15. The fact that Backpage is a citizen of Texas does not prohibit removal under the forum-defendant rule because Backpage was not “properly joined” in this suit. 28 U.S.C. § 1441(b)(2).

16. By its terms, “the forum defendant rule only contemplates the citizenship of properly-joined defendants.” *Flores v. Aguilera*, No. EP-09-CV-265-DB, 2009 WL 10700852, at \*3 (W.D. Tex. Sept. 29, 2009) (citing *Hornbuckle v. State Farm Lloyds*, 385 F.3d 538, 545 (5th Cir. 2004)). “Merely pleading a reasonably valid state law claim against the forum defendant does not automatically mean that the joinder of the forum defendant is not fraudulent and, therefore, proper.” *Id.* “[B]ecause the purpose underlying the improper joinder inquiry ‘is to determine whether or not the in-state defendant was properly joined, the focus of the inquiry

must be on the joinder, not the merits of the plaintiff's case.” *McDonal v. Abbott Lab'ys*, 408 F.3d 177, 183 (5th Cir. 2005) (quoting *Smallwood v. Ill. Cent. R.R. Co.*, 385 F.3d 568, 573 (5th Cir. 2004) (en banc)); *see also Williams v. Homeland Ins. Co. of New York*, 18 F.4th 806, 815 (5th Cir. 2021) (discussing application of “properly joined” test of 28 U.S.C. § 1441(b)(2) in cases where, as here, a case is “otherwise removable” except for the presence of a diverse forum defendant); *see also id.* at 820 (Ho, J., concurring) (same; noting that the “properly joined” test as applied to an “otherwise removable” action is based on the plain text of the removal statute).

17. At a minimum, a party is not “properly joined” where there is: (1) actual fraud in the pleading of jurisdictional facts, or (2) no possibility that the plaintiff could establish a cause of action against the in-state defendant in state court. *Guzman v. Cordero*, 481 F. Supp. 2d 787, 790 (W.D. Tex. 2007) (collecting cases). The latter circumstance is shown when a party “demonstrate[s] that there is no possibility of recovery by the plaintiff against an in-state defendant,” or “that there is no reasonable basis for the district court to predict that the plaintiff might be able to recover against an in-state defendant.” *Smallwood*, 385 F.3d at 573. A “mere theoretical possibility of recovery under local law will not preclude a finding of improper joinder.” *Id.* at 573 n.9 (citation and internal quotation marks omitted).

18. Backpage has no operations or assets and functionally does not exist, so any prospect of recovery against it is a “mere theoretical possibility.”

19. The Delaware Court of Chancery, in a proceeding against Backpage, found that Backpage has “ceased to operate” and ordered cancellation of its

certificate of formation. Ex. A, *Jennings v. Backpage.com LLC et al.*, Consent Judgment, No. 2018-0838 (Del. Ch.) (ordering cancellation of certification of formation after completion of criminal proceedings).

20. There is no reasonable basis to predict Plaintiff might recover against an entity that “has no corporate existence, ... even though the company has not been officially dissolved.” *Weinstein v. Conoco Phillips*, 2014 WL 868918, at \*2 (W.D. La. Mar. 5, 2014) (finding improper joinder).

21. As the Petition alleges, in April 2018, U.S. law enforcement seized Backpage and its assets and shut down its website. Petition ¶ 84; *see also Justice Department Leads Effort to Seize Backpage.Com, the Internet’s Leading Forum for Prostitution Ads, and Obtains 93-Count Federal Indictment*, U.S. Department of Justice (Apr. 9, 2018), <https://www.justice.gov/opa/pr/justice-department-leads-effort-seize-backpagecom-internet-s-leading-forum-prostitution-ads>.

22. Backpage now has no operations, no assets, no employees, and no insurance coverage available to pay claims. *See, e.g., Kyle Reyes, Sex Trafficking Bust in CT as Anti Sex Trafficking Group Moves Into Backpage’s Old Home*, Law Enforcement Today (Feb. 3, 2019), <https://www.lawenforcementtoday.com/sex-trafficker-ct-guilty/>. As a result of the government seizure, Petition ¶ 84, the United States government obtained all of Backpage’s assets, and subsequently obtained a forfeiture order—resulting in the government’s taking ownership of all Backpage assets, consisting of dozens of bank accounts, 264 web domains, retainers and deposits for future services, foreign and domestic reserves and accounts

receivable, and trademarks. Ex. B, *United States v. Backpage.com LLC*, No. 2:18-CR-465, Dkt. 22 (D. Ariz.); *see also id.* Dkt. 44 (amending forfeiture order).

23. As part of a related guilty plea by Backpage, it agreed to create a fund of up to \$500 million for restitution to victims through the criminal proceedings. Ex. C, *United States v. Backpage.com LLC*, No. 2:18-CR-465, Dkt. 8-1 ¶ 3e (D. Ariz.). Because all of Backpage's assets were forfeited to this fund, Plaintiff would not be able to recover anything in a civil case against Backpage.com LLC. Ex. D, *Backpage.com LLC v. Schmidt*, No. 4:17-CV-01951, Dkt. 111 at 19 (E.D. Mo.) (finding no funds available to pay \$200,000 sanctions order entered against Backpage at the behest of the Missouri Attorney General as the company is "already subject to a forfeiture order regarding all of its assets and a nationwide victims' fund is being established as a result of its guilty pleas"). In sum, Backpage has "no property or assets, no matter how insignificant, to fund any portion of a judgment." *Rich Land Seed Co., Inc. v. BLSW Pleasure Corp.*, 2021 WL 3627962, at \*6, \*11 (W.D. La. July 29, 2021) (finding improper joinder where defendant was "defunct with no assets" and plaintiff thus had no "reasonable possibility" of recovery).

24. Not only has Backpage closed operations and forfeited all of its assets, but it has also lost its right to continue as a business, in both Delaware and in Texas. As noted, by virtue of proceedings commenced by the Delaware Attorney General, the Delaware Court of Chancery entered an order cancelling Backpage's certificate of formation, as well as the certificates of several affiliated entities,

including some of the other LLCs that hold ownership interests in Backpage. The cancellation of Backpage's certificate of formation is final, and will automatically become effective upon the conclusion of certain identified criminal proceedings involving Backpage and its executives. Ex. A, *Jennings v. Backpage.com LLC et al.*, Consent Judgment, No. 2018-0838 (Del. Ch.). Further, Backpage is no longer registered to do business in Texas. Plaintiff's allegation that Backpage is "registered to do business and doing business in Texas" is thus false. Petition ¶ 11. The Texas Secretary of State revoked Backpage's registration on September 17, 2018. Ex. E, Certificate of Revocation of Backpage.com, LLC, File No. 801681105, Office of the Secretary of State.

25. More fundamentally, Backpage has no operations anywhere, and therefore is not doing business in Texas or anywhere else. Its domains and assets were seized by the government. It maintains no offices, has no employees, owns no assets, and conducts no operations. All of its prior assets have been pledged to a fund that is to be administered by the United States Government as restitution to victims in the criminal proceedings. For all of these reasons, Plaintiff has no reasonable possibility of recovery against Backpage. *See, e.g., Lowry v. Total Petrochemicals & Ref. USA, Inc.*, No. CV 18-0864, 2018 WL 5931146, at \*6 (W.D. La. Oct. 26, 2018) (improper joinder where defendants "do not have an office or presence of any kind, no assets, employees, officers, or directors, or evidence of business activity since the date that their corporate status was revoked"), report

and recommendation adopted, No. CV 18-0864, 2018 WL 5931111 (W.D. La. Nov. 13, 2018).

26. It also is apparent that Plaintiff's counsel have added Backpage to the Petition solely in the hope of defeating removal, and there is good reason to believe that they have no real intention of pursuing claims against Backpage through this action. Plaintiff's counsel have a history of filing lawsuits against both Facebook and Backpage (and other parties), only to nonsuit Backpage months later. For example, in October 2018, the same plaintiff's counsel filed a lawsuit against Facebook, Backpage, and several other defendants in Harris County. *See Jane Doe v. Facebook, Inc., et al.*, Cause No. 2018-69816 (334th Judicial District Court). Counsel then nonsuited Backpage and its executives a few months later, while the case was still in the pleading stage. Plaintiff's counsel did the same in another lawsuit filed against Facebook and Backpage in November 2018, *see Jane Doe v. Facebook, Inc.*, Cause No. 2018-82214 (334th Judicial District Court), and again in a lawsuit filed against Facebook and Backpage-related individuals in September 2019, *see Jane Doe 19 v. Facebook, Inc.*, Cause No. 2019-16262 (151st Judicial District Court). They have engaged in similar patterns in cases involving hotels and other defendants—adding Backpage only to non-suit Backpage at a later time. *See, e.g., Jane Doe #2 v. Backpage.com, LLC, et al.*, Cause No. 2018-09781 (11th Judicial District Court) (nonsuiting Backpage after one year); *Jane Doe #3 v. Backpage.com, LLC, et al.*, Cause No. 2018-12781 (125th Judicial District Court) (nonsuiting Backpage after fourteen months); *Jane Doe #4 v. Backpage.com, LLC,*

*et al.*, Cause No. 2018-12747 (157th Judicial District Court) (nonsuiting Backpage after fourteen months). These cases demonstrate that Plaintiff's counsel have "no real interest in gaining a judgment" against Backpage and that Backpage was added to this Petition solely in the hope of defeating removal. *Rodriguez v. Casa Chapa S.A., de C.V.*, 394 F. Supp. 2d 901, 908 (W.D. Tex. 2005) (finding improper joinder).

27. The contrived nature of the purported joinder of Backpage in this case is further confirmed by the complete lack of any relationship between the claims against Backpage and the claims against Facebook, as described above. Plaintiff alleges that she was the subject of illegal advertisements posted on the Backpage-operated website backpage.com by third-party traffickers who exploited her by offering her for commercial sex, that Backpage received money from the traffickers to post the ads, that these traffickers forced her into the commercial sex trade, and that she was further exploited by third parties who sexually assaulted her as a result of having answered the advertisements on the backpage.com website. Petition ¶¶ 85-89.

28. By contrast, as against Facebook, Plaintiff does not allege *any* connection between Facebook and her third-party trafficker; she does not allege that she was advertised or trafficked on any Facebook platform or that she communicated with any trafficker (or anyone) on a Facebook platform; and she alleges no connection between Facebook and any of the actions of Backpage or its website. Petition ¶¶ 85-89. For these reasons as well, there is no valid basis for

joining the claims against Backpage with the claims against Facebook, and such joinder is not “properly” made within the meaning of 28 U.S.C. § 1441(b)(2).

29. In short, Plaintiff “does not show any real justification for joining [Backpage] as a defendant outside of keeping the suit in state court.” *Morgan Plantation, Inc. v. Tenn. Gas Pipeline Co., LLC*, No. 2-16-CV-1620, 2017 WL 1180995, at \*2 (W.D. La. Feb. 8, 2017), report and recommendation adopted, No. 2-16-CV-1620, 2017 WL 1181512 (W.D. La. Mar. 28, 2017). This case is therefore removable because there is complete diversity between the parties, and the forum-defendant rule does not prohibit removal because Backpage was not “properly joined” to this action.

**B. Backpage’s Citizenship Can Also Be Disregarded Because It Has Been Improperly Joined to This Action**

30. Not only was Backpage not “properly joined” for purposes of the forum-defendant rule, but it also can be disregarded entirely as a party for all purposes in the jurisdictional analysis. Fifth Circuit law empowers district courts to consider whether a party was improperly joined to defeat federal jurisdiction. Thus, where complete diversity of citizenship is lacking—which is not even the case here—a district court can disregard the citizenship of a non-diverse defendant “for the purposes of evaluating its jurisdiction” if that defendant “is improperly joined.” *Williams*, 18 F.4th at 812. This doctrine is “not based upon the text of the [removal] statute but rather on the concept that fake or fraudulent joinder of a party to defeat federal jurisdiction should not be approved.” *Id.*

31. Improper joinder exists if “the removing party shows either that: (1) there was actual fraud in the pleading of jurisdictional facts; or (2) the plaintiff is unable to establish a cause of action against the non-diverse defendant in state court.” *Williams*, 18 F.4th at 812. The second test is evaluated by determining whether “the plaintiff had any possibility of recovery against the non-diverse defendant in state court at the time of removal.” *Id.* A “mere theoretical possibility” of recovery is insufficient. *Afr. Methodist Episcopal Church v. Lucien*, 756 F.3d 788, 793 (5th Cir. 2014).

32. Here, Backpage was improperly joined because Plaintiff has no real possibility of recovery against it.

33. As explained above, Backpage is defunct. The U.S. government has seized Backpage.com and forfeited Backpage’s assets to pay victims. Backpage’s certificate of formation has been cancelled, and its license to do business in Texas was revoked. It has no operations, no website, no assets, no employees, no insurance coverage, and it conducts no business. In short, there is no prospect of recovery against Backpage.

34. As also detailed above, Plaintiff’s counsel have engaged in a single pattern involving various different plaintiffs: Plaintiff’s counsel represent a plaintiff who sues Backpage, Facebook, and other defendants, only to dismiss Backpage from the lawsuit shortly thereafter—a pattern that confirms that Plaintiff’s counsel have no real intent to seek a judgment against Backpage.

35. Backpage was improperly joined as part of Plaintiff's efforts to "defeat federal jurisdiction." *Williams*, 18 F.4th at 812; *see, e.g., Padilla v. Wal-Mart Stores Tex., LLC*, No. EP-19-CV-004-KC, 2019 WL 2565260, at \*3 (W.D. Tex. Apr. 9, 2019) ("Disregarding [improperly joined defendant's] citizenship leaves completely diverse parties, and no forum-defendant." (internal citations omitted)).

## V. FACEBOOK HAS COMPLIED WITH REMOVAL PROCEDURES

36. The Southern District of Texas, Houston Division, is the proper place to file this Notice of Removal because it is the district court embracing the place where the state court action was filed and is pending. 28 U.S.C. § 1441(a).

37. The removal of this action is timely under 28 U.S.C. § 1446(b). The Petition was the first petition containing claims against Facebook. Facebook filed this Notice of Removal within thirty (30) days of the filing of the Petition within the meaning of 28 U.S.C. § 1446(b).

38. Because Backpage was improperly joined in this action, its consent for removal is unnecessary. *See Jernigan v. Ashland Oil Inc.*, 989 F.2d 812, 815 (5th Cir. 1993) ("In cases involving alleged improper or fraudulent joinder of parties . . . application of this requirement to improperly or fraudulently joined parties would be nonsensical, as removal in those cases is based on the contention that no other proper defendant exists."); *In re Silica Prods. Liability Litig.*, 398 F. Supp. 2d 563, 658 (S.D. Tex. 2005) ("One exception to the rule of unanimity is that there is no requirement that an improperly-joined party consent to the removal.").

39. Pursuant to Local Rule 81 and 28 U.S.C. § 1446(a), and as provided for in the Declaration of Collin J. Cox, the following documents are attached: an index

of all matters filed with this Notice, (Exhibit 1); all pleadings in the state court case (Exhibit 2); a copy of the state court docket sheet (Exhibit 3); a list of all counsel of record, including addresses, telephone numbers, and parties represented (Exhibit 4); and a copy of the civil cover sheet and attachment.<sup>2</sup>

40. Facebook will provide written notice of the filing of this Notice of Removal to Plaintiff and Backpage, and will file a copy of this Notice in the appropriate state court, as required by 28 U.S.C. § 1446(d).

41. In filing this Notice of Removal, Facebook does not waive any defenses that may be available to it.

WHEREFORE, Defendant Facebook, Inc. n/k/a Meta Platforms, Inc. respectfully gives notice that the above-captioned action brought against it in the 234th District Court of Harris County, Texas, is hereby removed therefrom to proceed in this Court.

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<sup>2</sup> In the state court case, there is no executed process or orders from the Court.

Dated: January 21, 2022

Respectfully submitted,

**GIBSON, DUNN & CRUTCHER LLP**

/s/ Collin J. Cox

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of January, 2022, the foregoing document was served on all parties via electronic mail to counsel of record and will be mailed to all parties (or their counsel) via certified U.S. mail/return receipt requested by the 21st day of January, 2022, in accordance with the Federal Rules of Civil Procedure.

*/s/ Collin J. Cox*  
Collin J. Cox